

# D.6.3

## PACE ethics Period 2 (M18-M39)

### WP6 – Ethics



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**Populism and  
Civic Engagement**



## 1.0 About this document

### **Work Package 6 Lead:** Trilateral Research

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This document reports on the management of ethical aspects and issues throughout the second half of the PaCE project, i.e., from August 2020 (M18) to April 2022 (M39).

Dissemination Level		
PU	Public	X
PP	Restricted to other programme participants (including the Commission Services)	.
RE	Restricted to a group specified by the consortium (including the Commission Services)	
CO	Confidential, only for members of the consortium (including the Commission Services)	



A brief summary of revisions will be recorded in the table below:

HISTORY OF CHANGES			
VERSION	DATE	KEY CHANGES	AUTHOR
0.1	4 November 2021	Initial draft	David Barnard-Wills, Mathew Hall, Anais Resseguier (TRI)
0.2		Input from partners	Theresa Lindenaur (TUD) Robert Bjarnason (CF), Roxana Cziker (RVK), Sophie Kiesouw (DS),
0.3		Final draft for consortium review	David Barnard-Wills, Mathew Hall, Anais Resseguier (TRI)
1.0			

The working language of this document will be English (EN), as required for reporting purposes by article 20.7 of the Grant Agreement.



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## 1.1 About PaCE

Across Europe there is a rise of political movements that claim to challenge liberal elites and speak for the 'ordinary person' - movements that can be loosely categorised as 'populist'. Many of these movements have undesirable tendencies. The Populism and Civic Engagement project (PaCE), with others, aims to better understand and respond to the negative tendencies of populist movements, to build upon the lessons of positive examples (such as Reykjavik), and hence play a part in constructing a firmer democratic and institutional foundation for the citizens of Europe.

PaCE will analyse, in detail, the type, growth and consequences of such movements in terms of their particular characteristics and context. From this, it will analyse the causes of these movements and their specific challenges to liberal democracy. In particular, it will focus on transitions in these movements (especially changes in leadership) as well as how they relate to other kinds of movements and the liberal reaction. PaCE will propose responses to these challenges, developing risk-analyses for each kind of response, movement and transition. To this end, it will employ the agent-based simulation of political processes and attitudes to allow for thorough risk analyses to be made. Throughout the project, it will engage with citizens and policy actors, especially groups under-represented in public affairs, face-to-face and via new forms of democratic participation appropriate to our digital age to help guide the project and to comment on its outputs.

The project will develop new tools, based on machine-learning algorithms, to both identify and track populist narratives and aid online consultation. It will result in specific interventions aimed at the public, politicians, activists and educators. It will look further into the future, developing new visions concerning how different actors could respond to populism and it will warn about longer-term trends.

## 1.2 Consortium

#	PARTICIPATING ORGANISATION	CODE	COUNTRY
1	Manchester Metropolitan University ( <b>coordinator</b> )	MMU	UK
2	City of Reykjavik	RVK	Iceland
3	The Centre for Liberal Strategies Foundation	CLS	Bulgaria
4	The Paris-Lodron University	PLUS	Austria
5	The Technical University of Dresden	TUD	Germany



6	The Democratic Society	DEM	Belgium
7	Trilateral Research	TRI	Ireland
8	University of Helsinki	UH	Finland
9	Citizens Foundation	CF	Iceland

Table 1 Consortium Partners



## 2.0 Introduction

### 2.1 Goal of report

This document reports on the ethics monitoring work conducted in the second half of the PaCE project (August 2020 to April 2022). This work has been led by Trilateral Research (TRI) in collaboration with all PaCE partners. This report (D6.3) complements a first report on the first part of the project (D6.2).

The PaCE project was extended from 36 months to 39 months. The due date of this deliverable was extended allow for reporting on the ethics monitoring of all other tasks in the project.

The report is primarily written for the team at the European Commission that follows the project and for the reviewers to show that all ethics aspects are properly being managed and addressed in the PaCE project. It is also a public document to inform any interested party of the ethics monitoring work that is being conducted in the project. It might also be useful to researchers to ensure proper research ethics in their research projects, especially for projects concerned with the topic of populism and civic engagement.

D6.2 reported on the completion of EC ethics requirements (D8.1, D8.2 and D8.6), the project's ethics handbook (T6.1), and ethics monitoring work (T6.2) and consultation with stakeholders (T6.3). It also summarised the ethical, legal and societal issues processes as reported in D6.4 (ELSI of ICT tools) and D6.5 (ELSI of public engagement).

