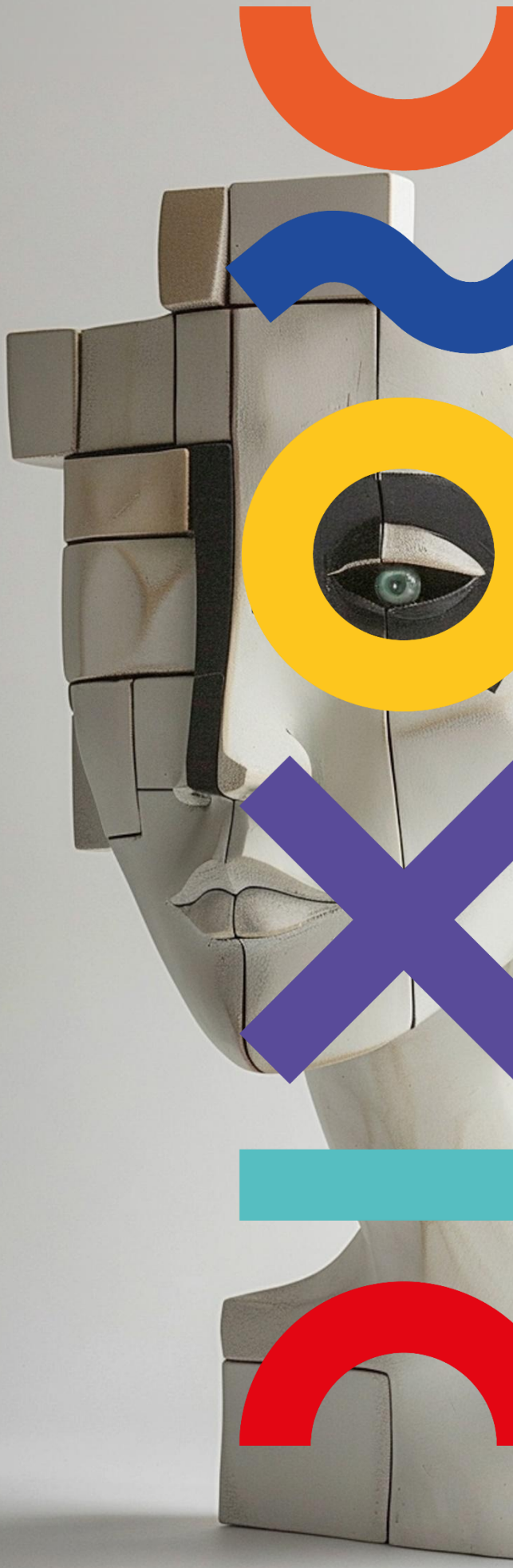
D9.1

OEI - Requirement No. 1



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D9.1 OEI - Requirement No. 1

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ENCODE - Unveiling emotional dimensions of politics to foster European democracy

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REVISION AND HISTORY CHART

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DISCLAIMER

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Executive summary

This deliverable, D9.1, represents a foundational effort to ensure that the ENCODE project adheres to ethical principles in recruiting and engaging research participants. The ENCODE project, centred on analysing the emotional dimensions within political discourse, aims to promote democratic engagement through deeper insights into affective political dynamics.

As the lead partner, ASM Research Solutions Strategy has outlined methodological criteria aligned with Horizon Europe's framework for protecting participants' autonomy, dignity, and privacy throughout the research lifecycle. Key ethical practices include stringent informed consent protocols, careful handling of biometric and AI-related data, and adherence to GDPR for participant data management across multiple European partner countries. These measures underscore the project's commitment to fostering an inclusive and trust-based research environment conducive to high scientific integrity.

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1. INTRODUCTION

1.1 THE ENCODE PROJECT

The ENCODE project, titled "Unveiling Emotional Dimensions of Politics to Foster European Democracy," aims to explore and decode the role of emotions in political discourse and their impact on democratic processes. Recognizing that emotional appeals have significantly influenced political movements and voter behaviour, ENCODE seeks to understand the interplay between emotions, values, and identities. The project's primary goal is to create new positive narratives that can foster trust and engagement in European democratic processes, thereby counteracting the negative emotions that often dominate political discussions. Through innovative methodologies, including social media sentiment analysis, biometric research, and surveys, ENCODE aims to provide policymakers with tools and strategies to better incorporate the emotional needs of citizens into governance, ultimately enhancing democratic resilience and fostering a more inclusive political environment.

1.2 OBJECTIVES OF DELIVERABLE

The Ethical Requirements deliverable is designed to ensure that all research activities within the project adhere to rigorous ethical standards, safeguarding participant rights and maintaining research integrity throughout the project lifecycle. This deliverable outlines specific objectives that align with Horizon Europe's ethical framework and address key considerations in privacy, data security, and fairness.

