r-aisd

Reshaping Attention and Inclusion Strategies for Distinctively vulnerable people among the forcibly displaced

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Ethics Plan

Deliverable D3.1

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RAISD Glossary

AB	Advisory Board
ARU	Action Research Unit
ARUL	Action Research Unit Leader
DMP	Data Management Plan
DPO	Data Protection Officer
EB	Executive Board
EC	European Commission
EP	Ethics Plan
EU	European Union
FDP	Forcibly Displaced People / Person
GA	Grant Agreement
NGO	Non-Governmental Organisation
PP	Privacy Plan
RRI	Responsible Research and Innovation
TAIS	Tailored Attention and Inclusion Strategy
UCM	Universidad Complutense de Madrid
UN	United Nations
UNCHR	UN High Commissioner for Refugees
VC	Vulnerability Context
VG	Vulnerable Group
WP	Work Package
WPL	Work Package Leader

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About RAISD	
Call (part) identifier	*H2020-SC6-MIGRATION-2018*
Topic	*MIGRATION-08-2018* *Addressing the challenge of forced displacement*
Fixed EC Keywords	*Globalisation, migration, interethnic relations*

Forced displacement crises overcome societies and institutions all over the world. Pushed by the urgencies rather than events, solutions are frequently reactive, partial, and disregard some groups. The project 'Reshaping Attention and Inclusion Strategies for Distinctively vulnerable people among the forcibly displaced' (RAISD) aims at identifying highly Vulnerable Groups (VG) among these forcibly displaced people, analysing their specific needs, and finding suitable practices to address them. The concept of 'vulnerability context' considers the interplay between the features of these persons and their hosting communities, their interactions and experiences, and how different solutions for attention and inclusion affect them. As a result of this work, a methodology to carry out these studies will be developed. These goals are aligned with the call. They pursue characterizing these migrations and developing suitable aid strategies for them. The Responsible Research and Innovation (RRI) frames the project. It proposes that all actors (including civil society) co-design actions, transversely integrates the gender perspective, and supports sustainability. Our research strategy will be based on methodological triangulation (i.e. the combined application of several methodologies). We will implement it through a specific participatory action research approach to fulfil the aim of undertaking advocacy-focused research, grounded in human rights and socio-ecological models. The team will work as a network of units in countries along migration routes. The units will promote the VG people' involvement, so they can speak with their own voices, gather information, and test practices. Work will rely on a tight integration of Social and Computer Sciences research. Automated learning and data mining will help to provide evidence-based recommendations, reducing a priori biases. A software tool will support collaboration, continuing previous H2020- funded RRI work.

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Executive Summary

The RAISD project deals with highly Vulnerable Groups (VG) among forcibly displaced people, and studies attention and inclusion practices for Forcibly Displaced People (FDP) with the objective of tailoring these practices to the needs of these persons and their host communities. Both ethics and data management are of high importance for quality assurance, therefore the RAISD Consortium carries out the project actions in compliance with ethical principles (including the highest standards of research integrity) and applicable international, EU and national laws. Paying a special attention to ethical issues the RAISD Consortium has developed guidelines that aim to support the ethical aspects of data collection and research, and also defined procedures and measures to secure their compliance.

The Consortium hereby shares the Ethics Plan (EP) which is a strategic document describing all the fundamental ethical issues relevant to RAISD project, and defining the procedures to be followed by all Consortium partners and Action Research Unit (ARU) members working in the project.

Lead and contributing partners of Task 3.2 [Ethics Management]:

No	Name	Country	Role
1	Universidad Complutense De Madrid	Spain	Providing information about country or partner specific issues
2	CESIE	Italy	Providing information about country or partner specific issues
3	UNIMED, Unione delle Università del Mediterraneo	Italy	Execution of the Ethics Plan
4	Helsingin Yliopisto	Finland	Execution of the Ethics Plan
5	Menedek-Migransokat Segito Egyesulet	Hungary	Leader: Setting up the Ethics Plan and supervise its application
6	Anadolu University	Turkey	Providing information about country or partner specific issues
7	Yarmouk University	Jordan	Providing information about country or partner specific issues
8	Lebanese International University	Lebanon	Execution of the Ethics Plan

This document may be updated during the lifecycle of the project if needed, introducing further information as Milestone actions get finalised and reported.

The Ethics Plan specifies all the ethical issues and provides how they will be processed during RAISD project actions. Relevant project documents are:

- Grant Agreement (GA).