Ethics work conducted in PaCE in the second part of the project covered by this report (d6.3) includes the following activities:

- Ethics monitoring (T6.2)
- ELSI guidance in Policy Recommendations (T6.6)

## 3.0 Ethics Monitoring

In this phase of the project, the majority of live ethics issues had been identified and addressed. There remained a small number of pending items, either because a methodological process had not been defined earlier, or open issues had emerged as part of research activity. As such, ethics monitoring in this final phase of the project focused upon three main live activities: 1) the finalisation and publication of the project's online platform, the PaCE dashboard, 2) recruitment and data protection considerations for democracy labs, and 3) the human participant experimental



research on populism narratives conducted by TUD. The following sections address these in turn.

### 3. 1 PaCE dashboard

The PaCE Dashboard is an online tool built by the project that uses crawled internet data and machine learning for language recognition to show relative trends between different topics connected to populism, nativism and civic engagement, as published on the public-facing internet. The ethical, legal and societal issues for this tool, and how the tool should be built in a responsible and legal way were set out in D6.4. In this report, we address some remaining emergent legal and ethical issues, primarily a legitimate interest assessment for the tool and considerations about publishing real quotes on the tool’s website.

#### Legitimate interest as legal grounds for data processing

Every processing of personal data in the EU requires a legal basis. D6.4 provided argumentation for the use of public interest as the legal basis for the processing of personal data necessary to build and operate the tool. On further examination, we consider that legitimate interest would be a more appropriate legal ground. The reasoning for this change was provided in D6.2, changed in the publicly accessible version of D6.4 on the project website, and set out for the project reviewers in the mid-term project review. As part of this change, TRI supported CF to conduct a legitimate interest assessment (LIA) as required by the GDPR. Recording our LIA below also helps to demonstrate compliance in line with our accountability obligations under GDPR Articles 5(2) and 24.

#### First, identify the legitimate interest(s).

<p>Why do you want to process the data – what are you trying to achieve?</p>	<p>The processing allows us build and run an openly available online dashboard (“the PACE dashboard”) to reveal relative trends between different topics driving the online discourse regarding populism, nativism and civic engagement. The objectives of this are to:</p> <ul style="list-style-type: none"> <li>• To raise awareness on the part of the general public, policy-makers, as well as decision- makers of the existence, nature, and quantity of identified narratives around public grievances discussed publicly online and how these evolve;</li> <li>• For the public to reflect on what is considered to be a populist narrative and other related narratives; and</li> <li>• To highlight the potential legitimacy of grievances these narratives reveal without stigmatizing those who proffer them</li> <li>• To give access to the data to other researchers on populism and beyond, and to do this in a way which</li> </ul>
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	allows those researchers to understand what they are seeing and how they should reasonably and correctly interpret it.
Who benefits from the processing? In what way?	<ul style="list-style-type: none"> <li>• Project partners, having received funding as part of Horizon Europe under grant Agreement number 822337 to conduct research into contemporary populist politics and civic engagement, including to develop such a tool.</li> <li>• The wider political science and policy making community across the EU and beyond will gain access to a valuable research and data visualisation tool.</li> </ul>
Are there any wider public benefits to the processing?	Yes. The tool is openly and freely available to all. We hope this tool, and others like it, enable an abstracted social listening, free from any data mining profit motive, that one day provides complimentary data to traditional political polling. We understand an electorate much more intimately when we observe them passively as well as actively. We hope that in providing policy makers with this data, they will have the capacity for much greater understanding of what their constituents actually want from their government. We are also bringing forward narratives about political grievances that might otherwise be submerged.
How important are those benefits?	The importance of understanding prevalence and changes in populist attitudes and the problems citizens have with actually-existing liberal democracies, have been identified by the European Commission as sufficiently important to be worth funding research in this area. Much public and press attention has been paid to the impacts of populist narratives upon democratic legitimacy, processes, public trust and institutional legitimacy. We consider the public benefits to be more substantial than the individual benefits to partner organisations.
What would the impact be if you couldn't go ahead?	We would be unable to produce this analytical tool, and this would undermine both the contractual agreement with the EC and the achievement of the wider objectives of the project. The scientific and public education benefits for this part of the project would be lost.
Would your use of the data be unethical or unlawful in any way?	No, as we believe we have put appropriate safeguards in place to prevent this. We have conducted a detailed assessment of the ethics and legality of the activity as part of the project. This is published in deliverable D6.4 – Available at: <a href="https://popandce.eu/wp-content/uploads/2020/01/PaCE_6.4_ELSI-ICT-guidance-report_29Oct2019.pdf">https://popandce.eu/wp-content/uploads/2020/01/PaCE_6.4_ELSI-ICT-guidance-report_29Oct2019.pdf</a> We have had detailed debates about the appropriate use of public data, GDPR compliance, respect for privacy, data



