

D6.2: PaCE Ethics report (Period 1)

[WP6 – Ethics]



This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 822337.



**Populism and
Civic Engagement**



1.0 About this document

Work Package 6 Lead: Trilateral Research

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Due Date of Deliverable: 31 July 2020

This document reports on the management of ethical aspects and issues throughout the first half of the PaCE project, i.e., from the start of the project in February 2019 (M1) to July 2020 (M18).

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/CONTRIBUTOR
0.1	20 July 2020	Initial version	Trilateral Research
0.2	27 July 2020	Finalisation of revisions	Trilateral Research
1.0	28 July 2020	Final version submitted to the EC	Trilateral Research

The working language of this document is 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 analyses, in detail, the type, growth and consequences of such movements in terms of their particular characteristics and context. From this, it analyses the causes of these movements and their specific challenges to liberal democracy. In particular, it focuss 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 proposes responses to these challenges, developing risk analyses for each kind of response, movement and transition. To this end, it employs the agent-based simulation of political processes and attitudes to allow for thorough risk analyses to be made. Throughout the project, it engages 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 develops 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 (coordinator)	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

This document reports on the ethics work conducted in the first half of the PaCE project (Feb 2019-July 2020). This work has been led by Trilateral Research (TRI) in collaboration with all PaCE partners. This report (D6.2) covers the first period of the project and will be complemented by a second report (D6.3) due at the end of the project to cover the second period. Since this report is written after the first periodic review, some of the activities it covers have already been formally reported on as part of the periodic review report that was submitted in March 2020.

It 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 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.

Ethics work conducted in PaCE since the start of the project includes the following activities that are detailed in this report:

1. Completion of EC additional ethics requirements (D8.1, D8.2, D8.6)
2. Ethics Handbook (T6.1)
3. Ethics Monitoring (T6.2)
4. Consultation with stakeholders (T6.3)
5. ELSI processes (T6.4, T6.5, T6.6)

3.0 Completion of EC additional ethics requirements

The EC has added three ethics¹ requirements to the project:

1. D8.1: H – Requirement No. 1 (informed consent)
2. D8.2: H – Requirement No. 2 (ethics opinions/approvals)
3. D8.6: M – Requirement No. 7 (Risk assessment and details on measures to prevent misuse of research findings)

3.1 D8.1: H – Requirement No. 1

“The informed consent procedures that will be implemented for the participation of humans must be submitted as a deliverable.”

The informed consent procedure for the participation of humans in the project has been submitted as a deliverable (D8.1). The informed consent procedure had initially been developed in the Ethics Handbook (D6.1). Templates of the informed consent form and of the information sheet were developed and are available to partners for use in their activities involving human participants. As part of its Ethics monitoring task (T6.2), TRI is closely following the proper implementation of the informed consent procedure and supporting partners when necessary (see Ethics Monitoring section of this report related to tasks involving human participants – section 5).

Many of the planned activities involving human participants (e.g., the democracy labs) are being adapted to take place virtually due to the impact of the COVID-19 pandemic. The informed consent documentation for these activities is being adapted by the responsible partners with support from TRI to take into account these changes.

3.2 D8.2: H – Requirement No. 2

“Copies of opinions/ approvals by ethics committees and/ or competent authorities for the research with humans”.

¹ Other WP8 requirements concern data protection.



TRI has been collecting copies of opinions/approvals by ethics committees and or/competent authorities for the research with humans and has been supporting partners to complete this requirement. These have been reported on in D8.2. An early version of D8.2 was submitted in November 2019. However, since it was still early in the project, a number of partners had not yet obtained the relevant documents. An updated version of D8.2 has been submitted in June 2020 following a request from the mid-term review. It includes copies of all ethics opinions/approvals received and a summary of the status of this requirement for each partner. This summary is copied in Annex 1 of the present report.

In brief, the majority of partners whose activities in PACE require such approval or opinion have it, with two partners where the approvals process is still in progress.

3.3 D8.6: M – Requirement No. 7

“Risk assessment and details on measures to prevent misuse of research findings”.

D8.6 was submitted as a deliverable in July 2019. It was prepared by the city of Reykjavik with the support of TRI.

These risks and the measures PaCE identified to prevent misuse have been integrated to the ethics touchpoint table that TRI is using to monitor ethical issues in the project with partners (for further details on this table, see Section 5.0).

4.0 Ethics Handbook (T6.1)

The Ethics Handbook (D6.1) has been submitted in March 2019. It outlines the research ethics obligations both in the conduct of the project as well as in the results the project produces. It highlights the various legal, contractual, and ethical rules governing PaCE, potential ethical issues that may arise in the project and measures to mitigate these risks, and the ethics control process in the project (including the informed consent procedure). All partners have access to the Ethics Handbook on the project’s shared drive and TRI has presented on the handbook at the consortium meeting in Brussels in June 2019. It serves as the starting point for discussions with partners through the ethics monitoring work.