- D1.1 H – Requirement No.1.
- D1.2 POPD – Requirement No.3.
- D1.3 H – Requirement No.6.
- D1.4 POPD – Requirement No. 11. Analysis on ethics risks related to the data processing activities of the project.
- D1.5 POPD – Requirement No. 12.(Analysis of transfers of personal data from a non-EU country to the EU (or another third state).
- D9.1 Data Management Plan (DMP).
- D9.2 Privacy Plan (PP).
- Manual for Researchers: Information related to Ethics and Gender Issues (July, 2019).
- Manual for Researchers: Interview guidelines (July, 2019).
- Manual for Researchers: Work methodology and guidelines for the project (July, 2019).
- Guidelines for the establishing of an ARU.

Other sources used for developing ethics requirements of RAISD project:

- National and EU regulations.
- Ethics Issues Table and Ethics Self-Assessment for Horizon 2020 proposals; Horizon 2020 regulation No 1291/2013 (Article 19).
- Principles specified by the European Commission (EC) in its 'Guidance note: Research on refugees, asylum seekers & migrants'.
- Conferences with the project officer prior to sign the Grant Agreement (July-August-September).
- Experiences of previous research on this topic. The research team knows from experience in other projects that research on refugees, asylum seekers and migrants concerns particularly vulnerable groups, who need specific safeguard ethics.

*The present **EP, Version 1** is part of WP3 Deliverable 3.2 Ethics Management | on behalf of MENEDÉK, Hungary [October 2019].*

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1 Ethics in RAISD project

1.1 General principles

'Research on refugees, asylum seekers and migrants concerns a particularly vulnerable group which needs particular safeguards in terms of research ethics'.[1]

Within the RAISD project information is gathered from pilots conducted by ARUs in order to better understand and be able to properly evaluate attention and inclusion strategies to Vulnerable Groups (VGs) of Forcibly Displaced People (FDP). In this context, the project aims to search for information that characterise these migrants and their lives, as well as related institutions and societal actors. These types of data collected include sensitive ones, such as gender, age, ethnicity, health, sexual lifestyle, political opinion, and religious or philosophical conviction.

Furthermore in order to react on the needs of the examined VGs new tailored attention strategies will be also designed to assist vulnerable migrants and their host communities more efficiently. The project is committed to ensure that the general benefits of its activities will warrant the involvement and efforts of their participant individuals, limiting any disturbance to them, especially in terms of protecting the identity and integrity of VGs. The project will be based on deliberative co-creation of activities, so participants can design them to bring results of maximum value according to their constraints. Representatives of all interested stakeholders will be involved in these activities in the field.

The research methodology includes data collection by means of interviews, workshops and focus groups with both migrants from VGs and actors from civil society, organisations, policy, business, and science/academia. In all cases, ethical issues should be considered starting from the recruitment of participants among FDP, their active participation in the research (both in ARU's activities and project workshops), and the management of the gathered information.

The ethical aspects of data collection and research on VGs have been carefully considered in the preparatory phase of the project taking into consideration national, EU and international laws and guidance on the issue.

European Commission's guidance on doing research with such particular VGs are highly respected by RAISD Consortium. Therefore the following general principles are secured by the relevant project documents:

- Treating VGs with care and sensitivity.
- Being objective and transparent in all case.
- Avoiding ethnocentricity and showing respect for both potential cultural, ethnical differences and gender or sexual orientation.
- Rigorously safeguarding the dignity, wellbeing, autonomy, safety and security of their family & friends.
- Respecting their values and right to make their own decisions.
- Giving special protection to participants with diminished autonomy, such as unaccompanied minors.

[1] European Commission: Guidance note — Research on refugees, asylum seekers & migrants

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The RAISD Consortium respects the fundamental principle of research integrity described in the European Code of Conduct for Research Integrity[2]. It implies compliance with the following fundamental principles[3]:

- **Reliability** in ensuring the quality of research reflected in the design, the methodology, the analysis and the use of resources.
- **Honesty** in developing, undertaking, reviewing, reporting and communicating research in a transparent and fair way.
- **Respect** for colleagues, research participants, society, ecosystems, cultural heritage and the environment.
- **Accountability** for the research from idea to publication, for its management and organisation, for training, supervision and mentoring, and for its wider impacts.

The Ethical Plan ensures that persons carrying out research tasks follow the good research practices and refrain from the research integrity violations described in this Code. It does not change the other obligations under RAISD project's Grant Agreement or obligations under applicable international, EU or national law, all of which still apply.

Activities raising ethical issues must also comply with the 'ethics requirements' set out as deliverables in WP1. The objective of WP1 is to ensure compliance with the 'ethics requirements' set out in this work package. It centralises the preliminary requirements on ethics, especially guarantee the security and rights of all the people involved in the research. It addresses those issues required before starting the project works, including those on templates for the informed consent of participants, data protection procedures and compliance with legislation, ethics on data processing, and approvals of ethics committees.

The Deliverables prepared in WP1:

- D1.1 H – Requirement No.1. Templates of the informed consent/assent forms and information sheets (in language and terms intelligible to the participants) submitted as deliverables before the commencement of the relevant research.
- D1.2: POPD - Requirement No. 3. The host institution confirms in the grant agreement that it has appointed a Data Protection Officer (DPO) and the contact details of the DPO will be made available to all data subjects involved in the research. For host institutions not required to appoint a DPO under the General Data Protection Regulation 2016/679, a detailed data protection policy for the project is submitted as a deliverable.
- D1.3: H - Requirement No. 6. Copies of opinions/approvals by ethics committees and/or competent authorities for the research with humans is be submitted as a deliverable prior to the commencement of the relevant research.

[2] European Code of Conduct for Research Integrity of ALLEA (All European Academies)
http://ec.europa.eu/research/participants/data/ref/h2020/other/hi/h2020-ethics_code-of-conduct_en.pdf
[3] Grant Agreement: Section 4, Article 34 – Ethics and Research Integrity

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- D1.4: POPD - Requirement No. 11. The beneficiary evaluates the ethics risks related to the data processing activities of the project. This includes also an opinion if data protection impact assessment should be conducted under art. 35 General Data Protection Regulation 2016/679.
- D1.5: POPD - Requirement No. 12 The confirmation that the transfer of personal data from a non-EU country to the EU (or another third state) comply with the laws of the country in which the data was collected.

1.2 National and EU regulations

The RAISD research is compatible with EU and international law and meets the data protection requirements set out in the European regulations, specifically in the treatment of data regarding its international transfer.[4] According to this text, all the processing of personal data will be lawful as all research subjects will provide their given consent for the purposes established in this report and that will be detailed in each consent form.

Furthermore, and according to Article 19 of the H2020 Regulation (EU) No 1291/2013[5], RAISD project complies with 'ethical principles and relevant national, Union and international legislation, including the Charter of Fundamental Rights of the European Union and the European Convention on Human Rights and its Supplementary Protocols'. The RAISD Consortium pays a special attention to 'the principle of proportionality, the right to privacy, the right to the protection of personal data, the right to the physical and mental integrity of a person, the right to non-discrimination and the need to ensure high levels of human health protection'.

Regulations on national and organizational levels

Consortium partner	Relevant national laws and regulations	Relevant regulations at the partner's organization
UCM, Spain	- Royal Decree-law 5/2018, of July 27, urgent measures for the adaptation of Spanish law to the European Union regulations on data protection (BOE 183 of 07/30/2018). - General Data Protection Regulation (GDPR) Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016 (Ref. DOUE-L-2016-80807), on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and by	(All referred at national regulations) - Complutense Code of Ethics 2008, Ethics and Deontology Committee of UCM - Conference of Rectors of Spanish Universities (Conferencia de Rectores de las Universidades Españolas, CRUE). Sectorial Commission for R+D+I (Comisión Sectorial I+D+i)

[4] 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN (Oct 2019)
[5] REGULATION (EU) No 1291/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 December 2013 establishing Horizon 2020 - the Framework Programme for Research and Innovation (2014-2020) and repealing Decision No 1982/2006/EC

	which the Directive 95/46 / CE (General Data Protection Regulation) is replaced. - National Statement on Research Integrity, 2 December 2015 by the CSIC, the Conference of Rectors of Spanish Universities (CRUE) and the Confederation of Spanish Scientific Societies. - Organic Law 15/1999 on Data Protection and its Development Regulation approved by Royal Decree 1720/2007, of December 21. - Law 14/2011, of June 1, on Science, Technology and Innovation, BOE n.131, adopted 2-06-2011. - The Law on Biomedical Research (Ley de Investigación Biomédica, LIB), enacted in 2007, Law 14/2007 on Biomedical Research. - The Spanish Bioethics Committee (Law 14/2007 of July 3rd on Biomedical Research). Ministry of Health, Social Services and Equality. - The Spanish Research Ethics Committee (Comité Español de Ética de la Investigación, CEEI). Created by the Law of Science, under the Council for Science, Technology and Innovation Policy. - Spanish Data Protection Agency (Agencia Española de Protección de Datos, AEPD). Ministry of Justice. - Spanish National Research Council (Consejo Superior de Investigaciones Científicas, CSIC), CSIC Code of Good Scientific Practices, 2011 CSIC. - Centre of Energetic, Environmental and Technological Research (Centro de Investigaciones Energéticas, Medioambientales y Tecnológicas, CIEMAT). - Institute of Health Carlos III (Instituto de Salud Carlos III, ISCIII). - The Spanish Science and Technology Foundation (Fundación Española para la Ciencia y Tecnología, FECYT).	- ALLEA Code (The European Code of Conduct for Research Integrity), ALLEA 2017.
CESIE, Italy	- National Research Council (CNR) Research Ethics and Integrity Committee's Documents: - "Guidelines for Research Integrity", 2019 - "Ethical Charter on Social Sciences and Humanities Research", adopted on March 16, 2017.	- Accessibility - Child Protection Policy - Privacy Policy
UNIMED, Italy	- 2019 Revision of the "Guidelines for Research	- Commissione per l'Etica e

	Integrity", approved on June 10, 2015. - "Ethical Charter on Social Sciences and Humanities Research", adopted on March 16, 2017. - "Informed Consent in Scientific Research: Ethical Toolkit", approved on November 23, 2017. - "Child Protection Policy and Code of Conduct", adopted on November 24, 2016. - Impact assessment on data protection, based on the provisions of the EU Regulation 2016/679" as prescribed by the National Data Protection Authority: (www.garanteprivacy.it/regolamentoue/DPIA).	l'Integrità nella Ricerca (CNR)
UH, Finland	- Data protection act (1050/2018). - Handbook of data management (Finnish Social Science Data Archives, 2015. - Responsible conduct of research and procedures for handling allegations of misconduct in Finland (Finnish Advisory Board on Research Integrity, 2012) - The ethical principles of research with human participants and ethical review in the human sciences in Finland (Finnish Advisory Board on Research Integrity, 2019).	- Ethical Review Board in the Humanities and Social and Behavioural Sciences (University of Helsinki). - Guide in Research Data Management (University of Helsinki).
Menedek, Hungary	- Act CXII of 2011 on Informational Self-Determination and on Freedom of Information, in Hungarian[6]. - Act LXXVI of 2014 on Scientific Research, Development and Innovation, in Hungarian[7]. - 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).	- Code of Ethics. - INTEGRITY RULES – Anti-Fraud Policy. - Data protection Regulations.
AU, Turkey	- National Ethics Code of Conduct Plan Resmî Gazete Tarihi: 13.04.2005 Resmî Gazete	- Anadolu University-28.02.2017 dated and 3/3 numbered University Senate

[6] https://net.jogtar.hu/jogszabaly?docid=a1100112.tv (Oct 2019)
[7] https://net.jogtar.hu/jogszabaly?docid=A1400076.TV (Oct 2019)

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	Sayısı: 25785 - Law on the Establishment of the Board of Ethics for Civil Servants and Some Law Amendments, numbered 5176 - Regulation on the Standards of Ethical Conduct for Civil Servants and Application Procedures and Principles - At the same time, Turkey follows EU ethics standards as part of their EU accession process.	decision to establish Anadolu University's Scientific Research and Ethics Committee's for Social, Health, Humanities and Engineering Sciences and their legislations
YU, Jordan	- Transfer Personal Data Transfer Act, October 2014. - Personal Data Protection Law No. (2) of 2019. - Cyber-Security Law 2019. - A list of standards of ethical conduct of civil servants and safety of procedures. - At the same time, Jordan follows the EU ethics standards based on the EU agreement with Jordan.	- Data protection Regulations - RUB. - Code of Ethics. - Consent Form.
LIU, Lebanon	- Law no 81 – 10/10/2018. - Law no 8/1970 organizing the profession of Lawyers. - Law no 240/1994. - Legislative Decree no 112/1959 organizing public servants. - Law 220/ 2000 – protecting disabled persons including employment discrimination. - Law no 293/2014 – protecting women and family members from domestic violence. - Law no 140/2014 protecting the legitimate right to confidential communication locally and abroad by any means of wired or wireless communication. - Law no 164/2011 on the "Punishment for the crime of Trafficking in persons and elimination of forced labor. - Consumer Protection Law. - Code of ethics for the promotion of medicines on Lebanon May 2016.	- Electronic Transactions and Personal data. - Code of Lawyers Ethics. - Medical Ethics Law. - Legal and ethical duties of public servant (Articles 14 & 15). - Law on the Rights of Persons with Disabilities in Lebanon. - Law on the Protection of Women and Family Members from Domestic Violence. - Law related to the confidentiality of information made by any means of communication except in the cases stipulated in the law. - Law aimed to suppress and punish human trafficking especially women and children.