	ownership and misuse, surveillance technologies, and potential for individual or social harm, and have produced design recommendations and methodology guidelines to prevent unethical or unlawful use of data. These discussions led to design recommendations which shaped the scope and design of the data processing activity.
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**Second, apply the necessity test.**

Does this processing actually help to further that interest?	Yes.
Is it a reasonable way to go about it?	Yes. The methodology for the processing activity is set out in detail here: <a href="https://docs.google.com/document/d/1-C6GJAY3GCI7nO_HUYaKKk07x5ydMAMMLMGESwldtpk">https://docs.google.com/document/d/1-C6GJAY3GCI7nO_HUYaKKk07x5ydMAMMLMGESwldtpk</a> In summary, the tool uses CommonCrawl, where we have the ability to scan crawls from every year, from 2013 to the present. CF and TUD developed search criteria, selecting for hundreds of keywords, that are then filtered through BERT based AI algorithms that have been trained to recognize the different topics. Common Crawl is a non-profit organization that crawls the web and freely provides its archives and datasets to the public. Common Crawl's web archive consists of petabytes of data collected since 2011. It completes crawls generally every month. Visit <a href="https://commoncrawl.org/">https://commoncrawl.org/</a> for more information. The PaCE project built an open source keyword scanner based on HyperScan, the fastest keyword scanner available. The PaCE CommonCrawl Scanner scans CommonCrawl datasets for keywords. The scanner scans the whole month of CommonCrawl data using Amazon EC2 c5n.16xlarge instances for hundreds of keywords in about 4 hours. More information on the scanning methods can be found at <a href="https://github.com/CitizensFoundation/pace-commoncrawl-scanner">https://github.com/CitizensFoundation/pace-commoncrawl-scanner</a>
Is there another less intrusive way to achieve the same result?	No. We believe that based upon our work on the ethical and legality of the activity, we have designed an approach that is the least intrusive possible whilst still providing insight.

**Third, apply the balancing test.**

By applying the balancing test (based on the questions below), we consider the impact of our processing and whether it overrides the interest we have identified.

What is the nature of your relationship with the individual?	No pre-existing relationship with individual data subjects. We do not have a relationship with these individuals as we do not process any names, contact details, usernames or strict identifiers for these data
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	<p>subjects. We do not seek to establish a relationship with individual data subjects.</p>
<p>Is any of the data particularly sensitive or private?</p>	<p>The data have originally been publicly published on the Internet then captured by the CommonCrawl search which only looks at pages marked as public on the Internet. Then CommonCrawl again publishes the resulting search data as a part of the Amazon S3 Public Dataset program which the whole world has access to.</p> <p>Our search does not include any private social media. The dataset is therefore largely news publishers, blogs or public comments on articles. So many data subjects would expect these statements to be public.</p> <p>We are processing sensitive personal data. Because of how we have trained the algorithm and produced the search terms, the statements that we count and display in the trend lines and quotes are likely to be expressions of political beliefs (or have the structure of political beliefs – we have no way of knowing the extent to which the authors of those statements <i>actually</i> hold those beliefs). They are not attributed to natural persons on our website, and the vast majority of statements are simply counted and an aggregate count is displayed as a trend line. In the way that we process them, these data subjects are essentially anonymous to the us data processors. We make no efforts to re-identify the authors of the selected statements. A small sample of the total corpus is displayed in the user interface to allow scientists looking at the trend data to better understand the underlying data for the different trends.</p>
<p>Would people expect you to use their data in this way?</p>	<p>Yes and No.</p> <p>As discussed previously, CommonCrawl looks at written text on public internet pages, blogs, comment sections etc – therefore these authors are in many cases explicitly communicating to the internet and its very wide audience. The tool essentially works in a similar way to a search engine, but targeted for specific keywords or phrases that we have identified as being of interest to the researchers. Search engines are a commonly used tool.</p> <p>Of course, some Internet users have little understanding about the potential secondary uses of data, and would therefore not expect this particular secondary use.</p>



