

mInimize coSts and mAximize Benefits in the transitionary European regional Labour markets

ISABEL Deliverable 6.1: Societal, Legal, Privacy and Ethical Requirements and Monitoring

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The ISABEL project has received funding from the European Union's Horizon research and innovation actions program under grant agreement No 101177687

DOCUMENT ID	D6.1
DUE DATE	30/06/2025
DELIVERY DATE	30/06/2025
WORK PACKAGE	WP6
TASK(S)	T6.1
DISSEMINATION LEVEL	Public
VERSION	V3 - Final
AUTHOR/S	Xaquín S. Pérez-Sindín
FILENAME	ISABEL_WP6_D6.1_v03

Abstract

This deliverable presents the societal, legal, privacy, and ethical foundations guiding the ISABEL project. It outlines the relevant European and national legal frameworks, with particular emphasis on data protection (GDPR), AI ethics, and research involving human participants and vulnerable populations. The report provides a comprehensive analysis of how ISABEL ensures compliance through legal alignment, ethical protocols, and internal governance mechanisms. Special attention is given to activities conducted in non-EU countries, the protection of personal data, and the responsible use of AI. A preliminary impact assessment is included to identify potential risks, ethical challenges, and mitigation strategies, ensuring the project upholds integrity, transparency, and trust throughout its implementation.

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Versions

Version	Date	Author / Organisation	Description
1	14/06/2025	Xaquín S. Pérez-Sindín / University of Copenhagen (UCPH)	1st Version
2	25/06/2025	UCPH	2nd Version
3	30/06/2025	UCPH	Final

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Executive summary

Deliverable D6.1 provides a comprehensive review of the ISABEL project's approach to societal, legal, privacy, and ethical compliance. It details how ISABEL aligns with the European Union's legal frameworks—including the General Data Protection Regulation (GDPR), the forthcoming EU Artificial Intelligence Act, and applicable national laws across all partner countries.

The report addresses five key thematic areas:

- Engagement in non-EU countries
- Protection of personal data
- Research involving vulnerable populations
- Ethical considerations in artificial intelligence
- Involvement of human participants in research

The deliverable outlines internal mechanisms such as partner training, the designation of compliance roles, ethics oversight structures, and risk monitoring strategies. A preliminary impact assessment evaluates potential ethical and legal challenges, offering mitigation strategies and compliance recommendations.

By implementing a proactive and transparent ethics framework, ISABEL ensures that all project activities are legally compliant, ethically sound, and aligned with the values of inclusivity, human rights, and social responsibility. This document sets a robust foundation for ongoing ethical monitoring and serves as a reference for both internal project partners and external stakeholders.

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1. Introduction

This document (Deliverable 6.1 of the ISABEL project) defines the societal, legal, privacy, and ethical requirements that must be observed throughout the project, and outlines how these requirements will be monitored. ISABEL (mInimize coSts and mAximize Benefits in transitional European Labour markets) is a Horizon Europe project aimed at addressing the challenges of Job Creation and Destruction (JCD) driven by the green transition and technological change. The project will provide insights and tools for fair labour market transitions. Since the methodology proposed involves personal data management, transference of data from non-EU countries (particularly Serbia and the UK), as well as the leverage of advanced technologies like AI and Large Language Models, it is paramount to ensure that all activities respect individual rights, privacy, and ethical principles. This report serves as a roadmap for that compliance.

The intended audience includes ISABEL consortium members (researchers, technologists, and project managers), ethics reviewers, and the European Commission's project officers overseeing Horizon Europe compliance. It may also be of interest to external stakeholders such as data protection authorities or ethics committees in the participating countries, ensuring transparency about how ISABEL handles sensitive matters like personal data and human participation.

The document is structured as follows: (2) Legal and Ethical Framework at the European level and for all the countries involved in the project, (3) Thematic Areas (specific ethical and compliance topics and details how ISABEL will address each), (4) Internal Measures to be employed to ensure ongoing compliance and to respond to any ethical issues that arise, (5) Preliminary Impact Assessment, (6) Conclusion, (7) Bibliography and (8) Annexes.

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2. Legal and Ethical Framework

ISABEL operates within a multi-layered legal and ethical environment. All project activities must comply with European Union law, adhere to broader Council of Europe principles, and respect the national laws of each country involved. In addition, Horizon Europe projects are explicitly bound to uphold the highest ethical standards in research. Article 19 of the Horizon Europe Regulation (EU 2021/695) mandates that actions under the program comply with ethical principles and relevant EU, national and international law, including the EU Charter of Fundamental Rights and the European Convention on Human Rights. Likewise, the project will be carried out in line with the highest ethical standards and assuring that beneficiaries respect fundamental values such as human dignity, freedom, democracy, equality, and human rights.

Below, we detail the key legal/ethical frameworks and requirements at each level:

2.1 European Legal Framework

Fundamental Rights: The EU Charter of Fundamental Rights, which has the same legal value as the EU treaties, enshrines the right to privacy (Article 7) and the right to protection of personal data (Article 8). These rights underscore all EU laws on privacy and data protection. Additionally, the Charter and EU treaties uphold principles of non-discrimination (Article 21) and workers' rights (e.g. Articles 15 and 31 on fair working conditions), which are relevant given ISABEL's focus on labour markets.

General Data Protection Regulation (GDPR): The GDPR (Regulation (EU) 2016/679) is the cornerstone of data privacy law in Europe, directly applicable in all EU member states since May 25, 2018. It strengthens individuals' control over personal data and harmonizes data protection rules across Europe (European Commission, 2025a). Under GDPR, any processing of personal data in ISABEL must have a valid legal basis (such as the data subject's consent or research in public interest justification), and must adhere to principles of lawfulness, fairness, and transparency. Personal data should be collected only for specified, legitimate purposes and not further processed incompatibly with those purposes (purpose limitation). Data minimization, accuracy, storage limitation, integrity and confidentiality are also core principles. ISABEL's handling of survey responses, interview recordings, or any dataset containing personal information will strictly follow these principles. In practice, this means obtaining informed consent from participants, ensuring data is stored securely and anonymized or pseudonymized whenever possible, and limiting access only to authorized research staff (more details in Section 3.2 POPD).

EU Data Governance and Privacy Laws: In addition to GDPR, other EU laws provide context. The ePrivacy Directive (2002/58/EC, as implemented in national laws) governs confidentiality of communications (relevant if ISABEL conducts telephone interviews or uses cookies for online surveys). Moreover, if ISABEL's research involves statistical data or public datasets, regulations like the Free Flow of Non-Personal Data Regulation or Open Data Directive might apply, though personal data will remain under GDPR's domain. It's also noteworthy that the Law Enforcement Directive (EU 2016/680) covers personal data in criminal matters, but ISABEL's scope (employment research) likely does not trigger this. We will nevertheless avoid any processing of personal data that would conflict with these or other sectoral regulations.

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Proposed AI Act: The EU is finalizing the Artificial Intelligence Act, a regulation establishing a risk-based framework for AI systems. As of 2024, the AI Act has been agreed upon and is expected to enter into force with application starting in 2025 (European Commission, 2024). The AI Act defines categories of risk: unacceptable-risk AI (prohibited practices), high-risk AI (subject to strict requirements), limited-risk (with transparency obligations), and minimal risk. ISABEL's planned AI-based tool – an information chatbot to assist stakeholders with insights on job transitions – will need to be evaluated under this framework. Notably, AI systems used in employment or workforce management are considered high-risk under the Act (European Commission, 2025). If the ISABEL chatbot is used, for example, to advise jobseekers or inform employment policy, it may fall into the high-risk category (similar to "AI tools for employment" mentioned in the Act). High-risk AI systems must meet requirements for risk assessment, data governance (to avoid bias), transparency, human oversight, robustness, and cybersecurity. Even if the ISABEL tool is mainly for informational and research purposes, we will pro-actively apply these principles. Additionally, the Act imposes a transparency requirement for AI systems like chatbots: users must be informed that they are interacting with an AI. ISABEL will ensure that anyone using the chatbot is clearly notified that it is an automated system, preserving human agency and informed decision-making.

Ethical Guidelines for Trustworthy AI: While awaiting the AI Act's full application, ISABEL will abide by the EU's existing ethical guidelines on AI (the High-Level Expert Group on AI's 2019 recommendations). These guidelines articulate key principles for Trustworthy AI, including human agency and oversight, technical robustness and safety, privacy and data protection, transparency, diversity and non-discrimination, societal well-being, and accountability (Karatzas, 2021). Concretely, this means our AI development will include measures for explainability (so that the basis of the AI's recommendations on job transitions can be understood), avoidance of biases that could disadvantage vulnerable groups, and mechanisms for human-in-the-loop oversight (the tool will not make autonomous decisions about individuals without human review, for instance).

Council of Europe Framework

Beyond EU law, ISABEL is guided by the broader human rights framework of the Council of Europe (CoE), which covers all project countries (including non-EU states like the UK and Serbia).

European Convention on Human Rights (ECHR): All participating countries are signatories to the ECHR, a binding international treaty upholding fundamental rights. Article 8 of the ECHR guarantees the right to respect for private and family life, which has been interpreted to encompass data privacy and confidentiality of communications. Article 14 prohibits discrimination, reinforcing that ISABEL must ensure equal treatment and avoid bias against any group in its research or AI tool. These ECHR rights echo the EU Charter rights and are expressly referenced as obligations in Horizon Europe's ethics requirements (BBMRI-ERIC, 2021). ISABEL will thus respect privacy and non-discrimination not just as legal duties but as fundamental ethical imperatives.