The Ethics Handbook has been updated in May 2020 and again in July 2020 following feedback from the mid-term review requesting additional details. The first version of the Handbook that was submitted in March 2019 was missing details of some activities involving human participants as the detailed methodology for these activities had not yet been developed.

As indicated in the Ethics Handbook, the consortium decided against the idea of appointing an ethics committee for two reasons:

- (1) we do not consider that the project involves any major ethical risks both in terms of the conduct of the project and the potential implications of its results; and
- (2) tasks specifically designed to address emerging ethically issues are planned in the project, including a consultation process with a wide range of different stakeholders (Task 6.3) who will help the consortium gain different views on these potential issues and ways to handle them.

However, the project designated an ethics advisor: David Wright (Trilateral Research) to assist the consortium with any emerging ethical issues and to ensure the ethics process is handled appropriately and an ethics officer Anais Resseguier (Trilateral Research) to conduct day-to-day ethics-related activities.

5.0 Ethics Monitoring (T6.2)

TRI is responsible for the ethical monitoring of the project with a dedicated task that runs throughout the project’s duration. As part of this task, TRI has developed an “Ethics touchpoint table” in which it keeps track of all potential ethical issues that could emerge in each task of the project. For each task, it has developed mitigation measures to implement in the project. TRI has shared this table with the consortium in order to raise partners’



awareness of these potential risks and to put in place measures to avoid them. TRI has presented this work to the consortium at the meeting in Salzburg in January 2020. TRI also conducted individual discussions with task leaders about the ethical issues raised in tasks they are responsible for. This discussion covered the status of their ethics approval/opinion, the informed consent procedure when they led activities involving human participants, and any other ethics issues that their project might raise.

The table below presents the main topics covered during these discussions that took place through Skype. The last discussion that was held was with the Coordinator, MMU, to whom we reported on these discussions that took place with each partner.

Discussion with:	Date (in 2020)	Topics covered
DemSoc	27 April	<ul style="list-style-type: none"> - ethics approval/opinion (incl. potential need to go back to committee in case of substantial changes to democracy labs because of pandemic) - ethics touchpoint table - main issues related to changed democracy labs plan related to pandemic
RVK	28 April	<ul style="list-style-type: none"> - ethics approval/opinion - Ethics touchpoint table - need for new methodology for Democracy labs - DMP review and update (data storage locations)
CLS	11 May	<ul style="list-style-type: none"> - ethics approval (incl. potential need to go back to committee in case of substantial changes to focus group because of pandemic) - ethics touchpoint table - main issue related to interviews with populist party leaders (including informed consent procedure)
CF	12 May	<ul style="list-style-type: none"> - ethics approval/opinion - ethics touchpoint table - narrative search work on going - how to support transparency of ICT tools
UH	26 May	<ul style="list-style-type: none"> - ethics approval/opinion - ethics touchpoint table - discussion related to use of the term 'populism' in the project - Policy-maker dissemination.
PLUS	14 July	<ul style="list-style-type: none"> - ethics approval/opinion - ethics touchpoint table
TUD	15 July	<ul style="list-style-type: none"> - ethics approval/opinion: to be requested when T3.5 methodology is in place. - ethics touchpoint table - T3.5 methodology development - Informed consent procedure - issue of stigmatisation
MMU	20 July	<ul style="list-style-type: none"> - ethics approval/opinion - ethics touchpoint table - ethics issues related to presentation of simulate results. - MMU's coordination role (including overview of partners' ethics approval)

Table 2 Ethics discussions with PaCE partners in 2020

As part of this monitoring, TRI is also keeping track of PaCE research tasks involving human participants to ensure proper informed consent is collected. The table below (developed for the Ethics Handbook and updated in later version of the Ethics Handbook) presents a timeline of these tasks.



MONTHS	TASKS INVOLVING HUMAN PARTICIPANTS								
M1	T6.3	T4.1							
M2									
M3									
M4									
M5									
M6									
M7									
M8									
M9									
M10									
M11									
M12									
M13									
M14									
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M25									
M26									
M27									
M28									
M29									
M30									
M31									
M32									
M33									
M34									
M35									
M36									

Table 3 Timeline of tasks involving human participants.

Over the second part of the project, TRI will keep monitoring the project from an ethical standpoint. It will focus its attention and provide ethical support to partners conducting activities involving human participants, especially the Democracy Labs and the experimentation in T3.5. It will also continue the work initiated by the ELSI research on the ICT tools (T6.4) together with CF, especially with regards to the ethical aspects pertaining to the design of the public website. Finally, TRI will keep regularly reporting to partners on ethics aspects in the project, including at each consortium meeting remaining.