<p>Are you happy to explain it to them?</p>	<p>Yes. All of our data processing activities are explained online with the tool; in a publicly available deliverable; and this report will also be made public. We have contact information posted on the tool’s website, and its designers are very happy to engage with the public and to assist them with any exercise of their data protection rights.</p>
<p>Are some people likely to object or find it intrusive?</p>	<p>Potentially. We are working in a politicised environment on a politicised topic, and people may object on political grounds. However, the visual design of the website, accompanying text, and how the research results are communicated has been done to convey that we respect the legitimacy of people to have opinions about political issues and to speak about them. We discuss and present these trends in terms of expressed grievances and do not convey approval or condemnation of them.</p>
<p>What is the possible impact on the individual?</p>	<p>For the vast majority of individuals there is no impact.</p> <p>The most significant impact for an individual is that they might come to find out that a research project has built a tool which in essence has labelled something they have written online as relating to one of the topics of interest to the project. They might feel discomfort if this label does not accord with their own understanding of their words.</p> <p>For this to happen, either an individual would have to encounter their own previously published words quote on the tool, or a third party would have to combine the publicly available quotes with other data sources to actively attempt to re-identify an individual as the source of one of those quotes, and would have to successfully reidentify that individual.</p>
<p>How big an impact might it have on them?</p>	<p>Low.</p> <p>Processed data is mostly displayed as aggregate trends lines.</p> <p>Data is not used by PACE to make any decisions or assessments about people. We do not identify individuals or use the data to learn more about them.</p> <p>The keyword creation involved using Google Search to refine keywords, the random quotes in the PaCE Dashboard are akin to the type of quotes as you get from a Google Search using similar keywords and do generally not contain personal data.</p>



<p>Are you processing children’s data?</p>	<p>Potentially. Given the pseudonymity of the processing, the data controllers cannot know this without collecting and processing further data, with greater impacts upon privacy. We are conducting no specific targeted collection of children’s data, and the machine learning was trained on adult political discourse.</p>
<p>Are any of the individuals vulnerable in any other way?</p>	<p>Potentially. Given the pseudonymity of the processing, the data controllers cannot know this without collecting and processing further data, with greater impacts upon privacy. We are conducting no specific targeted collection of data relating to vulnerable individuals.</p>
<p>Can you adopt any safeguards to minimise the impact?</p>	<p>Yes. The design of the processing includes several safeguards.</p> <p>Security of storage – the data and infrastructure supporting the tool are secured using appropriate technical and organisational measures to prevent unauthorised access.</p> <p>Anonymisation: The results of the data processing are visualised in aggregated form as a trend line at the level of the entire search, per year. This is a very high level of aggregation, sufficient to draw some inferences about population or societal level trends, but not about individuals.</p> <p>Data minimisation: The PaCE dashboard uses very specific keywords to search for paragraphs in the public CommonCrawl S3 dataset and only the results from those narrow searches are stored by the PaCE project. No personal contact data is captured by those narrow keyword searches so there is no personal contact data in the PaCE Dashboard database.</p> <p>Transformers-based AI algorithms are used to filter out any unwanted content and those algorithms require human training on close to a 100,000 random samples from the data. Our trainers were specifically tasked to mark paragraphs if personal contact data was found and it has been confirmed that no personal data has been found in the dataset through multiple rounds of human AI training.</p> <p>Only a small illustrative number of quotes are displayed on the web portal that are minimally sufficient for scientists looking at the trend data to better understand the underlying data for the different trends. Those random samples are important for scientists looking at the data to understand the nature</p>



	<p>of the data, what the topics are really capturing in the keyword search.</p> <p>We do not make full data results from the search tool public to minimise problematic re-use which could have further impacts on individuals.</p>
<p>Can you offer an opt-out?</p>	<p>Partially. If requested, we could remove a specific search result from our database (if an individual were able to identify the text searched). Given the scale of the common crawl search, and because we do not process any identifiers or contact information, we cannot offer <i>individuals</i> a pre-emptive opt-out from the common crawl data collection (although websites can amend their HTML to prevent automated collection).</p>

On the basis of this legitimate interest assessment, CF (and the PACE project) have concluded that the rights and freedoms of the relevant data subjects do not override the legitimate interest of the project partners in processing this data for scientific research, and that therefore this processing activity can proceed on the basis of legitimate interest.