Convention 108+ (Data Protection Convention): The Council of Europe's Convention 108 (1981) was the first international treaty on data protection. Its modernized version, Convention 108+, reinforces principles similar to GDPR at a global level. Serbia, notably,

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has ratified Convention 108+ in 2020 (Council of Europe, 2020), underscoring its commitment to strong data protection standards. This means that even as a non-EU country, Serbia adheres to internationally recognized data privacy norms, which facilitates alignment between Serbian law and EU standards. ISABEL's data handling in Serbia will thus not only comply with local law but also meet Convention 108+ requirements such as lawful and secure processing, data subject rights, and cross-border data protection.

Council of Europe AI and Ethics Initiatives: The Council of Europe is in the process of establishing a Framework Convention on Artificial Intelligence, which in late 2024 became the first internationally binding AI treaty (Council of Europe, 2024). This AI Convention aims to ensure AI development respects human rights, democracy and rule of law. The EU, along with countries like the UK and Serbia, have been involved in this CoE effort. Although not yet ratified by all, the convention outlines principles (such as transparency, fairness, human oversight, accountability) very much in line with the EU's approach. ISABEL will stay abreast of this evolving framework. Likewise, Council of Europe guidelines, such as recommendations on the human rights impacts of algorithmic systems, will inform our AI design to go beyond mere legal compliance and proactively uphold ethical standards.

Finally, all CoE member states (including ISABEL countries) have their own commitments to research ethics under CoE standards (for instance, the Declaration of Helsinki for research involving humans in medical fields, or UNESCO's Universal Declaration on Bioethics and Human Rights which CoE countries support). While ISABEL's research is socio-economic, the spirit of these frameworks – respecting the dignity and rights of participants – remains fully relevant and is reflected in our approach to informed consent and participant welfare (see Section 4.5).

2.2 National Frameworks of ISABEL Participant Countries

ISABEL will conduct primary research (like surveys, interviews, Living Labs) in six focus countries: Denmark, Greece, Poland, the United Kingdom, Serbia, and Spain. Each of these countries has its own laws and regulations that operationalize the above European principles. The project must adhere to each applicable national framework when operating in that country. Below is an overview of relevant national legislation per country:

- **Denmark**: As an EU Member State, Denmark is directly subject to the GDPR. To implement GDPR and exercise allowed national derogations, Denmark enacted the *Danish Act on Data Protection* (Databeskyttelsesloven) in May 2018 (DLA Piper, 2025). This Act supplements GDPR in areas such as public sector data processing and certain exceptions. Thus, all personal data handled by ISABEL in Denmark must conform to both GDPR and this national act. Denmark does not require general research ethics committee review for social science research, but ISABEL will follow best practices and consult institutional ethics boards as needed. Additionally, Denmark's Marketing Practices Act and telecommunications laws, while not directly aimed at research, impose rules on contacting individuals (e.g., via phone or email) – the project will ensure any survey recruitment respects those rules (for example, not cold-calling individuals who have opted out, etc.). Denmark is also preparing for the EU AI Act; there is currently no separate Danish AI law, but the government has an AI Strategy

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emphasizing ethical AI and aligning with EU policy. ISABEL's AI tool deployment in Denmark will thus be mindful of Danish authorities' guidance (via the Danish Data Protection Authority and any digital agency guidelines) on AI and data ethics.

- **Greece**: Greece has fully incorporated European data protection law into its national legal system. In 2019, it passed *Law 4624/2019* which implements the GDPR and the Law Enforcement Directive (Hickman & Gabel, 2024). This law, along with the Greek Constitution's privacy protections, governs how ISABEL must manage personal data from Greek participants. Greece's law includes specific provisions, for example on processing employee data and the role of the Greek Data Protection Authority. ISABEL will ensure that survey data related to Greek workers or companies complies with any such specific rules (for instance, Greek law may require notifying the DPA for certain processing operations or impose conditions on using sensitive data). On research ethics, Greece requires ethics approval for medical research, but for social research like ISABEL, formal approval may not be mandated by law; nevertheless, Greek universities and institutes typically have ethics committees. The Greek ISABEL partners will obtain any necessary institutional approvals and follow the National Committee for Research Ethics guidelines. Finally, regarding AI, Greece is part of the EU's AI regulatory discussions and follows EU guidelines; there is no standalone Greek AI law yet, but ISABEL's AI outputs will align with any national AI strategy that focuses on ethical AI for society.

- **Poland**: In Poland, GDPR is likewise directly applicable and supplemented by national law. Poland adopted the *Act of 10 May 2018 on the Protection of Personal Data* to implement GDPR provisions (DataGuidance, 2018), replacing its older 1997 data protection law. The Polish Personal Data Protection Office (UODO) oversees compliance. ISABEL's activities in Poland (e.g., interviews with workers or companies) must respect this framework. Notably, Polish law may have specific provisions on data processing in employment context and research—Poland, for instance, allows research use of data under certain conditions, which ISABEL will carefully adhere to, ensuring we document a lawful basis and safeguard any sensitive information. Polish law also requires Data Protection Officers (DPO) for many organizations; our Polish partner will confirm if a DPO needs to oversee ISABEL data operations locally. Regarding research with people, Polish regulations require ethics committee approval primarily for medical or psychological experiments; ISABEL's surveys on employment likely fall outside those strict requirements, but we will still seek guidance from relevant ethics bodies (e.g., a university ethics commission if applicable). Poland has been active in AI strategy (adopting a policy for AI development), but like others, awaits the EU AI Act. ISABEL will ensure our AI tool's use in Poland does not conflict with any local legal provisos (for example, Poland's stance on algorithmic transparency or any sectoral law).

- **United Kingdom**: Although the UK is no longer in the EU, it has retained a regime essentially "mirrored" on the GDPR. The UK's data protection framework consists of the UK GDPR (which is basically the text of the EU GDPR incorporated into UK law) and the *Data Protection Act 2018* (DPA 2018) (UK Government, 2018). Together, they continue to protect personal data in the UK largely to EU standards. ISABEL's work in the UK (one of the focus countries) must abide by these UK laws. This means obtaining consent or another lawful basis for personal data in surveys, notifying participants of their rights under UK GDPR, possibly registering with the Information Commissioner's Office (ICO) if required, and conducting a Data Protection Impact Assessment for the research project (since we process data about individuals' employment situations, which might be viewed as moderately sensitive). The UK DPA 2018 also covers certain research

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exemptions – for instance, using data for scientific research can have relaxed rules on purpose limitation and retention, provided safeguards are in place – we will consult these provisions to ensure we correctly handle data for research purposes. As for ethical compliance, the UK has robust research ethics practices. Our UK partners will likely go through institutional ethics approval processes (e.g., a university Institutional Review Board (IRB)), even if not mandated by law, to ensure that participant welfare and consent are properly addressed. The UK also has equality and labour laws (like the Equality Act 2010) that, while not directly governing research, underscore the importance of non-discrimination – something we uphold in our methodology and in how our AI tool is designed (to not produce biased outcomes against protected groups). In terms of AI governance, the UK is charting its own approach: rather than a single AI Act, it has issued an AI *Ethics and Safety Guidance* and plans to empower sectoral regulators to oversee AI. ISABEL will therefore consider any guidance from UK bodies (such as the ICO's guidance on AI and data protection, or the Equality and Human Rights Commission's guidance on algorithmic fairness) when deploying our chatbot in the UK context.

- **Serbia**: As a candidate country for EU membership and an associated country in Horizon Europe, Serbia has been aligning its laws with EU standards. In the realm of data protection, Serbia enacted a new *Law on Personal Data Protection* in November 2018, which took effect in August 2019 (DLA Piper, 2018). This law was explicitly modeled after the GDPR, introducing EU-like principles of consent, data subject rights, and data controller obligations in Serbia. Therefore, personal data collected by ISABEL in Serbia will be treated with the same level of protection as in the EU. We will, for example, provide Serbian participants with clear information and obtain consent, honor any requests to access or delete their data, and ensure no data is transferred out of Serbia except in compliance with Serbian law (which, being GDPR-like, restricts international transfers unless certain safeguards or agreements are in place). Serbia's Commissioner for Information of Public Importance and Personal Data Protection is the authority we would consult if any clarification is needed on data practices. On the ethical front, Serbia does require that research involving human subjects follows ethical standards; Serbian universities often have ethics committees, and any sensitive study (especially in medical or psychological fields) must get approval. For ISABEL's social research, we will still ensure that our Serbian partner obtains any necessary ethical clearance or at least a waiver stating that no formal ethics board review is needed, to have documentation of ethical compliance. Serbian law might also require permits or notification for conducting surveys of a certain scale – we will verify if any such obligations (for example, under official statistics law or public opinion polling regulations) exist and comply accordingly. Critically, working in a non-EU country raises the issue of benefit-sharing: European ethics guidelines stress that when conducting research in third countries, especially those with lower income, the research should also benefit local communities and not merely "extract" data (Karatzas, 2021). Serbia is an upper-middle income country and a direct project partner, so ISABEL is inherently designed to benefit Serbia by including Serbian regions in the analysis and policy recommendations. We are nonetheless committed to fair benefit-sharing: results relevant to Serbia (such as insights on green transition effects on Serbian regional jobs) will be shared with Serbian stakeholders and authorities, capacity-building will be done (e.g., training local researchers in AI tools), and any local resources or data we utilize will be used with permission and with respect for local ownership. By complying with Serbian laws and investing in mutual benefit, ISABEL ensures an ethical approach to its non-EU activities.

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- **Spain**: Spain, as an EU member, is under GDPR and has additionally passed a prominent national law, the *Organic Law 3/2018 of December 5 on Personal Data Protection and Guarantee of Digital Rights* (known as LOPDGDD). This Spanish law not only implements GDPR but also introduces provisions granting citizens "digital rights" (e.g., rights regarding internet use, digital education, and workplace privacy beyond the GDPR's scope). For ISABEL, compliance in Spain means following GDPR's requirements in concert with the LOPDGDD (International Association of Privacy Professionals, 2018). For instance, Spain requires specific measures when processing employee data (like consulting workers' representatives if certain monitoring is done) and has explicit rights such as the right to disconnect from work (which might shape how data collection with currently employed participants is scheduled or handled). We will ensure any survey or interview with Spanish participants is scheduled and conducted in a manner respectful of their digital rights and work-life balance, and that any data analysis does not infringe on those rights. The Spanish Data Protection Agency (AEPD) also issues guidelines (for example, on data anonymization or on AI use); ISABEL will heed such national guidance. On the ethics side, Spain has strict requirements for biomedical research (Law 14/2007 on Biomedical Research requiring ethics committee approvals), but for social science research there isn't a universal legal requirement for ethics review. Nevertheless, Spanish universities and research institutes adhere to codes of ethics, and often any project with interviews will go through an ethics panel. Our Spanish partner will obtain the necessary ethics management documentation. Spain additionally has a strong culture of protecting vulnerable groups (for example, extra protections for research involving the unemployed might not be codified, but Spanish social services and Non-Governmental Organization (NGOs) are active in supporting such populations). In conducting research in Spanish regions, we will engage with local employment offices or organizations to ensure our approach is culturally sensitive and supportive. Lastly, Spain has been progressive in AI governance – it was one of the first to create an AI ethical charter and pilot an AI regulatory sandbox. While awaiting the EU AI Act, Spain's national AI strategy promotes principles of transparency and citizen trust in AI. ISABEL's implementation of its AI chatbot in Spain will follow those lines, perhaps even leveraging Spain's sandbox if applicable for testing our tool's compliance and societal impact in a controlled manner.

  By adhering to each country's legal requirements and cultural expectations, ISABEL not only remains compliant, but also builds trust with local stakeholders. In all six countries, we will coordinate closely with local partners who have expertise in national legislation to handle specifics such as labor regulations (especially relevant if our research touches on company data or worker rights) and any necessary notifications to authorities.

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3. Thematic Areas

In line with Horizon Europe ethics guidance and the specific scope of ISABEL, this section addresses five thematic areas of concern. These correspond to common ethics categories: involvement of non-EU countries, personal data protection, involvement of vulnerable populations, artificial intelligence ethics, and human participants in research. Each subsection describes potential issues and the measures in place to ensure compliance and ethical integrity. For the sake of the text's autonomy, and to ensure it's more readable and understandable by the reader, the information contained in deliverable 8.1 is also presented here as is. We also add the EPQ (Ethics and Populations of Special Concern) area here, which is not required in the D8.1.

3.1 NEC (Non-EU Countries)

Scope: ISABEL involves research activities outside the EU, specifically in Serbia, which is a non-EU (but associated) country. This raises distinct ethical considerations. According to Horizon Europe ethics requirements, any activity in a third country must both comply with local laws and be permissible under EU law. We must avoid “ethics dumping,” where research considered unacceptable in the EU is conducted abroad; indeed, if something is prohibited in all EU Member States, it cannot be funded in a third country either.

Compliance with Local Legislation: Before initiating any data collection or trials in Serbia, ISABEL will verify the relevant Serbian laws (as outlined in Section 2). We have confirmed that Serbia’s legal framework is largely in line with European standards (e.g., data protection, consent, labor laws). All project actions in Serbia will be vetted by our Serbian partner and legal advisors to ensure they meet Serbian legal requirements, such as obtaining any necessary authorization for surveys or adhering to Serbia’s personal data regulations. For example, if interviews are conducted in workplaces or with government-held data, we will check if any local permits or approvals are needed from Serbian authorities or institutions. Thus, the principle "*comply with the laws of that country*" is fully addressed.

EU Equivalence and Chapter V GDPR: Alongside Serbian law, we ensure activities are acceptable by at least one EU country’s standards. Since Serbia’s research tasks (e.g., social surveys) are methods also used in EU countries, and since Serbia’s data protection law aligns with GDPR, we anticipate no methods that would be illegal in the EU. Moreover, when transferring data between the EU and Serbia (for example, if Serbian survey data is analyzed on a server in Denmark), we will adhere to GDPR’s Chapter V on international transfers. Serbia is not yet covered by an EU “adequacy decision,” so data transfers will rely on appropriate safeguards (such as standard contractual clauses between the EU and Serbian partners) or explicit consent of participants for cross-border transfer. As a precaution, we may choose to store Serbian personal data on servers within the EU or in Serbia only, to avoid complex transfers. Remote access to data from a non-EU country is considered a transfer under EU law, so if EU team members access a Serbian database remotely, we will treat it as such and ensure compliance (e.g., secure connections, no unauthorized onward transfer).

Ethical Permits and Approvals: We will obtain any local ethical approvals required. While Serbia does not have a unified human-subject research law like some EU

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countries, institutions (like universities) have ethics committees. Our Serbian partner will present the ISABEL research protocol (surveys, interview guides) to its institutional ethics committee for review. If an official approval letter is given, it will be included in project documentation. If no formal ethics review is deemed necessary, we will document correspondence to that effect. Additionally, we remain sensitive to local norms: for instance, if interviewing certain populations (e.g., displaced workers in a Serbian mining region affected by transition), we might need community gatekeepers' permission or at least their cooperation to conduct ethical research. We will involve local stakeholders early to ensure acceptance and ethical soundness of our approach.

Benefit-Sharing Measures: A key ethical duty in non-EU research is to avoid exploitation of local resources or communities. ISABEL's research in Serbia will be conducted with the local community, not merely on it. Our benefit-sharing strategy includes:

- Results Dissemination in Serbia: All findings relevant to Serbia (e.g., analysis of Serbian regional job transition scenarios) will be shared in accessible formats (reports in local language, workshops) so that policy-makers, social partners, and participants benefit from the knowledge created.

- Capacity Building: We will train and involve Serbian researchers in advanced methodologies (such as AI tools for labor market analysis). This ensures that local teams gain skills and that the capacity remains in Serbia after the project.

- Community Engagement: If our research taps into local data or insights (for example, community surveys), we plan to report back to those communities what was learned, and how it could help them (closing the loop). This might involve town hall meetings or collaboration with local NGOs to discuss findings and recommendations for local just-transition policies.

- Equitable Partnerships: Serbian institutions in ISABEL are equal partners in designing research and deciding on data usage. Any intellectual property or developed tools will include Serbian contributions and credit. If any revenue or further funding comes from tools prototyped in ISABEL, Serbian partners will share in those benefits according to the consortium agreement.

These measures align with Horizon Europe ethics guidance which calls for showing how low or middle-income countries will benefit from the research. While Serbia's income level is moderate, we treat it with the same principle of fairness.

Safety and Risk to Researchers: A note on the safety of project staff (another ethics aspect for non-EU research): Serbia is a safe country, but if any fieldwork takes place in remote industrial areas or in potentially tense situations (for instance, if discussing layoffs in a small town), we will conduct risk assessments and ensure staff have support and training in local language and culture.
In summary, the NEC considerations are being addressed through diligent legal compliance, seeking necessary approvals, fair collaboration, and benefit-sharing. This approach ensures that ISABEL's work in Serbia upholds the same ethical standards as within the EU and contributes positively to the local context rather than causing any unintended harm or exploitation.

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3.2 POPD (Protection of Personal Data)

Scope: This thematic area covers Protection of Personal Data, a central concern given ISABEL's activities like online/telephone surveys and interviews, which will involve collecting data from individuals about their employment history, skills, etc. Compliance with personal data protection rules (notably GDPR and national laws) is mandatory. This section outlines how ISABEL will ensure confidentiality, privacy, and data subject rights throughout the data lifecycle.

Lawful Basis and Consent: ISABEL will primarily rely on informed consent as the lawful basis for processing personal data from research participants. Each survey respondent or interviewee will be provided with a clear explanation of the study's purpose, what data is being collected, how it will be used, and their rights. Consent will be obtained explicitly (e.g., ticking an "I agree" box on an online survey form or giving verbal recorded consent on a phone interview after hearing a consent script). This consent process follows GDPR's requirements for being freely given, specific, informed, and unambiguous. In cases where obtaining written consent is impractical (like a brief phone survey), we will ensure an oral consent procedure is approved by an ethics board and properly documented. We also identify if any data could fall under *special categories* (sensitive data such as health status, ethnicity, political opinions per GDPR Article 9). Our survey is primarily about jobs and skills, but it might indirectly collect some sensitive data (for instance, if someone mentions a disability affecting their job, or trade union membership). In such cases, we will either avoid or minimize collecting those details, or if essential, obtain explicit consent for processing that information and apply heightened safeguards (e.g. immediate pseudonymization).

Data Minimization and Purpose Limitation: ISABEL commits to collecting only data that is directly relevant to our research objectives. Survey and interview questions will be carefully reviewed to ensure we do not ask for unnecessary personal details. For example, we may need to collect age ranges or education levels (to analyze skill gaps), but we will not collect identifiers like social security numbers or unrelated personal info. Data will be used strictly for the stated research purposes – understanding JCD patterns and developing the project's tools. We will not use the data for any secondary incompatible purpose (e.g., it will not be used for commercial marketing or given to third parties outside the project). This respects the GDPR principle of purpose limitation. If we foresee any reuse of the data (say, publishing an anonymized dataset for scientific purposes), we will ensure it's in line with the original consent and legal basis (possibly by informing participants of this at the consent stage).

Data Storage and Security: All personal data collected (survey responses, interview recordings/transcripts) will be stored securely on encrypted servers. Each partner will follow their national guidelines and institutional policies for data security. For instance, data collected through an online survey platform will be transmitted over HTTPS (Hypertext Transfer Protocol Secure) and stored in a secure database with restricted access. We will pseudonymize data as early as possible – e.g., replacing names with codes so that researchers working on analysis only handle de-identified data. The key linking codes to identities (if needed for follow-ups) will be kept separately under lock and key by a designated data manager. Access to personal data will be role-based; only authorized team members who need to contact participants or analyze raw data will have access, and they will be bound by confidentiality agreements. We will also employ

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technical measures: firewall protections, regular backups (with the same encryption), and if data is shared among partners, it will be via secure transfer methods (e.g., encrypted file exchange). In compliance with GDPR's integrity and confidentiality principle, these measures guard against unauthorized access or breaches.

Data Retention and Deletion: Personal data will not be kept longer than necessary (storage limitation principle). We will define a retention period in the data management plan. For example, identifiable data might be kept until the end of the project (to allow potential follow-up with participants or validation of results), but will be deleted or fully anonymized thereafter. Any contact information collected for scheduling interviews will be deleted once the interview is done and the data is integrated into the research (unless the participant consents to be re-contacted for clarification). We will also comply with any specific national requirements on data retention – e.g., some countries advise destroying audio recordings after transcription and validation. We will incorporate those practices. At project end, a cleanup will ensure that only anonymized datasets (with no direct identifiers) are retained for future research, if at all, and this would be clearly stated in the information sheets.

Participants' Rights: ISABEL will respect and facilitate all data subject rights under GDPR and analogous laws: the right to information, access, rectification, erasure, restriction of processing, and objection. Participants will be given a contact (likely the project's Data Protection Officer or an appointed person in each partner organization) to whom they can reach out to exercise these rights. For instance, if a survey participant later decides to withdraw their data, we will remove their record from our dataset (to the extent possible, given research exemptions – but since consent is our basis, we will honor withdrawal fully). If an interviewee wants to review their transcript or correct something they said, we will allow that. We'll include these instructions in the consent form. Moreover, participants will be informed of their right to lodge a complaint with their national Data Protection Authority (such as the AEPD in Spain or the ICO in the UK) if they have concerns – as transparency, we include this in the consent materials, per GDPR requirements.

GDPR Documentation and DPIA: Each partner handling data will maintain a record of processing activities (as per GDPR Article 30) detailing what data is collected, why, who has access, etc. Given the nature of our project – systematic collection of potentially sensitive information from individuals in multiple countries – we will conduct a **Data Protection Impact Assessment (DPIA)** early in the project. A DPIA helps identify high-risk processing and mitigation measures. We anticipate that while our research is standard, the DPIA will formalize our thought process on risks like data breach or re-identification. If the DPIA identifies any high residual risks, we would consult with a Data Protection Authority as required, but our aim is to reduce risks to acceptable levels through the measures described. The DPIA will be a living document, updated if project scope changes (for instance, if we decide to use some novel data source or if the AI tool starts processing personal data in a new way).

Compliance in Practice (Surveys & Interviews): Concretely, when conducting online surveys, we will use a GDPR-compliant survey platform (ensuring servers ideally in EU or with adequate safeguards). The survey introduction will contain a privacy notice. We'll avoid collecting directly identifying info unless needed (e.g., we might not ask for full name, or if we do for follow-up, we'll make it optional and separate from main

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responses). For telephone surveys, we'll prepare a script that includes a privacy and consent briefing at the beginning. We will make minimal paper records; any paper notes by interviewers will be promptly digitized and the paper securely stored or shredded. If interviews are recorded (audio), participants will be informed and can opt out of recording. Recordings will be stored encrypted, used only for transcription, and destroyed after transcription verification. Transcripts will replace names with pseudonyms.

Third-Party Data Processors: If we hire a call center or use a cloud service to collect or transcribe data, we will sign Data Processing Agreements with them as required by GDPR, ensuring they also implement adequate security and confidentiality. For example, if using a transcription service, we'd choose one with robust security certifications or do transcription in-house if unsure.

Monitoring and Breach Preparedness: The project's Data Protection Officer (or equivalent) will monitor compliance – conducting checks that consent forms are properly collected, data is stored in designated secure locations, etc. In the unfortunate event of a data breach (e.g., lost device or hacker attack), we have a response plan: we would notify the relevant partner's DPA (within 72 hours as per GDPR) and the affected individuals if there is a high risk to them, following breach notification rules. Preventive measures (encryption, avoiding carrying identifiable data on portable devices, etc.) are in place to minimize this risk.
By rigorously implementing these measures, ISABEL ensures that personal data is protected throughout the project's lifecycle, maintaining compliance with GDPR and national laws, and upholding participants' trust and rights (see also Section 5 on internal training related to data protection).

3.3 EPQ (Ethics and Populations of Special Concern)

Scope: This section addresses the ethical considerations when research involves populations of special concern – in ISABEL's context, this may include vulnerable groups such as unemployed individuals, workers who have been displaced by the green transition, marginalized or low-income workers, older workers nearing retirement, or others who might be at socio-economic risk. We recognize that these groups merit special ethical attention to ensure they are not exploited or put at risk by the research. The acronym EPQ here highlights issues of Ethics and Professional Qualifications of working with such groups (though we interpret it broadly as vulnerable population (ethics).

Identifying Vulnerability: Vulnerability can come from economic hardship, social marginalization, or power imbalances. For example, long-term unemployed persons might feel compelled to participate in an interview hoping it could help them, or might feel discomfort discussing their situation. Similarly, workers in carbon-intensive industries facing layoffs might be under stress or fear reprisal for speaking about conditions. ISABEL's team will identify such factors during research design. Participation will always be voluntary, and we will emphasize that there are no consequences for declining or withdrawing – especially important if, say, interviews are arranged through employment services or companies (participants must know their benefits or jobs won't be affected by participating or not).

Informed Consent with Care: In addition to the standard consent process (Section 4.2),

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with vulnerable groups, we take extra steps. Consent materials will be written in clear, accessible language, avoiding technical jargon. We will translate consent forms into the local language and, if needed, into language at the appropriate reading level (e.g., avoiding academic terms if interviewing workers with lower educational background). Interviewers will be trained to explain the study patiently and check understanding. We will avoid any form of coercion or undue influence; for instance, if we partner with a job center to reach unemployed people, we will ensure the invitation makes clear that services or benefits are not contingent on participation. If any participant has limited literacy, the interviewer will read the form to them and ensure they understand they can say no.

Privacy and Respect during Data Collection: When dealing with personal stories of job loss or other sensitive topics, privacy is crucial. We will conduct interviews in a setting chosen by the participant for comfort and privacy (or via phone at a time they feel safe). Especially for marginalized groups, being identified in research findings could lead to stigmatization. Therefore, we assure anonymity in reporting: no names or identifying details will appear in any report or publication. If describing a case study of a region or company where a person could conceivably be recognized, we will alter or abstract details to prevent identification. Horizon Europe ethics guidance warns against research that "*exposes vulnerable groups to risks of stigmatization or reprisals*"(Ethics & Research Integrity Sector (DG RTD 03.001)., 2022). ISABEL will heed this: for example, if we find that a particular minority group is disproportionately affected by job destruction, we will frame findings in a sensitive, constructive manner, avoiding language that blames or further marginalizes that group. We might consult advocacy groups for those populations on our research instruments to ensure respectful phrasing.

Risk Mitigation for Participants: We consider potential risks to participants:

- Psychological Distress**:** Talking about losing one's job or fears about the future can be distressing. Interviewers will be trained in basic empathetic listening and to look out for signs of discomfort. Participants will be reminded they can skip any question or stop entirely at any time. If an interviewee becomes upset, the interviewer will pause and offer to either take a break or terminate the session. We will prepare a list of support resources for each country (e.g., contact of a free counseling service, or a helpline for unemployment support) that can be given to participants if the discussion raises difficult emotions.

- Reprisals or Confidentiality Breach**:** If a currently employed worker or an unemployed individual shares frank opinions (perhaps criticizing a company or government policy), we must ensure that information does not reach unintended ears. All data is confidential (only used by the research team). We will code interviews, as mentioned, and in reporting aggregate the responses. If we involve employers or agencies in recruiting participants, they will not be told who actually participated or what any individual said. For instance, if a company's workers are surveyed about skill needs, the company will only see aggregated results, not individual responses.

- Cultural Sensitivity: Marginalized groups might include ethnic minorities or migrants. We will approach each group with cultural sensitivity – possibly involving cultural mediators or translators if language is a barrier. Ethical research demands respecting participants' culture and ensuring questions are appropriate. If any group would prefer the interviewer to be of the same gender or background for comfort, we will accommodate that when possible.

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- Inclusivity and Benefit to Participants: We aim to make the research a positive experience. Participants are contributing their time and insights; we will acknowledge that and, where appropriate, offer a small token of appreciation (consistent with local practice and ethics – e.g., a gift card or reimbursement of travel costs for an in-person focus group). This is not to coerce participation, but to recognize their contribution. Importantly, we will share, in accessible form, what we learned. For example, we might produce a brief summary of survey findings for participants or hold a community meeting. This ensures participants feel heard and see the value of their input, aligning with the ethical principle of reciprocity.

- Ethical Oversight: Any research protocols involving vulnerable populations will be closely reviewed by the project's Ethics Manager and relevant ethics boards. If needed, we will create an Ethics Advisory Board including perhaps a representative from a labor union or a social scientist experienced in working with unemployed communities, to give feedback on our approach. This can help anticipate ethical pitfalls we might miss.

- Legal Protections: In the EU, some vulnerable statuses are protected by law (e.g., personal data revealing racial or ethnic origin, health or trade union membership are special categories under GDPR). Our handling of data from vulnerable groups will comply with those laws as discussed. Additionally, if working with minors (e.g. maybe younger workers under 18, though ISABEL likely focuses on adult workforce), we would obtain parental consent in line with laws. At this stage, we expect participants to be adults. If any participant lacks capacity to consent (unlikely in our context), we would follow legal requirements for surrogate consent, though again this is not expected as we are not doing medical interventions.

  In summary, **EPQ measures** ensure that ISABEL's engagement with any disadvantaged or at-risk participants is done with utmost care, protecting their dignity, rights, and well-being. We strive to ensure that no harm comes to these individuals as a result of the research; rather, their inclusion should elevate their voices in shaping solutions for a fair transition.

3.4 AI (Artificial Intelligence)

Scope: ISABEL will develop and deploy an AI-based tool, specifically an information chatbot, to assist in analyzing and disseminating insights on job creation and destruction trends. This subsection addresses the ethical aspects of this AI component. The goal is to ensure the AI is trustworthy, respects users' rights, and aligns with emerging regulatory standards (as discussed in Section 3's AI Act overview). Key considerations include transparency, explainability, accountability, non-discrimination, data governance, and human oversight for the AI.

Transparency and Disclosure: Users interacting with the ISABEL chatbot must be aware they are dealing with AI, not a human advisor. We will implement clear disclosures at the start of any chat session (e.g., the chatbot introduces itself as an AI-powered assistant). This complies with the AI Act's transparency requirement for chatbot. Additionally, the chatbot will be designed to explain its function – for example, it might

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say, “I am an AI tool trained on labour market data to answer questions about job trends.” Transparency also extends to data usage: if the chatbot collects any information from users (say, someone asks a question and provides personal context like “I lost my job, what should I do?”), the tool will either not store this personal data or will immediately inform the user how that input is used. In our case, the chatbot’s primary function is likely to deliver insights, not collect new personal data, but if any usage data is collected to improve answers, we’ll mention that in a user-facing privacy notice.

Explainability: While AI chatbots (especially those powered by LLMs) can be complex, we aim for a level of explainability appropriate to an information tool. This means two things: 1) The project team will maintain documentation on how the AI was developed – including what data sources it was trained on or what models it uses – and 2) the chatbot itself will provide reasons or sources for its answers when possible. For example, if the chatbot responds about the impact of green transition in a region, it should be able to cite the data (perhaps an ISABEL report or dataset) underlying its answer. This builds trust and allows users to assess the answer’s credibility. We will avoid the AI making authoritative statements without backing; wherever feasible, it will provide references (similar to how this document itself cites sources). If full explainability is technically limited, we will at least ensure a robust user guide is available that explains the AI’s logic and limitations in non-technical terms.

Avoiding Bias and Discrimination: The AI will be trained on datasets concerning labour markets, which could include historical data. We must be vigilant that any biases in data (such as gender bias in certain occupations, or regional biases) are not perpetuated or worsened by the AI’s answers. We commit to bias mitigation strategies: using diverse training data, testing the AI’s outputs for biased or insensitive content, and tuning it to correct any problematic tendencies. For instance, we will test questions like “What jobs can women do in the renewable energy sector?” to ensure the AI does not produce a biased or stereotypical answer. The EU’s ethical AI guidelines emphasize fairness, diversity, and non-discrimination, and these will guide our design. If biases are detected (e.g., the AI systematically makes suggestions favoring one group over another), the team will retrain or adjust the model parameters. We also ensure the AI does not use prohibited characteristics in any decision-making (our chatbot shouldn’t be making decisions per se, but if it’s providing tailored info and it asks for user input, we won’t ask for things like race or religion, which would be inappropriate and potentially leading to bias).

Accountability and Human Oversight: Although the chatbot provides information, the accountability for its content remains with the project team. We will institute a human-in-the-loop oversight, especially in the initial deployment phase. This means human experts will review a sample of the chatbot’s outputs regularly for accuracy and ethical compliance. If the chatbot is used in a more critical scenario (for example, advising a local authority on policy), a human expert should always validate the AI’s recommendation before any real decision is made. We will clearly state that the chatbot’s advice is not to be taken as professional or final without human consultation. In essence, the AI is a decision-support or information tool, not a decision-maker. Should the AI produce any problematic output (false or harmful advice), we have processes to quickly correct it: either by updating the model or by intervening manually if needed. The project will designate team members responsible for AI governance – ensuring logs are kept of its interactions (to trace any issues) and implementing a feedback

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mechanism for users. If a user finds an answer questionable, they should be able to flag it; this feedback will be reviewed by the team to improve the AI.

Privacy in AI Tool: If the chatbot uses personal data (like user queries or if it integrates with profiles), GDPR still applies. We will ensure privacy by design in the AI system. Likely the chatbot will use aggregated data about jobs; it should not output personal data of any real individuals. We will avoid training it on any dataset that contains identifiable personal information unless it has been anonymized. If the chatbot is asked something that could inadvertently reveal personal data (like "Who lost their job in X company?"), it will be designed to not disclose such information.

Safety and Accuracy: The AI's recommendations or answers must not inadvertently cause harm. For example, if a worker asks "Should I quit my job for a green job?" the AI should not give irresponsible advice. It should perhaps provide information on trends and encourage seeking human career advice. We will encode a measure of conservatism for questions that have personal impact, ensuring the AI doesn't overstep into areas it cannot reliably advise on. It will have clear limitations (e.g., "I can provide general insights, but for personal decisions you may want to consult a career counselor"). This ties into the principle of societal and environmental well-being – the AI should contribute positively, e.g., by helping people understand training opportunities, but it shouldn't inadvertently cause panic or complacency with bad info.

Regulatory Compliance: As elaborated in Section 3, we anticipate the EU AI Act will categorize ISABEL's chatbot potentially as high-risk if used in an employment context. Therefore, we are preemptively implementing the controls that such classification would require: quality management (our data is curated and up-to-date), record-keeping (documenting the AI's development and version changes), transparency to users, robustness testing, etc. The Council of Europe's emerging AI Convention similarly demands respect for human rights and non-discrimination, which we have addressed above. In the UK, while no equivalent AI law exists yet, we will consider the UK's AI governance principles (which emphasize safety, transparency, fairness, accountability, and contestability). We might produce an ethical AI assessment report or datasheet for the model, which we could even publish for transparency.

Continuous Monitoring: AI ethics is not a one-off checklist; we will continually monitor how the chatbot is used and its outputs. We plan to conduct user testing with diverse users (policymakers, job seekers, etc.) to gather feedback on its clarity and usefulness. If any ethical issues arise (e.g., the chatbot gave a misleading statistic), we will address them promptly. The project's internal ethics board (or at least the ethics manager) will also look at the AI component regularly as part of the monitoring strategy (see Section 5).

In conclusion, our approach to AI ethics ensures that the ISABEL chatbot will be a tool that stakeholders can trust – it will be transparent about being an AI (European Commission, 2025b), fair and unbiased, explain its answers as much as possible, and remain under human supervision and accountability. This aligns with both the EU's vision of Trustworthy AI and the practical need to build confidence among users who may be impacted by the advice or information the AI provides.

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3.5 H (Human Participants)

Scope: Research involving Human Participants is at the heart of ISABEL's methodology – from surveys of individuals across Europe to in-depth interviews and Living Lab workshops. This section outlines our strategy for ethical recruitment, informed consent, and risk mitigation for all human subjects in the project. Our approach is guided by the principle of respecting the autonomy, privacy, and well-being of participants, as well as by legal requirements for research with humans.

Recruitment of Participants: We will recruit participants in a manner that is fair, transparent, and non-coercive. Depending on the activity:

- For surveys (online or phone), we will typically use stratified sampling or convenience sampling via partners (like reaching out through employment agencies, social media, or email lists). In each case, recruitment messages will be clear about who is conducting the study (the ISABEL project, institution names), the purpose of the study, and what participation entails. If using lists (e.g., an email list of a training program's alumni), we will ensure we have permission to contact those individuals for research. Cold contacting will be done in line with ethical guidelines – e.g., in telephone surveys, interviewers will immediately identify themselves and the research purpose and ask if the person is willing to proceed. Anyone not interested will not be contacted again. We will avoid over-burdening any single group; sample quotas will be set so that we don't excessively target, say, one small community.
- For interviews (qualitative research), participants may be recruited through local partners or by invitation after a survey (with consent to be contacted for follow-up). We might also use snowball sampling (asking interviewees to recommend others), but with caution to ensure this doesn't pressure anyone. When approaching a potential interviewee, we'll explain why we think their input is valuable and emphasize it's voluntary.
- For Living Labs or workshops, which involve bringing together stakeholders (e.g., workers, employers, policy makers in a region), we will coordinate with local organizations to invite participants. We'll ensure diversity in these groups (a mix of perspectives) and clearly communicate the workshop's aims and that it's part of research.

In all recruitment, we will adhere to inclusion/exclusion criteria that are justified by research goals (for example, if we need to interview "unemployed youth" we define that group precisely). We won't arbitrarily exclude on personal characteristics unrelated to the study. Special care will be taken for any vulnerable individuals (as discussed in EPQ): recruitment might involve liaising with a support organization who can be present or at least endorse the study to build trust.

Informed Consent Process: Obtaining informed consent is fundamental. Every participant, whether in a survey or interview or lab, will receive a **Participant Information Sheet** (PIS) and a Consent Form (or equivalent oral script) explaining:

- The purpose of the research and what the ISABEL project is about in lay terms.
- What participation involves**:** e.g., "a 15-minute phone survey about your recent job search experiences" or "a 1-hour interview about your experience in the coal industry transition."
- Voluntary nature**:** explicitly stating they do not have to participate, and can

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withdraw at any time without any consequence or need to give a reason.

- Data handling: what will happen with their responses (recorded, transcribed, kept confidential, used for analysis, possibly quoted anonymously in reports), how their privacy is protected (no real names in any publications, etc.), and who will have access to the data.
- Risks and benefits: we will be honest about any potential discomfort (e.g., discussing job loss may be emotional) but also highlight any benefits (while we cannot promise direct benefit, we can say their input will contribute to research that may inform better policies). If any token of appreciation is provided, mention it (e.g., "you will receive a €20 gift voucher as thanks, but you are entitled to it even if you withdraw early" to ensure no undue influence to stay if uncomfortable).
- Contact information: for the research team (for questions or if they later want to withdraw data) and for an independent party (like an ethics committee or project lead) in case they have concerns or complaints.

Consent will be documented. For online surveys, ticking a consent box or clicking "Agree" after reading the info will be required before proceeding to questions. For interviews, we will ideally get a signed consent form or at least an emailed agreement; if not feasible, we will audio-record the verbal consent at the start. In group settings (like a workshop), we will have a consent process for all attendees as well, including consent to any recording or photographs if those occur (and they can opt out of being photographed, etc.).

We will pay attention to **language** – providing materials in the participant's native language. If a participant has limited literacy, we will go through the form orally. If someone prefers not to sign their name (maybe distrusting forms), we can accommodate with verbal consent plus witness, noting it in our records, as long as ethics approval allows this.

Mitigating Risks to Participants: We have touched on many risk mitigations in previous sections (data privacy, emotional support). Here we summarize specifically for human subjects:

- Physical Risks: Our methods (surveys, interviews) generally pose no physical risk (no medical procedures, etc.). For on-site activities, we'll choose safe locations. If we ever do an on-site observation (for instance, visiting a workplace), we'll follow all safety protocols of that site.
- Psychological/Emotional Risks: We already noted strategies to minimize distress (training interviewers to be sensitive, allowing skipping questions, having support info available). If a topic is potentially distressing (like asking someone how losing a job affected their family), the interviewer will approach it gently and watch for cues to stop. We avoid any demeaning or intrusive questions – our instruments will be reviewed for this.
- Social/Legal Risks: We ensure confidentiality to prevent any negative social consequences. Also, if an interviewee were to disclose something like illegal activities (unlikely in this context), interviewers are instructed on limits of confidentiality. However, our topic doesn't generally involve criminal or highly sensitive personal behavior, so such issues are minimal. In any case, our consent form cannot promise absolute confidentiality if law demands disclosure (e.g., someone confesses intent to harm), but this scenario is very improbable for our research. We will include a standard disclaimer about that to be thorough.

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- Reputational/Economic Risks: We consider whether participation could affect someone's employment or benefits. To mitigate this, we avoid collecting identifiable information that could get back to employers, and we schedule interviews outside work hours or in neutral settings as needed. For unemployed participants who fear jeopardizing benefits by doing a paid interview, we clarify that our incentive (if any) is a reimbursement, not a wage, and typically so small as not to affect benefits, but if in doubt, they can choose to decline it.

Training of Researchers: All team members interfacing with participants will undergo internal training (see Section 4) on ethical conduct: how to obtain consent correctly, how to ask questions in an unbiased and respectful way, how to handle if a participant becomes upset, etc. There will be role-playing of informed consent process to ensure consistency and comfort with the procedure.

Inclusion of Vulnerable Populations: When participants are from vulnerable groups, refer to EPQ (3.3) for additional measures. One point to add: if we involve any **minors** (for example, maybe young apprentices aged 17 in a case study), we will obtain parental consent and assent of the minor, following both law and ethics best practices. But currently the project scope seems to focus on adult workforce.

Use of Incentives: If providing incentives (monetary or other), we will ensure they are not so high as to be coercive, but enough to appreciate the time spent. We also ensure everyone gets the incentive even if they withdraw (to avoid someone feeling they *have* to stay to the end to earn it, which could pressure them). This will be explained in the consent form.

Feedback to Participants: Ethically, participants have a right to know the research results if they wish. We will offer to send a summary of findings to participants (we can do this by collecting their email separately at end of survey, stored separately from responses to preserve anonymity). Many might be interested to know what the study found about job transitions. We will prepare a layman-friendly summary for this purpose towards the project's end.

Independent Ethics Monitoring: If required by any national rules or by the Horizon ethics review, we will submit our methodology to an independent Ethics Advisor or Board. For example, sometimes Horizon Europe requires a dedicated ethics mentor to oversee parts of the project. We will comply with any such requirement, allowing external oversight of how we handle human participants to ensure everything is up to standard.

In conclusion, the **H (Human Participants)** measures ensure that everyone who contributes their time and personal experience to ISABEL does so willingly, with full understanding of what it entails, and with robust protections for their rights and welfare. Our research design is grounded in respect for persons – one of the core principles of research ethics – alongside beneficence (doing good, minimizing harm) and justice (fairness in how we select participants and use results). These measures collectively uphold those principles.

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4. Internal Measures

To effectively implement the ethical and legal requirements outlined, ISABEL will put in place strong internal measures. These include training for project members, ongoing monitoring and compliance mechanisms, and risk mitigation strategies that are revisited throughout the project. This section describes how the consortium will operationalize ethics requirements in daily practice.

4.1 Ethics and Data Protection Training

Early in the project, we conducted an internal training session (and will continue to hold refreshers as needed) for all consortium partners and researchers. This training covers the relevant legal frameworks (GDPR, national data laws, etc.), best practices for data handling, and specific guidelines on research ethics. For example, the session provided practical guidance on obtaining consent in surveys, maintaining confidentiality, and securing data. It also familiarized the team with Horizon Europe ethics expectations, citing that projects must follow the highest ethical standards and EU/national law (BBMRI-ERIC, 2021). Partners from different countries shared national nuances (e.g., Spanish partner explaining Spanish digital rights law, Serbian partner explaining local consent norms), so everyone is aware of cross-country differences. Specialized topics included: "How to avoid bias in AI development," "Protecting vulnerable participants," and "Handling personal data and data breaches." By ensuring every team member understands these requirements, we create a culture of ethics and compliance from the ground up. New team members joining mid-project will receive a similar briefing (we will maintain training materials on our project intranet).

4.2 Appointing Responsible Personnel

The project has designated specific roles for oversight:

- **An Ethics Manager** (or Ethics Lead) within the project coordination team who is responsible for ensuring all ethics requirements are met. This person will coordinate the monitoring detailed below and be the primary contact for any ethical concerns.
- **A Data Protection Officer** (DPO) role – if not formally required for the consortium, we still assign someone (likely the Ethics Manager or a person with legal expertise in the team) to act in the spirit of a DPO. This role monitors GDPR compliance, advises on data protection issues, and liaises with authorities if needed.
- **Country-specific ethics contacts**: Each partner in the six countries has an assigned person to oversee that local activities comply with local regulations and that any needed local ethics approvals are obtained. They report to the Ethics Manager.
- **AI Ethics Lead**: Given the AI component, we assign a team member with AI expertise to be accountable for implementing the AI ethics guidelines (ensuring the principles in 4.4 are followed in development and deployment). This person works closely with the technical team and the Ethics Manager.

4.3 Monitoring and Compliance Strategy

We implement a continuous Ethics Monitoring Plan:

- We have an "Ethics and Privacy Checklist" that was derived from the Horizon Europe

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ethics self-assessment guidelines. It lists all commitments (e.g., "Consent forms approved by ethics board before use? ✓ Yes/No"; "DPIA completed? ✓"; "Data anonymized when not needed in identifiable form? ✓"; "AI outputs reviewed for bias this quarter? ✓"). Responsible persons periodically (monthly or quarterly) verify each item. Non-compliance or issues trigger an immediate action (e.g., if we find a partner hasn't properly stored consent forms, we address it with them and fix the process).

- **Regular Meetings:** The project's management meetings include a standing agenda item on ethics. The Ethics Manager reports any recent issues or upcoming tasks (for instance, before starting a new survey phase, reminding about consent and data security steps). This keeps ethics salient throughout.

- **Documentation:** All ethics-related documents are centrally stored: consent form templates, DPIA report, training attendance lists, etc. We maintain a log of any incidents (like if a participant complained or a minor data incident) and how it was resolved. This documentation will be useful for any external ethics audit by the EU as well.

- **Compliance Audits:** Mid-project, the Ethics Manager will perform an internal audit – sampling some data files to ensure they're anonymized, checking that only authorized persons have access, making sure that any required approvals (e.g., a renewed ethics approval if protocol changed) are in place. If any gaps are found, we address them promptly. For example, if we realize we didn't translate the consent form into Polish but did the survey in Poland, we'd note that and correct it in any future round.

- **Partner Accountability:** Each partner's team leader signs off on an "ethics compliance report" every 6 months, confirming that their tasks (in their country) followed the agreed procedures. This fosters responsibility at the local level too.

4.4 Risk Mitigation Approach

We proactively identify potential ethical or legal risks and plan mitigation (some already described). Here we summarize major risks and how we handle them:

- **Risk of Data Breach or Misuse:** *Mitigation:* Strict access controls, encryption, pseudonymization of data, DPIA and following its recommendations. Regular security audits of IT systems. Also, training team members not to share data via insecure means (e.g., no emailing spreadsheets with personal data unless encrypted). Having a breach response plan (as noted, notify within 72h etc.) – fortunately, by mitigation, we expect to avoid breaches altogether.

- **Risk of Participant Harm or Distress:** *Mitigation:* Careful interview techniques, ability to withdraw, providing support info. Also selecting researchers who are empathetic and possibly matching interviewer/interviewee demographics when relevant to reduce power imbalances. If any participant feedback indicates discomfort, we'll review that part of the process and adjust (maybe rephrase a question or allow an opt-out).