1.3 STRUCTURE OF THE DOCUMENT

The deliverable is structured as follows:

- Chapter 1 - Introduction to the deliverable – presents the purpose, scope, and main context of the deliverable.
- Chapter 2 – Ethics and Guidelines – provides an overview of the ethical principles and guidelines applicable to the ENCODE project.
- Chapter 3 - Horizon Europe Ethical Process and Project Integration – outlines the ethical requirements under the Horizon Europe programme and their integration into project activities.
- Chapter 4 – Ethical Advisor – describes the role and functioning of the Ethics Advisor within the ENCODE project.
- Chapter 5 – Ethics Specifications – focuses on ethical considerations related to the use of artificial intelligence and the involvement of vulnerable groups in research.
- Chapter 6 – National Ethics Regulations – provides basic information about the national ethics regulations in different partner countries.
- Informed Consent Form – Example of the Informed Consent Form that might be used in the ENCODE project (although it can be adapted according to national regulations of each country).

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1.4 RELATION TO OTHER TASKS

The current report is related to all tasks dealing with the research to be conducted among external participants (respondents). These tasks involve the conducting of surveys, interviews, focus groups and biometric research. The related Work Packages are:

1. WP2 – Heightened understanding – a theoretical framework and an empirical review (interviews with policy-makers)
2. WP4 – Understanding citizens emotional responses (biometrics and qualitative research)
3. WP5 – Explaining the effects of emotions (qualitative research)
4. WP6 – Active citizen innovation for future narratives (quantitative and qualitative research)
5. WP7 – Forward-looking – foresight and policymaking workshops (qualitative research)

2. ETHICS PRINCIPLES AND GUIDELINES

The Ethics Principles and Guidelines established for this project serve as a critical foundation for ensuring research integrity, transparency, and respect for participant rights. Adhering to these principles helps create trust and credibility, both with participants and the broader scientific community. This chapter delves into the ethical guidelines that govern all aspects of the research, with a particular focus on protecting human dignity, autonomy, and privacy, especially as these principles apply to AI-related research.

The ethics principles applied to this project are grounded in core concepts such as integrity, respect for autonomy, beneficence, and justice. Integrity is central to ethical research, requiring researchers to conduct their work honestly, rigorously, and transparently. This entails meticulous data handling, clear communication with participants, and accountability for any potential conflicts or biases in research findings. Transparency is a natural extension of integrity, emphasizing that all stages of the research, from design to dissemination, must be open to scrutiny, thereby enabling participants, reviewers, and stakeholders to have a clear understanding of the study's aims and processes.

In addition, the project is committed to promoting gender equality and actively combating discrimination in all its forms. Recognizing that these are potential threats throughout the project lifecycle, specific measures will be implemented to ensure equal opportunities and fair treatment across all participant demographics. This proactive approach aims to prevent bias, safeguard diversity, and foster an inclusive research environment that upholds the values of fairness and respect for all individuals.

Respect for autonomy is critical, particularly where human subjects are involved. Participants must be provided with adequate information, allowing them to make informed, voluntary decisions about their involvement in the study. This involves more than obtaining consent; it means creating an environment in which participants feel empowered and fully aware of how their data will be used. In cases involving complex technologies like AI, researchers have a responsibility to explain technical details in accessible language, ensuring that participants understand potential risks, benefits, and the specific ways AI may process or analyse their information.

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The principle of beneficence mandates that researchers seek to maximize the benefits of their research while minimizing harm. This consideration is especially relevant when using data-centric or AI-driven methods, as such technologies can unintentionally expose participants to privacy risks or produce biased results. To uphold beneficence, researchers must implement thorough data security protocols and be vigilant in their oversight of AI models, ensuring they do not reinforce harmful stereotypes or amplify inequalities.

Justice is another cornerstone of ethical research and requires equitable treatment of all research participants. In AI research, this entails a rigorous evaluation of algorithms to prevent discriminatory outcomes, especially against marginalized or vulnerable groups. Justice also encompasses fair representation, ensuring that all demographic groups—regardless of gender, age, nationality, or socio-economic status—are included proportionally and meaningfully in the research. This approach safeguards against biases in data collection and analysis, promoting inclusive insights. Additionally, justice requires that the benefits and burdens of the research are shared fairly, ensuring no group is disproportionately affected by any negative impacts of the research, while fostering equitable access to its positive outcomes.

The project's ethical guidelines are closely aligned with the Horizon Europe framework, which provides a comprehensive set of ethics requirements, particularly for projects involving AI and data processing. These guidelines call for regular ethics reviews, impact assessments, and a commitment to responsible innovation. Ethical considerations are embedded at every stage of the research process, adapting to new challenges and insights, and ensuring that all activities uphold the project's ethical principles.

2.1 INTERNAL ETHICS WORKFLOW

ENCODE applies a structured internal ethics workflow that is activated before, during, and after each research activity. This workflow ensures that ethical considerations are addressed systematically across work packages and countries, while allowing for adaptation to national and institutional contexts.

Figure 1 - Internal ethics workflow

1) At the study design stage, each planned research activity is subject to an internal ethics screening coordinated by the relevant task leader. This screening identifies the type of data to be collected (e.g. personal data, biometric data, political opinions, social media content), the characteristics of target participants (including any potentially vulnerable groups), and the methodological tools to be used (e.g. interviews, surveys, biometric measurements, AI-based analysis). The purpose of this step is to identify potential ethical risks early and to ensure that mitigation measures are embedded in the research design.