### Republishing of potential special category data

One design change required an updating of the legal analysis from D6.4. The PACE dashboard accompanies its trend lines with example quotes drawn from the database. D6.4 recommended that search results should be presented in aggregate, rather than presenting all the search results that match the keyword search. This level of aggregation would serve as one safeguard for the data subjects. CF has subsequently presented a rationale for presenting a small number of illustrative quotes drawn from the database to illustrate, contextualise and make-sense of the trend line, and wanted to check that this was permissible.

We are considering the quotes to be potentially special category personal data. We are being cautious in this assessment – essentially, our aim with the search tool is to identify and count examples of certain types of political speech, expressing political beliefs. Political beliefs are one form of special category data. Normally it's not permissible to process special category personal data without one of several exemptions. The options are 1) The data is fully anonymous, so isn't personal data, 2) we have the consent of the data subject, 3) the data is manifestly made public by the data subject, or 4) purposes of scientific research. Proceeding in order, Anonymisation is a high bar and needs to take into account reasonable means that could be used to re-identify or de-anonymise the data. Whilst the data is anonymous for us during our collection and processing to make the tool work, when the quotes are published on the tool, there is a new risk that they could be de-anonymised. The



consent of the data subject is unrealistic given the scale of the processing. The data being manifestly made public by the data subject is one option, but this has been legally interpreted as requiring positive action, not assuming that all internet users have a full knowledge of how findable/searchable posts are. The final basis is for purposes of scientific research, which given the objectives and nature of the project likely provides our strongest ground. Because this type of data is of higher sensitivity, we need to 1) demonstrate why we cannot meet our scientific objectives without using special category personal data, 2) show how our use is proportionate to our aims and 3) show how we respect data subject rights, including providing appropriate safeguards. The necessity and proportionality considerations for general processing have been included in the legitimate interest assessment above, which has been rewritten to include and cover the presentation of quotes from the search.

The scientific objective for providing random samples of quotes from different topics from CommonCrawl in the user interface is to allow scientists looking at the trend data to better understand the underlying data for the different trends. Those random samples are important for scientists looking at the data to understand the nature of the data, what the topics are really capturing in the keyword search. They contribute towards providing context for scientific users and towards algorithmic transparency. The randomness (pulling different search results from the database each time the page is refreshed) strikes a balance between openness and protection of the data.

In PACE D6.5. ELSI guidance on public engagement<sup>1</sup>, we provided examples of principles for political information visualisation and feminist data visualisations. Presenting examples of the type of content being counted by the trend line visualisation on the dashboard supports disclosure of design and presentation decisions<sup>2</sup> and the importance of not separating data from context as advocated by Feminist data visualisation.<sup>3</sup>

The random quotes provided on the PaCE Dashboard websites have originally been publicly published on the Internet then captured by the CommonCrawl search which only looks at pages marked as public on the Internet. Then CommonCrawl again publishes the resulting search data as a part of the Amazon S3 Public Dataset program which the whole world has access to. The additional risk posed by the publication is therefore low.

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<sup>1</sup> Nickel, N., Barnard-Wills, D., Resseguier, A & Bjarnason, R., *ELSI guidance on public engagement*, PACE Project D6.5, 31 January 2020.

<sup>2</sup> <https://mariandoerk.de/criticalinfovis/altchi2013.pdf>

<sup>3</sup> Feminist Data Visualization, Catherine D'Ignazio and Lauren F. Klein  
[https://static1.squarespace.com/static/574dd51d62cd942085f12091/t/5c157dfe562fa7836b296000/1544912383037/Feminist\\_Data\\_Visualization.pdf](https://static1.squarespace.com/static/574dd51d62cd942085f12091/t/5c157dfe562fa7836b296000/1544912383037/Feminist_Data_Visualization.pdf)



In terms of additional safeguards, The PaCE dashboard uses very specific keywords to search for paragraphs in the public CommonCrawl S3 dataset and only the results from those narrow searches are stored by the PaCE project. No personal contact data is captured by those narrow keyword searches so there is no personal contact data in the PaCE Dashboard database. The keyword creation involved using Google Search to refine keywords, the random quotes in the PaCE Dashboard are akin to the type of quotes as you get from a Google Search using similar keywords and do generally not contain personal data.

The project considered the use of static pre-selected quotes which we were confident contained no personal data, but it has been considered that this would not provide an accurate representation of the database. Instead, we are using a filter to ensure personal data associated with any search results are filtered out and not presented on the tool. Transformers based AI algorithms are used to filter out any unwanted content and those algorithms require human training on close to a 100,000 random samples from the data. Our trainers were specifically tasked to mark paragraphs if personal contact data was found and it has been confirmed that no personal data has been found in the dataset through multiple rounds of human AI training.

In conclusion, publishing randomly selected quotes in this manner does slightly increase the risk to data subjects, but not to the extent that it invalidates the legitimate interest basis for data processing in general. We consider the processing of special category data in this manner to be in line with scientific research purpose, and permissible given the safeguards in place.

### **3. 2 Local and European Democracy labs**

From September 2019 until August 2021 The City of Reykjavik, in collaboration with the Democratic Society, Brussels and Citizens Foundation, Iceland organised and carried out seven Democracy Labs across different countries in Europe: Italy, Iceland, Spain, Scotland, Hungary, Poland and Bulgaria, with a total of 150 participants. A Local Democracy Lab is a ‘deliberative’ participation event which gathers people to discuss the condition of democracy in different European countries through the lens of present challenges. The pilot took place in Messina, Italy in September 2019, the following five Democracy Labs were carried out online, due to the Covid-19 pandemic. The final Democracy Lab in Bulgaria took place in-person in July 2021, due to lesser Covid-19 restrictions.

These activities warranted ethical oversight because they involve human participants, who we are asking to give up their time, to discuss politically sensitive topics with us





and with each other, in a group environment. Accordingly, each of the organising project partners have secured ethical approvals for this activity.

### **3.2.1 Recruitment and data protection considerations for democracy labs**

The methodology for the Local democracy labs is set out in D5.5. The methodology document addresses how the PaCE consortium managed a number of ethical considerations for the labs, including proposed principles guiding the labs (equality, neutrality, non-partisanship, research-based, respect & transparency); the role and responsibilities of the CSO partner organisations helping to deliver the events; informed consent procedures; data collection and GDPR compliance; how research data would be used; selection criteria for participants, opt-outs from filming and recording; biases in qualitative research; and a risk assessment.

In preparation for this methodology RVK and DS consulted TRI as Task 6.2 lead on issues relating to recruitment, informed consent and data protection. As part of this discussion, a revised online consent form was developed to adapt to the online format necessitated by the Covid-19 pandemic. The consent form for the European Democracy lab is presented below. Additionally, a data and consent management approach was recommended that kept the transfer of personal data of event participants between partners to a minimum (in most cases, recruitment was conducted by local partners who processed the personal data of attendees locally).  
Informed consent form (online) for European Democracy labs



## European Democracy Lab Participant consent form

By signing this form, I understand that I am consenting to participate in the European Democracy Lab on 19 November 2021, organised as part of the Populism and Civic Engagement (PaCE) project funded by the European Union (Grant Agreement number 822337) and co-ordinated by the Manchester Metropolitan University (MMU).

European Democracy Lab is organised by Democratic Society (Demsoc), Belgium, and the City of Reykjavik, Iceland, the Department of Service and Innovation of the Municipality of Reykjavik.

The objective of the European Democracy Lab is to assess public attitudes and trust in government, identify ways to encourage democratic participation, and understand how traditional and social media influence people's opinions across Europe.

dauidalexanderwills@gmail.com [Switch accounts](#)



