

RETLAMI-SEE

Deliverable 8.3 – Ethical procedures framework

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List of abbreviations used in this document

D - Deliverable

FPN UNIBL – Faculty of Political Sciences University of Banja Luka

GDPR - General Data Protection Regulation

IOS - Leibniz-Institute for East and Southeast European Studies in Regensburg

UNIVIE RECET - University of Vienna – Research Centre for the History of Transformations

WP – Work Package

ZRC SAZU - Research Centre of the Slovenian Academy of Science and Arts – Institute of Culture and Memory Studies



Executive Summary

This document presents an overview of ethical considerations, procedures and measures to be undertaken for RETLAMI-SEE activities. It provides detailed information on the informed consent procedures. It also describes the measures pertaining to the transfer of data from the EU to a non-EU country (in this case Bosnia and Herzegovina) and vice versa in accordance with the General Data Protection Regulation (GDPR).



Introduction

The aim of this document is to describe measures to be implemented throughout the RETLAMI-SEE project ensuring that its activities meet the highest ethical standards. This document is prepared based on the [Ethics and Data Protection](#) and [Ethics in Social Science and Humanities](#) guidance provided by the European Commission.

Even though RETLAMI-SEE is mainly focusing on capacity building activities, two of its Work Packages (WP4 and WP5) are focused on exploratory research through engaging human participants through interviews. In order to adhere to ethical standards in conducting exploratory research, but also other activities within the project, RETLAMI-SEE team members follow the standards and procedures described in this document.

All RETLAMI-SEE team members are responsible to ensure the adequate protection of the personal data collected throughout the project implementation. This means compliance with the obligations provided under the EU General Data Protection Regulation (GDPR) and all other (national) applicable data protection laws and regulation when processing personal data within the RETLAMI-SEE project.

This document also relies on the data management procedures and measures provided in the *D8.2 – Data management plan*.

Measures to ensure adhering to ethical standards in RETLAMI-SEE

- **Ethics approval**

RETLAMI-SEE activities envisaged in the “Exploratory research project: Transformation of labour in Bosnia and Herzegovina through the lens of migration” (WP4 and WP5) include a combination of life history interviews and interviews with experts, participant observation (ethnography), statistical data collection, and the analysis of archival documents. Prior to beginning of fieldwork, RETLAMI-SEE team will obtain ethics approval by the relevant ethics committee. The UNIVIE team, as the leader of WP4 and WP5, will be responsible for completing the procedure and obtaining the ethics approval through the Ethics Committee of the University of Vienna.

- **Data protection and privacy**

Deliverable 8.2 – Data management plan, among other, describes the data security measures to be applied throughout the RETLAMI-SEE lifespan. These encompass user authentication, access control and storage security.

Depending on the sensitivity of data collected, the data protection process will ensure that the re-identification of data subjects will be avoided, primarily through pseudonymisation in the context of interviews, archival documents and ethnography. Pseudonymisation will be achieved through the coding of the personally identifiable information into a specifically assigned ‘participant code’. In the exploratory research project (WP4, WP5) data collection is conducted through interviews with individuals who will either be audio recorded or whose responses will be written up by the interviewer (depending on the provided consent). In both instances pseudonymisation will take place during the transcription of audio recordings and/or research note so that identifiable information, including, but not limited to name, date,



and date of birth is substituted by the participant code. Interview notes, audio recordings, the subsequent transcripts and a digital copy of the consent form (all containing personal data) will be stored in the password protected [u:cloud pro](#) (supported by the Vienna University Computer Centre). The u:cloud pro for RETLAMI-SEE is password protected and accessible only to the core RETLAMI-SEE team members. Only carefully selected sections of the pseudonymised data (coded interview transcripts and field notes) will be used in academic writing, presentations and other scholarly activities to protect identifiable information.