2) Following the initial screening, consultations are conducted with consortium partners, particularly those responsible for data collection in specific countries. These

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consultations draw on partners' country-specific legal, cultural, and institutional knowledge and focus on the appropriateness of recruitment strategies, consent procedures, data collection instruments, and participant safeguards. Where necessary, methodological elements are adjusted to ensure ethical compliance at national level while maintaining overall comparability across countries.

3) Based on this consultation, the consortium determines whether a given research activity requires formal ethical approval under national or institutional regulations. When such approval is required, the responsible partner initiates the relevant ethics committee or institutional review process in line with local procedures. Formal ethical approval, as required by the University Partners (UNIVIE, UCPH, UNSA), will be obtained and appended to the relevant deliverables associated with the specific research activities.
When formal approval is not required, the activity proceeds under ENCODE's internal ethics safeguards, which include informed consent, voluntary participation, data minimisation, anonymisation or pseudonymisation, secure data storage, and clearly defined withdrawal rights.

4) During implementation, partners apply agreed ethical procedures in practice. Access to personal data is restricted to authorised personnel, data are stored securely, and participants are informed of their rights throughout the research process. Any ethical concerns, unexpected risks, or participant complaints arising during fieldwork are reported to the task leader and addressed promptly within the consortium.

5) After data collection, post-implementation checks are carried out to confirm that data handling complies with agreed procedures, including the removal or separation of identifiers, adherence to retention and deletion rules, and documentation of any deviations from the original protocol. This ensures that ethical compliance is not limited to planning stages but is maintained throughout the full research lifecycle.

This internal workflow provides a transparent and practical mechanism for managing ethical issues across diverse methods and national contexts, ensuring that ethical responsibility is shared, documented, and continuously monitored within the ENCODE project.

3. HORIZON EUROPE ETHICAL PROCESS AND PROJECT INTEGRATION

The Horizon Europe framework's ethical process is designed to ensure that all funded research adheres to rigorous ethical standards, with a particular focus on human rights, data privacy, and social responsibility. Ethical compliance within Horizon Europe is not a one-time activity but an integral component of the project, woven into every phase and regularly evaluated for consistency with EU regulations and ethical norms. This chapter explores how Horizon Europe's ethical process is integrated into the project's daily operations, ensuring sustained adherence to ethical practices.

The Horizon Europe ethical process begins with an exhaustive self-assessment, where the research team identifies any ethical risks or considerations specific to the project's objectives and methodologies. This self-assessment provides a preliminary understanding of ethical

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concerns, enabling the team to proactively address potential challenges before formal research activities commence. The self-assessment phase is followed by a rigorous ethical review, conducted by external evaluators who scrutinize the research design, objectives, and methods to ensure alignment with ethical principles and legal requirements. Approval at this stage is contingent upon a detailed plan for addressing identified ethical issues, particularly those related to participant privacy, data protection, and AI model transparency.

Integration of ethics into the project workflow occurs at multiple levels. During the design phase, ethics play a vital role in shaping research methodologies and protocols, particularly in areas where AI is used to analyse sensitive data. Ethical guidelines mandate that all AI algorithms undergo pre-deployment testing to identify and mitigate biases, ensuring that the models operate fairly across different demographic groups. The project team must also document the specific ways in which AI models process data, providing a transparent account of model logic, data flows, and decision-making mechanisms.

During the implementation phase, ethics reviews are conducted regularly to ensure that ongoing activities remain in compliance with Horizon Europe's standards. These reviews include checks on data handling practices, participant interactions, and the impact of AI models on vulnerable groups. Ethical considerations are documented and reported to Horizon Europe, ensuring accountability and transparency. In the reporting phase, the project team compiles a comprehensive ethics compliance report, detailing the steps taken to address ethical challenges and any adjustments made to project activities to maintain alignment with ethical standards.

An ongoing ethics impact assessment complements the review process, allowing the research team to continuously evaluate the project's ethical footprint. This approach facilitates adaptive management of ethical issues, ensuring that any emerging challenges are promptly identified and addressed. The impact assessment also provides a basis for ethical risk management, helping the team develop contingency plans to handle unexpected ethical dilemmas effectively.

The detailed information might be found in Article 19 1291/2013[1] document Provides clear guidance on ethical principles that projects awarded funding must adhere to.

4.ETHICAL ADVISOR

The role of the Ethical Advisor is pivotal in maintaining a high standard of ethical compliance across the project. As a key figure in the research team, the Ethical Advisor provides oversight, guidance, and expertise on ethical issues, helping to ensure that the project not only meets regulatory requirements but also upholds the values of fairness, accountability, and transparency. This chapter explores the responsibilities of the Ethical Advisor, from advising on ethical decision-making to overseeing compliance with Horizon Europe's ethics framework.

The Ethical Advisor's primary responsibility is to guide the research team in aligning project

[1] https://ec.europa.eu/research/participants/data/ref/h2020/legal_basis/rules_participation/h2020-rules-participation_en.pdf

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activities with established ethical standards. This includes advising on data privacy measures, informed consent protocols, and the fair treatment of participants, particularly those from vulnerable populations. The advisor also provides expertise on navigating complex regulatory landscapes, ensuring that the project complies with both EU and national ethics requirements. This guidance extends to the use of AI, where the advisor evaluates the ethical implications of algorithm design and deployment, particularly in terms of potential biases and impacts on participant privacy.