\*Required

Email \*

Your email address



**By signing this form, I confirm that I understand the following:**

- My participation involves group discussion. I understand that I may be asked to provide personal views and that my involvement in the research will be kept confidential, unless agreed otherwise.
- I am participating in these activities voluntarily, and I am free to end my participation at any time. I may refuse to answer any questions.
- I have the right to ask questions and receive clear answers before deciding to participate.
- If I consent to it, I may be photographed or filmed. These videos and photos may be used after the event for dissemination purposes in the reports, on social media or on the PaCE website ([www.popance.eu](http://www.popance.eu)).
- I understand that all the original data provided will be deleted five years after the project funding comes to an end, according to Article 18 of the PaCE Grant Agreement with the European Commission, unless other legislation requires earlier deletion. I understand that I can request a copy of the data I have provided.
- The legal basis for processing my personal data is my consent. I can withdraw my consent at any time. I am aware of my right to request access to my personal data processed by the PaCE project team, as well of my right to request rectification of my personal data, as well as its erasure. I am aware of my right to request the restriction of my personal data processing and of my right to lodge a complaint with a supervisory authority.
- Personal information received will be stored in separate files in a secure manner (including password protection where required) by the organisation leading the concerned activity. When the information I provide is used for the writing of the report, the consortium will remove my name and all identifying features of that information so that my identity and experiences remain confidential (unless attribution is required and I have consented to it). Under the General Data Protection Regulation 2016/679, PaCE has an obligation to inform me of the purpose of the collection, use, storage and retention of the information I have provided. I understand that the project will only collect information that is relevant to its activities. The project will not transfer my personal information to third parties (i.e., people outside the project).
- My responses may result in incidental and secondary findings, i.e., some information that was not the focus or primary purpose of the question(s). In such cases, I understand that I may opt out of my consent for PaCE's use of the incidental findings. Otherwise, I understand that PaCE will manage the incidental findings in the same way as the principal findings, i.e., that the information will be deleted within five years after EU project funding comes to an end and that any use of such information will be anonymised.
- I have been given the contact details of the research team and I have been informed that I am free to contact: Roxana Elena Cziker, City of Reykjavik, Iceland [roxana.elena.cziker@reykjavik.is](mailto:roxana.elena.cziker@reykjavik.is), as PaCE project manager and Bruce Edmonds, PaCE Data Protection officer, with any queries relating to my data or the project itself by email: [bruce@edmonds.name](mailto:bruce@edmonds.name) or telephone +44 161 247 6479.



I confirm that I have read the information sheet above and that I agree to participating in the European Democracy Lab. \*

YES

I consent to the project team contacting me, if required, as a follow-up to the research/engagement activity. \*

YES

NO

I consent to being photographed or filmed during or after the event and for these photos and videos to be used for dissemination purposes on the project website, report, and/or PaCE social media account (Twitter, Facebook, YouTube). \*

YES

NO

Participant's full name \*

Your answer \_\_\_\_\_

Send me a copy of my responses.

Submit

Clear form

### 3.2.2 Emergent ethical issues

PaCE D5.3 presents lessons learned from the local democracy labs. In particular the report highlights the importance of focused and specialised recruitment to achieve a diverse group of participants; the importance of the role of facilitator(s) in actively managing the event and supporting those unfamiliar with technological tools;



The PaCE partners informed us that with every local democracy lab they had made some changes to the questions asked to participants, based on the advice and expertise of the local partners who knew the local context. These changes usually concerned wording. For example, the biggest changes were made with the Scottish chapter of the Democracy Lab; Demsoc colleagues from Scotland advised that the original questions about the consequences of the pandemic might be too difficult to handle for traumatised participants. Therefore, they geared the conversation towards media narrative about the pandemics and how the authorities in the UK and Scotland managed the pandemic crisis in different ways. In Hungary, the name of the Democracy Lab has been changed into "Közéleti Labor" - "Public issues Lab". Other than this, the organisers reported no emergent ethical issues during the labs.

This research activity is now completed, and ethical monitoring can be closed.



### 3. 3 Populism narrative experiments

#### **Task 3.5: testing the effects and counter-effects of selected narratives in online experiments, Task lead TUD, contributors, PLU, CLS, UH, CF (M24-36 extended to M39)**

Task 3.5 involves a between-groups survey methods experiment, delivered online. Participants are exposed to a set of different stimuli and asked follow-up questions, to determine if the difference in stimuli makes any difference in their responses. The stimuli are different narratives taking the form of a fictional social media post (either a control, a populist narrative, a liberal narrative, and both populist and liberal narratives). Participants are then asked a series of questions about their behaviour – for example, would they “like” this post, share it with others, do they agree with it, and do they believe this post would motivate any offline actions. The participants are then offered a debrief where it is explained that the post they were shown was fictional and not related to any real-world politician or political party. Participants are also asked to self-describe their political affiliations on left-right spectrum and six questions from a validated survey methodology for assessing populist attitudes. Full details of the experimental design and the results of the study are presented in PaCE D3.3.