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		- Law aimed to protect the health and safety of the consumer. - Code of ethics for the promotion of medical products and implementation procedures.

2 Ethics Plan

2.1 Purpose of Ethics Plan

The EP is a strategic document containing the procedures to be followed by all the project participants and ARUs that are included in the action-research platform. The objective of ethical guidelines is to ensure that all RAISD Consortium partners work in an ethically acceptable way with respect to involving participants in any of its actions in the project. This plan specifies how the Consortium will maintain security, privacy and confidentiality norms, as well as common values of autonomy, independence, beneficence, non-maleficence and justice will be respected. Furthermore, it will advise all partners in the consortium, both EU and non-EU, on how to work with participants, respecting the combined ethical standards of the consortium members, as well as the national regulations.

It discusses ethical issues related to the following topics: 1) Issues on data collection and interviews, 2) Informed consent, 3) Anonymity of interviewed people, 4) Compensation to participants, 5) Gender perspective, 6) Multi-functional teams and multi-perspective analysis, and 7) Regular participatory assessments with representatives of all target groups.

The EP and other project materials discussing ethical guidelines are available in English. Each partner organisation is responsible for ensuring that all involved people are aware and understand the guidelines (i.e. if required they will have to translate the content into the national languages).

It is mandatory that each member organisation signs a declaration stating that ethical standards and guidelines of Horizon2020 will be rigorously applied, at the onset of RAISD project.

Being the leader of T.3.2. Ethics management, Menedék Association supervises their application.

2.2 Procedures on ethical issues and self-assessment

The procedures described in this EP are implemented in order to protect VGs' best interests and ensure their security without increasing their vulnerability.

The project sets up 'Privacy by Design' rules to guarantee that all research activities address security, ethics and individuals' liberties. The project will enable mechanisms to avoid any intentional or unintentional use of information that can bring any harm to any participant, or being misused in other contexts. All partners

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performing research will act according to national and European legislation, and in line with national data protection provisions and the European data protection rules. They will also be required to follow agreed rules for the recruitment of participants, the implementation of activities, recording, analysis, and storage of data collected in the project. The guidelines on these issues are applied by all partners and periodically reviewed by the Ethics and Information Privacy protection committees of the project (see below). Each partner is responsible for compliance in their country and must be able to justify it and prove it to the ethical committee as well as observe national and EU legislation[8].

Activities raising ethical issues must also comply with the 'ethics requirements' developed in WP1. Before the beginning of an activity raising an ethical issue, each beneficiary must have obtained: (a) any ethics committee opinion required under national law and (b) any notification or authorisation for activities raising ethical issues required under national and/or European law needed for implementing the action tasks in question.

The documents must be kept on file and be submitted upon request by the coordinator to the Agency[9]. If they are not in English, they must be submitted together with an English summary, which shows that the action tasks in question are covered and includes the conclusions of the committee or authority concerned (if available).

Role and responsibilities of Executive Board (EB) and Ethics committee[10]

The Executive Board (EB) of RAISD project chaired by the Coordinator, composed of the WP Leaders (WPLs) and ARU Leaders (ARULs), and supported when needed by the Project Management Assistant, is responsible for all the significant management issues related to the project (daily project management decisions, strategic orientation, risk management, assessment of results, reporting, funding issues, organizing larger project meetings, etc.).

Within the EB three committees operate: 1) Quality Control, 2) Ethics, and 3) Privacy protection.

The **Ethics committee** aims at guaranteeing that any confidential information managed in the project is handled responsibly and precautions are taken to prevent unauthorized communication, copying, or otherwise relating to or by third parties. Partners, members of the AB, and participants in experiments are required to sign information security agreements. Also, it monitors that communication and dissemination activities keep the safety norms for data related to people connected to this project.

The Ethics committee has the responsibility to guarantee all ethical issues. Its members must meet periodically and make decisions for it. Its members are the Coordinator and WPLs of WP1 and WP3-WP7 and ARULs, with at least one expert in Computer Science and one expert from Social Sciences.

Ethics self-assessment

Based on European Commission's guidance for ethics self-assessment it is significant to have information on the participants' specific vulnerable characteristics, the research has to be relevant to both source and host

[8] see in *GA: Section 5, Ethics and Security*
[9] see in *GA: Article 52*
[10] see in *GA Annex part B, Section 3.2.*

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communities, and its objectives must not be harmful or prejudicial to participants.

Ethics self-assessment of research requires when there are incidental findings that might compromise the security or integrity of the interviewee or a person in their surroundings, we should report to the corresponding authorities.

At the beginning of the RAISD works all partners and team members must ensure that they fulfil the Ethical self-assessment of project that guarantees that our research is relevant to the communities involved and has objectives that are not harmful or prejudicial to participants.

The project is committed to ensure that the general benefits of its activities will warrant the involvement and efforts of their participant individuals, limiting any disturbance to them, especially in terms of protecting the identity and integrity of VGs. The project will be based on deliberative co-creation of activities and representatives of all interested stakeholders will be involved in these field activities.

The project will enable mechanisms to avoid any intentional or unintentional use of data that can bring any harm to any participant, or being misused in other contexts. All partners performing research will act according to national and European legislation, and in line with national data protection provisions and the European data protection rules. They will be required to follow agreed rules for the recruitment of participants, the implementation of activities, recording, analysis and storage of data collected in the project.

Any survey, interview or workshop participation will happen on a voluntary basis with sufficient information to all parties. The information on the rights of interviewees and participants to workshops will be given verbally before the research activity starts. Agreement will be reached with organisations that provide information through documents or interviews, on the disclosure of that information and the protection of confidentiality.

All data will be stored anonymously on secure servers that has restricted, password protected access and data encryption. An identification number will be assigned to each participant. The storage and transferring of across borders, and from institution to institution, will adhere to national, institutional and EU policies, such as the FAIR Data Management guidelines, concerning safe storage and transfer of data. The use of data for analyses will not breach confidentiality.

The project will carry out periodic evaluation meetings to ensure that ethical issues are followed by all partners in the research. If ethical issues arise unexpectedly during the research process, the Ethics Committee would contact the Commission/Agency immediately to receive appropriate help and guidance.

Incidental findings

In terms of incidental findings policy, the consortium members will resort to the United Nations High Commissioner for Refugees (UNHCR) and local refugee aid Non-Governmental Organisations (NGOs) and organisations when something unexpected happens (e.g. irregular situation, crime, disasters, armed conflicts, or terrorist attacks) that interferes the planned research and innovation activities in any of the participating countries. UNHCR, with its global network, has emergency action policies that can assist RAISD consortium members in detailing an incidental findings policy and action plan should the occasion require such. Due to the unexpected and emerging nature of this kind of incidents, each case will be studied specifically, and detailed plans

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will be made in collaboration with the organisations.

In this research with FDP, researchers can also discover unintentionally information concerning human rights violations (when the research subjects are victims or perpetrators) like human and sexual trafficking, domestic violence, forced marriage, female genital mutilation, trading in human organs, or child pornography. The consortium researchers implement in WP1 a strategic plan for helping participants in these situations, e.g. by informing the responsible national authorities, NGOs, or other agencies with relevant expertise. This plan must be approved by a competent national research ethics committee, and must comply with domestic laws and regulations.

2.3 Main ethical issues in RAISD project

2.3.1 Data collection and interviews

The ethical aspects of data collection and research on them have been carefully considered. The project will enable mechanisms to avoid any intentional or unintentional use of information that can bring any harm to any participant, or being misused in other contexts. All partners performing research will act according to national and European legislation, and in line with national data protection provisions and the European data protection rules. They will also be required to follow agreed rules for the recruitment of participants, the implementation of activities, recording, analysis, and storage of data collected in the project.

The Data Management Plan (DMP) developed in the first phase of the RAISD project specifies the methodology, procedures and measures to be performed throughout the investigation and analysis phases, including how and with whom these data will potentially be exchanged (accessibility) and made open for public exploitation and re-use in order to ensure the widest use of project results by different stakeholders in society (data utility) and finally, the ambition for preserving them in a medium long-term perspective (sustainability).

Regarding data collection within RAISD project the following recommendations are to be carefully attended:

- Researchers will conduct the interviews to each person alone, without the supervision of other members of her/his group.
- In case of women interviewees, preferably a female researcher will conduct the interviews.
- The research activities will not create unjustified expectations in participants about future residence or status, and they will be clearly distinguished from investigations by authorities.
- Each partner will focus on data collection, preferably working with a recognized NGO or related institution (in the phases of fieldwork and pilots) that will facilitate the specific aspects that are necessary to protect VGs. The project will detail in the meetings the measures needed to implement in place to minimize the risk of stigmatization in each case. Partners will treat the cases one by one, observing whether participating in the interviews carries any risk of stigmatization for vulnerable profiles. Researchers and NGO staff will also decide if the presence of counsellors or psychologists is necessary in each case.

- The direct data collection will be done always by researchers with a background in refugee and asylum studies.
- The researchers of all partners will ensure that there are no misunderstandings because of the language used, with the assistance of an interpreter if necessary.
- Each consortium partner will follow the same steps in the fieldwork phase and in the pilot's phase:
    - Detection of potential research participants working in collaboration with the NGOs of each country, always considering the profiles that will be obtained as a result of our methodological design.
    - Review of the interviews previously designed in WP3, and checking with the NGO, to find out if adaptations are needed in each country.
    - Selection of research participants in collaboration with the NGO that knows their context in each case. This collaboration will pursue to avoid participants' stigmatization and also analyse other aspects such as the possible presence of traumas, difficulties in communication (e.g. need of a translator or deaf interpreter), pressures from her/his membership group. The objective is to detect, as partners have done in other researchers with refugees, which are the ideal conditions for each interviewee.
- A document with information about the research and the researchers will be provided to participants, so they can decide informed if they want to participate in the research[11].
- Under no circumstances will visual images of the people interviewed be recorded.
- Interviews can be recorded with digital voice-recorders or smart phone applications (in the latter case, with a careful handling of sending and sharing the recordings via online channels). After transcription all voice-records must be destroyed.
- We do not collect names, addresses or specific locations and exact dates unless absolutely essential.
- We keep completely anonymous any information that participants wish to hide for reasons of personal safety or privacy.
- Signatures will be collected only according to H2020 stipulations.
- Pseudonymisation[12] implies data treatment while is recorded and transcript: data masking, using pseudonyms, substituting places and territories that can identify the person interviewed.
- Each interview will be recorded and stored with a number code.

[11] see in Ethics Plan*: 2.4. Informed consent, 2.5. Anonymity of Interviewed people*

[12] "Pseudonymisation" is the "processing or personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person". Source: Durham University https://www.dur.ac.uk/ig/dp/anonymisation/

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2.3.2 *Informed consent*

Researchers will provide an informed consent form that must be signed by the members of the involved groups. It must be obtained before the interview begins. Before getting the informed consent research participants will receive information about the project aims, expected results and limits of the research. The purpose is to ensure that participants fully understand the implications of being involved in the research. Participation in surveys and at the events in the project is voluntary and the participants will not be subject to any psychological, social, economic or other form of risk. The content of the consent form should be translated and recorded in a voice message in as many languages as necessary for the project as a whole, though it has to be signed anyway.

All participants will also be informed that they may withdraw from the research process during its data collection phase. If the research participant decides that they do not want to participate in the research process during the collection data phase, for any reason, they will be always able to do it. In this document, there will also be information about the anonymization procedure that we are going to implement to guarantee the confidentiality of the data[13].

Children or adults unable to give their informed consent will never be selected as research participants. The consent of their legal representatives is very difficult to obtain. In addition, it is not necessary for this research to expose them to possible stress in the interviews. The researchers will obtain the information related to these groups by analysing the data that the NGO with relevant expertise can provide, complying with all the ethical requirements.

2.3.3 *Anonymity of interviewed people*

Researchers will guarantee the anonymity of the interviewed people throughout all the process, and keep completely anonymous any information that interviewees wish to hide for reasons of personal safety or privacy. The procedures the partners will implement for the collection, storage, protection, retention and destruction of data comply with national and EU legislation.

2.3.4 *Compensation to participants*

Researchers will provide a small compensation as honorarium to participants of the research that acknowledges their time and effort they have provided in participating in the research.

Compensation must be granted to all participants in accordance with general ethical principles, such as justice and respect (recognizing that their time and effort of participation is valuable and worthy of recognition), fairness and equity (all participants receive the same amount of compensation, and it must be reasonable and fair), safety protection (it must not increase participant's vulnerability or cause a disadvantaged situation for them), voluntariness (ensuring that participants are not unduly influenced into consenting to participate).

[13] see in Data Management Plan

It is unconditional, cannot be regarded as a business transaction, and it has no obligation for the parties to provide any further services in the research.

Usually, this compensation is provided as cash, voucher or some gift. Each partner must decide how it is going to materialise, though the last recommendations of the EC indicate that they cannot be money. In all cases participants have to sign an acknowledgement of receipt proving the transmission of compensation.

2.3.5 Gender perspective

As it is a basic requirement in RAISD project[14] RAISD partners take all measures to promote and provide equal opportunities between men and women, and secure gender balance at all levels of the project. Therefore this gender dimension is considered and integrated in the entire research process as well. However, based on previous research experiences, integrating the gender perspective is not an easy task because it must be applied in a structural way and adapted in the different steps of the investigation. In this case, the project will apply the gender perspective in four priority areas in which universities and centres of research can usefully undertake gender actions[15]: 1) leadership, vision and strategy; 2) measures for achieving structural change; 3) strategies for effective implementation of those measures; and 4) steps for addressing the lack of a gender dimension in the researches.

Regarding the composition of the research groups in each ARU, the project will follow several considerations:

- The composition of women and men of each team will be balanced.
- The decision-making process will prioritise the existence of a shared leadership between women and men.
- The design of the gender dimension and its application will be collaborative and involve both female and male members of teams.
- There will be previously designed and precise measures to assess that the gender perspective had been applied in the process, or to adapt it to the actual requirements if necessary.
- The dissemination of research will emphasise how the gender dimension has been included throughout the process, serving as a demonstration effect for other research projects.

In the data collection phase, the project will apply the principles for gender equality developed by UNHCR[16], with a strategy that involves:

- Promoting a multi-functional team approach to bring together the expertise and skills of all staff and partners. The goal is to maximise effectiveness of actions.

[14] see GA Article 33

[15] LERU: Women, research and universities - Excellence without gender bias. 2010. Available at https://www.leru.org/files/Women-Research-and-Universities-Excellence-without-Gender-Bias-Executive-summary.pdf

[16] UNHCR (2008): UNHCR Handbook for the Protection of Women and Girls, Chapter 2: Principles and Practices for Gender Equality. 2008.

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- Undertaking regular participatory assessments with representatives of all target groups, including women, girls, boys and men of all ages and diverse backgrounds. These assessments will analyse their protection risks, concerns, priorities, capacities and proposed solutions, and evaluate the results.
- Putting persons of concern at the heart of operational planning. They will ensure that findings from participatory assessments are analysed from the required perspectives (age, gender and diversity), and are the basis of strategies and solutions for attention and inclusion.
- Identifying by means of a multi-perspective analysis (age, gender and diversity), where targeted actions are required to address inequalities and support the empowerment and protection of discriminated groups, in particular women and girls at risk. The project will also add gender-specific training for each team of researchers.

2.3.6 Multi-functional teams and multi-perspective analysis

In RAISD project we promote a multi-functional team approach meaning that in the realization of project actions participants with various expertise, skills, professional background and function work together to maximise effectiveness of actions. A multifunctional team enables a comprehensive, holistic and multi-perspective analysis and planning process, and also ensures fulfilling common goals and approaches within the project.

The most important ethical principles are confidentiality, professional secrecy, personal integrity which need to be secured by all members who are involved in the realization of the project. Furthermore, it is also important to keep proportionality, balance and equity among participants.

2.3.7 Regular participatory assessments with representatives of all target groups

In order to understand VCs more, and develop proper TAISs to assist vulnerable migrants and their host communities more effectively, regular participatory assessments have to be conducted with all target groups (both migrant participants considering gender, age and diversity, and other stakeholders). Such assessments help to gather accurate information on VGs specific needs, estimate their potential risks, concerns and capacities, and propose solutions for handling their situation.

First and foremost, the safety, rights and well-being of people of concerns sharing their experiences must be protected during actions. In general, basic human rights principles (e.g. empathy, openness, and security) should guide all interactions, and it is also important to keep balance in the composition of participants.

When undertaking a participatory assessment, people of concern must:

- Decide themselves whether they want to participate in the assessment or not.
- Not be asked to provide information in public which embarrasses them, makes them feel uncomfortable or relive former traumatic experiences.
- Be allowed to express themselves freely without interruption or any negative comments.

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- Be informed about the purpose and process of the assessment and also be notified about its limitations.
- Be informed about both the potential risks or inconveniences associated with participation and potential benefits arising from the assessment.
- Be reassured about confidentiality.
- Be informed about any follow-up actions (names of contact staff should be provided)[17].

3 Conclusion

In RAISD project ethics and data management are of high importance for quality assurance, therefore this strategic document, the Ethics Plan (EP) aims to describe all the fundamental ethical issues relevant to the project, and present all the procedures to be followed by all Consortium partners and ARU members working in the project.

The Consortium carries out the project actions in compliance with ethical principles and applicable international, EU and national laws, and has also developed its own guidelines, procedures and measures aiming to support the protection of ethical aspects of research.

As a summary the following visualization helps to understand the procedure of handling ethical issues, and also identifies the responsible actors.

Consortium partners (and their ARUs) following the guidelines in Ethics Plan, reporting all ethical issues to the Ethics Committee >> periodic evaluation meetings for partners within the Ethics Committee >> reporting on arising ethical issues to the Commission

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