Beyond compliance, the Ethical Advisor plays a proactive role in identifying and mitigating ethical risks. In projects involving AI, ethical risks can arise from model biases, data misuse, or unintended consequences of automated decision-making. The advisor works closely with the team to develop risk mitigation strategies, which may include adjustments to data handling protocols, model tuning to reduce bias, or the development of alternative methodologies that minimize ethical concerns. Training and awareness-building are also part of the Ethical Advisor's role, equipping team members with the skills and knowledge needed to recognize and address ethical issues.

Reporting and accountability are essential to the Ethical Advisor's function, with responsibilities that include documenting the ethical status of the project and communicating challenges and solutions to stakeholders. The advisor produces regular ethics reports, detailing any ethical challenges encountered, the strategies implemented to address them, and the outcomes of these actions. These reports are shared with stakeholders and Horizon Europe, ensuring transparency and building trust in the project's ethical commitments.

The ENCODE Ethical Advisory Board consists of two people not involved directly in the project:

1) GDPR Ethical Advisor assigned from ASM (Katarzyna Walburg) – iod@asmresearch.pl
2) AI Ethical Advisor assigned from PredictBy (Lucas Javier Segal) - lsegal@predictby.com

In addition, and in line with the comments received after 1st review meeting, an **external Ethical Advisor will be nominated**, while also retaining the contributions of ethical advisors appointed by project partners to ensure domain-specific expertise. The external advisor will work alongside partner-assigned experts to share oversight of the project's activities and to address specific ethical and regulatory concerns related to artificial intelligence (PBY) and data protection (ASM).

5. ETHICS SPECIFICATIONS: AI AND VULNERABLE GROUPS INVOLVEMENT

AI introduces unique ethical considerations, particularly when applied in research involving vulnerable[2] populations. This chapter addresses the specific ethical requirements for AI

[2] In the context of the ENCODE project, vulnerable people can be defined as individuals or groups who experience heightened exposure to political, social, or emotional risks due to structural inequalities, systemic discrimination, or unique sociocultural dynamics. These individuals are more susceptible to the adverse impacts of political manipulation, disinformation, and the emotional dimensions of

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applications and participant involvement, providing a framework to safeguard the rights and well-being of vulnerable groups while maintaining the integrity of AI-driven insights.

AI ethics focuses on ensuring that algorithms are transparent, fair, and accountable. In this project, transparency is prioritized, with AI models designed to be interpretable and explainable, particularly when making decisions that impact individuals. This transparency allows for external scrutiny, enabling researchers, participants, and stakeholders to understand how AI models arrive at certain outcomes. Transparency in AI is essential for maintaining trust and minimizing the potential for harm, especially when working with sensitive data or vulnerable populations.

This is achieved through the following practices:

- Model selection: We use XLM-RoBERTa, an open-source multilingual transformer model, for coding and sentiment analysis, and Lumo for post generation. The architecture, training corpus, and performance metrics for XLM-RoBERTa are publicly documented and accessible for review. For Lumo, we provide detailed documentation of its intended use, input data, and generation protocols.
- Documentation of procedures: All steps in the application of XLM-RoBERTa and Lumo, including data selection, preprocessing, fine-tuning, coding, and post-generation protocols, are thoroughly documented in project deliverables.
- Reproducibility: By using widely recognised, open-source models and maintaining transparent documentation, we ensure that our results can be independently reproduced and validated by external researchers.

These measures collectively ensure that the use of XLM-RoBERTa and Lumo in ENCODE is transparent and subject to ongoing external scrutiny, supporting ethical integrity and stakeholder trust.

The project also places a strong emphasis on preventing algorithmic bias, which can disproportionately impact marginalized groups. Rigorous testing is conducted to identify and eliminate biases in AI models, ensuring that the algorithms do not reinforce stereotypes or amplify social inequalities. This testing process includes reviewing datasets for representativeness, as biased data can lead to biased outcomes. By carefully curating data and fine-tuning models, the research team works to ensure that AI applications operate fairly across all demographic groups.

When involving vulnerable populations, enhanced safeguards are implemented to protect their rights and dignity. Vulnerable participants may have limited autonomy or may be at a higher risk of experiencing harm, making it essential to provide clear, accessible consent processes. Simplified consent forms and additional support are provided to ensure that vulnerable individuals fully understand the research and their rights. Special monitoring protocols are also established to oversee the welfare of vulnerable participants, with measures in place to minimize risks and provide support as needed.

Ethical requirements specific to AI applications involving vulnerable populations include

populist narratives. Vulnerability arises from various factors, including socio-economic status, ethnicity, age, disability, or political marginalization. Within the ENCODE framework, vulnerable groups may include marginalized communities, those facing systemic biases, or individuals in precarious socio-political environments, such as regions experiencing heightened political tensions or conflict.