The *RETLAMI-SEE project website* does not require a cookie policy as it does not utilize cookies or other tracking mechanisms that necessitate user consent under General Data Protection Regulation (GDPR) or the EU ePrivacy Directive. However, as the project may collect and process personal data through external event registration links, a *Privacy Policy* is in place to ensure compliance with data protection regulations. The reasoning for this distinction is outlined below:

1. No Cookie Policy Required

The RETLAMI-SEE website does not employ cookies, tracking technologies, or user profiling mechanisms. The following factors justify the absence of a cookie policy:

- **No Data Collection Through the Website:** The website does not collect or store any personally identifiable information (PII) such as names, email addresses, or browsing behaviour.
- **No Third-Party Analytics or Tracking Tools:** The website does not use Google Analytics, Facebook Pixel, or similar tracking technologies that would require explicit consent from users.
- **No Comment Sections, Logins, or User Accounts:** Since visitors do not interact directly with the website via comments, logins, or forms, there is no need for cookie-based session tracking or user authentication.
- **Only Essential Functionalities:** If the website uses minimal session cookies (e.g., for language settings or security purposes), these are exempt from consent requirements under Article 5(3) of the ePrivacy Directive.

2. Privacy Policy is Required and Implemented

While the website itself does not collect personal data, the project may process user data through external event registration forms. A Privacy Policy is in place to address this and to ensure compliance with GDPR (Regulation (EU) 2016/679). The key reasons for having a Privacy Policy include:

- **Event Registrations and Data Processing:** The project occasionally shares event invitations via the website, which include registration links or QR codes leading to an external registration platform (e.g., Google Forms, or institutional forms). If users provide personal data (such as name, email, and affiliation) through these external platforms, this data may be processed by the project team.
- **Transparency and User Rights:** The Privacy Policy outlines what data is collected, the purpose of collection, storage duration, user rights (access, correction, deletion), and the contact details for data inquiries.
- **Third-Party Processing Disclaimer:** Since event registrations are handled by external service providers, users are explicitly informed that they will be redirected to a third-party platform.

3. Compliance with GDPR and ePrivacy Regulations

- **GDPR Compliance:** The Privacy Policy ensures that any personal data collected through event registrations is processed lawfully, fairly, and transparently in accordance with Article 5 of GDPR.
- **ePrivacy Directive Compliance:** Since the website does not use tracking technologies, it is exempt from the requirement to obtain cookie consent.
- **Transfer of personal data from EU to non-EU countries**

The coordinating institution is located in non-EU country and the activities carried out through RETLAMI-SEE WPs involve researchers from non-EU country (i.e. Bosnia and Herzegovina). This implies also that the researchers will, particularly in the exploratory research project (WP4, WP5) collect data in EU countries (Austria, Germany and Slovenia). They will also have access to the collected data through WPs, which would amount as 'transfer of personal data to non-EU countries' in the context of GDPR. In order to ensure that the recipients of the data ensure the same level of data protection as required by EU law, the data transfer will have to fulfil the following requirements:

- Through informed consent ensure that the data subject has given its explicit consent to such transfers;
- Ensure that the RETLAMI-SEE General Assembly passes the 'adequacy determination' given that Bosnia and Herzegovina is not covered by the European Commission's [Adequacy decision](#);
- Data 'provider' and data 'recipient' sign the data-transfer agreement with contractual clauses ensuring respect of the EU data protection law.

- **Collection of data in non-EU countries**

In all activities RETLAMI-SEE will comply with GDPR and national rules and regulations relevant for data sharing and data protection. Applicable legislation in Bosnia and Herzegovina at the moment is Personal Data Protection Act of Bosnia and Herzegovina (Official Gazette of Bosnia and Herzegovina No. 49/06, 76/11 and 89/11) and the Rulebook on the maintenance and special technical security measures for personal data (Official Gazette of Bosnia and Herzegovina, No. 67/09). However, a new Law that is aligned with GDPR has been recently passed at the 8th extraordinary session of the Parliamentary Assembly of Bosnia and Herzegovina held on 30 January 2025 (at the moment not yet published in the Official Gazette).

