

University of Wisconsin Milwaukee

IRB Guidance on the use of the terms 'Anonymous' and 'Confidential'

Please use the following guidance to determine if your proposed study meets the criteria for anonymous or confidential study processes.

Anonymous: For a study to collect anonymous data, the identity of the participant must not be known by the researcher at any time, for any reason. It would be impossible for the researcher to ever link a participant to his/her data. Please keep in mind that this refers not only to not collecting direct identifiers such as name, address, ID numbers, etc... but also includes collecting demographic information that would make the participant identifiable even in the absence of direct identifiers. Because of this, investigators must consider the sample size and diversity before determining if their participants and data can be considered to be anonymous or confidential.

In online surveys in particular, be aware that many survey platforms will automatically collect IP addresses of respondents unless programmed to do otherwise. IP address is considered an identifier and would make the data collection confidential instead of anonymous. If you would like to conduct an anonymous online survey, the IRB will ask you to confirm that you have taken steps to ensure that IP address will not be collected.

Confidential: In studies where participation and/or data will be confidential, identifying information is collected by the researchers, for any reason. The investigator is obligated to make it clear in the consent forms who will have access to identified data and when it will, if ever, be disclosed. Data are confidential if a link *exists* between the data and the participant. In most cases, it is highly recommended that identifying information be kept in a separate secure location and that a unique code be used for any active data sets. Please remember that coded data are not considered anonymous.

If the key (document linking coded data to identifiers) is destroyed, and the data set no longer contains any identifiers (refer to anonymous section above for what is considered an identifier) then the data are considered de-identified and may be considered anonymous for further research purposes.

Common Scenarios:

Online survey that does not collect any identifying information, including IP address of respondent = Anonymous

Paper-based surveys where no identifiers are collected = Anonymous

In-person interviews where no identifiers are being collected = Confidential (The researcher knows who participated in the study)

Online survey which includes a question about student name/course info for distribution of incentives only = Confidential