6.0 Consultation with stakeholders (T6.3)

As part of this task, DEMSCOC, RVK, and TRI IE have conducted a series of interviews (8) and a workshop (14 participants) with relevant stakeholders from various backgrounds, perspectives and roles. As part of this task, we spoke for instance to political scientists, ethicists, educational psychologists, advocacy actors, political psychologists, journalists, etc. The main objective of this task was to reach out beyond the members of the consortium to make sure we engaged with a variety of perspectives on the topic under study. The results have been presented at the Consortium meeting that took place in Brussels in June 2019, have been inserted in other reports produced as part of WP6, and have fed the project as a whole.

No official report has been attached to this task, but a report collecting the results of the workshop organised by the City of Reykjavik has been produced and shared with partners. Key points that came out of this discussion include the following:

- Negative framing of the label “populism” and the implications this framing might have on the research project as a whole (including access to a diversity of viewpoints or risk of denying legitimacy to citizens’ calls for changes).
- Challenges related to the AI tools developed in the project and the biases that might be engrained into them and related implications.
- Challenges related to ensuring an effective exploitation of the results.
- Need to address root causes of populism and not only its most visible and often polarizing expressions. This includes addressing what might be legitimate calls for change, including for more democratic political processes, policies to fight rising inequalities, etc. The anger that animates people who vote for populist parties can be destructive when leading to more division and violence, but it can also be constructive when requiring necessary changes to society. When engaging on the topic of populism, one should make sure to pay attention not to further exacerbate the destructive anger and actually listen to the constructive one that can lead to necessary changes.

7.0 Ethical, Legal and Societal Issues (ELSI) processes

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.

7.1 ELSI of ICT tools (D6.4)

The report D6.4 – ELSI guidance on ICT tool has been delivered and submitted to the EC platform. As part of T6.4, DemSoc and TRI have engaged in a dialogue with the CF who is developing technical tools to crawl the internet to identify populist narratives and to present the results of this search to the public and policy-makers. DS and TRI have worked with CF to identify potential Ethical, Legal and Social Issues (ELSI) that could be raised by the ICT tools created as part of the PaCE project and to provide recommendations for their development. These recommendations can also serve as guidance for other consortia or organisations designing similar tools involving web-based data analytics and the deployment of machine learning for political sentiment analysis and in support of public democratic engagement.



The analysis of potential ethical, legal, and social issues that may arise in the development of tools to crawl the internet for populist narratives has contributed positively to the creation of these tools. Indeed, it has helped identifying potential issues that these tools may raise and to mitigate them. The identified issues include issues of privacy and surveillance, risk of stigmatisation of internet users with populist views, risk of further polarisation between “populists” and “liberals”. This ELSI analysis has influenced the development of the web crawling tool as well as of the public website that will present the results of the search on populist narratives. It has also sensitised PaCE consortium partners to these issues.

TRI will keep following up on this work as part of the ethics monitoring task (T6.2).

D6.4, section 5.2 (pages 29-30) included a discussion of the potential legal basis for the processing of personal data in these tasks. Following the submission of the deliverable, and based upon experience subsequently gained from other activities outside the project, TRI has revised its assessment of the appropriate legal basis. Previously, the project expressed that it intended to rely upon public interest (Article 6,1,e) in relation to the processing of personal data in the web-scraping activities in Task 3.3 and 3.4. We now believe that legitimate interest (Article 6,1,f) combined with a purpose of scientific research (Article 9,1,j) and the fact that any special category data we process will have been manifestly made public (Article 9,2,e) to allow for the processing of special category data potentially collected, provides the most appropriate legal basis for processing personal data in the course of these activities. Whilst PaCE is carrying out tasks in the broad public interest, this basis typically requires a more direct link between the public interest and the activity. Relying upon legitimate interest of the partners (as research institutions with a legitimate interest in conducting research activity), appropriately balanced against the rights of the data subjects through a legitimate interests assessment, and protected by the safeguards and measures that were already anticipated in D6.4, provides a stronger legal basis for processing this personal data. The rights of the data subjects, safeguards and mitigation measures to protect these, as discussed in section 5.2, remain the same as before.

The public version of the deliverable hosted on the project website will be updated to include this revised legal basis in order to meet the transparency requirements of the GDPR.

7.2 ELSI of Public Engagement (D6.5)

The report D6.5 ELSI guidance on public engagement has been delivered. As part of T6.5, DemSoc and TRI have explored the potential risks around public engagement on the topic of populism and civic engagement, and its potential impact on individuals and communities across Europe. It has done so to ensure these are mitigated in the PaCE project. The results of this task have been summarised in D6.5 and will serve as guidance for the PaCE consortium to develop its public engagement and can also be used as a guidance for other organisations or similar research consortia.