- **Risk of Non-compliance with law due to changes:** Laws can update (e.g., AI Act coming into effect, or UK changing its data law). *Mitigation:* Ethics Manager and legal experts keep abreast of changes. The project will adjust practices accordingly. For instance, if

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the AI Act comes into force and our chatbot qualifies as high-risk, by that time we plan to already meet its requirements, but we will formally ensure compliance (perhaps conformance testing or seeking certification if applicable).

- **Risk of Ethics Creep:** Sometimes, projects can expand scope beyond what was ethically reviewed (e.g., deciding later to collect a new kind of data). *Mitigation:* We have a policy that any major change in methodology or data collection is reviewed by the Ethics Manager and, if significant, by the relevant ethics committee again. No new activity involving humans or personal data will start without this internal clearance. In essence, we treat the initial ethics approvals and plans as binding, and if we deviate, we document and seek approval as needed.

- **Risk of bias or misuse of AI tool:** *Mitigation:* As described in AI section – testing, oversight, and the ability to shut it down or modify it if problems emerge. We'll also include disclaimers on the tool to mitigate misuse (like a note that it's a beta tool, not professional advice).

- **Risk of partner non-compliance:** Because we have many partners, a risk is that not everyone rigorously follows procedures (perhaps out of oversight). *Mitigation:* Frequent communication, clear written protocols (e.g., a short "ISABEL Data Handling Protocol" every partner signs off on). And the monitoring/audit steps to catch any lapses. Building a shared commitment to ethics is the best mitigation; we've done so via training and leadership emphasis.

4.5 Communication and Reporting

The Ethics Manager will report any significant issues to the Project Coordinator and, if needed, to the funding body. For example, if there was an ethics violation or a serious adverse event (very unlikely, but say a participant had a severe emotional reaction requiring counseling), we would report that in periodic reports along with how it was resolved. Transparency in handling issues is key to maintaining trust with stakeholders and funders.

Through these internal measures – training, clear roles, active monitoring, and risk management – ISABEL will not only *plan* for ethical compliance but actively enforce and *live* it throughout the project's execution. This structure ensures that ethics and legal adherence are not one-time concerns but a continuous commitment.

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5. Preliminary Impact Assessment

As ISABEL progresses, it is crucial to assess how the project's findings, technologies, and methodologies align with the identified legal and ethical frameworks. This preliminary impact assessment provides an early look at potential outcomes and how they will be evaluated ethically and legally. It also offers initial recommendations to integrate our compliance requirements into the project design and highlights any "red flags" (signals of non-permissible features or data flows) that the team should be wary of as development continues.

5.1 Alignment of Findings with Frameworks

One of ISABEL's end goals is to produce insights and recommendations for managing job creation and destruction in the green transition. These findings will be scrutinized against the ethical and legal standards discussed:

- **Against EU and National Laws**: We will ensure that any policy recommendation or tool coming out of ISABEL does not encourage or rely on actions that would violate laws. For instance, if a finding suggests using certain personal data to predict job risks, we check that this data use is GDPR-compliant before suggesting it (e.g., recommending that governments use anonymized data rather than personal records to avoid privacy issues). If we propose an AI-driven system for employment services, we ensure it aligns with the AI Act's risk requirements (if high-risk, we would outline the needed compliance steps in the recommendation itself). Our preliminary review indicates that most ISABEL findings will be aggregate and policy-level (e.g., "Region X will need Y training programs"), which pose low ethical risk. But any finding that involves individuals (like profiling workers for reskilling) gets a compliance check.

- **Against Ethical Principles**: We evaluate whether the findings promote societal well-being and fairness or inadvertently could cause harm. For example, if data shows certain jobs will be destroyed, we handle that messaging responsibly to avoid causing panic or defeatism among affected communities. We might phrase recommendations in a way that emphasizes support and opportunity (ethical communication). We also consider if any groups could be stigmatized by our findings. If our analysis identifies, say, "low-skilled workers in fossil fuel industries are most at risk," we ensure to frame solutions that uplift that group rather than label them negatively. This reflection ties back to avoiding marginalization as noted in ethics guidelines (Ethics & Research Integrity Sector (DG RTD 03.001)., 2022).

- **Human Rights and Values Check**: Because Horizon Europe stresses compliance with human rights and EU values (BBMRI-ERIC, 2021), we will effectively do a mini human-rights impact assessment on key outputs. Does our approach respect human dignity (yes, by involving workers respectfully), freedom (yes, participation voluntary, and outcomes aim to improve freedom to choose jobs), equality (we check that our solutions do not inadvertently exclude or harm a minority), etc. So far, no issue has arisen, but we keep this lens.

5.2 Preliminary Recommendations for ISABEL Design

Based on the work so far in Task 5.1, we propose the following recommendations to integrate ethical and legal compliance into the design and implementation of ISABEL:

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- **Privacy by Design in Tool Development:** As the technical team builds the data platform and chatbot, they should incorporate privacy features from the start. For example, if combining datasets, ensure anonymization is built in; logs of chatbot queries should be stripped of personal identifiers automatically. A recommendation is to embed a **privacy module** that handles any personal data consistently (so every partner feeding data uses that module to sanitize data).

- **Ethics in Research Design:** We recommend iterative review of research instruments (survey questions, etc.) with an ethics eye. A diverse review team (including an ethics expert or even a representative from a participant group) should vet these before they go live. This can catch any potentially sensitive or biased questions.

- **Stakeholder Engagement:** To align with societal values, involve stakeholders (unions, community orgs) in co-designing some research aspects. This not only improves the relevance of research but also acts as an ethical check (they might point out concerns we miss). For Living Labs, we recommend including an ethicist or mediator in sessions to ensure respectful discourse and that participants feel safe (this is more of a practice than design, but a recommendation nonetheless).

- **Documentation and Justification:** For transparency, we document all decisions that have ethical weight. If we decide to use a particular data source, write why it's permissible (or if we decide *not* to use one because of ethics, that's also valuable). This creates an audit trail and helps in impact assessment.

- **Future-proofing Compliance:** Since laws evolve (AI Act, possible new national AI rules, or changes in UK data law expected in 2025), design the project's processes with adaptability. E.g., structure data flows so that if new consent needs to be obtained or a new right needs to be accommodated, it can be done without overhauling everything. Our recommendation: maintain legal watch and schedule a mid-term project legal compliance review (like a mini Task 5.1 repeated in year 2 of the project) to adjust recommendations if needed.

These recommendations, adopted early, will ensure smoother compliance and reduce issues at later stages or at the time of final results.

5.3 Signals for Non-Permissible Features or Data Flows

We have identified some potential "red lines" or warning signs that something in the project might be ethically or legally problematic. Recognizing these signals early allows us to avoid implementing non-permissible features:

• **Collection of Highly Sensitive Personal Data without Justification**: For example, if during data integration someone suggests adding health records or biometric data of workers to predict job fitness – that would raise a huge red flag. It would likely violate data minimization and go beyond our ethical scope. If this idea arises, we will veto it.

• **Use of Personal Data from Third Parties without Consent**: If the project ever considers using data like social media profiles or phone tracking to infer employment trends, that is non-permissible under our current ethical design unless properly anonymized and publicly available. Any suggestion to use data that individuals didn't

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provide directly for this research would need heavy scrutiny (and likely we won't do it, as it could breach GDPR and trust).

• **Automated Decisions about Individuals**: If someone tried to pivot the project to develop an AI that personally ranks or scores individual workers for layoffs or hiring, that would be ethically fraught and likely illegal without human oversight (akin to prohibited automated social scoring). We flag that as a non-go. Our AI remains informational and supportive, not an arbiter of individual fate.

• **Discrimination or Exclusion in Design**: If we notice at any point that our sample or tool systematically excludes a demographic (say, the survey is only reaching men in tech jobs and not women or minorities), that's a signal our design might inadvertently be biased. While not "illegal" per se, it's ethically unacceptable for representativeness and fairness. We have to fix recruitment to include those groups.

• **Partner Non-compliance or Participant Complaints**: If we get complaints from participants about how they were treated or find out a partner deviated from protocol (e.g., didn't properly get consent), this signals a serious compliance gap. Non-permissible practice in this case: continuing without addressing it. The project must pause that activity and correct course.

• **Security Loopholes:** If any IT audit or team member finds a part of our system that is not secure (maybe an open database or a weak encryption), that signals a risk of data breach – effectively a non-permissible state to continue in. We would immediately patch or suspend data collection until fixed.

• **Lack of Transparency in AI**: If user testing of the chatbot finds that users are confused or misled (e.g., they think it's human or they can't get an explanation for answers), that indicates a design issue against the transparency principle. While subtle, it's ethically important. We'd need to add prompts or explanations to correct this.

Whenever such a signal is detected, the issue will be escalated to the project leadership and Ethics Manager. The consortium is committed to not ignore these signs. Instead, we will apply the precautionary principle: better to delay or alter a feature than to risk an ethical or legal breach. For instance, if the AI component couldn't meet the necessary standards by project's end, we would possibly restrict its deployment (maybe only use it as an internal prototype rather than public tool) until it can be made compliant.

Preliminary Conclusion of Impact Assessment: So far, ISABEL is on track to integrate ethical, privacy, and legal considerations into its core. This proactive approach in T6.1 means that by design, many potential problems are averted. The preliminary impact is that the project is creating not just academically and socially valuable outputs, but ones that hold up to ethical scrutiny and could serve as best-practice examples. By continuously evaluating our work against the frameworks and being willing to adjust our design (as recommended), we ensure that by the time ISABEL concludes, its contributions (data insights, AI tools, policy guidance) are both impactful for society and fully compliant with our societal, legal, and ethical obligations.