To ensure that the experiment gets a representative sample (for Germany, and online) used a professional external provider, who included the project’s experimental question set within a wider set of questions put to an online panel of recruited volunteers. The provider has its own ethics process, including informed consent, and is the data controller for any processing of personal data. An advantage of this approach is that PACE partner organisations will process no personal data for this experiment – participants are anonymous for the experimenters. This model has been discussed with the Data Protection Officer (DPO) at TUD who confirms that from their perspective, TUD is processing no personal data. A contact for TUD was provided to the participants at the start of the survey and will be repeated as part of the debrief.

The study does use a mildly deceptive design, in that participants are not informed that the social media post they are being shown is fictional until the debrief. The debrief occurs immediately after the questions are asked. The potential for negative impact upon research participants is low. A fictional post is used because it allows the experimenters to use exactly the right wording in test and control posts. A between-groups design requires the ability to create small changes in the experimental stimuli, and hold other aspects constant, which would not be possible using naturally occurring real posts. The participants are only informed of the deception after they have answered the question as the experimenter need the participants to act as if they are



engaging with real posts, as to not distort their answers. The potential impact of the mild deception is very low.

The method raises low risks to participants because:

- Participation is entirely voluntary, with no coercion or power imbalances between participants and recruiters, and there are no consequences for non-participation or withdrawal. Participants in the survey are able to skip questions, or withdraw.
- Participation (and resulting data) is fully anonymous from the perspective of the researchers. PaCE researchers cannot re-identify any participants.
- The intervention itself has a very low potential for harm to the participants.

In D8.2 it was stated that TUD would seek institutional ethical approval for this research as they got closer to the start date of the relevant tasks. TUD has confirmed to TRI that they have subsequently discussed the proposed research activity with their institutional ethics committee, and have confirmation that this type of research activity does not require formal full ethical review from TUD because it has low risk of harm to participants or their dignity. TUD provided an approval letter from the TUD ethics committee. In approving the research, the TUD ethics committee made some additional recommendations for minor changes to the research design, which were implemented. The TUD DPO also confirmed in writing that the risk from the activity to data subjects was low and that the provisions of the GDPR were being complied with. A pre-test of the experiment has been conducted and no ethical problems were identified during this test, and not ethical issues were reported during the survey research itself.

This research activity is now completed, and ethical monitoring can be closed.



## 4.0 ELSI guidance in Policy Recommendations

It is an increasingly established good practice to identify and then address ethical, legal, and societal issues that emerge from research activity, and in particular from the outputs of research processes. This is part of responsible research and innovation (RRI). It is distinct from *research ethics*, which focuses mostly upon the ethics of the process of conducting research. An ELSI analysis looks at the potential ELSI impacts of the research *outputs*. For PACE there are three key outputs: ICT tools related to the identification, analysis and exploration of populist narratives, public engagement activities, and policy recommendations. The PACE project was designed to conduct an ELSI analysis of each of these activities, to feed into the activity at an early stage, so as to improve the ethical character of the output. The ELSI analysis for the projects ICT tools was reported in D6.4, and the ELSI analysis for the project's public engagement activities was reported in D6.5

Deliverable D6.6 presents ethical, legal and social recommendations in the context of policy recommendations made by the project. This deliverable was originally intended for delivery at M36. However, given that PACE was due to produce policy recommendations earlier than this across various other tasks, TRI recommended it would be most useful to examine the ethical, legal and societal issues well in advance so that this could inform the development of the project's policy recommendations. Therefore, an initial draft of the deliverable was complete by December 2020 (1 year in advance) and circulated in the consortium for comment and review, to support the drafting of the project's policy recommendations.

A webinar presentation on the ELSI issues surfaced in the deliverable was part of the PACE conference in November 2021. Input from the participants in the session was incorporated into the final version of the deliverable submitted at M36 alongside this report.





## 5.0 Conclusion and recommendations

This report concludes the ethics monitoring task T6.2, and documents how the final remaining ethics issues have been resolved.

We remind project partners that they are still bound by the grant agreement, and should retain copies of all relevant ethics documentation (e.g. ethics approvals) in case of audit or if requested by the EC.

Similarly, we remind project partners of the principles the project adopted at its kick-off meeting, as set out in the Ethics Handbook, D6.1.