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thorough risk assessments and ethics training for the research team. The risk assessments evaluate potential impacts on vulnerable participants, identifying and addressing any ethical concerns before the research begins. Ethics training focuses on the unique challenges of working with AI and vulnerable groups, helping team members develop sensitivity and awareness around these issues. This training fosters a culture of responsibility, equipping researchers with the knowledge needed to handle ethical challenges proactively and effectively.

6. NATIONAL ETHICS REGULATIONS

Table 1. Overview of Partner Organizations and National Ethics Regulations

Country: Austria
1. Partner Information
Organization Name: University of Vienna **Contact Person:** Jörg Matthes **Email:** joerg.matthes@univie.ac.at
2. Overview of National Ethics Regulations
a. Research Ethics Overview As a member of the EU, Austria adheres to the **GDPR (General Data Protection Regulation).** Researchers are required to maintain transparency, comply with legal standards, and uphold participants' rights regarding their data, which includes obtaining explicit consent prior to data collection and processing. The University of Vienna is dedicated to conducting research that upholds the dignity and integrity of both humans and the environment. All research adheres to the guidelines established by the **University of Vienna Ethics Committee** and the ethical research guidelines set forth by the **Institutional Review Board of the Department of Communication.**
b. Data Protection Legal guidelines of the **GDPR** apply regarding the handling and storing of data.
3. Ethical Review and Consent
a. Ethical Approval An ethical review **is required** for the research. **Name of the Ethics Committee:** Ethics screening by the Institutional Review Board of the Department of Communication (for standard research) or Ethical approval by the University of Vienna Ethics Committee.
b. Informed Consent Consent is the main rule in research on individuals. Prior to conducting the planned studies, the researcher will collect informed consent from the participants. This consent will be informed, explicit, voluntary, and documentable. In giving consent, participants will retain the right to withdraw this consent at any time. Providing informed consent will entail that the participant gives consent to participate in a study based on information about the purpose, procedure, benefits, potential risks, and obligations of the study. Participants will also be

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informed about the procedure to follow if negative symptoms or unwanted side effects occur, the process for withdrawal from the study, how the collected data will be used, and whether there will be reimbursements or remunerations connected to their participation in this study (see the guidelines for ethical research by the Institutional Review Board of the Department of Communication).

4. Data Anonymization and Security

a. Anonymization

The norm of anonymity prevails: the researcher will ensure that individual participants cannot be identified in research reports and (in quantitative studies) in the course of data analysis.

b. Data security

The guidelines of the GDPR will be applied regarding the handling and storage of data.

Country: Belgium

1. Partner Information

Organization Name: Re-Imagine Europa
Contact Person: Sorhna PERROT
Email: sohrna.perrot@re-imagine.eu

2. Overview of National Ethics Regulations

a. Research Ethics Overview

Since Belgium is an EU member state, the **GDPR** applies to all research activities involving personal data. Researchers must ensure transparency, lawfulness, and respect for participants' data rights, including obtaining explicit consent for data collection and processing.

Royal Decree on Ethics Committees (2017) regulates the structure, functioning, and responsibilities of Ethics Committees, which play a key role in the approval and oversight of research involving human participants. Each research project must receive clearance from an Ethics Committee, which ensures compliance with ethical standards.

b. Data Protection

In Belgium, the **Data Protection Act** (Belgian Law of 30 July 2018) is complementary to the **GDPR** ensures that personal data is handled with care and respect for privacy. This law also establishes the **Data Protection Authority (DPA)**; an independent body responsible for enforcing privacy laws and overseeing data protection practices across the country. Its main role is to ensure compliance with the GDPR and Belgium's national data protection laws.

3. Ethical Review and Consent

a. Ethical Approval

An ethical review is **not required** for the research.

b. Informed Consent

The process of obtaining consent from participants will ensure that participants are informed about the research, understand their rights, and voluntarily agree to participate. Detailed information will initially be provided to participants, and their explicit consent will be obtained, typically through a written or digital form before

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the interview. Personal data will be archived only if necessary for the purposes of the research, after which it shall be deleted.
4. Data Anonymization and Security
a. Anonymization The researchers aim to gather the required information from participants without processing personal data unless it is essential for data analysis and reporting the research findings. Typically, participant data will be anonymized by assigning codes to each data source during storage and analysis. Personal data will only be archived if necessary for the research and will be deleted afterward.
b. Data security The data will be secured by passwords on devices.
Country: Bosnia and Herzegovina
1. Partner Information
Organization Name: Faculty of Political Science of University of Sarajevo Contact Person: Valida Repovac-Niksic Email: valida.repovac.niksic@fpn.unsa.ba
2. Overview of National Ethics Regulations
a. Research Ethics Overview In Bosnia and Herzegovina, ethical research is governed by national and institutional guidelines that ensure the protection of human subjects and uphold research integrity. Ethical principles follow the Declaration of Helsinki and EU standards, ensuring respect for participant rights, risk minimization, and voluntary participation. Universities and research institutions typically adhere to institutional ethics committees to review and approve research involving human participants. These committees are responsible for evaluating proposed studies to ensure ethical compliance and protecting the welfare of participants.
b. Data Protection Bosnia and Herzegovina's data protection regulations are in the process of aligning with the GDPR framework due to its association with the European Union and its aspiration to become a full-fledged member state. The Personal Data Protection Agency in Bosnia and Herzegovina is an independent administrative organization whose authority and scope are defined by the Law on Protection of Personal Data. This law outlines requirements for collecting, storing, and processing personal data, mandating that such data be used lawfully, fairly, and transparently. Specific regulations include obtaining consent, ensuring data accuracy, and enforcing data subject rights, such as access and deletion.
3. Ethical Review and Consent
a. Ethical Approval An ethical review is required for this research. Name of the Ethics Committee: Ethics Committee of the Faculty of Political Science, University of Sarajevo.
b. Informed Consent