The analysis of potential ethical, legal, and social issues that may arise in PaCE public engagement activities has contributed positively to these initiatives. In particular, it has further expanded and specified the need for a dialogic approach to public engagement practices (rather than an engagement based on the idea of a deficit on the part of the public that expert would need to fill). The view on public engagement as being a one-way process (the expert bringing knowledge to the general public) has been identified as the key risk of public engagement. It was shown that this risk is particularly exacerbated in populism studies considering that populism is often a reaction toward the elite (the experts being generally viewed as being part of this group). This ELSI analysis is reported in D6.5 and has been presented to consortium partners to raise their sensitivity toward this issue.

7.3 ELSI of Policy Recommendations (D6.6)

The third ELSI task concerns Policy Recommendations that will be elaborated in the project on the basis of project’s results. This task runs from July to October 2020 and aims at identifying potential ethical, legal and social issues related to policy recommendations in PaCE and at providing mitigating measures to these issues for the



PaCE project. As the other ELSI tasks, it also aims at providing guidance to other projects similar to PaCE. The plan for this task was presented at the online consortium meeting held on 24-25 June 2020.

It is a four-stage process.

1. First, TRI will carry out a literature review on the ethical, legal and social issues that may emerge in elaborating and disseminating policy recommendations in a project such as PaCE.
2. TRI will then engage with other PaCE partners involved in drafting PaCE policy recommendations (i.e., CLS, UH, and other interested partners) to identify more specifically the plans in PaCe in terms of the type of policy recommendations that will be elaborated in the project, the way they will be elaborated, and the way they will be communicated to specific policy actors (including the identification of relevant policy actors).
3. On this basis, TRI will develop a more detailed ELSI analysis of policy recommendations. This analysis will then be shared with partners and discussed in an online workshop with all consortium partners in September 2020.
4. Final stage will consist in the drafting of the report to be submitted at the end of October 2020.

Once the report is finalised, TRI will keep following up on this work as part of the ethics monitoring task (T6.2) and ensure that the guidance formulated in this report (D6.6) are followed.

8.0 Next steps

Next steps of the ethics work in PaCE include the following:

- ELSI of policy recommendations,
- Continue the ethics monitoring of the project, especially following activities involving human participants, the web crawling, and the experimentation in T3.5,
- Ensure that ethics issues and considerations remain an agenda item on all full consortium and management board meetings,
- Report on all ethics activities conducted in the Ethics Report for Period 2 (D6.3) at the end of the project.

Annex 1: Status of copies of opinions/approvals by ethics committees and/or competent authorities for the research with humans (D8.2)

Partner organisation	Opinion/approval/letter delivered by	Position of the person/committee	Date of letters	Notes	Status	Documentation in Annex of D8.2
CLS	Vessela Tcherneva	Deputy Director of European Council for Foreign Relations and Head of ECFR –Sofia; Chair of Ethics commission, Advisory Board of CLS	15-Jan-20	Approval for activities involving human participants	Complete	Letter attached
DemSoc	Dr Catherine Howe Prof Graham Smith Jonathan Flowers	Members of DemSoc ethics board	July-Aug 2019	Approval for all activities of DemSoc in PaCE	Complete	3 letters attached
UH	Aura Kivilaakso	Secretary of the Ethical Review Board in the Humanities and Social and Behavioral Sciences at the University of Helsinki	22-May-20	Letter from the Secretary of the ethical review board at UH saying that UH does not require researchers conducting the type of research UH is doing PaCE to go through ethics review.	Complete	Letter attached
MMU	N/A	Business and Law Research Ethics and Governance Committee	29-Mar-19	Application "reviewed by the Business and Law Research Ethics and Governance Committee and, on the 29/03/2019, was given a favourable ethical opinion."	Complete	Letter attached
PLUS	Frank Wilhelm	Ethics Committee of the Paris Lodron University Salzburg	21-Oct-19	Approval for all activities of PLUS in PaCe	Complete	Letter attached

	PaCE					
TUD	Constanze Mullender	Ethics Committee of TUD	11-Mar-19	Correspondence between PaCE partner and university ethics committee indicating that, according to TUD rules, approval from the committee is not required at the moment but approval will be necessary for T3.5 and will be sought in time and kept on file should the Commission need it.	In process	Correspondence attached
TRI	Agata Gurzawska Mistale Taylor Adam Panagiotopoulos	Ethics Committee of TRI	28-May-20	Official letters received	Complete	3 letters attached
CF			05-Jun-20	Not required by law and organisational process. No ethics committee in place.	Complete	Letter attached
RVK				Seeking through the University of Iceland	In process	Letter attached



This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 822337.