- **Informed consent**

Informed consent is pivotal to ensure ethical conduct in RETLAMI-SEE project activities. RETLAMI-SEE has two streams of activities: one related to capacity building and participation/organization of different types of events and the other focusing on conducting the exploratory research project. Thus, ensuring informed consent of participants is organized as:

- Informed consent of participants at online and on-site training/workshops/conferences organized within RETLAMI-SEE (WP2, WP3, WP6) regarding their personal data processing, photographs and audio/visual recording. RETLAMI-SEE team is aware of the existence of different tools, such as the [DARIAH ELDAH Consent Form Wizard](#) which can be applied for creation of event-specific informed consent forms. Informed consent for online events will be provided through the application form in which it will be clearly stated:
 - Who collects the data and how we can be contacted (who is acting as the data controller within the meaning of the GDPR),



- For what purpose we collect and process the data,
- What information we collect and process (for example, Name and surname, E-mail address, Affiliation, Professional title / academic status, Gender, Country) and for how long we retain it for use,
- How the data will be further used and by which parties, and
- What are the rights of persons with regard to processing their data in accordance with the GDPR (i.e. access rights, rectification, erasure, restriction of processing in certain circumstances, data portability in certain circumstances, right to object and right to withdraw consent).
- Informed consent of research participants, i.e. labour migrants involved in life history interviews and experts (trade union leaders and employers), regarding their voluntary participation in exploratory research conducted within RETLAMI-SEE (WP4 and WP5). RETLAMI-SEE researchers will provide research participants with an information sheet and informed consent form (see Annex 1) to be signed before the start of the interview. The consent form is drafted in English and will be translated into the local language(s) of Bosnia and Herzegovina. In case, for any reason, consent cannot be given in writing, non-written consent will be formally documented and independently witnessed. The information sheet provides accessible information on the aims and methods of the research, clearly stating that the participation in the research is on a voluntary basis and can be withdrawn at any time without consequences. The information sheet also provides details on how the data collected through the interview will be stored, pseudonymised and, under which circumstances and in which form, reflected in publications.

All records relevant to the informed consent procedure, including the information sheets and consent forms provided to and signed by the research participants (or consent given otherwise) will be scanned and stored as digital version on the UNIVIE repository (u:cloud) while hard copies will be deposited by the Project Coordinator at UNIBL.

● Do no harm principle

RETLAMI-SEE will strive to shape its activities and in particular the exploratory research project (WP4 and WP5) in a manner that ensures non-maleficence and beneficence in data collection, data processing and analysis, as well as publishing the research results (research publications). This will be done by a careful consideration and approach as follows:

- Assessing the potential risks for labour migrants in Austria, Germany and Slovenia who will be interviewed depending on their employment and immigration status, gender, or any other characteristic for which participation in research could induce more harm than benefit.
- Careful preparation and conduct of the interviews to ensure that the interlocutors feel safe and comfortable to share their stories, with clear indication that they can always decline to answer a particular question, and/or withdraw from the interview/research without any consequences.
- Assuring the data protection procedures are implemented as described above and in *D8.2 – Data management plan*.



Annex 1 – Information sheet and Informed consent form

Information for participants and declaration of consent to participate in the study: “Transformation of Labour in Bosnia and Herzegovina through the lens of migration”

Dear participant,

We would like to invite you to participate in the study “Transformation of Labour in Bosnia and Herzegovina through the lens of migration”.

Your participation in this study through a biographical interview is voluntary. You can refuse to participate at any time, without having to give a reason, or also withdraw your agreement to participate once the study has already started. There will be no negative consequences for you if you refuse to participate or if you decide to withdraw.

This kind of study is necessary to gain new, reliable academic research results. However, your written consent to participate in the study is a prerequisite for us to conduct this research. Please take time to read the following information carefully and do not hesitate to ask questions.

Please only sign the declaration of consent

- if you have fully understood the type and procedure of the study,
- if you are willing to give your consent to participate, and
- if you are aware of your rights as a participant in this study.

