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An Unethical Experiment

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What are the things to consider when reviewing internet research?

Facebook's Emotional Contagion Study

Jan 11-18, 2012: Facebook (FB) filtered news feeds – the flow of comments, videos, pictures and web links.

Users: 689,003 without their knowledge.

Goal: To establish whether or not emotions are contagious online.
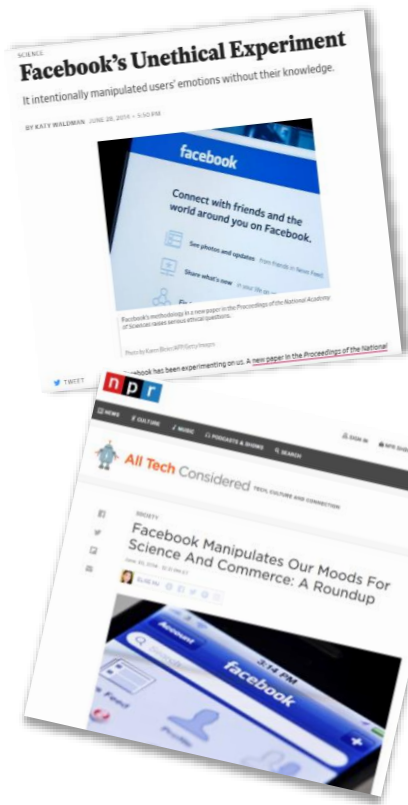
Resource: www.PNAS.org

- **Test 1**: Reduced users' exposure to "**positive emotional content**" resulting in fewer positive posts of their own.

- **Test 2:** Reduced users' exposure to "**negative emotional content**" and the opposite happened.

Result: Massive-scale "Emotional Contagion" via social media.

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The News

Facebook's Unethical Experiment
It intentionally manipulated users' emotions without their knowledge.

Facebook Manipulates Our Moods For Science And Commerce: A Roundup

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The Issues

- Is FB Data Use Policy enough or can this be considered as an informed consent for the research?

- Does FB, as a private entity, need to comply with the Federal Regulations?

What does FB defenders say about this?

1. FB permission came from its Data Use Policy.

2. FB is not subject to HHS rules.

3. Non-FB authors were not engaged in research.

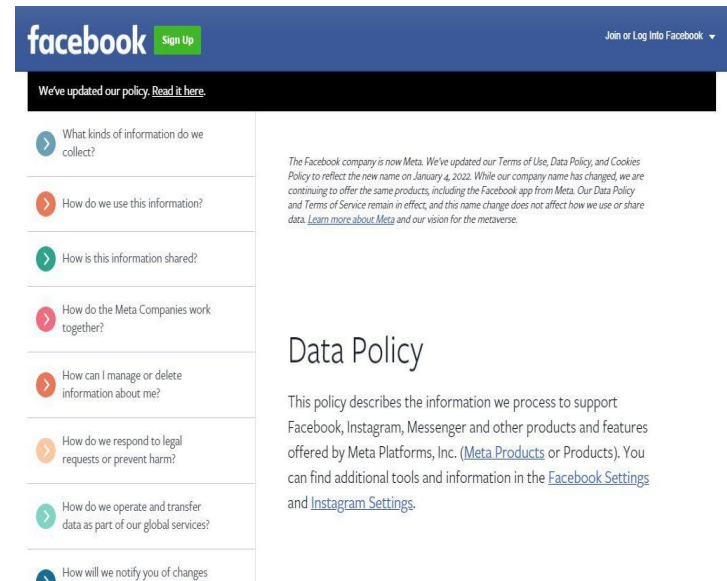4. The archival use of already-collected data by non-FB authors was approved/determined to be exempt.

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Are these justifications correct?

1. ## FB Data Use Policy

    - Newsfeeds are being manipulated all the time for internal operations to increase revenues.

    – The checking of a box is not enough. Participants must be fully aware of what research they are agreeing to.

Are these justifications correct?

2. FB is not subject to HHS rules

- Per www.hhs.gov, some research is outside of OHRP's oversight (e.g. research paid by private companies, charitable foundations, or wealthy individuals).

However, there are 2 researchers (University of California & Cornell University) who collaborated with FB on this particular study that receive funding from the Federal Agencies and thus, subject to OHRP regulations.

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Are these justifications correct? (cont.)

3. <u>Non-FB Authors were not engaged in research</u>
   – Could be true since they were not involved in the recruitment process, consenting, data collection procedures, but only on the analysis of deidentified data.

4. <u>Archival data was approved to be exempt</u>
   – Could be true for the same reason as above.

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Best Practice

1. <u>All recruitment materials must be reviewed</u>
   - Email, blog post, FB or Twitter post, webpages, chat room.
   - Obtain permission for ads posted on website or social media site not belonging to researchers.

2. <u>Carefully Plan Data Collection and Security</u>
   - Internet data collection is rarely private, anonymous, or even confidential since it is an insecure medium as data in transit is vulnerable.
   - Other laws governing data-use e.g. EU-GDPR, COPPA
   - Re-identification issues

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Best Practice (cont.)

3. <u>Informed Consent</u>

- Outsider (e.g. non-FB employee/PI) - As much as possible obtain consent. Do not rely solely on the Data Use Policy.

- If waiver is requested, ensure that the following are justified:

    1. The research involves no more than minimal risk to the subjects;
    2. The waiver or alteration will not adversely affect the rights and welfare of the subjects;
    3. The research could not practicably be carried out without the waiver or alteration;
    4. Whenever appropriate, the subjects will be provided with additional pertinent information after participation.

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Best Practice (cont.)

- Although research on available information over the internet is becoming common, access to this information is not a justification for collecting data without consent from the subjects because not all internet content is "public information."

- Fact-checking when minors are involved (i.e., COPPA).

4. <u>Data storage and Disposal</u>
  - PII should be kept separate from data.
  - Use competent data destruction services.

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Helpful Links

- UGAHRP-098-1 – Internet Research

- Children's Online Privacy Protection Act (COPPA)

- End User License Agreements (EULA) /Terms of Service (ToS)

- European Union General Data Protection Regulation (EU-GDPR) Compliance Policy

- Data Classification and Protection Standard

Thank you!