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Informed consent will be obtained from all research participants through a process that includes a clear explanation of the study's purpose, duration, procedures, and any potential risks or benefits. Participants will be informed of their rights to withdraw at any time without penalty, and they will sign a consent form to indicate their voluntary participation. For studies involving minors or vulnerable groups, consent from a legal guardian or representative is required.
4. Data Anonymization and Security
a. Anonymization Participant data will be anonymized by removing or altering identifying details to prevent re-identification. Pseudonymization or numerical methods may also be applied to retain data utility while protecting participant privacy, ensuring that only anonymized datasets are used for analysis.
b. Data security Research data will be secured using encryption methods both in transit and at rest. It will be stored on secure servers with access controls and authentication protocols, ensuring that only authorized personnel can access sensitive information. Regular audits and backups will be conducted to maintain data integrity and ensure compliance with data protection regulations.
Country: Bulgaria
1. Partner Information
Organization Name: Center for the Study of Democracy **Contact Person:** Alexander Gerganov **Email:** alexander.gerganov@csd.eu
2. Overview of National Ethics Regulations
a. Research Ethics Overview As an EU member state, Bulgaria adheres to the **GDPR**, which mandates transparency, lawfulness, and respect for participants' data rights in research involving personal data. Researchers must obtain explicit consent for data collection and processing. Ethical research in Bulgaria is regulated by the **National Strategy for the Development of Scientific Research of the Republic of Bulgaria, 2017-2030.** According to the strategy the ethical principles of major EU documents in the area of ethical research, such as the **European Charter for Researchers and the European Code of Conduct for Research Integrity**, need to be followed. Typically, research organizations have established their own ethical advisory bodies which abide by these laws and regulations, and some of them have devised a standard ethical code for their organization to follow up the principles outlined in these regulations. **CSD has its own ethical board and an ethical policy** which it follows in the conduct of research.
b. Data Protection When it comes to regulation on personal data protection, Bulgaria follows **Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016** on the protection of natural persons in relation to the processing of personal data and the free movement of personal data.

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CSD also has a standard GDPR policy which aligns with Regulation (EU) 2016/679 and the Personal Data Protection Act.
3. Ethical Review and Consent
a. Ethical Approval An ethical review is not required for the research.
b. Informed Consent There is not a specified consent process for participants in scientific research in Bulgaria. However, CSD usually takes an informed consent process with research participants as informed consent is one of the principles in the CSD's Code of Ethics. According to the Code, the „Center's staff is obliged to include in the research only participants who have given their informed consent" (CSD, 2023, p. 4).
4. Data Anonymization and Security
a. Anonymization The researchers will seek to obtain the necessary information from participants in a manner that does not require the processing of personal data unless essential for data analysis and the description of research results. Generally, participant data will be anonymized by assigning codes to each data source as it is organized for storage and archiving, as well as during the data analysis process. Personal data will be archived only if necessary for the purposes of the research, after which it will be deleted.
b. Data security Data security will be ensured through secure storage on password-protected computers kept in a locked room.
Country: Denmark
1. Partner Information
Organization Name: University of Copenhagen Contact Person: Mette Marie Stæhr Harder Email: mm.harder@jur.ku.dk
2. Overview of National Ethics Regulations
a. Research Ethics Overview As an EU member state, Denmark follows the GDPR, requiring transparency, lawfulness, and explicit consent for data collection and processing in research involving personal data. Research is conducted in accordance with the Danish Code of Conduct for Research Integrity, which sets out general rules for data protection. Data must be stored in a manner that is inaccessible to unauthorized persons and minimizes the risk of loss. Furthermore, data storage practices should ensure accessibility for other researchers for similar research purposes and allow for examination in case questions regarding a research project's results or integrity arise. In accordance with this code, data must be retained for a minimum of five years after the conclusion of a project period.
b. Data Protection In accordance with the GDPR and the Danish Data Protection Act, projects that collect and register personal data must be registered in the University of

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Copenhagen's joint record of biobanks and record of research projects containing personal data.
3. Ethical Review and Consent
a. Ethical Approval An ethical review **is required** for this research. **Name of the Ethics Committee:** The Research Ethics Committee of The Faculty of Humanities and The Faculty of Law, which functions as an Institutional Review Board (IRB).
b. Informed Consent The process of obtaining informed consent from participants will ensure they are aware of the research's overall purpose, including the questions being addressed and the specific methods used, such as interviews or participant observation. Participants will also be informed about the anticipated outcomes, potential risks and disadvantages, and possible advantages of participation. They will be made aware of their options regarding anonymity in final products, their right to withdraw from the project, and the possibility of reviewing and commenting on transcriptions or the final product. Information will be presented clearly and understandably, typically in written form, though oral communication is acceptable when necessary. Consent may be documented either in writing or verbally, and researchers must be able to demonstrate that consent has been given. Exceptions to these standards may apply, particularly when observing groups or in public spaces, where individual consent is not required. If individual informed consent is deemed unnecessary, the applicant must provide justification in their application.
4. Data Anonymization and Security
a. Anonymization Anonymization will involve the removal or modification of names or descriptions that may make it possible for outsiders to identify the individual in question.
b. Data security Data will be stored safely and kept inaccessible to unauthorized individuals. It will be organized in a manner that minimizes the risk of data loss, ensuring its integrity and availability for future research or examination.
Country: Spain
1. Partner Information
Organization Name: PredictBy **Contact Person:** Jim Ingebretsen Carlson **Email:** jcarlson@predictby.com
2. Overview of National Ethics Regulations
a. Research Ethics Overview In Spain, the **GDPR** and **Organic Law 3/2018** play crucial roles in the protection of individuals' personal information. While research in the social sciences and humanities is not governed by a single national law, it follows general ethical guidelines that include seeking informed consent, respecting participants' privacy, and avoiding harm.

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Additionally, universities and research institutions typically have ethics committees that oversee this type of research. These committees evaluate and approve research projects to ensure compliance with ethical and legal standards, following national guidelines while adapting to specific regional or institutional policies.
b. Data Protection GDPR is enforced in Spain as part of the EU framework for research involving personal data. Researchers are required to protect participants' privacy, ensure data security, and obtain explicit consent for data collection and use. Additionally, the Organic Law 3/2018 on Data Protection and Guarantee of Digital Rights (LOPDGDD) complements the GDPR in Spain by providing specific guidelines on processing sensitive data, including health data, while also reinforcing the rights of individuals in digital environments.
3. Ethical Review and Consent
a. Ethical Approval An ethical review is required for this research.
b. Informed Consent Not applicable, as the data for this research will be gathered from social media platforms.
4. Data Anonymization and Security
a. Anonymization Data shared by the social media platforms will be pseudonymized.
b. Data security The guidelines of the GDPR will be applied regarding the handling and storage of data.
Country: Poland
1. Partner Information
Organization Name: ASM Research Solutions Strategy (responsible in ENCODE for implementing fieldwork) Contact Person: Agnieszka Kowalska Email: a.kowalska@asmresearch.pl
2. Overview of National Ethics Regulations
a. Research Ethics Overview The Polish Constitution guarantees that "the freedom of artistic creation and scientific research, as well as the dissemination and enjoyment of cultural products, shall be ensured to everyone" (Article 73). It also prohibits conducting experiments without consent, stating in Article 29 that "no one shall be subjected to scientific experimentation, including medical experimentation, without their voluntary consent. In Poland, there is no comprehensive "research act"; instead, provisions governing research are distributed across various laws and executive acts. Key regulations for human research include legal acts related to clinical trials in alignment with EU provisions, such as the Pharmaceutical Law of 6 September 2001, the Act of 20 May 2010 on Medical Devices, and the Act of 5 December 1996 on the Medical Profession, along with several executive acts issued by the Minister of Health.

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Beyond legal frameworks, various guidelines and codes of conduct also influence the ethics assessment process.
No legally binding provisions require ethical review for human subject research (e.g., social research) outside of medical experiments. However, ethics committees at higher education institutions (such as colleges, academies, and universities) are responsible for conducting ethical reviews of these types of research.
As field research in Poland will be conducted by ASM Research Solutions Strategy below we provide summary of ethics procedures and rules at ASM:

PKJPA
ASM undergoes an annual quality audit conducted by OFBOR (Polish Association of Public Opinion and Marketing Research Firms) and is awarded the Research Quality Certificate. This certificate signifies quality assurance for ASM Research Solutions Strategy Sp. z o.o. and is granted under the PKJPA Program, ensuring adherence to high research standards. The certificate granted for 2024, validates that ASM meets quality standards in several specific research methodologies:

- Face-to-Face (F2F) Interviews
- Computer-Aided Telephone Interviews (CATI)
- Qualitative Research
- Mystery Shopping
- Computer-Aided Web Interviews (CAWI).

ESOMAR guidelines
ASM is a member of ESOMAR (The European Society for Opinion and Market Research) and has been granted the ESOMAR Certificate of Membership for 2024. As a member, ASM is required to adhere to the ICC/ESOMAR International Code, which sets forth essential standards for ethical and professional conduct. This code mandates compliance with relevant regional, national, and local laws, as well as any industry or professional codes of conduct that may establish stricter standards.

b. Data Protection
In Poland personal data protection is governed by GDPR [REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016 (General Data Protection Regulation)] and the Act of May 10, 2018 (Dz.U. 2018 poz. 1000), which came into force on May 25, 2018, along with specific regulations pertaining to areas of law such as labour law, public procurement law, and several others. Researchers must safeguard participants' privacy, ensure the security of data, and obtain explicit consent for data collection and usage.

