



Overcoming cancer together

SOCIAL MEDIA FREQUENTLY ASKED QUESTIONS (FAQS)

January 2023

What is considered 'advertising' on social media?

Advertising on social media is the same as traditional media. Anything that promotes a trial is considered advertising. Examples include the paid advert for a specific study, or a post on the institution's social media web page.

How are social media recruitment strategies different to traditional advertising?

Social media and traditional advertising are actually very similar. However, because social media has a wider reach and people may be able to publicly comment on the advertisement/post, there are additional privacy concerns to consider.

What are these additional privacy concerns?

When adverts are posted on social media, people can leave comments and are identifiable. There need to be safeguards to ensure that these people are aware of the implication of leaving comments or 'liking' the post. Additionally, it is important to make sure that the social media companies do not collect personal, private or sensitive information on behalf of the Sponsor and/or Principal Investigator.

Can you use an institution's social media page to advertise a clinical trial?

If the institution allows you to use their account, then you can. You should let the HREC know this. Be aware that the advert will also need to comply with the institution's own guidelines.

Who moderates comments on the social media advertisement?

Someone needs to act as the Administrator and review/moderate the comments generated from the social media post. This person should be from the study team, but not a student, as students need to be supervised. It is often beneficial to turn off the option of commenting on this post.

What happens if there are negative comments on the social media page?

If you receive negative comments, or need a second opinion before responding, please contact your Research Integrity office (or complaints person) to discuss best ways to respond.

Who approves the social media advertisements?

HREC/Governance approval remains a requirement for all advertising materials. The advertisements should be clear about the purpose of the study. ICH GCP requires that advertising materials are appropriate and not coercive, and The National Statement states that 'recruitment materials', including social media posts, should follow the ethics principles of justice and respect.

Is there additional guidance regarding the social media company?

It is important to ensure the social media companies do not collect personal, private or sensitive information on behalf of the Sponsor and/or Principal Investigator. It is also preferable if comments are turned off as part of advertising campaign.

What information does the HREC need to approve the social media post?

HREC need to know:

- which social media sites will be used
- who the audience is and how you will reach them
- duration of the advertising campaign
- the URL link
- the key message
- headline
- description
- who is paying for the advertisement?
- what measures are in place to protect the privacy of those that respond to the post.

How are recruitment strategies, including social media, communicated to HRECs?

For an *Investigator Initiated Trial* there are two options:

- a) Protocol Description – embed the social media tool within the recruitment guidance.
- b) Use the Social Media tool as an appendix and a guideline to help you set out the principles you need to adhere to when creating a social media strategy.

For *Commercially Sponsored Trials*, when using social media, the tool can be used as guidance and attach it as an appendix to your protocol. This can be a site specific or project specific appendix.

If a protocol is unable to be amended and recruitment strategy is not clearly specified, the HREC may ask for further information. This does not need to be a special document (but it can). Remembering that as with traditional advertising to approve the social media advert, HREC needs to know strategy about how the advertising will be used. The National Statement (section 3.1.12) also mentions that “*research proposals should clearly describe the recruitment strategy and the criteria for the selection of potential participants.*”

	Social Media Advertising	Traditional Advertising
What is the 'advertisement'?	The final social media post, including any video needs to be submitted to HREC and RGO for approval	The printed advertising material (e.g. poster) needs to be submitted to HREC and RGO for approval
What approvals are needed?	HREC needs to approve the material The institution's social media page needs to agree that it can be used (as appropriate) Social media company guidelines need to be followed	HREC needs to approve the material The institution needs to approve where it will be displayed
What happens when the advertising material is updated?	Each update needs to be approved as above. However, acknowledging the dynamic nature of social media, the National Statement notes that where the material needs to be 'ad lib', tailored or adapted, "a description of the strategy and broad messages is sufficient" (National Statement 3.1.20).	Each update needs to be approved as above.
What are the specific privacy issues?	Privacy concerns of the audience need to be considered and communicated with HREC	N/A - unless there is a link from a poster to a social media site.



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