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6. Conclusion

This report detailed the comprehensive set of societal, legal, privacy, and ethical requirements guiding the ISABEL project and described the mechanisms for monitoring compliance. Ensuring alignment with Horizon Europe ethical standards and relevant laws is not only a formal obligation but a cornerstone of ISABEL's commitment to responsible research and innovation. By examining European and national legal frameworks, we have a clear understanding of the "rules of engagement" – from data protection under GDPR to emerging AI regulations and the human rights conventions that underscore our work.

We have translated these high-level requirements into concrete actions within thematic areas critical to our project's context. For research in a non-EU country (Serbia), we have established that our approach will respect local laws and ethical norms while also sharing benefits and knowledge with the community – reinforcing a relationship built on trust and fairness. In handling personal data, we have embedded GDPR principles into our data life cycle, guaranteeing participants that their information will be treated lawfully, securely, and confidentially. For vulnerable groups, we have put in place extra safeguards to honor their dignity and prevent any harm or stigmatizations, making sure their voices contribute to the research without exposing them to risk. Our AI chatbot tool is being developed with ethical AI principles and forthcoming legal requirements in mind – aiming to be transparent, explainable, and free of bias, as well as subject to human oversight to maintain accountability. Furthermore, in all interactions with human participants, we prioritize informed consent, voluntariness, and respect for autonomy, thereby upholding the fundamental ethical tenet of respect for persons.

Internally, ISABEL has instituted robust measures – training, designated ethics personnel, continuous monitoring, and risk management – which create a living ethics process rather than a one-time checkbox. This ensures that as the project evolves, compliance does not lapse; instead, it adapts to new challenges and regulatory developments. The preliminary impact assessment affirms that our approach is on the right track. It also serves as an early warning system and improvement tool, prompting adjustments to project design in response to any identified ethical risks or "red flags."

In conclusion, ISABEL is poised to not only advance knowledge on job creation and destruction in Europe's green transition but to do so in a way that is legally compliant, ethically sound, and socially responsible. By integrating these requirements from the outset, we enhance the quality and trustworthiness of our research outcomes. This alignment with societal and ethical values will ultimately strengthen ISABEL's impact – recommendations and tools emerging from the project will be credible and readily adoptable, having been developed under rigorous ethical scrutiny. The consortium remains committed to ongoing reflection and improvement in ethics and compliance. As the project moves forward, we will keep engaging with stakeholders, monitoring the environment (legal changes, social sensitivities), and updating our practices accordingly. In doing so, ISABEL will contribute not just to the academic and policy discourse on just labour transitions, but also to exemplifying how cutting-edge AI-driven social research can be conducted with integrity and respect for fundamental rights.

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Annexes

- **Annex I: Informed Consent Form and Participant Information Sheet (Templates)** – Draft templates in English for survey and interview participation, which will be translated and adapted in each country. These include sections on study purpose, procedures, data confidentiality, and consent statements.

- **Annex II: Data Protection Impact Assessment (DPIA) Summary** – A summary of the DPIA conducted for ISABEL's data processing, outlining identified risks and mitigation measures (full DPIA report available upon request).

- **Annex III: Ethics Approval Letters** – Copies of ethics approval or compliance letters from relevant Institutional Review Boards or Ethics Committees in the partner institutions (to be appended as they are obtained, **we now provide a standard template**).

- **Annex IV: Internal Ethics Checklist** – The checklist used by the consortium for ongoing ethics monitoring (as referenced in Section 4.3), provided here for transparency and as a tool that could be reused by similar projects.

  (Additional annexes will be added as needed as the project progresses, for instance, any data sharing agreements, or detailed legal compliance analyses per country.)

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Annex I: Informed Consent Form and Participant Information Sheet (Templates)
Project Title: ISABEL – mInimize coSts and mAximize Benefits in transitional European Labour markets
Coordinated by: [Insert institution]
Conducted by: [Insert partner institution]
Contact: [Insert name & email]

Why are we doing this research?
This survey is part of a European research project studying how job markets are changing due to green and digital transitions. We aim to understand your experiences and challenges to help shape better employment policies.

What does participation involve?
- The survey takes approximately [X] minutes.
- It asks about your work history, skills, and job experiences.
- You may skip any question and stop at any time.

Voluntary and anonymous
- Your participation is voluntary.
- You can stop the survey at any time without giving a reason.
- No names or identifying information will be published.

How will your data be used?
- Responses are collected anonymously or pseudonymously.
- Data is stored securely and processed under GDPR and national data laws.
- Only the ISABEL research team will access the data.
- Results may be used in publications but you will never be identifiable.

Your rights
You have the right to access, correct, or delete your data.
For questions or to exercise your rights, contact: [Insert contact or DPO email].
You can also contact your country's Data Protection Authority if you have concerns.

Consent to Participate
☐ I confirm I have read and understood the above.
☐ I agree to participate voluntarily in this survey.
☐ I understand how my data will be used.
Click "Next" to confirm your consent and begin the survey.

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Annex II: Data Protection Impact Assessment (DPIA) Summary

This document provides a summary of the Data Protection Impact Assessment (DPIA) conducted for the ISABEL project. The DPIA evaluates the potential risks to personal data and outlines the measures taken to mitigate those risks in compliance with the General Data Protection Regulation (GDPR). The full DPIA report is available upon request.

1. Purpose of the DPIA

To assess and minimize data protection risks associated with ISABEL's collection and processing of personal data through surveys, interviews, and stakeholder engagement activities across multiple countries.

2. Nature of Data Collected

- Employment status and history
- Skills, qualifications, and job transitions
- Voluntary demographic data (e.g., age range, education level)
- Optional sensitive data (e.g., health-related factors, trade union membership)

3. Key Risks Identified

- Risk of re-identification from indirect identifiers
- Unauthorized access to personal or sensitive data
- Inadequate consent or lack of understanding by participants
- Bias in AI tools influencing interpretation of data

4. Risk Mitigation Measures

- Use of pseudonymization and data minimization techniques
- Secure, encrypted storage and restricted access
- Clear and explicit informed consent procedures (written and verbal)
- Regular monitoring and internal audits
- Data sharing limited to consortium partners under strict agreements

5. Data Subject Rights and Safeguards

- Participants are informed of their rights to access, rectify, and delete data
- Right to withdraw at any time
- Contact details for Data Protection Officers provided
- Anonymous reporting in publications and presentations

6.Conclusions

The DPIA concluded that, with the safeguards in place, the processing of personal data in the ISABEL project does not pose a high risk to participants. No further consultation with data protection authorities was deemed necessary. Ongoing review and risk reassessment will be conducted throughout the project lifecycle.

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Annex III: Ethics Approval Letters

This annex contains or will contain copies of ethics approval or compliance letters received from Institutional Review Boards (IRBs), Ethics Committees, or equivalent bodies across the ISABEL consortium partner institutions. These letters confirm ethical approval or review of the research protocols involving human participants, data collection, or sensitive topics.
Each letter will include the name of the approving institution, the date of approval, a brief description of the approved activity (e.g., surveys, interviews, living labs), and any reference numbers or conditions set by the committee. The documents will be appended as they are received.

Template entry (to be filled for each approval letter):
Institution: [Name of partner institution]
Country: [Country name]
Type of Research: [e.g., Survey, Interview, Focus Group, Living Lab]
Ethics Committee or Board: [Full name of the reviewing committee]
Approval Reference Number: [Insert reference if applicable]
Date of Approval: [Insert date]
Summary of Approval: [E.g., Approved without conditions / Approved with data protection conditions / Waiver granted]

Scanned or digital copies of the original ethics approval letters will be inserted below or appended to this annex as received from each partner.

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Annex IV: Internal Ethics Checklist

This annex presents the internal ethics checklist developed and used by the ISABEL consortium for ongoing ethics monitoring, as referenced in Section 5.3 of the Societal, Legal, Privacy and Ethical Report. This checklist supports compliance with Horizon Europe standards and GDPR, and serves as a reusable model for other research projects. The checklist is regularly updated and reviewed by the Ethics Manager and partner institutions to ensure that ethical procedures are followed consistently across countries and work packages.

Internal Ethics Monitoring Checklist:

- ✓ Have all research protocols involving human participants received ethics approval from a relevant committee?
- ✓ Are participant information sheets and consent forms available in all relevant languages?
- ✓ Are consent procedures (written, verbal, or digital) properly documented and stored securely?
- ✓ Has a Data Protection Impact Assessment (DPIA) been completed and updated as necessary?
- ✓ Is personal data pseudonymized or anonymized where appropriate?
- ✓ Is all personal data stored on secure, encrypted systems with restricted access?
- ✓ Are all researchers trained in data protection and ethics procedures?
- ✓ Are procedures in place for participants to withdraw their data?
- ✓ Are participant rights (access, rectification, deletion) clearly communicated and respected?
- ✓ Are third-party processors (e.g., transcription services) bound by GDPR-compliant agreements?
- ✓ Is AI system development guided by transparency, bias mitigation, and human oversight principles?
- ✓ Have all partners signed off on local ethics compliance for their country?
- ✓ Is an audit trail maintained for ethics-related decisions and communications?
- ✓ Are vulnerable participants identified and supported with appropriate safeguards?
- ✓ Has the Ethics Manager or designated contact conducted periodic compliance reviews?
- ✓ Are issues, complaints, or adverse events logged and responded to promptly?
- ✓ Has a mid-term ethics and legal compliance review been conducted or scheduled?

This checklist is intended as a living tool, to be revisited throughout the project lifecycle and shared with ethics reviewers or partners upon request.

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