The data protection at ASM is managed by the company Data Protection Officer – Katarzyna Walburg (iod@asmresearch.pl) who consults the research projects if needed and provides with specific information with regards data protection procedures for each project.

3. Ethical Review and Consent

a. Ethical Approval

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An ethical review is **not required** for the research conducted in Poland by ASM Research Solutions Strategy.
b. Informed Consent Informed consent is required. Prior to any interview, the participants will sign necessary notifications/ authorisations for collecting and processing the data and the free and fully informed consent of the persons concerned forms will be obtained. Participation will be entirely voluntary and the respective project Partners will obtain and clearly document participants' informed consent in advance. Consent will be given in writing/web form, for example by signing the "informed consent form" and "information sheet".
4. Data Anonymization and Security
a. Anonymization Participant data will be anonymized. Pseudonymization or numerical techniques will be also utilized (questionnaires will be codified) to maintain the utility of the data while safeguarding participant privacy, ensuring that only anonymized datasets are employed for analysis. This page will remain confidential for the Partner performing the interview.
b. Data security The Data Protection Security Policy was developed at ASM and applies to all data managed within the organization. This policy outlines the principles and procedures for ensuring the confidentiality, integrity, and availability of personal and sensitive information handled by ASM. It establishes clear guidelines for data management practices, compliance with relevant data protection regulations, and the responsibilities of all staff members in safeguarding data throughout its lifecycle. The following documents / tools /strategies are implemented at ASM to endure data security: 1. Instructions for managing the IT system used to process personal data (security of IT and telecommunications infrastructure, security of programs, databases, procedures for using the Internet, e-mail, procedure for granting permissions to process personal data, general rules for dealing with passwords, etc.). 2. Personal data protection security policy. 3. Personal data protection regulations. 4. Authorizations for persons who process personal data (employees) and personal data entrustment agreements (with external companies, if applicable). 5. Confidentiality declarations, protocols for deleting databases after the end of the project (under the data entrustment agreement), consent to image processing, policies regarding e.g. clean desk, clean screen, information clauses. 6. Security of rooms where personal data is processed, e.g. video surveillance, keys, etc. 7. IT security (securing the entire IT infrastructure, how backups are secured, anti-virus protection, inspections, maintenance, software updates etc.). 8. Regular training, internal audits.

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CONCLUSIONS

In conclusion, this deliverable encapsulates a structured approach to embedding ethics within the ENCODE project. The document emphasizes a layered integration of ethical guidelines that align with both the Horizon Europe standards and the European Union's General Data Protection Regulation, particularly in contexts involving artificial intelligence and vulnerable populations.

By creating comprehensive protocols, we underscore the project's dedication to ethical rigor, transparency, and respect for participant welfare, thereby strengthening ENCODE's contributions to democratic resilience through ethically-grounded research practices.

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ENCODE Informed Consent Form

Project Overview:
You are invited to participate in the ENCODE project, funded under the Horizon Europe Research & Innovation Programme (Grant Agreement no. 101132698). The project aims to explore how emotions influence political behaviour and democratic processes in Europe. By participating, you will contribute to valuable insights that can foster better democratic engagement.

Purpose of the Study:
The purpose of this study is to investigate the emotional dimensions of political discourse and its impact on democratic resilience. Various research methods, including surveys, interviews, focus groups, and biometric data collection (e.g., face-tracking), will be employed.

Data Collection and Anonymisation:

- Data Collected: Your participation will involve sharing personal opinions, emotional responses, and potentially biometric data.
- Anonymization: All data collected will be anonymized, meaning your personal identifiers (name, address) will not be linked to your responses. Where full anonymization is not possible, pseudonymization will be employed (use of codes to mask your identity) in accordance with the General Data Protection Regulation (GDPR) standards.
- Confidentiality: Your data will be stored securely, and only authorized project personnel will have access to it. We will use encryption to protect digital data during storage and transmission.

Use of Data:
Your anonymized data will be used strictly for research purposes and may be shared in academic publications, policy reports, open database and public presentations. All results will be presented in aggregate form, and no identifying information will be disclosed.

Voluntary Participation:
Your participation is entirely voluntary. You have the right to withdraw from the study at any time without any consequences. Refusal to participate will not affect any benefits to which you are entitled.

Risks and Benefits:
Participation in this study presents minimal risk. The potential benefit of your involvement is contributing to research that may enhance democratic processes and citizen engagement across Europe. You may also receive compensation or other non-monetary benefits for your participation as specified in the project documentation.

Contact Information:
If you have any questions or concerns regarding the study, feel free to contact [Researcher's Name] at [Contact Information].

Consent:
By signing below, you acknowledge that you have read and understood this information, and you agree to participate in this study under the conditions outlined.

Name of Participant: _____
Signature: _____
Date: _____

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ACRONYM	FULL NAME
AI	Artificial Intelligence
D	Deliverable
DPA	Data Protection Authority
EC	European Commission
EU	European Union
GDPR	General Data Protection Regulation
IRB	Institutional Review Board
M	Month
PC	Project Coordinator
WP	Work Package

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