Information on the study

BACKGROUND OF RESEARCH:

The EU-funded Horizon Europe project "Enhancing Capacities for Quality and Impactful Research on Transformations, Labour and Migration in Southeast-Europe" (RETLAMI-SEE) is coordinated by the Faculty of Political Science at the University of Banja Luka (FPN UNIBL). RETLAMI-SEE **aims to enhance the research capacities and empower young researchers at FPN UNIBL to conduct interdisciplinary research on transformations, labour, and migration in Southeast Europe.** In implementing this project, the FPN UNIBL cooperates with the University of Vienna – Research Centre for the History of Transformations (UNIVIE RECET), the Research Centre of the Slovenian Academy of Science and Arts – Institute of Culture



Funded by
the European Union

and Memory Studies (ZRC SAZU) and the Leibniz-Institute for East and Southeast European Studies (IOS) in Regensburg.

THE PURPOSE OF THE STUDY:

“Transformation of Labour in Bosnia and Herzegovina through the lens of migration” is an exploratory research project in which the research team conducts life history interviews with migrant workers from Bosnia and Herzegovina in Slovenia, Austria and Germany, and returned workers in Bosnia and Herzegovina. The purpose is to gather diverse accounts of labour migrants about their personal experiences and narratives of work and migration.

PROCEDURES OF THIS STUDY:

The researcher (the RETLAMI-SEE team member who is the interviewer) will clearly explain the goals of the research project and provide an information and consent form to the research participant (interviewee). The interview then begins with a series of open-ended biographical questions centred on work and migration and the research participant is encouraged to speak about issues in their own lives and experience which they consider to be important. Interviews typically last from 30-60 minutes.

Participation is voluntary. Every participant has the right to withdraw from the project and delete individual responses without penalty at any time (with the proviso that pseudonymized information published in scientific publications at a later date cannot retrospectively be withdrawn). If a participant submits a written request of withdrawal, their interview and resulting transcripts will be deleted from the project database. The interviews archived by the academic partner institutions will not be made available to third parties. Personal data will not be published.

USE OF DATA:

The interview will be recorded by a voice-recorder (or alternatively, as hand written notes made during the interview). The interview recording and notes will be transcribed and personal identifiable information (such as age, birthday, address) will be changed (pseudonymised with a code) and stored in a password protected repository at the University of Vienna accessible only to the core project team members. The team members will collect data from EU countries (Germany, Austria, Slovenia) and non-EU countries (Bosnia and Herzegovina) which will be transferred between the EU and non-EU states via the University of Vienna password protected repository u:cloud pro. The data will be used to produce scientific publications (papers, articles, dissertations and other forms of scientific communication) and not for any other purposes.



Consent form

DECLARATION:

- I am 18 years or older and am competent to provide consent and I voluntarily agree to be part of this research study.
- I have read, or had read to me, the information about this research project and this consent form. I have had the opportunity to ask questions and all my questions have been answered to my satisfaction, and I understand the description of the research that has been provided to me.
- I approve the use of the data I provide for scientific purposes, and I have no objections to this data being published in scientific publications in a way that does not reveal my identity (pseudonymisation).
- I understand that I may refuse to answer any question and/or stop the interview at any time and that I may, at any time, even subsequent to my participation, request to have my recorded interview and/or interview notes deleted from the project database.
- I understand that, subject to the constraints above, no recordings will be replayed in any public forum or made available to any audience other than the current researchers/research team.
- I understand that I will not receive reimbursement or payment for research participation and that I will not incur costs from participation in the study.
- I have received a copy of this agreement.
- I consent to an audio recording of my interview: YES NO (if no, I consent to an unrecorded interview during which the interviewer will take notes: YES NO)

PARTICIPANT'S NAME:

PARTICIPANT'S SIGNATURE:

Date:

Statement of the researcher's responsibility:

I have explained the nature and purpose of this research study, the procedures to be undertaken and any risks that may be involved. I have offered to answer any questions and fully answered such questions. I believe that the participant understands my explanation and has freely given informed consent.

RESEARCHER'S CONTACT DETAILS:

Partner organization:

RESEARCHER'S SIGNATURE:

Date: