

# EDULAB

European Youth in Transition to  
Education and Labour



## Ethic Issues Management Plan for EDU-LAB project

Documentation and guidelines

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## Purpose and scope of the deliverable

The Ethic Issues Management Plan (D7.1) consists of a set of documentation and guidelines to ensure that all research, dissemination and activities adhere to ethical principles and comply with relevant national, EU and international legislation. This includes the **Charter of Fundamental Rights of the European Union** and the **European Convention on Human Rights** and its Supplementary Protocols.

A particular emphasis is placed on upholding key principles such as inclusiveness, non-discrimination, the protection of personal data, the protection of minors, the right to privacy, the right to physical and mental integrity, and the need for high standards of human health protection. Ethic Issues Management applies to all consortium participants, project participants, and stakeholders who engage with the project's outputs.

## Document history

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## List of project-specific terms and abbreviations

- JCA** Jointed Controllorship Agreement (Annex F to the Consortium Agreement)
- EIMP** Ethics Issues Management Plan (this document)
- EIG** Ethics Issues Group
- PN** Privacy Notice
- ICF** Informed Consent Form
- NDA** Non-disclosure agreement (template)
- WP** work package
- PMB** Project Management Board
- EDU-LAB** this EU-funded project “European Youth in Transition to Education and Labour”

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# 1 Introduction

## 1.1 About this document

This document is produced as a part of work package 7 (Project Management), led by the project coordinator ECONOMICA. In accordance with Annex A (part 3) to the Grant Agreement, deliverable D7.1 “Ethics issues management documentation and guidelines” (further referred to as “EIM”) outlines the ethics issues relevant to the EDU-LAB research and dissemination agenda, and provides guidance on the specific activities and procedures that project teams must follow to ensure compliance with European and national legislation on the study of social sciences and humanities.

Ethics issues management (EIM) includes sets of specific documentation, such as the **Information Sheet for Participants (ISP)**, the **Informed Consent Form (ICF)**, **Non-Disclosure Agreement (NDA)**, **Privacy Notice (PN)** and **Joint Controllership Agreement (JCA)** to help project team meet the ethical requirements. Most of these documents or templates are quoted or reproduced in the Annexes to this document.

EIM serves as the primary reference for project teams conducting ethics self-assessment. Beyond that, EIM establishes the ethical framework guiding the overall organization of the research process within the project. It ensures full adherence to the principles of research integrity and aligns with best practices and regulatory requirements for responsible research conduct. EIM also addresses key aspects of personal data storage, security measures, and safeguards implemented to prevent data misuse throughout the research, dissemination, and exploitation phases. EIM therefore applies not only to consortium participants, but also to project informants (experts, minors and youths) and stakeholders engaged with project’s outputs.

## 1.2 Project summary

EDU-LAB is a Horizon Europe collaborative research project (Grant Agreement No. 101177428) running from 2025 to 2027. The project aims to address systemic challenges related to the transition of young people (aged 15–30) from education to the labour market, with a strong focus on equity, inclusion, and evidence-based policy reform.

EDU-LAB explores how policies, practices, and institutional arrangements across different education and training systems—particularly in general education (GE) and professional/vocational education and training (PVET)—can be optimized to better support youth in accessing quality learning pathways, completing education, and transitioning into employment.

Key project dimensions include:

- Examining early schools leaving, work-based learning, and regional disparities
- Assessing the policy and investment landscape in the European Education Area
- Identifying and promoting effective and inclusive practices at the local, national, and EU levels

The project brings together a multidisciplinary consortium of universities, research institutions, and policy-oriented organizations from across Europe. Through its work packages, EDU-LAB will deliver a combination of empirical research, policy recommendations, and practical toolkits designed to inform and support stakeholders in education, governance, and labour market development.

The project’s ambition is not only to generate knowledge, but also to facilitate its uptake through collaborative stakeholder engagement, strategic communication, and targeted dissemination, ensuring that its outputs are accessible, relevant, and impactful at all levels of policy and practice.

## 1.3 Glossary and definitions of main ethics-related terms and concepts used in EDU-LAB project

This glossary presents (in alphabetical order) and briefly explains several main terms concepts related to the various aspects of project’s ethics policies.

**Anonymization** is the process of permanently removing personal identifiers—information that directly or indirectly links to an identified or identifiable individual—from a dataset containing sensitive data, ensuring that identification is no longer possible.

**Any mental illness (AMI)** is defined as a mental, behavioral, or emotional disorder. AMI can vary in impact, ranging from no impairment to mild, moderate, and even severe impairment (e.g., individuals with serious mental illness as defined below).

**Confidentiality** refers to the research team's obligation to protect participants' personal information from unauthorized access or disclosure, ensuring that it is only shared with individuals qualified to receive it. This duty aligns with Article 5(f) of Regulation (EU) 2016/679 and Article 4(f) of Regulation (EU) 2018/1725.

**Consent** refers to a freely given, specific, and informed expression of agreement by research participants to take part in a study. In the context of data protection, it signifies a voluntary, informed, and specific authorization for the processing of personal data, in compliance with Article 4(11) of Regulation (EU) 2016/679 and Article 3(15) of Regulation (EU) 2018/1725.

**Data Subject** are individuals whose personal data is collected, processed, or stored by an organization. Under Regulation (EU) 2016/679 a data subject is any identified or identifiable natural person whose data is being processed.

**Data minimization** is a fundamental principle governing the collection and retention of personal information. It requires that only the data that is adequate, relevant, and strictly necessary for achieving a specific purpose be collected. Additionally, personal data must be retained only for as long as needed to fulfill that purpose, ensuring compliance with Article 5(1)(c) of the GDPR and Article 4(1)(c) of Regulation (EU) 2018/1725.

**Data processing** refers to any operation or sets of operations performed on personal data, whether by automated or manual means. This includes collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure, dissemination, alignment, combination, restriction, erasure, or destruction of personal data.

**Personal data** refers to any information related to an identified or identifiable living individual. An individual is considered identifiable if they can be directly or indirectly recognized through identifiers such as a name, identification number, location data, online identifier, or other factors specific to their physical, physiological, genetic, mental, economic, cultural, or social identity. This definition aligns with Article 4(1) of Regulation (EU) 2018/1725.

**Pseudonymization** is a data protection technique that replaces or alters personal identifiers within a dataset so that individuals can no longer be directly identified without additional information. This definition aligns with Article 4(5) of Regulation (EU) 2016/679 (GDPR) and Article 3(6) Regulation (EU) 2018/1725

**Research participants** are individuals who voluntarily take part in a study after providing written consent. They act as informants by sharing their opinions on various issues through methods such as Delphi surveys and interviews. In the context of EDU-LAB, research participants are also considered *data subjects*, as their personal data is collected, stored, and processed.

**Right to object** allows *data subjects* to oppose the processing of their personal data at any time, based on reasons related to their particular situation, in accordance with Article 23 of Regulation (EU) 2018/1725. This right also applies when data is processed for scientific research purposes (Article 23(4)). *Data subjects* must be informed of this right before participating in the study, and it must be explicitly stated and presented separately from other information (Article 23(2)).

**Sensitive data** refers to a category of personal data that discloses specific characteristics or details about an identified or identifiable individual. This includes information on racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health status, genetic and biometric data, as well as data related to a person's sex life or sexual orientation.

**Serious mental illness (SMI)** is defined as a mental, behavioural, or emotional disorder resulting in serious functional impairment, which substantially interferes with or limits one or more major life activities. The burden of mental illnesses is particularly concentrated among those who experience disability due to SMI.

## 2 Ethical dimension of the objectives, methodology, and impact

### 2.1 EDU-LAB research objectives and methodology

#### 2.1.1 Objectives of the activities

The EDU-LAB project adopts a mixed-method approach, incorporating both primary data collection and the reuse of existing data. Secondary data used for analysis comes from openly available, large international datasets. The project will also collect new qualitative and quantitative data from young people (WP4) and experts (WP3B). This newly collected data includes personal information such as socio-demographic details and individual opinions.

Given that some participants belong to a vulnerable group (minors aged 15–17), specific protective measures will be implemented, as described *inter alia* in section 2.5.

#### 2.1.2 Potential impact of project activities

EDU-LAB research project examines trends and barriers in education and the labour market by processing personal data in compliance with applicable data protection laws and aims to generate insights that benefit young people policy development.

The research project will not have any negative impact on participants, individuals, social groups, institutions, or countries. This commitment is ensured through the implementation of strict ethical guidelines, which will be rigorously followed and continuously monitored by the **Ethical Issues Group (EIG)** – see **Annex Six** on page 36 – to guarantee full compliance with the highest ethical and legal standards.

#### 2.1.3 EDU-LAB research methodology in relation to ethics

##### Overall ethics-related principles and management

EDU-LAB research agenda fully complies with European legislation. All participating institutions will also adhere to national data protection laws. Each project partner will assess any additional national legal requirements relevant to their research activities. If applicable, these regulations will be documented, shared, and referenced in regular project reports.

All international, European, and national legal and ethical frameworks governing Social Sciences and Humanities research will serve as key guidelines for this project.

EDU-LAB follows the general ethical principles and legislation applicable to research set by the European Commission and the ethical boards from the locations where implementation of the research will occur (universities, countries). The empirical fieldwork is strictly guided by ethical considerations and is in line with the EU General Data Protection Regulation (GDPR) and the European Code of Conduct for Research Integrity of All European Academies (ALLEA).

Project's **Ethical Issues Group (EIG)** includes leading researchers from several partnering teams (see its personal composition in **Annex Six: Personal composition of Ethics Issues Group (EIG)** on page 36) and serves as one of the steering bodies of the consortium (WP7) responsible for overseeing all ethical aspects of the research. This includes ensuring compliance with ethical guidelines and managing the Data Management Plan (DMP). Throughout the project, the EIG monitors adherence to ethical standards, DMP protocols, and GDPR regulations.

The Ethical Issues Group (EIG) reviews data collection tools and procedures on a case-by-case basis. When necessary, it will consult the relevant national or regional data protection commissions to ensure that all ethical concerns are properly addressed. All collected data will be safeguarded in accordance with the European Directive on Data Protection (EDPR) and its transposition into national laws, General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), Data Protection Law Enforcement Directive (Directive (EU) 2016/680), Regulation on Processing of Personal Data (Regulation (EU) 2018/1725), OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data, UN Guidelines on Computerized Personal Data Files and other relevant international frameworks.



Ethical standards are outlined regarding the recruitment of participants, informed consent procedures, joint controllership of data, as well as the processing of personal data in line with legal and ethical requirements.

### Informed consent

Information Sheets for Participants (ISP) and Informed Consent Forms (ICF) will be provided to all potential study participants in their local languages. Participation is strictly voluntarily, and respondents will be explicitly informed about their right to withdraw their participation at any time and at no consequence to them. All respondents will be informed about the purpose of the research in written form and orally (in the local languages), including information about the measures to secure their anonymity and confidentiality, and ways for them to learn about the outcomes of this research.

### Recruitment of participants

For all data collection activities (WP3 and WP4), only individuals who are mentally capable of comprehending the informed consent form will be recruited. Participation will be entirely voluntary, and all study participants will (1) receive an **Information Sheet for Participants** (ISP) outlining the study's aims and scope; (2) be provided with **Informed Consent Sheet** (ICS) to review and sign before the start of data collection; and (3) be clearly informed about their role in the study and their rights, including the right to withdraw at any time without justification and without consequences. These measures ensure that participation is ethically sound, transparent, and fully aligned with research integrity principles.

### Data protection of privacy and Data Management Plan

All collected data will be anonymized for analysis to ensure that individual research participants cannot be traced back from the data or any research results in the process of data management. All necessary data protection measures guarantee that none of the participants (young people and experts) can be identified based on the data collected will be carefully applied. All collected data will be stored safely with access only for the core researchers of the national teams. All measures will be taken to secure the protection and the privacy of the participants so that the data they provide cannot be accessed by third parties. All procedures for data collection, storage, protection, retention, and destruction will be compliant with national and EU legislation and will be monitored by the Ethics Issues Group (EIG).

**Data Management Plan** (DMP, project's deliverable D7.2) describes the data management life cycle for all datasets collected, processed or generated by the research project. For online data collection, only copyright survey software and online collaborative platforms (e.g., MS Teams) that are compliant with GDPR and that include safety measures ensuring users' control over the data and any other content uploaded to the platforms will be used. Additionally, the research project will use only videoconferencing platforms that meet the following criteria: (1) local recordings can only be initiated by the researchers, with all participants immediately notified and asked for their consent, and (2) cloud recording is disabled. As part of the data collection protocols and Data Management Plan (DMP), local recordings and downloads must be securely stored in a safe and protected place.

- (1) During the whole data process
- (2) EIG ensures data protection in every component associated with data collection (sampling requirements, survey guidelines and manuals, survey information leaflets for respondents on data anonymity and confidentiality, procedures of data agglomeration, and merging of national survey data sets into project's database, etc.).
- (3) Prior to the fieldwork, the Ethical Conformity Certificate (ECC) will be produced as required by the ethical principles and applicable legislation of a Case Study country. The implementation will be preceded by the training of the teams and special attention will be paid to the procedures of regional supervision and quality control, including strictly following the ethics compliance norms.
- (4) As outlined in the Data Management Plan (DMP; WP7), all collected data will be (a) fairly and lawfully processed; (b) used for limited research-related purposes; (c) adequate, accurate, relevant and not excessive; (d) anonymized at the stage of the data analysis on the local level: personal identification data will be immediately separated from the main part of the survey or another tool and deleted after the quality checks procedures; (e) stored safely in separate project files only accessible to core team

members; (f) processed in accordance to the rights of research participants; (g) not transferred between the research team members without adequate protection. Under no circumstances will personal data generated in this research be transferred to any external party, including authorities of countries where these data have been collected.

### Protection of minors

For participants aged 15 to 17, specific measures will be implemented to safeguard their rights and interests:

An Information Sheet for Participants (ISP) detailing the data collection process, data management procedures, and participants' rights will be provided to both the young participants and their parents or legal guardians prior to data collection to ensure transparency and informed decision-making. The research team's contact information will be provided to the parents or legal guardians of minor participants. They have the right to reach out to the research team at any time with any concerns or inquiries.

The working teams of the research project will obtain informed consent from their parents or legal guardians before data collection begins. Minor research participants have the right to withdraw from the study at any time, even if their parents or legal guardians have provided informed consent. Likewise, parents or legal guardians also have the right to withdraw their child from the study at any time, without providing justification and without facing any consequences.

## 2.2 Compliance with the European Code of Conduct for Research Integrity

The European Code of Conduct for Research Integrity is quoted in the annex to this EIMP (see **Annex Four: European Code of Conduct for Research Integrity and its implications for EDU-LAB project** on page 31) and sets out fundamental principles and best practices to ensure ethical, responsible, and high-quality research. It provides guidance on honesty, reliability, respect, and accountability in all stages of research, including data processing and dissemination. This code serves as a key reference for maintaining research integrity within EDU-LAB project, ensuring compliance with European and national regulations while upholding the highest ethical standards.

The research, dissemination, and related activities of EDU-LAB project place particular emphasis on the following good research practices, as outlined in the European Code of Conduct for Research Integrity:

### Training, Supervision and Mentoring

The project coordinator ensures that *researchers receive rigorous training in research design, methodology, analysis, dissemination, and communication*. Work package leaders *mentor their team members, led by example, and offer specific guidance and training to properly develop and structure their research activities*.

### Research Procedures

Researchers design, carry out, analyse, and document research in a careful, transparent, and well-considered manner. Researchers share their results in an open, honest, transparent, and accurate manner, and respect confidentiality of data or findings when legitimately required to do so. Researchers report their results and methods, including the use of external services or AI and automated tools as needed, in a way that is compatible with the accepted norms of the discipline and facilitates verification or replication, where applicable.

### Safeguards

Researchers handle research participants and subjects (be they human, animal, cultural, biological, environmental, or physical) and related data with respect and care, and in accordance with legal provisions and ethical principles. Researchers have due regard for the health, safety, and welfare of the community, of collaborators, and others connected with their research.

### Data Practices and Management

Researchers ensure appropriate stewardship, curation, and preservation of all data, metadata, protocols, code, software, and other research materials for a reasonable and clearly stated period. Researchers ensure that access to data is as open as possible, as closed as necessary, and where appropriate in line with the FAIR



Principles (Findable, Accessible, Interoperable and Reusable) for data management. Researchers are transparent about how to access and gain permission to use data, metadata, protocols, code, software, and other research materials. Researchers inform research participants about how their data will be used, reused, accessed, stored, and deleted, in compliance with GDPR. Researchers acknowledge data, metadata, protocols, code, software, and other research materials as legitimate and citable products of research. Researchers ensure that any contracts or agreements relating to research results include equitable and fair provisions for the management of their use, ownership, and protection under intellectual property rights.

### Collaborative Working

All partners in research collaborations take responsibility for the integrity of the research and its results. All partners in research collaborations formally agree at the outset, and monitor and adapt as necessary, the goals of the research and the process for communicating their research as transparently and openly as possible. All partners in research collaborations formally agree at the outset, and monitor and adapt as necessary, the expectations and standards concerning research integrity, the laws and regulations that will apply, protection of the intellectual property of collaborators, and procedures for handling conflicts and possible cases of misconduct. All partners in research collaborations are consulted and formally agree on submissions for publication of research results and other forms of dissemination or exploitation of the results.

### Publication, Dissemination, and Authorship

Authors formally agree on the sequence of authorship, acknowledging that authorship itself is based on: (1) a significant contribution to the design of the research, relevant data collection, its analysis, and/or interpretation; (2) drafting and/or critical reviewing the publication; (3) approval of the final publication; and (4) agreeing to be responsible for the content of the publication, unless specified otherwise in the publication. Authors disclose any financial and nonfinancial conflicts of interest as well as sources of support for the research or the publication. Authors and publishers promptly issue corrections or retract publications, if necessary, the retraction processes are clear and the reasons stated, and authors are given credit for issuing corrections post-publication. Authors are accurate and honest in their communication to colleagues, policymakers, and society at large. Authors are transparent in their communication, outreach, and public engagement about assumptions and values influencing their research as well as the robustness of the evidence, including remaining uncertainties and knowledge gaps.

### Reviewing and Assessment

Researchers review and assess submissions for publication, funding, appointment, promotion, or reward in a transparent and justifiable manner, and disclose the use of AI and automated tools. Researchers adopt assessment practices that are based on principles of quality, knowledge advancement, and impact that go beyond quantitative indicators and take into account diversity, inclusiveness, openness, and collaboration where relevant.

## 2.3 Compliance with GDPR (EI 2016/679)

The EDU-LAB project fully adheres to the General Data Protection Regulation (Regulation EU 2016/679), which provides a legal framework for the protection of personal data within the European Union. Given the project's methodological reliance on personal data — particularly through expert interviews and the Delphi online survey — the consortium has developed a coherent data protection framework that is embedded across all phases of research design, implementation, analysis, dissemination, and data retention.

### Legal Basis and Principles

Personal data is collected and processed solely on the basis of informed, explicit, and voluntary consent, in accordance with Article 6(1)(a) of the GDPR. In cases where sensitive data may be involved, Article 9(2)(j) concerning scientific research is invoked, supported by appropriate safeguards. All personal data handling is guided by the core GDPR principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and confidentiality, and accountability (Article 5, GDPR).

According to the Data Protection Impact Assessment (DPIA) approved in May 2025, the EDU-LAB project is classified as a moderate risk, as special categories of personal data are collected and processed in accordance

with Article 9 (1) GDPR. These include information on ethnicity, disability status and migration background, especially for minors and other potentially vulnerable groups.

As outlined in the DPIA, the legal bases for processing are:

- **Article 6(1)(a)** GDPR — explicit, informed consent of participants (or their guardians, for minors); and
- **Article 9(2)(j)** GDPR — scientific research purposes, subject to suitable safeguards.

To minimize risk, transcripts and structured diary data are pseudonymized at the time of collection; all recordings are encrypted, stored locally and with access restrictions; only GDPR-compliant platforms are used. These measures are described in detail in the Data Management Plan (D7.2), in the DPIA and in the Privacy Policy and are regularly reviewed by the Ethics Issues Group (EIG) throughout the course of the project.

To this end, EDU-LAB ensures that:

- **Purpose limitation** is respected: personal data is collected exclusively for the defined research objectives and is not used for secondary, incompatible purposes.
- **Data minimisation** is practiced: only data strictly necessary for the objectives of each work package is collected.
- **Transparency and fairness** are operationalized: participants are informed about their rights and the use of their data via tailored Privacy Notices and Information Sheets.

### Operational Implementation

The project implements a decentralised yet harmonised system of data collection, whereby national teams conduct interviews and surveys in their respective contexts but under a unified data governance model. This includes:

- A **Joint Controllership Agreement (JCA)** signed by all consortium partners, defining shared responsibilities for data processing and ensuring that GDPR obligations are fulfilled collectively and transparently (see *Annex Eighteen: Jointed Controllership Agreement (Annex F to the Consortium Agreement)* on page 68).
- Standardized **Privacy Notices (PN)** (see *Annex Seven: EDU-LAB Privacy Notice (PN)* on page 37) and **Informed Consent Forms (ICF)** (see *Annex Eight: Informed Consent Form (ICF) for WP4 (Case Studies)*, *Annex Nine: Informed Consent Form (ICF) for WP3B (OSES-EEI)* and *Annex Ten: Informed Consent Form (ICF) for WP3B (OSES-Delphi)* on pages 45 to 54), which are localized in participants' native languages and designed to be clear, accessible, and specific about data handling procedures.
- Procedures for obtaining **prior consent** that emphasize voluntariness and enable participants to withdraw consent at any point without consequence.

All data collection tools and storage systems are subject to **ex-ante review** by the project's Ethical Issues Group (EIG), which also oversees compliance throughout the project lifecycle as needed.

### Data Handling and Security

To uphold data confidentiality and integrity:

- Personal identifiers are stored separately from research data and secured via encryption, password protection, and access control measures.
- All recordings (e.g., from interviews) are encrypted upon capture and transferred securely to a central server operated by the coordinating institution, where only authorized personnel may access them.
- Raw data is pseudonymized or anonymized at the earliest opportunity, depending on analytical requirements and ethical considerations.
- No personal data is transferred outside the EU or to third parties under any circumstances, ensuring full alignment with the GDPR's data transfer restrictions (Chapter V).

The **Data Management Plan (D7.2)**, elaborated in parallel to this EIMP, describes in detail the life cycle of each dataset, including provisions for retention periods, access restrictions, and data destruction protocols.

## Rights of Data Subjects

Participants are clearly informed of their rights under GDPR, including the right to access, rectify, erase, restrict, or object to the processing of their personal data. These rights are communicated in all study documentation and are supported by clear procedures for exercising them. Requests are processed without undue delay, under the oversight of the Data Protection Officer (DPO) at the coordinating institution.

Additionally, the EDU-LAB project does not engage in automated decision-making or profiling based on collected data.

## Monitoring and Oversight

The Ethics Issues Group (EIG), in collaboration with designated DPOs at each institution, monitors GDPR compliance across the project. Regular internal audits and reviews will be organized as needed to ensure that data protection practices evolve in accordance with the latest legal and technological standards.

In cases of doubt or dispute, the consortium will consult with national Data Protection Authorities and the European Data Protection Supervisor (EDPS), as appropriate.

## 2.4 Gender aspects

Within the EDU-LAB project, gender aspects are not considered auxiliary or optional; they form an essential part of ethical research design, data analysis, team composition, and policy recommendations.

The EDU-LAB consortium is committed to ensuring that gender equality, gender sensitivity, and intersectionality are explicitly and systematically integrated throughout the research lifecycle — from project design and data collection to analysis, dissemination, and impact evaluation.

### Gender Equality in Research Teams and Governance

In accordance with Horizon Europe requirements and the European Commission's commitment to mainstream gender in research and innovation:

- All EDU-LAB partner institutions are encouraged to implement or maintain a **Gender Equality Plan (GEP)**, particularly where this is an eligibility criterion for Horizon Europe funding.
- The consortium strives for **gender-balanced representation** across its governance structures (including the Ethics Issues Group, WP leadership, and advisory boards) and research staff.

Moreover, all participating institutions commit to offering equal opportunities in recruitment, task allocation, training, and professional development, irrespective of gender identity or expression.

### Gender-Sensitive Research Design

The EDU-LAB project explicitly integrates **gender as an analytical category** in the research methodology:

- **Research instruments** including the sociodemographic survey, structured diaries, and Delphi questionnaires include gender-sensitive response options and allow for self-identification beyond the binary model.
- **Exploratory expert interviews** and **case studies** are designed to capture gendered dimensions of education and labour transitions — such as differences in dropout rates, sectoral segregation, unpaid care responsibilities, and gender biases in educational counselling.
- Data collection tools are reviewed to ensure that questions and indicators are not unintentionally gender-biased and are appropriate for diverse populations.

In accordance with the Data Management Plan (D7.2), all survey instruments, structured diaries and interview guidelines contain gender-sensitive items that enable self-identification beyond the binary model; gender differentiation is anchored in all data sets. Gender-related data is processed exclusively in pseudonymized form, and sensitive information on gender identity is not stored in personally identifiable form.

The specific coding schemes and data dictionaries for gender variables are documented in the DMP. All datasets containing gender or intersectional analyses follow the principles of data minimization, relevance and respect for identity according to the GDPR and the European Code of Conduct for Research Integrity.

In accordance with **Horizon Europe's gender dimension** in research content, EDU-LAB also analyses how gender interacts with other social stratifiers, including age, ethnicity, migration status, disability, and socio-economic background (i.e., **intersectional analysis**).

### Gendered Barriers in Education and Employment

One of the central aims of EDU-LAB is to identify and understand gender-specific barriers and facilitators that affect young people's educational and labour market trajectories. This includes:

- Assessing how gender influences the choice of educational pathways (e.g., underrepresentation of women in STEM or men in health and education).
- Exploring gendered patterns in work-based learning opportunities and labour market integration.
- Understanding how education and employment policies affect women, men, and non-binary youth differently, particularly those from marginalized or intersectionally disadvantaged backgrounds.

The case studies and Delphi expert assessments are structured to reveal such asymmetries and to inform gender-sensitive recommendations for policy and practice.

### Ethical Considerations for Gender and Vulnerability

In line with the EDU-LAB ethics framework, specific attention is paid to the ethical implications of gender in the recruitment and treatment of participants:

- Participation in qualitative and survey-based research is entirely voluntary, with protocols in place to protect the dignity, privacy, and autonomy of all individuals regardless of gender identity.
- Interviewers and field researchers are trained to recognize and respond appropriately to gender-based vulnerabilities or sensitivities that may arise during empirical work.
- The consortium ensures that research environments are safe and respectful, particularly when engaging with minors, LGBTQ+ individuals, or individuals who may have experienced gender-based discrimination or violence.

### Monitoring and Reporting

To ensure ongoing accountability:

- Gender-disaggregated data is collected, analysed, and reported across all empirical work packages.
- Internal monitoring mechanisms are in place to track gender representation among study participants and research teams.
- Interim and final reports to the European Commission will include sections on gender equality outcomes and lessons learned.

### Dissemination and Gender-Inclusive Language

All dissemination materials (e.g., reports, publications, presentations, public outreach materials) adhere to **gender-inclusive language guidelines**. Visuals and narratives avoid reinforcing stereotypes and aim to reflect the diversity of young people in Europe.

Special effort is made to ensure that dissemination reaches audiences across genders, including through tailored messaging and media formats. Project findings on gender will also be highlighted in briefings for policymakers and stakeholders.

### Regulation EU 2018/1725

Regulation EU 2018/1725 is particularly relevant for EDU-LAB in the context of:

- Data processing responsibilities shared between EDU-LAB project partners and the Commission.
- Data exchanges that may involve the project coordinator, the funding agency, and external evaluators or auditors.

### Core Principles of Regulation (EU) 2018/1725 in EDU-LAB

The EDU-LAB project adheres to the following core data protection principles as defined by Regulation 2018/1725:

1. **Lawfulness, fairness and transparency** (Article 4(1)(a)): All personal data collected within EDU-LAB is processed in a lawful, fair, and transparent manner. Participants are fully informed of their rights and the purposes for which their data is being processed via Information Sheets for Participants (ISP) and Privacy Notices (PN).
2. **Purpose limitation** (Article 4(1)(b)): Data is collected only for clearly specified research purposes — namely, to understand and improve education-to-labour transitions among young people in Europe. It is not reused for any other unrelated purpose.
3. **Data minimization** (Article 4(1)(c)): Only data that is strictly necessary to fulfil the research objectives is collected. This principle is embedded in the design of interviews, surveys, and case studies. Redundant or extraneous data is actively excluded.
4. **Accuracy** (Article 4(1)(d)): All efforts are made to ensure data accuracy. Mechanisms are in place for research participants to correct inaccurate or outdated data during the project's data lifecycle.
5. **Storage limitation** (Article 4(1)(e)): Personal data is stored only as long as necessary to complete the research tasks and fulfil reporting obligations. Identifiable data is destroyed no later than December 31, 2027, following anonymization procedures.
6. **Integrity and confidentiality** (Article 4(1)(f)): EDU-LAB implements state-of-the-art technical and organizational measures—including secure servers, password protection, access control, and encryption—to ensure data is protected against unauthorized access or disclosure.
7. **Accountability** (Article 4(2)): All partners in the EDU-LAB consortium demonstrate compliance with the regulation and maintain complete documentation of data protection activities. This includes privacy notices, signed informed consent forms, joint controllership agreements, and records of data processing activities.

### **Anonymization and Pseudonymization under Regulation (EU) 2018/1725**

Article 4(5) and Article 10 of the regulation emphasize the importance of **anonymization** as a method of protecting personal data. EDU-LAB takes particular care to apply pseudonymization to qualitative interview transcripts, case study materials, and Delphi survey responses, ensuring that no direct or indirect identifiers remain.

Access to the pseudonymization keys is restricted to core members of each project partner (for their own data provided) and the Economica research team, and this separation is enforced by both technical (encryption, access logs) and organizational (access protocols) means.

### **Consent Requirements and Rights of Data Subjects**

Article 3(15) of Regulation (EU) 2018/1725 defines consent as a freely given, specific, informed, and unambiguous indication of the data subject's wishes. EDU-LAB ensures that informed consent:

- Is obtained prior to any data collection.
- Includes information on the right to withdraw (Article 23).
- Covers pseudonymization and the intended future use of pseudonymized data.
- Is documented and retained securely.

Research participants are informed of their rights through detailed privacy notices. These rights include:

- **Right to access** (Article 17)
- **Right to rectification** (Article 18)
- **Right to erasure** (Article 19)
- **Right to restriction of processing** (Article 20)
- **Right to object** (Article 23)

These rights are upheld throughout the research process and explicitly communicated to participants at every stage.

### **Joint Controllershship and Institutional Obligations**

Under Articles 28 and 29 of Regulation 2018/1725, the EDU-LAB consortium operates under a **Joint Controllershship Agreement (JCA)**. This agreement defines the roles, responsibilities, and coordination mechanisms of all partners in the handling of personal data. Economica, as the lead beneficiary, acts as the primary point of contact and data protection liaison.

All consortium members are required to:

- Adhere to GDPR-equivalent data protection standards.
- Maintain confidentiality (through NDAs and internal protocols).
- Follow agreed procedures in case of data breaches (Article 33).

### **Enforcement and Oversight**

In line with Article 41, oversight of compliance with Regulation (EU) 2018/1725 lies with the **European Data Protection Supervisor (EDPS)**. The EDU-LAB project maintains proactive communication with national Data Protection Authorities and ensures that all ethics applications are submitted and approved before data collection begins.

Data protection officers (DPOs) have been designated within the consortium and provide continuous guidance to ensure conformity with EU law.

### **Regulation EU 2021/695**

**Regulation (EU) 2021/695**, also known as the **Horizon Europe Framework Programme Regulation**, establishes the legal foundation for the EU's flagship funding programme for research and innovation for the period 2021–2027. As the EDU-LAB project is directly funded under Horizon Europe (Grant Agreement No. 101177428), full compliance with this regulation is both a legal and operational necessity.

### **Relevance to EDU-LAB: Scope and Applicability**

The EDU-LAB project must comply with Regulation 2021/695 in the following areas:

- Ethical conduct of research and safeguarding of human participants
- Data protection and the responsible use of data and digital technologies
- Non-discrimination, gender equality, and inclusiveness
- Open science practices and responsible research innovation (RRI)
- Reporting, dissemination, and exploitation of results

This regulation is implemented through the Grant Agreement and the associated legal and ethical obligations as laid out in Articles 14 and 15 of the Grant Agreement and further expanded in its Annexes.

### **Ethical Standards under Horizon Europe**

Article 18 of Regulation (EU) 2021/695 stipulates that all research activities funded under Horizon Europe:

“shall comply with ethical principles and relevant Union, international and national law, including the Charter of Fundamental Rights of the European Union and the European Convention on Human Rights and its Supplementary Protocols.”

EDU-LAB explicitly adheres to these ethical standards across all its empirical and analytical activities. This includes measures to secure:

- **Informed consent** for all interviews and data collection activities;
- **Anonymization and pseudonymization** of data in line with EU data protection norms;
- **Safeguards for working with minors** (ages 15–17), including dual consent (minor and guardian);
- **Risk assessments and ethical clearance** from institutional and national bodies.

All partners in the EDU-LAB consortium are contractually obligated to uphold these standards, and the Ethics Issues Group (EIG) monitors their enforcement throughout the project lifecycle.

### **Alignment with Union Values and Fundamental Rights**

Regulation 2021/695 reinforces core EU values as guiding principles of funded research. These include respect for human dignity, democracy, the rule of law, equality, and human rights, including the rights of



persons belonging to minorities. Article 18 explicitly references the **EU Charter of Fundamental Rights**, and Article 14 of the Grant Agreement reiterates the requirement for strict adherence to:

- The right to privacy and protection of personal data;
- The right to non-discrimination;
- The right to physical and mental integrity;
- High standards of health and environmental protection.

The EDU-LAB project operationalizes these values in its design, notably by prioritizing equity and inclusion in its sampling, targeting underrepresented youth populations, and avoiding any forms of coercion or exclusion in its recruitment and engagement strategies.

### **Open Science and Dissemination**

Article 14(1) of Regulation 2021/695 mandates that research funded under Horizon Europe must promote open science practices. EDU-LAB complies with this by:

- Publishing its deliverables on the official project website (<https://www.edu-lab-project.eu>);
- Releasing anonymized datasets, when possible, for scientific reuse;
- Publishing in open access journals where feasible;
- Ensuring FAIR (Findable, Accessible, Interoperable, Reusable) data management practices.

In line with the Horizon Europe open science agenda, EDU-LAB's Data Management Plan (DMP) sets out procedures for data handling, storage, anonymization, and accessibility, while protecting participants' confidentiality and rights.

### **Responsible Research and Innovation (RRI)**

In alignment with Horizon Europe's focus on societal impact and RRI, EDU-LAB ensures:

1. Inclusive and participatory design processes (involving youth and expert stakeholders);
2. Transparent communication of findings;
3. Ongoing ethical reflection and adaptation;
4. Monitoring for unintended impacts or risks.

## **2.5 Safeguards for Vulnerable Participants**

A significant part of EDU-LAB's empirical research involves young people aged 15–30, including minors (participants under the age of 18), NEET youth, people with disabilities, migrants and other potentially vulnerable groups (part of WP4). These participant groups may experience social disadvantage, exclusion or marginalisation, which entails increased ethical obligations with regard to protective measures, consent and data protection.

#### **Informed consent procedures:**

- Informed consent: As described in the Privacy Note, the DPIA and the DMP, all participants give their informed consent prior to participation.
- For participants under 18 years of age, a dual consent procedure is implemented: both parental or legal guardian consent and the minor's own assent are required before any data collection begins.
- Consent forms describe participants' rights to withdraw at any time, the voluntary nature of participation, the scope and purpose of data processing, confidentiality protections, data access limitations, and contact details for the responsible data controller.

#### **Safeguarding measures:**

- Reporting obligations: When disclosing risks, national protection laws and reporting obligations are complied with.
- Researchers are briefed in advance about potential emotional or psychological discomfort that participants may experience and discuss these issues during debriefing sessions as part of the data collection protocol.
- In case a participant discloses serious harm or abuse, national safeguarding laws and reporting obligations will be followed.

**Training of research teams:**

- Ethics and data protection training: All national teams receive training on ethical working practices, protection protocols, data protection and dealing with vulnerable groups before data collection begins.
- WP4 case study protocols include debriefing sessions where case study teams may discuss critical or ethically sensitive situations encountered during data collection.

**Minimisation of psychological risks:**

- Interview and diary protocols avoid unnecessary stress or intrusion into sensitive areas beyond what is essential for the research purpose.
- Open-ended diary questions are formulated in such a way that allow participants discretion in the level of detail they wish to share.

**Data protection measures**

- Restricted data collection: No criminal, judicial or highly sensitive health data is collected.
- Only data necessary for the research purposes are processed, in accordance with GDPR principles of data minimization and purpose limitation
- All data protection and pseudonymization protocols described in Section 4 of this document and the Data Management Plan are strictly applied to research with minors and vulnerable participants.

These safeguards are a central component of EDU-LAB's ethical governance framework and are regularly reviewed by the Project Management Board (PMB) as part of internal ethics monitoring.

### 3 EDU-LAB Ethics reviews and assessments

#### 3.1 Ethics self-assessment in EDU-LAB project proposal

At the stage of the submission and evaluation of EDU-LAB project proposal, the consortium has performed the prescribed **Ethics Self-assessment** and completed the **Ethics Issues Checklist**.

Both documents are quoted in **Annex Five: Ethics self-assessment in EDU-LAB proposal** on pages 33-35.

#### 3.2 Centralized and local Ethics reviews

The table below summarizes the current ethics approval status for EDU-LAB research activities involving human participants. This overview will be updated continuously as ethics approvals progress.

**Table 1. Ethics-related status per work package**

<i>Work Package</i>	<i>Research Activities</i>	<i>Requires Ethics Approval</i>	<i>Current Status</i>
<b>WP1</b>	Theoretical framework development	no	Not applicable
<b>WP2</b>	Policy mapping	no	Not applicable
<b>WP3A</b>	Secondary data analysis	no	Not applicable
<b>WP3B (OSES)</b>	International expert survey (Delphi) and the preceding Exploratory Expert Interviews	Yes (Centralized mode) <sup>1</sup>	Approved
<b>WP4</b>	Case Studies in 7 countries (Focus groups, participatory workshops, structured diaries, sociodemographic survey with youth (including minors))	Yes (Decentralized mode <sup>2</sup> )	Approved
<b>WP5/WP6/WP7</b>	Synthesis, dissemination, coordination	No	Not applicable

National ethics approvals have been obtained by the majority of partners and are stored in the project's internal Nextcloud structure. Specific documents are not publicly annexed in this plan to respect national confidentiality practices and data protection norms. Outstanding approvals are expected shortly from the UK and Austria teams.

<sup>1</sup> Ethics Review and approval by the Ethics Commission at ECONOMICA research institute (EDU-LAB project coordinator and leader of WP3B)

<sup>2</sup> Each national team secures the Ethics Review and approvals by the appropriate Ethics Committees (normally, at their universities or the nationally appointed bodies)

## 4 Ethics-related documentation of EDU-LAB

### 4.1 Informed Consent Form (ICF)

For each type and instance of fieldwork that implies the participation of human respondents, namely (a) Case studies in 12 locations 7 countries that constitute the empirical scope of WP4 and (b) the Exploratory Expert Interviews and the online Delphi-type survey that are parts of WP3B effort, we ensure that participants are fully informed about the research procedures and the purposes of these research activities. This is done using the **Informed Consent Forms** and the **Privacy Notice** that are handed out to respondents prior they agree to take part.

Generic templates for these documents are produced in English and will be adapted for national languages by the partners that implement these studies. See **Annex Seven: EDU-LAB Privacy Notice (PN)** on page 37, **Annex Eight: Informed Consent Form (ICF) for WP4 (Case Studies)** on page 45, **Annex Nine: Informed Consent Form (ICF) for WP3B (OSES-EEI)** on page 51 and **Annex Ten: Informed Consent Form (ICF) for WP3B (OSES-Delphi)** on page 54.

The subsequent sections explain these instruments on further details.

#### 4.1.1 Overall explanation of ICF

**The Informed Consent Forms** (ICF) serve to document the consent of research participants or the legal guardians of minor participants for their involvement in the respective empirical study. Informed Consent Forms for Participants will be provided and distributed to each respondent. The project teams will prepare the ICF in the languages most suitable for their respondents. Respondents will voluntarily sign the form and return it to the researchers. Only those who complete and sign the ICF will be eligible to participate in the study.

The ICFs are signed in two copies, with both the research participant and the researcher signing each. One copy is returned to the researchers, while the other copy is retained by the research participants.

For the online survey, the ICF will be integrated into the online questionnaire for electronic completion; only participants who provide their consent will be able to proceed with the survey.

The same consent form shall be used without modifications by all EDU-LAB partners. As a standard practice, the Informed Consent Form (ICF) is submitted as part of the Ethics Application. The consent must include the following essential elements:

- **Freely given** – Participants are not dependent on the research team and must not feel pressured to provide consent.
- **Specific** – Consent applies exclusively to this particular research project and the specified research method.
- **Informed** – Participants must be fully informed about the study's objectives, goals, data collection procedures, and how their data will be used.
- **Participant rights** – The consent form must outline participants' rights, including voluntary participation, the right to anonymity, the right to withdraw at any time, and the right to request the withdrawal of their data after the conclusion of the focus group discussion.

#### 4.1.2 ICF for Case Studies (WP4)

The WP4 Informed Consent Form (provided in **Annex Eight: Informed Consent Form (ICF) for WP4 (Case Studies)**) informs participants about the purpose and scope of the case study research, which includes focus groups, participatory workshops, structured diaries, and a sociodemographic survey. The form explains that participation is voluntary, that participants may withdraw at any time, and that confidentiality will be strictly maintained. It describes what personal data will be collected (including sociodemographic information and personal experiences), how these data will be processed, pseudonymized, and stored securely in accordance with GDPR principles.

For participants under 18, the ICF includes a double consent procedure requiring both guardian consent and participant assent. The form also informs participants about how to exercise their rights under GDPR, including rights of access, rectification, and withdrawal of consent. Contact information for the responsible data controller and Data Protection Officer is provided.

#### 4.1.3 ICF for the Exploratory Expert Interviews and online Delphi survey (WP3B)

The WP3B consent form (see ***Annex Nine: Informed Consent Form (ICF) for WP3B (OSES-EEI) and Annex Ten: Informed Consent Form (ICF) for WP3B (OSES-Delphi)***) informs the experts invited for interviews about the purpose and objective of the EDU-LAB research, the voluntary nature of their participation, and their right to withdraw at any time without negative consequences. It explains that the interviews – subject to consent – will be recorded, transcribed, pseudonymised, and stored securely on encrypted servers within the European Union.

Personal information such as name, institutional affiliation and contact details will be removed from the transcripts used for analysis and reporting. The form makes it clear that only pseudonymised data will be used for scientific analysis and publications and that quotations will not contain any identifying information. Audio recordings and complete transcripts will be deleted after the end of the project (no later than 31 December 2027)

Participants are also informed about how they can exercise their data protection rights – including withdrawal of consent, data access, correction and erasure – and are provided with contact details for both the local data collection team and the project's data protection contact point.

## 4.2 Privacy Notice

See ***Annex Seven: EDU-LAB Privacy Notice (PN)***.

Privacy Notice (PN) provides information on how, what, when, why and by whom personal data is collected, used, stored, and protected within the research project. The Privacy Notice adapted for each participating county has been submitted for the reviews the appropriate ethics committees to ensure compliance with relevant data protection laws and institutional policies. All PNs have been successfully endorsed,

The Privacy Notice (PN) - in line with the Data Management Plan and the DPIA - describes the categories of personal data processed in the EDU-LAB project. These include demographic data (age, gender, place of residence), socio-economic data (education level, employment status) and - in certain cases, especially in WP4 - sensitive data (e.g. disability status, ethnic or migration status).

The PN makes it clear that no criminal or judicial data is collected and that all processing follows the principles of lawfulness, fairness, purpose limitation and data minimization. Personal data is stored securely and only kept for as long as necessary - but no later than December 31, 2029; shorter retention periods may apply to raw data if required by national law.

The PN informs participants comprehensively about their rights as data subjects under the GDPR - including access, rectification, erasure, restriction and objection - and explains how these rights can be asserted via the coordinating institution's data protection officer (DPO).

No personal data is transferred to third parties or outside the EU/EEA. All platforms used for collection and storage are GDPR compliant as described in the WP4 and general DMP documents.

## 4.3 Joined Controllershship Agreement (JCA)

See ***Annex Eighteen: Joned Controllershship Agreement (Annex F to the Consortium Agreement)***.

Joint Controllershship Agreement (JCA) ensures the joint controllers determine their respective responsibilities of data processing in a transparent manner for compliance with the obligations under the EU's *General Data Protection Regulation*.

JCA is compiled and legally executed as Annex F to the Consortium Agreement and as such duly signed by all project partners.

The Joint Controllershship Agreement (JCA) defines the joint responsibilities and roles of all EDU-LAB consortium members in accordance with Article 26 of the General Data Protection Regulation (GDPR). All partners act as joint controllers for the personal data collected locally and are jointly responsible for ensuring that all processing operations comply with EU and national data protection laws.

The JCA ensures that each partner

- Obtains and documents the informed consent of the data subjects (or legal guardians in the case of minors),
- Stores raw and identifiable data securely within its national jurisdiction, without cross-border transmission of direct identifiers
- Processes pseudonymized or anonymized data sets under the coordination of Economica for central comparative analyses and
- Cooperates in the processing of data subject requests (information, correction, deletion, etc.) according to common procedures.

Economica acts as project coordinator and primary contact for data protection inquiries from research participants or supervisory authorities. Coordination between the institutions is also governed by Article 1.4.5 of the Consortium Agreement, which emphasizes the need for legal coordination, joint compliance and prompt reporting of data protection incidents.

The JCA is fully consistent with the DPIA, the Privacy Statement and the Data Management Plan and serves as a binding mechanism to ensure the GDPR accountability of all partner organizations.

EDU-LAB Consortium Agreement (core part) contains **Article 1.4.5 Specific responsibilities regarding data protection** that says “Where necessary, the Parties shall cooperate to enable one another to fulfil legal obligations arising under applicable data protection laws (the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and relevant national data protection law applicable to said Party) within the scope of the performance and administration of the Project and of this Consortium Agreement. In particular, the Parties shall, where necessary, conclude **a separate data processing, data sharing and/or joint controller agreement** before any data processing or data sharing takes place.”

This constitutes a legal base for Annex F to EDU-LAB Consortium Agreement.

The **Joint Controllershship Agreement** clarifies that all EDU-LAB partners act as joint controllers under GDPR Article 26 for personal data processed within their respective responsibilities. Each partner remains responsible for compliance with applicable national legislation, institutional data protection policies, and obligations toward its own data subjects, including processing participant requests (e.g., access, rectification, erasure). The Coordinator, in cooperation with the Project Management Board (PMB), provides overarching coordination to ensure joint compliance and facilitate cross-partner cooperation in data protection matters.

## 4.4 Non-disclosure agreement (NDA)

This document stands for a template of a document that must be executed between a project partner as a legal entity and any external expert who would be performing the assigned research tasks for or on behalf of the partnering team. This would not be applicable to researchers who already employed by a partnering institution. See **Annex Seventeen: Non-disclosure Agreement (template)** for the full text of NDA.



## 5 Technical measures for data process and anonymization

This section describes the procedures for identifying, assessing and mitigating ethical risks throughout the EDU-LAB project. It also sets out the internal review mechanisms, the arrangements for anonymization and pseudonymization, and the ways to comply with applicable laws and institutional policies.

### 5.1 Protection and safeguarding of personal and research data

The EDU-LAB project's approach to data protection is based on the requirements of the General Data Protection Regulation (GDPR), Regulation (EU) 2018/1725 and the relevant national laws. All data collection, storage, processing and transfer activities are carried out in accordance with the Data Protection Impact Assessment (DPIA), the general and WP-specific Data Management Plans (DMPs) and the Joint Controllership Agreement.

Personal data collected in the project includes demographic and socio-economic data and, in certain cases, sensitive data such as disability status or migration background, as well as data with direct identifiers. This applies in particular to work packages 3 and 4, in which work is carried out directly with minors and young people in need of protection. Informed consent (and, if necessary, the consent of legal guardians) is obtained for each data collection.

The data is pseudonymised immediately after collection; direct identifiers are encrypted and stored separately from the research data with access restrictions. Anonymisation and pseudonymization protocols are applied before any merging, forwarding or public provision. Audio and video recordings remain encrypted with the national teams and are deleted after transcript review—unless extended retention has been explicitly authorised.

Access to raw data is strictly limited to the necessary research staff within each institution. Exchange between partners will only take place with data sets without direct identifiers that are transmitted via secure channels to the coordinating institution for comparative analyses. Digital tools are only used in GDPR-compliant configurations and local storage protocols apply.

The retention of personal data is limited to the project duration plus a validation phase (until 31 December 2029 at the latest), after which all identifiable data is securely deleted. These safeguards are described in detail in the DPIA, Privacy Policy and the DMPs. Compliance is monitored internally via the project's ethics oversight procedures and enforced via the Joint Controllership Agreement signed by all partners.

### 5.2 Issues of personal data anonymization

Technical measures for ensuring protection and security of data process in Data Management Plan (DMP).

Data anonymization is the process of permanently and irreversibly removing any identifying characteristics from data, ensuring that the data subject can no longer be directly identified. Unlike pseudonymization, which retains unique identifiers and a correspondence table that allows data to be linked to an individual—typically accessible only to a limited number of research team members—anonymization eliminates such identifiers entirely, making re-identification impossible. As a result of complete data anonymization, even the researchers who conducted the project cannot link any data set to a specific individual.

EDU-LAB research project collects personal data of demographic, socioeconomic, digital & technology characteristics. These data fall within the scope of GDPR and the national personal data protection laws. However, fully anonymized data that can no longer be linked to identifiable individuals are no longer considered personal data and, therefore, fall outside the scope of data protection regulations. Such anonymized data may, for example, be shared with other researchers for scientific purposes.

To comply with the GDPR, any information that could be used to identify a data subject must be stored separately from the research data and safeguarded with appropriate technical and organizational security measures. These measures ensure that personal data cannot be linked to an identified or identifiable individual, in accordance with Article 4(5) of Regulation (EU) 2018/1725.

Anonymization techniques are used to protect the privacy of individuals by removing or altering identifiable information in datasets while maintaining their usability for research and analysis. Anonymization techniques to be employed in the EDU-LAB project are summarized below.

- **Removal of direct identifiers:** All direct identifiers, such as names, telephone numbers, addresses, email addresses, are completely removed from the data. This applies not only to information about the research participants themselves but also to any references to the personal data of other individuals mentioned in the empirical studies.
- **Encoding:** When anonymized data still needs to be distinguishable within the dataset for the research usability. The original values, such as the name of the schools, the name of the regions, will be replaced with randomly assigned codes that are only meaningful within the dataset. For example, “XYZ High School” will be replaced with “high school 001”.

In our empirical studies, qualitative data also includes transcripts where direct and indirect identifiers are not structured in a predictable manner and identifying details may be dispersed throughout the entire transcript. To ensure compliance with anonymization criteria, transcripts must be carefully reviewed by at least two team members.

It is essential that all EDU-LAB project partners inform research participants that their data will only be used in an anonymized format and that data anonymization is a key objective of this research. The anonymization process and the use of anonymized data must be explicitly stated in the Informed Consent Form (ICF).

If anonymization is not clearly communicated and consented to, it may be classified as “further processing”, meaning the data is being used for purposes beyond those for which it was originally collected. Under the GDPR, such further processing is subject to strict limitations and compliance requirements.

Additionally, it is important to recognize that audio and video recordings initially contain personal identifiers and therefore remain personal data subject to applicable data protection laws until properly anonymized.

## 5.3 Provisions for data anonymization

EDU-LAB uses a multi-level protocol for data anonymization and pseudonymization that protects the privacy of participants while maintaining the validity of qualitative and quantitative data for cross-national analyses. These procedures fully comply with the DPIA, the general and WP4-specific DMPs, the Privacy Statement and the Joint Controllship Agreement.

### 1. Separation of identifiers and research data

Immediately after the survey, all direct identifiers (e.g. names, contact details, dates of birth, institutional affiliations) are stored separately from the research data in encrypted, access-restricted files. These files remain locally with the respective national research teams and are not passed on across national borders. Pseudonymization keys are created by each team according to structured naming protocols and are only kept accessible to a limited extent.

### 2. Anonymization and pseudonymization of transcripts

In the qualitative case studies, audio and video recordings of focus groups and participatory workshops are transcribed by researchers or approved transcription tools (e.g. Otter.ai in local off-line operation). The transcripts undergo a two-stage review:

- First review: data collectors remove or mask references to locations, institutions or identifiable characteristics.
- Second review: An independent member of the national team checks any remaining indirect identifiers.

The transcripts are then given pseudonymous IDs (e.g. PT-LX-FG01-P002) and stored both in the original language and - if necessary - as anonymized English summaries.

### 3. Processing of structured survey and diary data

Data from socio-demographic surveys and structured diaries - including Likert-type items and open-ended responses - are processed using standardized variable names and controlled vocabularies (see DMP WP4, section 4). Indirect identifiers (e.g. school type, migration background, employment status) are only kept if they are analytically necessary and generalized when published (e.g. “urban/rural area” instead of city name).

#### **4. File storage, versioning and encryption**

Raw data, transcripts and audio/video files are stored in versioned structures with clearly designated folders (e.g. FG\_Audio\_Raw, Diary\_Anonymized). The platforms used (e.g. Nextcloud) are GDPR-compliant; all file transfers are encrypted. Identifiable data never leaves the country of origin.

#### **5. Deletion and retention policy**

Audio/video files are only stored for as long as they are required for transcript verification, after which they are deleted unless explicit consent has been given for longer storage. Identifiable data will be destroyed by December 31, 2029 at the latest; many partners apply shorter periods in accordance with national law. Anonymized data sets that are to be shared publicly (e.g. via Zenodo) are archived with persistent identifiers and metadata in accordance with DMP and WP4 plans.

#### **6. Transparency and information for participants**

All anonymization procedures are explained in the consent forms and the privacy policy. Participants are informed which types of data are collected, how identifiers are processed and that data is only analyzed in anonymized or pseudonymized form. No data is published or used without first going through these processes.

Through these measures, EDU-LAB fulfils its obligations under Articles 5, 25 and 89 GDPR and anchors data minimization, privacy by design and research protection in all phases of data processing.

## **5.4 Ethical aspects of data management**

The EDU-LAB project consortium is committed to the highest ethical standards in research and recognizes that any misconduct can have a serious impact on individuals, communities and the environment. To prevent this, we take a proactive approach to ensure that all research activities are conducted responsibly, ethically and in strict accordance with legal and ethical requirements.

EDU-LAB's data management strategy embeds these ethical principles throughout the data lifecycle and is aligned with the General Data Protection Regulation (GDPR), the European Code of Conduct for Research Integrity (ALLEA) and the national laws of the respective partner institutions.

#### **1. Data life cycle and ethical processing**

Personal data is collected exclusively on the basis of informed consent and processed in accordance with the principles of purpose limitation, data minimization and storage limitation. Each phase - collection, storage, use, disclosure and deletion - follows the protocols of the Data Management Plan (D7.2 and WP4-specific) and the DPIA. All platforms (e.g. MS Teams, Otter.ai, Qualtrics, Miro) are used with GDPR-compliant settings, such as local recording and secure data transfer.

#### **2. Access and role-based authorizations**

Access to raw data (not anonymized) is restricted to necessary personnel within the national teams and regulated by institutional access guidelines (password protection, access protocols, access safeguards in accordance with institutional data security policies). Pseudonymized data is only shared with designated team members who perform the cross-national analysis. Only anonymized data records are transferred across national borders.

The consortium agreement contains a confidentiality clause that obliges all partners to keep participant data and project-sensitive information secret. Any breach of this can lead to immediate exclusion from the consortium.

#### **3. Metadata, storage and back-ups**

All files contain standardized metadata (e.g. participant ID, session date, data type) and follow the naming conventions defined in the WP4-DMP. Research data is stored on encrypted institutional servers or GDPR-

compliant cloud systems (such as Nextcloud); automatic and manual back-ups are carried out in accordance with the data security guidelines of the respective institutions.

#### **4. Retention and deletion periods**

Personal data is only kept for as long as necessary. Raw audio and video files are deleted after transcript verification, unless explicit consent of the participants allows longer storage. Identifiable data will be destroyed no later than December 31, 2029, unless national law requires earlier deletion.

#### **5. Cross-partner data protection and ethics compliance**

The Joint Controllership Agreement (Annex F of the consortium agreement) defines the responsibilities of the partners in accordance with Article 26 GDPR. Each institution ensures local data protection compliance and all partners cooperate on data subject requests (access, rectification, erasure, restriction) Protocols for data breaches include joint reporting and coordinated remedial action in accordance with DPIA.

In the context of transcription and summarization of audio data collected during qualitative fieldwork (e.g. expert interviews, focus groups, participatory workshops), the EDU-LAB consortium may use large language models (LLMs) operated entirely within the internal infrastructure of the coordinating institution, Economica Institute of Economic Research. These models are hosted on secure, access-restricted institutional servers and are never connected to external providers or cloud-based AI platforms. AI-based tools are used exclusively in a supervised setting to support transcription, translation, and summarization. All processing is conducted in compliance with GDPR and subject to prior ethics approval. No fully automated decision-making is applied to participant data, and all outputs undergo human review before any further analysis or dissemination.

## **5.5 Data Breach Procedures**

In accordance with Article 33 of the GDPR and the relevant national data protection laws, all partners must report any breach of personal data protection affecting EDU-LAB research data to their institutional data protection officer (DPO) and the competent supervisory authority within 72 hours of becoming aware of it. The coordinator shall be informed immediately, and the Project Management Board (PMB) shall coordinate the further action of the partners involved if several institutions are affected. Where required, the data subjects shall be notified in accordance with Article 34 GDPR.

## 6 Ethics Governance and Oversight

Ethical oversight in EDU-LAB is fully embedded in project governance. Responsibility for monitoring and compliance with ethical standards lies with the Project Management Board (PMB), which includes the coordinator and all work package leaders. The PMB monitors the implementation of the project's ethical framework and ensures that ethical aspects are taken into account throughout the research cycle.

Each work package leader is responsible for ensuring that their team implements the ethical and data protection requirements in accordance with the Data Protection Impact Assessment (DPIA), Data Management Plan (DMP), local ethics approvals and the Joint Controllership Agreement (JCA). If necessary, the partners also consult with their national ethics committees or data protection authorities.

Ethical issues are a fixed item on the agenda of all PMB meetings in order to promptly review and discuss new or unforeseen ethical risks. Any problems are escalated to the coordinator, who can consult institutional data protection officers (DPOs), legal departments or national supervisory authorities if necessary.

EDU-LAB has established an Ethics Issues Group (EIG), whose members are listed in ***Annex Six: Personal composition of Ethics Issues Group (EIG)***. The EIG acts as the consortium's internal ethics advisory body. Its main task is to provide advice and support on ethical issues during project implementation, as required. The Project Management Board (PMB), the work package leaders or the coordinator may consult the EIG on topics such as participant protection, informed consent, safeguarding and data protection.

The Project Management Board retains overall responsibility for ethics oversight and coordination of ethics-related activities, including monitoring compliance with legal and regulatory obligations.

## ANNEXES

### Annex One: Charter of Fundamental Rights of the European Union (excerpt, Article 8 “Protection of personal data”)

[The Charter of Fundamental Rights of the European Union](#) serves as the primary guiding document for researchers in EU projects regarding the protection of personal data. The Article relevant to protection of personal data is quoted below:

#### **Article 8**

##### *Protection of personal data*

1. *Everyone has the right to the protection of personal data concerning him or her.*
2. *Such data must be processed fairly for specified purposes and on the basis of the consent of the person concerned or some other legitimate basis laid down by law. Everyone has the right of access to data which has been collected concerning him or her, and the right to have it rectified.*
3. *Compliance with these rules shall be subject to control by an independent authority.*



## Annex Two: EDU-LAB Grant Agreement on ethics and data protection

### ARTICLE 14 — ETHICS AND VALUES

#### 14.1 Ethics

*The action must be carried out in line with the highest ethical standards and the applicable EU, international and national law on ethical principles.*

*Specific ethics rules (if any) are set out in Annex 5.*

#### 14.2 Values

*The beneficiaries must commit to and ensure the respect of basic EU values (such as respect for human dignity, freedom, democracy, equality, the rule of law and human rights, including the rights of minorities).*

*Specific rules on values (if any) are set out in Annex 5.*

#### 14.3 Consequences of non-compliance

*If a beneficiary breaches any of its obligations under this Article, the grant may be reduced (see Article 28). Such breaches may also lead to other measures described in Chapter 5.*

### ARTICLE 15 — DATA PROTECTION

#### 15.1 Data processing by the granting authority

*Any personal data under the Agreement will be processed under the responsibility of the data controller of the granting authority in accordance with and for the purposes set out in the Portal Privacy Statement. For grants where the granting authority is the European Commission, an EU regulatory or executive agency, joint undertaking or other EU body, the processing will be subject to Regulation 2018/1725<sup>3</sup>.*

#### 15.2 Data processing by the beneficiaries

*The beneficiaries must process personal data under the Agreement in compliance with the applicable EU, international and national law on data protection (in particular, Regulation 2016/679<sup>4</sup>).*

*They must ensure that personal data is:*

- *processed lawfully, fairly and in a transparent manner in relation to the data subjects*
- *collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes*
- *adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed*
- *accurate and, where necessary, kept up to date*
- *kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed and*
- *processed in a manner that ensures appropriate security of the data.*

*The beneficiaries may grant their personnel access to personal data only if it is strictly necessary for implementing, managing and monitoring the Agreement. The beneficiaries must ensure that the personnel is under a confidentiality obligation. The beneficiaries must inform the persons whose data are transferred to the granting authority and provide them with the Portal Privacy Statement.*

<sup>3</sup> Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295, 21.11.2018, p. 39).

<sup>4</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ('GDPR') (OJ L 119, 4.5.2016, p. 1).

### 15.3 Consequences of non-compliance

*If a beneficiary breaches any of its obligations under this Article, the grant may be reduced (see Article 28). Such breaches may also lead to other measures described in Chapter 5.*

#### **Annex 5 of Grant Agreement on ETHICS (— ARTICLE 14)**

##### *Ethics and research integrity*

*The beneficiaries must carry out the action in compliance with:*

- *ethical principles (including the highest standards of research integrity) and*
- *applicable EU, international and national law, including the EU Charter of Fundamental Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms and its Supplementary Protocols.*

*No funding can be granted, within or outside the EU, for activities that are prohibited in all Member States. No funding can be granted in a Member State for an activity which is forbidden in that Member State. The beneficiaries must pay particular attention to the principle of proportionality, the right to privacy, the right to the protection of personal data, the right to the physical and mental integrity of persons, the right to non-discrimination, the need to ensure protection of the environment and high levels of human health protection. The beneficiaries must ensure that the activities under the action have an exclusive focus on civil applications.*

*The beneficiaries must ensure that the activities under the action do not:*

- *aim at human cloning for reproductive purposes*
- *intend to modify the genetic heritage of human beings which could make such modifications heritable (with the exception of research relating to cancer treatment of the gonads, which may be financed)*
- *intend to create human embryos solely for the purpose of research or for the purpose of stem cell procurement, including by means of somatic cell nuclear transfer, or*
- *lead to the destruction of human embryos (for example, for obtaining stem cells).*

*Activities involving research on human embryos or human embryonic stem cells may be carried out only if:*

- *they are set out in Annex 1 or*
- *the coordinator has obtained explicit approval (in writing) from the granting authority.*

*In addition, the beneficiaries must respect the fundamental principle of research integrity — as set out in the European Code of Conduct for Research Integrity<sup>5</sup>.*

*This implies compliance with the following principles:*

- *reliability in ensuring the quality of research reflected in the design, the methodology, the analysis and the use of resources*
- *honesty in developing, undertaking, reviewing, reporting and communicating research in a transparent, fair and unbiased way*
- *respect for colleagues, research participants, society, ecosystems, cultural heritage and the environment*
- *accountability for the research from idea to publication, for its management and organisation, for training, supervision and mentoring, and for its wider impacts*

*and means that beneficiaries must ensure that persons carrying out research tasks follow the good research practices including ensuring, where possible, openness, reproducibility and traceability and refrain from the research integrity violations described in the Code. Activities raising ethical issues must comply with the additional requirements formulated by the ethics panels (including after checks, reviews or audits; see Article 25). Before starting an action task raising ethical issues, the beneficiaries must have obtained all approvals or other mandatory documents needed for implementing the task, notably from any (national or local) ethics*

<sup>5</sup> European Code of Conduct for Research Integrity of ALLEA (All European Academies).

*committee or other bodies such as data protection authorities. The documents must be kept on file and be submitted upon request by the coordinator to the granting authority. If they are not in English, they must be submitted together with an English summary, which shows that the documents cover the action tasks in question and includes the conclusions of the committee or authority concerned (if any).*

#### **Annex 5 of Grant Agreement on VALUES (— ARTICLE 14)**

##### *Gender mainstreaming*

*The beneficiaries must take all measures to promote equal opportunities between men and women in the implementation of the action and, where applicable, in line with the gender equality plan. They must aim, to the extent possible, for a gender balance at all levels of personnel assigned to the action, including at supervisory and managerial level.*

## Annex Three: Regulation EU 2016/679 General Data Protection Regulation (GDPR), Excerpts

The full document [as available here](#).

### **Article 5 *Principles relating to processing of personal data***

*1. Personal data shall be: (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')*

### **Article 25 *Data protection by design and by default***

*1. Taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing, the controller shall, both at the time of the determination of the means for processing and at the time of the processing itself, implement appropriate technical and organisational measures, such as pseudonymisation, which are designed to implement data-protection principles, such as data minimisation, in an effective manner and to integrate the necessary safeguards into the processing in order to meet the requirements of this Regulation and protect the rights of data subjects.*

### **Article 89 *Safeguards and derogations relating to processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes***

*1. Processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, shall be subject to appropriate safeguards, in accordance with this Regulation, for the rights and freedoms of the data subject. Those safeguards shall ensure that technical and organisational measures are in place in particular in 4.5.2016 L 119/84 Official Journal of the European Union EN order to ensure respect for the principle of data minimisation. Those measures may include pseudonymisation provided that those purposes can be fulfilled in that manner. Where those purposes can be fulfilled by further processing which does not permit or no longer permits the identification of data subjects, those purposes shall be fulfilled in that manner.*

## Annex Four: European Code of Conduct for Research Integrity and its implications for EDU-LAB project

The [European Code of Conduct for Research Integrity](#) sets out fundamental principles and best practices to ensure ethical, responsible, and high-quality research. It provides guidance on honesty, reliability, respect, and accountability in all stages of research, including data processing and dissemination. This code serves as a key reference for maintaining research integrity within EDU-LAB project, ensuring compliance with European and national regulations while upholding the highest ethical standards.

The research, dissemination, and related activities of EDU-LAB project place particular emphasis on the following good research practices, as outlined in the European Code of Conduct for Research Integrity:

### **Training, Supervision and Mentoring**

The project coordinator ensures that *researchers receive rigorous training in research design, methodology, analysis, dissemination, and communication*. Work package leaders *mentor their team members, led by example, and offer specific guidance and training to properly develop and structure their research activities*.

### **Research Procedures**

*Researchers design, carry out, analyse, and document research in a careful, transparent, and well-considered manner. Researchers share their results in an open, honest, transparent, and accurate manner, and respect confidentiality of data or findings when legitimately required to do so. Researchers report their results and methods, including the use of external services or AI and automated tools, in a way that is compatible with the accepted norms of the discipline and facilitates verification or replication, where applicable.*

### **Safeguards**

*Researchers handle research participants and subjects (be they human, animal, cultural, biological, environmental, or physical) and related data with respect and care, and in accordance with legal provisions and ethical principles. Researchers have due regard for the health, safety, and welfare of the community, of collaborators, and others connected with their research.*

### **Data Practices and Management**

*Researchers ensure appropriate stewardship, curation, and preservation of all data, metadata, protocols, code, software, and other research materials for a reasonable and clearly stated period. Researchers ensure that access to data is as open as possible, as closed as necessary, and where appropriate in line with the FAIR Principles (Findable, Accessible, Interoperable and Reusable) for data management. Researchers are transparent about how to access and gain permission to use data, metadata, protocols, code, software, and other research materials. Researchers inform research participants about how their data will be used, reused, accessed, stored, and deleted, in compliance with GDPR. Researchers acknowledge data, metadata, protocols, code, software, and other research materials as legitimate and citable products of research. Researchers ensure that any contracts or agreements relating to research results include equitable and fair provisions for the management of their use, ownership, and protection under intellectual property rights.*

### **Collaborative Working**

*All partners in research collaborations take responsibility for the integrity of the research and its results. All partners in research collaborations formally agree at the outset, and monitor and adapt as necessary, the goals of the research and the process for communicating their research as transparently and openly as possible. All partners in research collaborations formally agree at the outset, and monitor and adapt as necessary, the expectations and standards concerning research integrity, the laws and regulations that will apply, protection of the intellectual property of collaborators, and procedures for handling conflicts and possible cases of misconduct. All partners in research collaborations are consulted and formally agree on submissions for publication of research results and other forms of dissemination or exploitation of the results.*

### **Publication, Dissemination, and Authorship**

*Authors formally agree on the sequence of authorship, acknowledging that authorship itself is based on: (1) a significant contribution to the design of the research, relevant data collection, its analysis, and/or interpretation; (2) drafting and/or critical reviewing the publication; (3) approval of the final publication; and (4) agreeing to be responsible for the content of the publication, unless specified otherwise in the publication. Authors disclose any financial and nonfinancial conflicts of interest as well as sources of support for the research or the publication. Authors and publishers promptly issue corrections or retract publications, if necessary, the retraction processes are clear and the reasons stated, and authors are given credit for issuing corrections post-publication. Authors are accurate and honest in their communication to colleagues, policymakers, and society at large. Authors are transparent in their communication, outreach, and public engagement about assumptions and values influencing their research as well as the robustness of the evidence, including remaining uncertainties and knowledge gaps.*

### **Reviewing and Assessment**

*Researchers review and assess submissions for publication, funding, appointment, promotion, or reward in a transparent and justifiable manner, and disclose the use of AI and automated tools. Researchers adopt assessment practices that are based on principles of quality, knowledge advancement, and impact that go beyond quantitative indicators and take into account diversity, inclusiveness, openness, and collaboration where relevant.*



## Annex Five: Ethics self-assessment in EDU-LAB proposal

### Ethical dimension of the objectives, methodology and likely impact

#### OBJECTIVES of the activities

Collection of personal qualitative and quantitative data. EDU-LAB relies on a mixed methods approach and will reuse and collect data. The data reused (for secondary analysis) is openly available in large international data sets (see 1.2.1, B-Part). The project will also collect new qualitative data from young people (WP4) and quantitative data from experts (WP3). This new data involves the collection of personal data such as socio-demographic information and personal opinions.

#### DATA PROTECTION AND PRIVACY

All necessary data protection measures guaranteeing that none of the participants (young people and experts) can be identified based on the data collected will be carefully applied. All procedures for data collection, storage, protection, retention, and destruction will be compliant with national and EU legislation.

#### COLLECTION OF PERSONAL DATA FROM YOUNG PEOPLE: PROTECTION OF MINORS

Qualitative data will be collected from young people/young adults, some of them aged 15-17. To protect this vulnerable group, specific measures will be implemented as described next in the Methodology.

#### METHODOLOGY

Establishment of the Ethical Issues Group (EIG). EDU-LAB follows the general ethical principles and legislation applicable to research set by the European Commission and the ethical boards from the locations where implementation of the research will occur (universities, countries). The empirical fieldwork is strictly guided by ethical considerations and is in line with the EU General Data Protection Regulation (GDPR) and the European Code of Conduct for Research Integrity of All European Academies (ALLEA). The Ethical Issues Group (EIG) will be established as one of the steering bodies of the consortium (WP7), which will be responsible for all ethical aspects of the research, including its ethical guidelines (Ethical Conformity Certificate) and Data Management Plan (DMP). EIG will monitor ethical compliance with the project's ethical guidelines, DMPs, and GDPR throughout the project. Ethical standards will be outlined regarding the recruitment of participants, informed consent procedures with specific requirements for participants younger than 18, as well as the storage, management and processing of personal data.

Recruitment of participants. For all data collection (WP3 and WP4) only healthy human beings will be recruited. All study participants will volunteer to participate and, before the start of the data collection, will be asked to sign a consent form and read an information sheet with the study aims and scope. They will be informed about their involvement in the study and their rights (e.g., to withdraw at any time without consequences).

Protection of personal data. All collected data will be anonymized in the process of data management and stored safely with access only for the core researchers of the national teams. All procedures for data collection, storage, protection, retention, and destruction will be compliant with national and EU legislation and will be monitored by the EIG. A DMP will be prepared, describing the data management life cycle for all datasets collected, processed or generated by the research project. For the online data collection, only copyright survey software and online collaborative platforms (e.g., MS Teams) that are compliant with GDPR and that include safety measures ensuring users' control over the data and any other content uploaded to the platforms will be used. Also, the project will use only videoconferencing platforms where (1) local recordings can only be made by the host (the researchers) with all participants immediately notified and asked for their permission and (2) cloud recording is disabled. Local recording, downloading, and saving of the recording to a safe and secure storage place will be a mandatory step in the data collection protocols and DMP.

Protection of children involved in data collection. According to the specific national regulations, informed (active or passive) consent from the parents or legal guardians of the participants aged 15-17 will be secured before the start of the data collection. The information sheet including all details about data collection and management, contact information as well as participants' rights and interests will be given to the young people themselves as well as to their parents/legal guardians prior to the data collection. Participation is strictly voluntarily.

#### POTENTIAL IMPACT of the activities

The project will have no negative impact – i.e., it will not violate data protection rights or the rights of children and minors – on participants, other individuals, social groups, institutions or countries. This is assured by the ethical guidelines (based on GDPR, ALLEA and if more strict, national/regional/institutional regulations) that the project will establish and strictly follow (as monitored by the project's EIG).

## Compliance with ethical principles and relevant legislations

**DATA PROTECTION**

The Ethical Issues Group (EIG) will prepare ethical guidelines and will monitor all data collection, processing, and storage processes. (1) EIG will ensure data protection in every component associated with data collection (sampling requirements, survey guidelines and manuals, survey information leaflets for respondents on data anonymity and confidentiality, procedures of data agglomeration, and merging of national survey data sets into project's database, etc.). (2) Prior to the fieldwork, the Ethical Conformity Certificate will be produced as required by the ethical principles and applicable legislation of a Case Study country. The implementation will be preceded by the training of the teams and special attention will be paid to the procedures of regional supervision and quality control, including strictly following the ethics compliance norms. (3) As outlined in the Data Management Plan (DMP; WP7), all collected data will be (a) fairly and lawfully processed; (b) used for limited research-related purposes; (c) adequate, accurate, relevant and not excessive; (d) anonymized at the stage of the data entry on the local level: personal identification data will be immediately separated from the main part of the questionnaire or another tool and deleted after the quality checks procedures; (e) stored safely in separate project files only accessible to core team members; (f) processed in accordance to the rights of research participants; (g) not transferred between the research team members without adequate protection. Under no circumstances will personal data generated in this research be transferred to any external party, including authorities of countries where these data have been collected.

**INFORMED CONSENT**

Informed consent forms will be provided to all potential study participants in the local languages. Participation is strictly voluntarily, and respondents will be explicitly informed about their right to withdraw their participation at any time and at no consequence to them. All respondents will be informed about the purpose of the research in written form and orally (in the local languages), including information about the measures to secure their anonymity and confidentiality, and ways for them to learn about the outcomes of this research.

**ANONYMITY AND PARTICIPANTS' PRIVACY**

All measures will be taken to secure the protection and the privacy of the participants so that the data they provide cannot be accessed by third parties. All datasets generated in the process of this research will be anonymized. Online survey data collected will be anonymized by removing any IP identifiers. These steps will ensure that individual research participants cannot be traced back from the data or any research results. Safety measures regarding the online data collection will be taken, as described in the previous section.

**COMPLIANCE WITH NATIONAL AND EUROPEAN LEGISLATION FRAMEWORKS**

All participating research teams are subject to national data protection legislation. However, to ensure all potential ethical issues are adequately addressed, the EIG will check the tools and the procedures on a case-by-case basis, and – if needed – seek the opinion of the corresponding National/Regional Data Protection Commissions. All steps will be taken to ensure that personal data security and privacy will be reflected in the regular reporting to the European Commission services. All data collected will be safeguarded according to the provisions of the European Directive on Data Protection (EDPR) and the relevant laws arising from transposition of the directive into national law, as well as relevant international guidance, including: General Data Protection Regulation (Regulation (EU) 2016/679), Data Protection Law Enforcement Directive (Directive (EU) 2016/680), regulation on processing the personal data (Regulation 2018/1725), OECD recommendation concerning guidelines governing the protection of privacy and trans-border flows of personal data, UN guidelines concerning computerised personal data files and others. Data will only be collected in the EU member and associated states.

**PROTECTION OF CHILDREN AND MINORS**

Some of the participants are students at upper secondary and tertiary level (e.g., in vocational training). For those aged 15 to 17, measures safeguarding their interests and rights will be taken, including securing informed consent from their parents or legal guardians before the start of the data collection. An information sheet with all details about data collection and management as well as participants' rights and interests will be given to the young people themselves as well as to their parents/legal guardians prior to the data collection.

**Table 2. Ethics issues check list for EDU-LAB proposal**

Ethics Issue Category	Applicable to EDU-LAB?	Notes
Human embryos / fetuses	Not applicable	No embryonic or fetal material used
Human cells / tissues	Not applicable	No human biological material used
Animals	Not applicable	No animal research conducted
Third countries / non-EU	Applicable	Data collected in EU and associated countries
Dual-use items / military use	Not applicable	No dual-use or defense applications
Artificial intelligence / automated decision-making	Not applicable	No automated decision-making; local AI models may assist transcription under full human control
Personal data / GDPR	Applicable	Personal data from human participants (including youth), managed under GDPR
Genetic data	Not applicable	No genetic data collected
Highly sensitive health data	Not applicable	Only self-reported disability status collected
Environmental or safety risks	Not applicable	No environmental risks involved
Research with minors / vulnerable populations	Applicable	Involves minors and vulnerable youth; safeguards in place

## Annex Six: Personal composition of Ethics Issues Group (EIG)

EDU-LAB's EIG includes the following researchers:

- **Prof. Dr. Natalia Wächter** (University of Graz, head of EIG)
- Dr. Alexander Chrovostov (Project Coordinator)
- Dr. Theodor Leiber
- Dr. Claudia Palt
- Dr. Filomena Parada
- Mr. Daniel Helmenstein
- Mr. Stanislav Savov

## Annex Seven: EDU-LAB Privacy Notice (PN)

Master version in English

Introductory Explanations

Abstract

This Privacy Notice explains the policies for the secure collection, processing, storage, and analysis of personal data from research participants in the EDU-LAB project, in compliance with GDPR (EU 2016/679) and applicable national laws.

The two principal groups of research participants are: (a) Young people aged 15 to 30 years in selected case study regions, participating in the structured research program of EDU-LAB. (b) Adult experts representing different stakeholder groups relevant to the themes of the study. All personal data collection and processing will be conducted by research teams and will adhere to data protection and ethical standards.

### Title, Nature, and Duration of Research Title:

Title of the research project: *EDU-LAB: European Youth in Transition to Education and Labour*. A Horizon Europe collaborative project (2025-2027) under Grant Agreement #101177428.

The EDU-LAB project is a comparative European study that systematically examines factors and determinants influencing choices, pathways, and transitions in education and training (E&T) and from E&T to the labour market for young people aged 15-30 years.

The project implements different types of empirical fieldwork that involve the collection, processing, and analysis of personal data from participants : (a) Young people aged 15 to 30 years participating in the case studies conducted in twelve regions across seven European countries, who participate in a specifically designed research program; (b) Adult experts representing different stakeholder groups relevant to the themes of the study.

The project deploys both qualitative and quantitative research methods. Further details on the empirical studies can be found on the project's website ([www.edu-lab-project.eu](http://www.edu-lab-project.eu)) and in Work Packages WP1, WP2, WP3A and WP4.

The collection, processing, and subsequent analysis of personal data will be conducted exclusively by members of the partnering teams of the EDU-LAB project consortium, including researchers and, where applicable, other trained personnel involved in research activities. All research activities are carried out in full compliance with GDPR (EU 2016/679) and applicable national data protection laws, as specified in the Grant Agreement with the European Commission.

All research data, including personal details of respondents, will be collected exclusively for research purposes and based on explicit informed consent, provided in written or otherwise clearly documented form.

- Duration of research, including data collection: 01.01.2025 – 31.12.2027
- Duration of data processing, including analysis and storage: 01.01.2025 – 31.12.2029

### Compliance with GDPR and National Data Protection Laws

This Privacy Notice is based on Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and applies across all relevant jurisdictions.

Where national data protection laws impose more stringent provisions than GDPR (EU 2016/679), the applicable national legislation shall take precedence. However, compliance with national laws shall not result in a violation of the fundamental principles and obligations set out in the GDPR (EU 2016/679).

In cases where national laws prevail, the Principal Investigators must be informed in detail. This includes a comprehensive explanation of the applicable national provisions, the specific requirements that differ from the GDPR (EU 2016/679), and any necessary adjustments to data protection practices to ensure full compliance with both legal frameworks.



The Principal Investigator will assess the impact in coordination with data controllers, ensuring that all measures align with the project's overarching commitment to data privacy, security, and ethical research practices.

### Content and Types of Research Data

As part of this research, we will collect and process **personal data**, in compliance with **GDPR (EU 2016/679)**. The types of data collected fall under the following **GDPR-recognized categories**:

- (a) **Personal data with direct identifiers**: This includes contact details required for participant recruitment and follow-up, such as name, telephone number, email address, and date of birth. Audio and video recordings collected during focus groups, participatory workshops, expert interviews, and Delphi panels also fall into this category, as they may reveal identifiable characteristics such as voice and appearance.
- (b) **Personal data with indirect identifiers**: This includes demographic data (age, gender, education level, employment status, socioeconomic background), responses to structured diaries, and participants' views and lived experiences or expertise gathered through the focus groups, participatory workshops and structured diaries, as well as other qualitative data gathered through expert interviews, and the Delphi panel.
- (c) **Special categories of personal data (sensitive data)** under Article 9(1) of GDPR, including ethnicity and health status (disability).

The data will be collected, stored, and processed in the following formats:

- **Paper documents**, where applicable.
- **Textual data**: Responses to structured diaries, transcripts of focus groups and participatory workshops, and research notes.
- **Digital records**, such as survey responses, structured diaries, and electronic research inputs.
- **Audio and video recordings**, Digital recordings of focus groups, participatory workshops, and interviews.

All collected data will be processed in accordance with GDPR (EU 2016/679) and applicable national data protection laws and consortium partners' regulations, ensuring confidentiality and security.

General and Research-Specific Personal Data:

- **Contact and identification data**: Name, telephone number, email address, date of birth.
- **Demographic and socioeconomic data**: Age, gender, education level, employment status, income level, education level of parents/guardians, country of birth, current residence, ethnic and migration background (where necessary; sensitive data), professional experience of experts, and belonging to specific groups of stakeholders.
- **Digital and technology data**: Digital competence, internet access, and accessibility of digital devices.
- **Health information (Sensitive Data)**: Disability status.
- **Research-specific data**: including Focus Groups and Participatory Workshops video recordings and/or audio recordings and original transcripts, Structured Diaries documenting young people's actions and processes as they share their insider knowledge and lived expertise on their choices, pathways and transitions in education and training and from education and training to the labour market.

These data will be processed and analyzed or transferred between the participating research teams for analytical purposes in line with the EDU-LAB research program. Any such transfers will be strictly limited to pseudonymized or anonymized data, ensuring that all direct identifiers are removed from datasets before sharing. In transit, all files containing sensitive data will be encrypted.

### Policy on Anonymization and Pseudonymization:

- Pseudonymization (or anonymization where applicable) will be applied for research and publication purposes.
- Direct identifiers (e.g., name, date of birth, names of educational or employment institutions, and place names) will be removed before analysis.

- Only essential indirect identifiers relevant for qualitative analysis will be retained.

### Sensitive Personal Data:

- Ethnicity and migration background (if relevant).
- Health information (health status, disability status).
- Audio/video recordings from research activities.

These types of sensitive personal data will be collected and stored locally in secured locations by the research teams and kept separately from de-identified research outputs (e.g., survey results, pseudonymised transcripts of interviews, focus groups, or participatory workshops). Personal key identifiers will not be transferred to any third party, including other research teams.

Where research activities involve minors, specific protections apply in accordance with GDPR Recital 38. All data collected from minors will be handled with heightened confidentiality and processed only in compliance with applicable national child protection and data privacy regulations.

### Data That Will NOT Be Collected:

- Personal data concerning criminal convictions, offenses, or criminal records.

These types of data will not be collected during the research activities of the project.

### Sources of Personal Data

The personal data processed in this research project will be collected directly from participants through the following methods:

- Data provided voluntarily through sociodemographic surveys.
- Structured Diaries, completed by participants during specific phases of the research.
- Audio and video data collected from focus groups, participatory workshops, and interviews.

Participants will be provided with an Information Sheet for Participants (ISF) and an Informed Consent Form (ICF) to ensure they fully understand:

- The purpose of the study;
- The procedures involved in data collection;
- Any potential risks;
- Their data protection rights under GDPR (EU 2016/679).

Where participants are not legally eligible to provide consent, the ISF and ICF will be provided to their parent(s) or legal guardian(s), who will be required to review and sign consent on their behalf before study participation.

## Data Processing, Storage, and Transfer

### Purpose of Processing Personal Data

The processing of personal data in this research project is conducted exclusively for scientific research purposes, in compliance with GDPR (EU 2016/679) and applicable national data protection laws.

As part of the research, twelve case studies will be conducted across seven European countries. These case studies focus on documenting young people's actions, experiences, and perspectives regarding their choices, pathways, and transitions in education and training (E&T) and their transition to the labour market (LM).

To achieve these objectives, the study will rely on multiple data collection methods, including:

- Sociodemographic surveys (to collect demographic and socioeconomic background information).
- Structured Diaries (to document participants' reflections and experiences during the study).
- Focus Groups and Participatory Workshops (to gather qualitative insights into young people's views and lived experiences).
- Online or in-person interviews with key stakeholders.
- Interactive collaboration platforms (used to facilitate participatory workshops).



This research project also incorporates an online Delphi-type survey of experts and stakeholders, alongside with a limited number of preceding exploratory semi-structured expert interviews. Experts with extensive knowledge and expertise contribute valuable insights to the research process, addressing the analytical requirements of multiple work packages. Delphi surveys are used to collect expert opinions and build consensus on complex topics, such as future forecasting and policy development.

The processing of personal data in these activities is necessary to achieve the scientific research objectives of the EDU-LAB project. All data processing will adhere to GDPR principles, including purpose limitation, data minimization, and strict security protocols to protect participants' privacy.

### Legal Basis for Processing Personal Data

The legal basis for the processing of personal data in this research project is established under the General Data Protection Regulation (GDPR) (EU 2016/679), specifically:

- **Article 6(1)(e)** – Processing is necessary for the performance of a task carried out in the public interest, specifically scientific research.
- **Article 9(2)(j)** – Processing of special categories of personal data (sensitive data) is permitted when necessary for scientific research purposes, provided that appropriate safeguards are in place.
- **National data protection laws**, where applicable, may impose additional requirements for the processing of personal data. In such cases, the most stringent provisions will be followed, ensuring full compliance with both GDPR and national regulations.

The EDU-LAB project follows strict data protection safeguards, including:

- Pseudonymization of the personal data or anonymization of personal data wherever possible.
- Purpose limitation – personal data will only be used for the defined scientific research objectives.
- Data minimization – only the minimum necessary personal data will be collected and processed.
- Security measures – personal data will be stored securely with access restrictions in place.

By adhering to these legal bases and safeguards, the project ensures that all personal data processing is lawful, fair, and transparent, in full compliance with GDPR (EU 2016/679) and applicable national data protection laws.

### Data Protection Principles

All personal data collected in this research project will be processed and stored in compliance with GDPR (EU 2016/679) and applicable national data protection laws. The project adheres to the following key data protection principles:

- Personal data will be collected only for the defined research purposes of the EDU-LAB project and will not be used for unrelated purposes (*purpose limitation*).
- Only the minimum necessary personal data will be collected and processed to achieve the study's objectives (*data minimization*).
- Personal data will be securely stored using encryption, restricted access controls, and pseudonymization before analysis or sharing (*confidentiality and security*).
- Direct identifiers will be removed before data sharing, pseudonymization and, when applicable, anonymization will be applied.
- All files with sensitive data will be encrypted both in storage and in transit.
- Data retention periods will be strictly limited in line with GDPR and the Privacy notice (we already say that we will retain the data for 2 extra years).
- Data accuracy will be ensured where applicable, and safeguards will be applied to protect personal data from unauthorized access or misuse.
- Data will primarily be processed and stored in digital formats, in accordance with the DMP. If any paper-based data collection occurs, it will be securely digitized for analysis, and the original physical documents will be securely stored or destroyed in compliance with data protection policies.

- Multi-factor authentication (MFA) and audit logging will be implemented for sensitive data storage and access.

By adhering to these principles, the project ensures that all personal data is processed responsibly and in accordance with GDPR, the DMP, and applicable national regulations.

### Transfer or Disclosure of Data to External Parties or Non-EU Countries

Personal data collected during the research project will not be transferred or disclosed to external parties unless explicitly required by the research objectives and in compliance with GDPR (EU 2016/679) and applicable national data protection laws.

Data transfers within the EDU-LAB consortium:

- Data may be shared among EDU-LAB research teams, including those located in non-EU countries (e.g., the UK and Kosovo).
- Only pseudonymized or anonymized data will be shared across research teams, ensuring that no direct identifiers are transferred.
- All data transfers will follow the terms of the **Grant Agreement** and the **Consortium Agreement**.

Transfers to Non-EU/EEA Countries

- Transfers to the UK: Since the United Kingdom benefits from an EU adequacy decision, Standard Contractual Clauses (SCCs) are not required for data transfers to UK partners.
- Transfers to Kosovo and other non-adequacy decision countries:
  - Any transfer of personal data outside the EU/EEA will comply with Chapter V of GDPR.
  - The transfer will rely on Standard Contractual Clauses (SCCs) or other appropriate safeguards when no adequacy decision exists for the receiving country.
  - An internal Transfer Impact Assessment (TIA) form must be completed before any data transfer outside the EU/EEA to assess the level of data protection in the recipient country.
  - Additional data protection agreements may be required between the transferring and receiving institutions.

Storage and access restrictions:

- Any data containing direct identifiers will remain stored within the local jurisdiction where it was collected and will not be transferred.
- Access to personal data is restricted to authorized research team members and will be strictly controlled to prevent unauthorized disclosure.

By adhering to these data transfer principles, the project ensures that all international data exchanges comply with **GDPR** and national data protection regulations, safeguarding participant privacy.

### Horizon Europe Association of Non-EU Partners:

Although the United Kingdom and Kosovo are classified as non-EU countries under the GDPR framework, it is important to note that both are officially associated with the Horizon Europe programme. As such, institutions based in these countries are contractually obliged to comply with the same data protection, ethical, and legal standards as partners from EU Member States. This Horizon Europe association ensures that data transfers within the consortium to these partners uphold a level of protection equivalent to that within the EU/EEA.

### Automated Decision-Making Regarding Personal Data

No automated decision-making or profiling will be conducted on the personal data collected in this research project.

All data processing will be conducted under the supervision of researchers, in accordance with the EDU-LAB research objectives. Automated tools, such as transcription software and data analysis programs, may be used for processing, but all final decisions and interpretations will be made by researchers. Participants retain

the right not to be subject to automated decision-making, in accordance with Article 22 of GDPR (EU 2016/679).

### Processing of Personal Data After the Research Project Has Been Concluded

At the conclusion of the EDU-LAB project, all personal data will be processed in accordance with data retention and deletion policies outlined in the WP4 DMP and in compliance with GDPR (EU 2016/679) and applicable national data protection laws.

The following data retention measures will apply:

- Personal data containing direct identifiers will be retained for a maximum of two years after the end of the project, exclusively for validation purposes. After this period, direct identifiers will be securely deleted. However, pseudonymised data — with indirect identifiers required for research purposes — will continue to be processed and stored in accordance with GDPR and the project's data management plan. Full anonymisation may be applied where possible without compromising the analytical value of the data.
- Pseudonymized and anonymized datasets will be retained in a secure, GDPR-compliant repository (Zenodo) for a minimum of five years, ensuring long-term accessibility for scientific research purposes.
- Any audio and video recordings containing personal identifiers (such as voices or facial images) will be securely deleted within two years of project completion, unless effective anonymization techniques are applied, ensuring that individuals can no longer be identified in accordance with GDPR Recital 26. If full anonymization is not feasible, the data will be deleted. Any remaining personal data will be erased or anonymized in compliance with institutional, national, and EU data protection regulations.

Upon request, participants may exercise their right to request deletion or anonymization of their personal data, subject to legal and research integrity requirements. However, in accordance with GDPR Article 17(3)(d), if the data is necessary for scientific research and cannot be anonymized, it may be retained in a pseudonymized form and continue to be used for research purposes, even if the participant withdraws from the study.

## Rights of data subjects and contacts for data controllers

### Data Subjects' Rights and Possible Restrictions Thereof

Data subjects (research participants, respondents) have the following rights under GDPR (EU 2016/679) regarding the processing of their personal data:

- Right of access – Data subjects are entitled to find out what information the project partners hold about them or to receive confirmation that their personal data is not processed by the project partners.
- Right to rectification – Data subjects have the right to have any incorrect, inaccurate or incomplete personal details held by the project partners revised or supplemented without undue delay. In addition, data subjects are entitled to have any unnecessary personal data deleted from the project partners' systems.
- Right to erasure: In exceptional circumstances, data subjects have the right to have their personal data erased from the Data Controller's records ('right to be forgotten').
- Right to restriction of processing – In certain circumstances, data subjects have the right to request the project partners to restrict processing their personal data until the accuracy of their data, or the basis for processing their data, has been appropriately reviewed and potentially revised or supplemented.
- Right to object – In certain circumstances, data subjects may at any time object to the processing of their personal data for compelling personal reasons.
- Right to data portability: Data subjects have the right to obtain a copy of the personal data that they have submitted to the project partners in a commonly used, machine-readable format and transfer the data to another Data Controller.

- Right to lodge a complaint with a supervisory authority: Data subjects have the right to lodge a complaint with a supervisory authority in their permanent place of residence or place of work, if they consider the processing of their personal data to violate the provisions of the GDPR (EU 2016/679). In addition, data subjects may follow other administrative procedures to appeal against a decision made by a supervisory authority or seek a judicial remedy.

These rights can be exercised as long as the data remains identifiable — including in pseudonymised form. Once data has been fully anonymised (i.e. irreversibly de-identified), it can no longer be linked to individual participants and is therefore no longer subject to these rights under GDPR.

In certain circumstances, and in accordance with **Article 89(2) of GDPR**, some rights (such as deletion and objection) may be lawfully restricted if necessary for scientific research purposes, provided that such restrictions are proportionate and necessary to ensure research validity.

Any inquiries or requests related to personal data collected in the course the research fieldwork must be addressed to the Data Controllers and/or Principal Investigators of research teams that implements the study at the location of a concerned respondent. The contact details for these persons are indicated in each Informed Consent forms handed to the respondents and can be found in the Annex to this Privacy Note.

Research participants will be advised to send all requests relating to the research, including subject access requests referred to in Section III of the GDPR (EU 2016/679), to the contact person identified here.

## Data Controllers and Principal Investigators in EDU-LAB project

In the EDU-LAB project, the collection, processing, and storage of personal data of data subjects is organized and controlled by the implementation teams, in accordance with the **Joint Controllership Agreement**, which is publicly available on the project's website: [www.edu-lab-project.eu](http://www.edu-lab-project.eu).

This implies that each team implementing a fieldwork study nominates a Data Controller (DC), who is directly employed by or contractually bound to one of the project partners conducting the fieldwork. The DC may be either a physical person or a legal entity and is responsible for making material decisions regarding the processing of personal data while ensuring compliance with GDPR (EU 2016/679) and applicable national data protection laws.

The duties of a Data Controller include:

- Providing information to data subjects regarding the processing of their personal data.
- Ensuring that all processing activities have a legitimate legal basis under GDPR.
- Giving effect to data subjects' rights under GDPR, including access, rectification, and deletion where applicable.
- Implementing appropriate security measures to protect the confidentiality and integrity of personal data.

A Data Controller works in close collaboration with the Principal Investigators (PIs), who are the Team Leaders of EDU-LAB project partners and are responsible for organizing the research fieldwork according to the project program.

The Principal Investigators (PIs) of this research project are responsible for:

- Overseeing the study and ensuring compliance with ethical and legal standards.
- Managing data access, ensuring that only authorized individuals have access to personal data.
- Coordinating with any data processors to uphold the security and confidentiality of data subjects' personal information.

If a data subject has any questions regarding their data protection rights or wishes to exercise their rights under GDPR, they may contact the Project Coordinator, the Team Leaders (Principal Investigators - PI) or Data Controller at their respective research institution.

Additionally, if a data subject believes their rights under GDPR have been violated, they have the right to file a complaint with their national Data Protection Authority (DPA).

## Annex Eight: Informed Consent Form (ICF) for WP4 (Case Studies)

### Master version in English

#### Hearing Young People's Voices: Qualitative Case Studies

##### Information Sheet

EDU-LAB Consortium includes 11 partners in 9 countries whose research focuses on diverse topics in Education, namely effective education, training, and labour market transitions of young people in Europe. The Consortium is led by the Economica Institute of Economic Research (Austria), and the present study is coordinated by Lusófona University/CeiED – Center for Interdisciplinary Studies in Education and Development (Portugal). In addition to the [name of country] this study will be conducted in 6 other European countries [adjust list according to country]: Austria, Finland, Italy, Kosovo, Poland, Portugal, and the UK.

We strive to adhere to the highest standards of transparency and openness while protecting the sensitive information collected in this study. Next, we provide you with information about the aims of this study, benefits and risks associated with participation in this study as well as information about data usage and data protection.

Before participating in the study, please read the following document carefully.

If you have any concerns or questions before, during or after participating in this study, do not hesitate to contact us at [email address].

#### Research Team and Research Team Members

- [Country] Research Team and contact information
- Principal Researcher in [name of country]:
- Research Team Members in [name of country]:
- Contact details for the project/LRT

#### Funding

The study is being conducted thanks to the international research project “European youth in education and in transition to the labour market” (EDU-LAB, [www.edu-lab-project.eu](http://www.edu-lab-project.eu)) funded by the European Commission under the Horizon Europe Programme (Grant Agreement # 101177428).

#### Purpose of the Research

The EDU-LAB is a comparative European study that systematically examines what influences the choices, pathways, and transitions in education and training, and from education and training to the labour market of young people aged 15-30 years. The focus is on equity and inclusion, and young people's participation, progression, and completion of upper secondary and tertiary general education and professional/vocational education, as well as on their transitions to and from the labour market.

The present study – Hearing Young People's Voices: Qualitative Case Studies – aims to hear young people's voices and understand their insider knowledge and lived expertise on their choices, pathways and transitions in education and training, and from education and training to the labour market. Specifically, we want to understand how young people's careers (education and training and early labour market integration) unfolded and their career-related experiences by focusing on:

- How, why and when specific education and training or employment-related decisions were made (e.g., stay in or drop out of education; choose an academic or a vocational track; change jobs).
- What overlapping factors explain how young people's education and training or employment pathways and transitions occurred.
- How and why these (intersecting) factors hindered or enabled young people's choices, pathways and transitions in education and training and from education and training to the labour market.

Next, with the young people participating in the study, we will come up with solutions that in their view optimize the participation and completion of education and training and labour market integration.

#### Purpose of use, handling and storage of research data

The information collected will be used primarily for research purposes, and the data collected may be used later for research purposes. Some teaching based on the study may occur, but no details allowing for direct or indirect identification of the participants will be disclosed.

EDU-LAB project partners have joint controllership over the data, which means they jointly determine the purpose and means of processing your data, and data transfers may occur between the EDU-LAB project partners. The EDU-LAB Privacy Notice and the Joint Controllership Agreement ensure all project partners comply with GDPR and national regulations or law when processing, accessing or transferring the data we will collect from you.

The code keys (personal code, participant ID) and data with confidential information on your name and contact information (telephone number, email address) are stored according to precise ethical guidelines and under the research team's strict supervision. Your name and contact information will be kept for use in the EDU-LAB data collection and other research purposes. This information will be stored in an electronic form in protected files. Research team members are responsible for protecting the data, thus avoiding unforeseen disclosure or usage of the data.

Your and every other participant's identity will be kept strictly confidential. All documents will be identified only by a personal code number and an ID and kept in password-protected documents and files. Study participants will not be identified by name in any reports of the completed study.

After the study ends, all anonymised data will be transferred to and safely stored in the Zenodo repository for long-term preservation, ensuring it remains accessible and reusable for a minimum of five years, with the possibility of prolongation. This process includes compliance with GDPR requirements.

### **Recruitment and procedure**

Young people aged 15-30 years will be recruited for the study. These young people will voluntarily manifest interest in participating in the study.

The young people volunteering for the study will be engaged in diverse education and training pathways, starting from year one of secondary education, and have diverse employment situations and experiences (e.g., with smooth or uncertain or non-linear transitions to the labour market). They may also be education and training dropouts and other youth not in education, employment or training (NEET).

Language of data collection, if applicable.

The research process begins with recruitment and onboarding, during which the researchers and/or trusted people at the data collection site will invite you to participate in the study. Trusted people are socially recognised by your community, ensuring safety and trust in this initial research stage. Examples are the school principal or the learning centre director, teachers or trainers, NGO or outreach programme coordinator or worker.

The researchers are responsible for onboarding. During onboarding, they will support you and answer any initial questions you may have about your participation in the study. They will clearly explain the research aims and methods, outline the expected type and duration of your participation, and assist you in installing any necessary technological apps required for study participation. Preference will be given to online data collection. However, in-person data collection in safe spaces to be determined, also is an option. Upon joining the study, you will receive a Personal Code for identification during the research. You will be reminded of how to generate the Personal Code before we collect data.

The study adopts a research approach emphasising your views and lived experiences on the topics of the research: young people's choices, pathways and transitions in education and training and from education and training to the labour market.

To ensure we capture your views and experiences your participation in the study will be intensive and prolonged, involving data collection through:

- Focus group: Opportunities to collectively discuss your views and lived experiences on the topics of the research. If you are interested in continuing to be involved in the study, you will be invited to take part in the participatory workshops. The first participatory workshop to which you will be invited takes place 4-6 weeks after the focus group.
- Four participatory workshops. In the participatory workshops, you will be invited to engage in discussions on the main barriers or challenges to education and training participation or completion and labour market integration. Solutions to these barriers or challenges will also be explored. There



will be a 4–6-week interval between participatory workshops 1 and 2, between participatory workshops 2 and 3, and participatory workshops 3 and 4.

- **Structured diaries and autonomous work.** At the end of each participatory workshop and between workshops you will be asked to provide some information on your reflections about the workshops and on experiences and events occurring between the workshops. If you wish to, you will also be able to access and continue the activities started at the participatory workshops by yourself or with some of your workshop colleagues (with the support of the researchers). Structured diaries and autonomous work will allow the researchers to document your reflections on the participatory workshops and to capture your insights, thoughts, experiences and relevant events occurring between the workshops.

All activities comply with the General Data Protection Regulation (GDPR) and will take place synchronously and asynchronously. Data collection for the whole study will take place from May 2025 to October 2026. Your participation in the study is expected to extend for about 6 months if you decide to participate both in the focus groups and the participatory workshops. If you decide to only participate in the focus groups, this will be a one-time thing for you.

Online focus groups and participatory workshops will be conducted via secure collaboration platforms such as Zoom or Microsoft Teams. A stable internet connection and access to a computer are required. If you do not have access to the necessary infrastructure, the research team and/or the trusted people will ensure you receive the required support.

During the participatory workshops, you will use interactive collaboration platforms such as Miro or Mentimeter. The researchers will ensure you have access to and are familiar with the platform used for collecting the data.

For the structured diaries, you will receive a short questionnaire via a notification on your preferred app (e.g., WhatsApp, email). The questionnaire will be accessed and answered via your mobile phone using a platform software such as Qualtrics and LimeSurvey.

All data collection platforms are GDPR-compliant.

### **Data Protection & Withdrawal**

The study ensures compliance with GDPR and information security requirements through a combination of encryption, secure storage, and controlled access. All personal and sensitive data are stored locally on encrypted secure servers with strict access controls, ensuring only authorized personnel can access the data. Your personal and sensitive raw data (e.g., video recordings) will be protected through enhanced encryption and restricted access. We adopt the strictest adherence to national and EU laws governing data protection. We rigorously follow guidelines and legal requirements, including GDPR and child protection laws, to ensure the security and confidentiality of sensitive data throughout the project lifecycle and beyond.

All data collection platforms will include safety measures ensuring you have control over the data and any other content uploaded to the platforms and that platform owners cannot scan or access any such content without your knowledge and permission. Local recording and hosting of the data collected with these platforms and its immediate transfer to a safe storage place in their research teams' host organisation is a mandatory step in the data collection procedures followed by the researchers.

We guarantee your privacy. All data will be anonymised and, when applicable, pseudo-anonymised, and it will not be shared with third parties. Your personal data will be permanently deleted up to two years after the EDU-LAB project ending.

You have the right to access, correct, or delete your data, and in the event of a data breach, the affected individuals and relevant authorities will be notified within 72 hours, under GDPR and the EDU-LAB Joint Controllorship Agreement.

You also have the right to withdraw from the study at any time. Since data collection is based on scientific research in the public interest, we can still use all the data we collected about you for research purposes.

You and other participants will receive incentives for your continued engagement in the research. For further details, please refer to the Incentives section.

### **Potential Risks of the Research**

There are no known harmful risks associated with your participation in this study. However, you may feel slightly uncomfortable when answering personal questions, discussing your experiences in a group, or being recorded.

Some persons may not feel comfortable using the platforms selected for data collection. If that is the case, the researchers will assist these persons throughout the study to ensure everyone can participate. Also, clear, simple protocols supporting the use of these data collection platforms will be developed by the research teams, and, if needed, pre-data collection training sessions where you can practice with digital tools will be carried out. In-person data collection also is an alternative.

The researchers in collaboration with the trusted people, will ensure everyone who desires access to safe physical spaces (e.g., in the school or NGOs) with computers and access to the internet.

### **Potential Benefits of the Research**

You may find that talking about yourself - your views, experiences, and the pathways, choices, and transitions in education, training, or the labour market - is a positive experience that helps you gain new insights about yourself. Often, people feel that having the opportunity to express themselves and share their experiences and perspectives while contributing to research which can influence education, training, and employment policies is empowering and gives them a voice.

During the study, you will also gain experience in reflecting on your life transitions, which can support you in your personal and professional development. Furthermore, the study fosters peer interaction through focus groups and participatory workshops, allowing young people to connect with others who share similar experiences and challenges, which may enhance your self-confidence and sense of belonging.

### **Use of research results**

The findings from this research project will be published and presented in national and international publications, conferences, and seminars, as well as in university teaching. The data may also contribute to Master's and Doctoral dissertations and inform education, training, and employment practice and policy development. The results will not be used for commercial purposes.

As a participant, and upon request, you will be informed about the study's progress and findings through feedback reports, keeping you updated on key aspects of the study. We value your participation and want to ensure that you have access to the insights gained through this research.

### **Rights of the research participants**

Your participation in this study is entirely voluntary. If you choose to take part, you have the right to change your mind and withdraw at any time without any consequences. The research will be conducted in a way that ensures your identity remains strictly confidential. No personal information collected during the study will be shared with anyone outside the research team. When the findings are published or presented, no details will be included that could identify you.

At any time during data collection and afterwards, you have the right to ask for information about the study and your participation. Upon request, the researchers will keep you updated on key aspects of the study and will provide you with information about the study's progress and findings.

The research team will also provide information on any further resources or support available if needed.

### **Incentives**

You will not be given any monetary incentives (i.e., money). Incentives will be gift vouchers or similar tokens of appreciation for your engagement in the study. Each person participating in the participatory workshops and answering the structured diaries will be entitled to an incentive of 40€/50€. The incentive will be [choose the one that applies]

(a) Given as a one-time reward, at the end of the data collection.

(b) Split into two, with the first incentive being given halfway through the data collection and the second incentive at the end of the data collection.

To be awarded the incentive, you must have participated in [choose the one that applies]:

(a) [The incentive is given at the end of the data collection] The 4 participatory workshops and answered a minimum of 10 structured diaries out of the 16 you will be asked to fill out.

(b) [The incentive is split into two] 2 participatory workshops and answered a minimum of 5 structured diaries out of the 8 you will be asked to fill out halfway through the participatory workshops. You will be eligible to

receive the second half of the incentive if you participated in the other 2 participatory workshops and answered an additional 5 structured diaries out of the additional 8 you will be asked to fill out.

Everyone participating in the focus groups and the participatory workshops is entitled to a Diploma/Certificate. The Diploma/Certificate will discriminate the extent to which you participated in the study.

Optional (each LRT decides if they want to have the lottery): On top of the gift vouchers, each LRTs can decide if they want to carry out a lottery where a smart/iPhone or a tablet (for example) is offered to one of the participants. All the rules for rewarding participants will be in the consent form.

### Consent/Assent Form - Young People

#### Hearing Young People's Voices: Qualitative Case Studies

Name:

Date of birth (month and year):

Age:

Telephone:

Email:

#### **If under 16 or 18**

Name of parent or guardian:

Telephone of parent or guardian

Email contact of parent or guardian:

Personal Code (to be filled by the participant)

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#### **Consent to participate in the research**

I have been informed of the purpose and content of the research, the use and handling of its research materials, including my data, the potential risks and problems the research may cause to myself as a participant, and my rights.

- ☐ I hereby agree to participate in the study following the instructions given by the researchers.
- ☐ I consent to the use of my data, so it is impossible to identify me as a person.
- ☐ I am aware I can withdraw from the research or refuse to participate in any of its proposed activities at any time without consequences.
- ☐ I consent to the archiving of my data and its future use for research purposes.

Date: \_\_\_\_\_

## Template Consent Form - Parent or Guardian

### Hearing Young People's Voices: Qualitative Case Studies

Name:

Email:

Telephone:

Child's or ward's name:

Child or ward's date of birth (month and year):

Child or ward's age:

Child or ward's telephone:

Child or ward's email:

Personal Code – to be filled by the researchers

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### Consent to participate in the research

I have been informed of the purpose and content of the research, the use and handling of its research materials, including my child's/ward's data, the potential risks and problems the research may cause to him/her as a participant, and their rights.

- ☐ I hereby agree to my child's/ward's participation in the study following the instructions given by the researchers.
- ☐ I consent to the use of the data collected from my child/ward so that it is impossible to identify him/her as a person.
- ☐ I am aware my child/ward can withdraw from the research or refuse to participate in any of its proposed activities at any time without consequences.
- ☐ I consent to the archiving of my child/ward data and its future use for research purposes."

Date: \_\_\_\_\_

## Annex Nine: Informed Consent Form (ICF) for WP3B (OSSES-EEI)

Master template in English

### INFORMATION FOR PARTICIPANTS

#### EDU-LAB – EUROPEAN YOUTH IN EDUCATION AND IN TRANSITION TO THE LABOUR MARKET

**Responsible Team for Data Collection in XXXX (your country):**

**Coordinators:**

**Team Members:**

Dear Participant,

We invite you to take part in the study “EDU-LAB – European Youth in Education and in Transition to the Labour Market”. Your participation is voluntary. You may refuse to participate or withdraw from the study at any time without providing a reason. Refusing or withdrawing will not result in any negative consequences for you.

This study is necessary to obtain new, reliable scientific research findings. Your written consent is an essential requirement for participation. Please take the time to carefully read the following information, and do not hesitate to ask questions.

Please only sign the consent form if:

- **You fully understand the nature and procedure of the study,**
- **You are willing to give your consent to participate, and**
- **You are aware of your rights as a participant in this study.**

#### What is the purpose of this international study?

\*EDU-LAB – European Youth in Education and in Transition to the Labour Market\* is a multinational European research project focused on understanding and improving the pathways and transitions of young people (aged 15–30) in education and training (E&T) and their entry into the labour market.

EDU-LAB is funded by the European Commission’s Horizon Europe program and implemented by a consortium of 11 European universities and research organizations. The project will run from 2025 to 2027, with fieldwork planned from May 2025 to July 2026. During this phase, we aim to gather data across several European countries.

#### Who is conducting this study?

The funding recipient of this international study is the Economica Institute of Economic Research. The entire project is coordinated by Economica. Further details can be found on our website: <http://www.edu-lab-project.eu>

This research program and its instruments have been approved by the European Commission (Horizon Europe Grant Agreement No. 101177428). Ethical review and approval for the whole consortium was conducted in Austria by the Ethics Committee of Economica (please change accordingly if you have your own ethics approval).

#### How will the study proceed?

Today, we invite you to participate in an interview as part of the research project. If you agree, a member of our research team will ask you to answer questions. The interview is expected to last approximately 60 minutes. In total, around 3-5 experts will be interviewed in XXXX (your country) between May and August 2025.

Your participation is voluntary, and you may withdraw at any time without providing a reason. If you agree to participate, we will ask you to sign a consent form. At the beginning of the interview, you will be asked whether you consent to an audio recording. The recording helps us focus on the conversation and recall

details more accurately. You may decline the recording, refuse to answer specific questions, or terminate the interview at any time. You may also request pauses in the recording if you feel uncomfortable.

At the end, we will ask for your contact details for quality control by the project coordinator. This information will be stored separately from interview content and securely retained only until the project's conclusion, after which all personal data will be destroyed. Your name, professional affiliation, and contact details will not appear in the analysis report and will never be made publicly available. Apart from your valuable time, participation in this study involves no costs to you.

### What happens to the information you provide?

The audio recording of your interview will be **securely transferred in encrypted form** to the project coordinator, Economica Institute of Economic Research in Austria, where it will be stored on an encrypted, access-restricted server accessible only by authorized personnel. The recordings will be used exclusively to create written transcripts and translations. These transcripts and translations will then be **temporarily and securely shared only with the project partner who conducted the interview**, for the sole purpose of verifying transcription and translation accuracy. After this quality control step, **Economica will create a pseudonymized summary** of your interview. Only these pseudonymized summaries will be used to develop questions/statements for the Delphi online survey conducted in the project. Any direct quotes used in reports will refer only to general participant characteristics and will not be traceable to any individual. All original recordings and transcripts will be permanently deleted after the project ends, and no later than December 31, 2027.

All data collected in this interview (and the EDU-LAB project in general) will be used exclusively for scientific research purposes, including reports to the European Commission and academic publications (e.g., journal articles, books). The data will not be used for media publications, commercial exploitation, or political campaigns. The research reports and analyses will be submitted to the European Commission and made publicly available on the project website.

If you change your mind and no longer wish your responses to be included, please contact XXXX by July 1, 2025.

### What are the benefits of participating?

As an expert, you will have the opportunity to contribute your knowledge, experiences, and insights to the scientific outcomes of this project.

### Where will the study results be available?

All EDU-LAB project reports will be published on the project website: <http://www.edu-lab-project.eu>. Some preliminary publications and findings are already accessible. Reports will primarily be in English, but summaries of key results will be available in all European languages upon request until December 2027. Please check the appropriate box in the consent form if you wish to receive the project reports.

### For further information

We aim to ensure your comfort throughout the research process, so all questions, comments, or suggestions are welcome! For additional inquiries, please contact your local study coordinator: XXXX

**Thank you for your time and cooperation!**

## CONSENT FORM

### DECLARATION OF CONSENT FOR STUDY PARTICIPATION

Participant's Name (in block letters): \_\_\_\_\_

Date of Birth: \_\_\_\_\_

I agree to participate in the study as part of the research project "EDU-LAB – European Youth in Education and in Transition to the Labour Market."

The research team member, XXX, has clearly and thoroughly informed me about the study's objectives, significance, and procedures, as well as the implications of my participation. I have read the \*Participant Information Sheet\* and this \*Consent Form\*, particularly the sections on transcript pseudonymization, data usage, and secure storage of my personal data until the project's conclusion.

XXX has answered all my questions sufficiently and understandably. I have had enough time to decide whether to participate. At this time, I have no further questions.

I agree to the necessary "procedures" for conducting this study but reserve the right to withdraw my voluntary participation at any time without disadvantage. Should I wish to withdraw, I may do so at any time by notifying XXX in writing or verbally.

I also consent to the audio recording and analysis of my data collected in this study. I agree that my data will be stored electronically and pseudonymized. Non-pseudonymized data will be stored in a format accessible only to the Austrian project team and secured according to current standards.

If I later wish to have my data deleted, I may request this without providing reasons by emailing XXX or the project lead at: [dataprotection@economica.eu](mailto:dataprotection@economica.eu).

I have read and understood the „Participant Information Sheet“. During the briefing, I had the opportunity to ask any questions I had, and they were answered fully and clearly.

I have received a copy of the Participant Information Sheet and this Consent Form. The original will remain with the study coordinator.

**Please check the boxes below:**

1. ☐ I have read the EDU-LAB Participant information Sheet (printed or online). I had the opportunity to review the information, ask questions, and received satisfactory answers.
2. ☐ I agree to participate in the above-mentioned study.
3. ☐ My participation is voluntary, and I may withdraw at any time without giving a reason.
4. ☐ I consent to the interview being recorded for research purposes. I understand that the recordings will be securely stored by the project team, used solely for transcript and translation creation, and not made publicly available.
5. ☐ I understand that audio data will be stored on password-protected and access-restricted servers within the European Union and destroyed after the project ends.
6. ☐ I agree that the transcript data from this interview will be used by all EDU-LAB researchers only in pseudonymized form, with my name, affiliation, and any other personal data altered or removed.
7. ☐ I consent to being quoted in scientific reports or publications produced under the EDU-LAB project without my real name or institutional affiliation being disclosed.
8. ☐ I agree that the pseudonymized transcript of this interview may be shared with other researchers exclusively for research purposes upon request.
9. ☐ I understand that the pseudonymized interview transcript will be used by EDU-LAB researchers to produce scientific reports and policy recommendations, which will be made freely available to the public.
10. ☐ I would like to receive a copy of the project results in my native language via email.

---

**Participant's Name:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Researcher's Name:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Signature:** \_\_\_\_\_



## Annex Ten: Informed Consent Form (ICF) for WP3B (OSes-Delphi)

### Master template in English

#### INFORMATION FOR PARTICIPANTS

#### EDU-LAB – EUROPEAN YOUTH IN EDUCATION AND IN TRANSITION TO THE LABOUR MARKET

**Responsible Team for Data Collection in XXXX (your country):**

**Coordinators:**

**Team Members:**

Dear Participant,

We invite you to take part in the study “EDU-LAB – European Youth in Education and in Transition to the Labour Market”. Your participation is voluntary. You may refuse to participate or withdraw from the study at any time without providing a reason. Refusing or withdrawing will not result in any negative consequences for you.

This study is necessary to obtain new, reliable scientific research findings. Your written consent is an essential requirement for participation. Please take the time to carefully read the following information, and do not hesitate to ask questions.

Please only sign the consent form if:

- **You fully understand the nature and procedure of the study,**
- **You are willing to give your consent to participate, and**
- **You are aware of your rights as a participant in this study.**

#### What is the purpose of this international study?

\*EDU-LAB – European Youth in Education and in Transition to the Labour Market\* is a multinational European research project focused on understanding and improving the pathways and transitions of young people (aged 15–30) in education and training (E&T) and their entry into the labour market.

EDU-LAB is funded by the European Commission’s Horizon Europe program and implemented by a consortium of 11 European universities and research organizations. The project will run from 2025 to 2027, with fieldwork planned from May 2025 to July 2026. During this phase, we aim to gather data across several European countries.

#### Who is conducting this study?

The funding recipient of this international study is the Economica Institute of Economic Research. The entire project is coordinated by Economica. Further details can be found on our website: <http://www.edu-lab-project.eu>

This research program and its instruments have been approved by the European Commission (Horizon Europe Grant Agreement No. 101177428). Ethical review and approval for the whole consortium was conducted in Austria by the Ethics Committee of Economica (please change accordingly if you have your own ethics approval).

#### How will the study proceed?

Today, we invite you to participate in an interview as part of the research project. If you agree, a member of our research team will ask you to answer questions. The interview is expected to last approximately 60 minutes. In total, around 3-5 experts will be interviewed in XXXX (your country) between May and August 2025.

Your participation is voluntary, and you may withdraw at any time without providing a reason. If you agree to participate, we will ask you to sign a consent form. At the beginning of the interview, you will be asked whether you consent to an audio recording. The recording helps us focus on the conversation and recall details more accurately. You may decline the recording, refuse to answer specific questions, or terminate the interview at any time. You may also request pauses in the recording if you feel uncomfortable.

At the end, we will ask for your contact details for quality control by the project coordinator. This information will be stored separately from interview content and securely retained only until the project's conclusion, after which all personal data will be destroyed. Your name, professional affiliation, and contact details will not appear in the analysis report and will never be made publicly available. Apart from your valuable time, participation in this study involves no costs to you.

### What happens to the information you provide?

The audio recording of your interview will be **securely transferred in encrypted form** to the project coordinator, Economica Institute of Economic Research in Austria, where it will be stored on an encrypted, access-restricted server accessible only by authorized personnel. The recordings will be used exclusively to create written transcripts and translations. These transcripts and translations will then be **temporarily and securely shared only with the project partner who conducted the interview**, for the sole purpose of verifying transcription and translation accuracy. After this quality control step, **Economica will create a pseudonymized summary** of your interview. Only these pseudonymized summaries will be used to develop questions/statements for the Delphi online survey conducted in the project. Any direct quotes used in reports will refer only to general participant characteristics and will not be traceable to any individual. All original recordings and transcripts will be permanently deleted after the project ends, and no later than December 31, 2027.

All data collected in this interview (and the EDU-LAB project in general) will be used exclusively for scientific research purposes, including reports to the European Commission and academic publications (e.g., journal articles, books). The data will not be used for media publications, commercial exploitation, or political campaigns. The research reports and analyses will be submitted to the European Commission and made publicly available on the project website.

If you change your mind and no longer wish your responses to be included, please contact XXXX by July 1, 2025.

### What are the benefits of participating?

As an expert, you will have the opportunity to contribute your knowledge, experiences, and insights to the scientific outcomes of this project.

### Where will the study results be available?

All EDU-LAB project reports will be published on the project website: <http://www.edu-lab-project.eu>. Some preliminary publications and findings are already accessible. Reports will primarily be in English, but summaries of key results will be available in all European languages upon request until December 2027. Please check the appropriate box in the consent form if you wish to receive the project reports.

### For further information

We aim to ensure your comfort throughout the research process, so all questions, comments, or suggestions are welcome! For additional inquiries, please contact your local study coordinator: XXXX

**Thank you for your time and cooperation!**

## CONSENT FORM

### DECLARATION OF CONSENT FOR STUDY PARTICIPATION

Participant's Name (in block letters): \_\_\_\_\_

Date of Birth: \_\_\_\_\_

I agree to participate in the study as part of the research project "EDU-LAB – European Youth in Education and in Transition to the Labour Market."

The research team member, XXX, has clearly and thoroughly informed me about the study's objectives, significance, and procedures, as well as the implications of my participation. I have read the \*Participant Information Sheet\* and this \*Consent Form\*, particularly the sections on transcript pseudonymization, data usage, and secure storage of my personal data until the project's conclusion.

XXX has answered all my questions sufficiently and understandably. I have had enough time to decide whether to participate. At this time, I have no further questions.

I agree to the necessary "procedures" for conducting this study but reserve the right to withdraw my voluntary participation at any time without disadvantage. Should I wish to withdraw, I may do so at any time by notifying XXX in writing or verbally.

I also consent to the audio recording and analysis of my data collected in this study. I agree that my data will be stored electronically and pseudonymized. Non-pseudonymized data will be stored in a format accessible only to the Austrian project team and secured according to current standards.

If I later wish to have my data deleted, I may request this without providing reasons by emailing XXX or the project lead at: [dataprotection@economica.eu](mailto:dataprotection@economica.eu).

I have read and understood the „Participant Information Sheet“. During the briefing, I had the opportunity to ask any questions I had, and they were answered fully and clearly.

I have received a copy of the Participant Information Sheet and this Consent Form. The original will remain with the study coordinator.

**Please check the boxes below:**

1. ☐ I have read the EDU-LAB Participant information Sheet (printed or online). I had the opportunity to review the information, ask questions, and received satisfactory answers.
2. ☐ I agree to participate in the above-mentioned study.
3. ☐ My participation is voluntary, and I may withdraw at any time without giving a reason.
4. ☐ I consent to the interview being recorded for research purposes. I understand that the recordings will be securely stored by the project team, used solely for transcript and translation creation, and not made publicly available.
5. ☐ I understand that audio data will be stored on password-protected and access-restricted servers within the European Union and destroyed after the project ends.
6. ☐ I agree that the transcript data from this interview will be used by all EDU-LAB researchers only in pseudonymized form, with my name, affiliation, and any other personal data altered or removed.
7. ☐ I consent to being quoted in scientific reports or publications produced under the EDU-LAB project without my real name or institutional affiliation being disclosed.
8. ☐ I agree that the pseudonymized transcript of this interview may be shared with other researchers exclusively for research purposes upon request.
9. ☐ I understand that the pseudonymized interview transcript will be used by EDU-LAB researchers to produce scientific reports and policy recommendations, which will be made freely available to the public.
10. ☐ I would like to receive a copy of the project results in my native language via email.

**Participant's Name:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Researcher's Name:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

## Annex Eleven: Ethics Approval for WP3B (OSES-Delphi)

Vienna, June 3<sup>rd</sup>, 2025**Statement of Economica's ethics commission****Subject:**

**EDU-LAB: European Youth in Education and in Transition to the Labor, (EU Horizon Program, Grant No 101177428)** proposed by Univ.-Prof. Dr. Christian Helmenstein, member of the board of Economica Institute of Economic Research together with project coordinator Dr. Alexander Chvorostov, Liniengasse 50-52, 1060 Vienna.

**Aim of the project**

EDU-LAB's main research objective is to expand the current knowledge base on the main factors and determinants influencing young people's choices, pathways and transitions in E&T and from E&T to the labor market in Europe. EDU-LAB aims to identify effective strategies to promote inclusion, reduce early school leaving, and boost work-based learning opportunities.

**Brief summary of the project's research topics.**

EDU-LAB is a European research project focused on understanding and improving the pathways and transitions of young people (aged 15–30) in education and training (E&T) and their entry into the labor market. EDU-LAB addresses the complex interaction between educational pathways, transitions and labor market integration, with a focus on general education (GE) and vocational education and training (PVET) across ISCED levels 3-8. The aim is to model, evaluate and improve the systems, policies and individual experiences that shape these transitions. Research will focus on issues of equity, inclusion and the socio-economic factors that influence participation, progression and completion rates in education and training. By identifying barriers and facilitators, the aim is to ensure that educational pathways are more inclusive and efficient for diverse groups such as migrants, minorities and other disadvantaged populations. The project is organized into several interconnected work packages (WPs).

**Description of the Research Design – Methods used**

EDU-LAB utilizes a mixed-method approach, focusing on secondary quantitative analyses of publicly available empirical data and newly collected qualitative empirical data. Specifically, EDU-LAB considers all stakeholders and conducts a systematic literature review, qualitative conceptual analysis, quantitative trend and regression analysis, difference-in-difference analysis, expert interviews (in person), and an online Delphi survey with experts. The empirical surveys presented below are an essential part of WP3 (Work package lead at Economica).

Several preliminary exploratory expert interviews are planned in each of the consortium partners' countries of origin. These semi-structured expert interviews (duration 60 to 90 minutes) will be conducted (by qualified interviewers) in all participating countries / teams by the respective national researcher(s) / interviewer(s). Experts will have to sign a Consent Form, which will remain with the national teams and are kept safe until the end of the project. All audio files related to the expert interviews will be stored securely (encrypted or through other forms of IT security) by Economica until the end of the project, after which they will be destroyed.

The participating teams are only responsible for the identification of interview partners and the interviewing itself, the transcription, translation and pseudonymization will be done in a centralized mode by Economica. The translated and pseudonymized transcripts will be stored on a secure server at Economica

so this applies also to all data which will be stored securely on internal servers of Economica. There will be no data transmission using external tools, all data will directly be uploaded on the servers of Economica.

An online Delphi survey study (CAWI only) with experts will be conducted in all participating countries. The data collection period will be October/ November / December 2025 and June – August 2026. Participants for the Expert Delphi Survey (CAWI, two rounds, iterations) are recruited in the countries by the national teams based on their compliance with specific criteria (level, expertise). The online survey (CAWI) with experts/stakeholders follows the methodology of a Delphi study (iterative) and will comprise two online survey rounds (2 waves). The Delphi study will be conducted and hosted centrally at Economica by using the Software LimeSurvey which is also hosted directly on the institute's local servers. *Access to LimeSurvey Data is strictly limited (administrator at Economica).*

The field phase as well as the data analysis is also managed centrally by Economica. The data collected will not contain any direct identifiers, and no personal metadata is collected in the OSES Delphi online study. To summarize, the entire online Delphi survey is handled by Economica and thus via its own servers. No third-party providers are involved throughout the entire survey and analysis process. All collected data and information will be stored at a secure server at Economica. Participation in the study is only possible if participants have given their consent electronically (by clicking).

*The ethics commission has been informed on details regarding pseudonymization strategy and server security. The respective letter also solved/clarified minor open (mainly technically) questions and comments from commission members on project description.*

### Statement and recommendation


The project and its performance agree with Austrian and international laws of scientific ethics (European Union's General Data Protection Regulation). The commission for ethics of Economica has no objection to its implementation.



Priv. Doz. Dr. Andrea Pitzschke (Chairwoman)  
on behalf of Economica's ethics commission



## Annex Twelve: Ethics Approval for the Case Study in Kosovo



**KOLEGJI AAB**  
**AAB COLLEGE**  
Prishtinë

**Kolegji AAB**

No. 175/25 data: 24.04.2025

Rr. "Elez Berisha", nr. 56, Zona Industriale Prishtinë-  
Futboll Kosovë, 10000 Prishtinë, Republika e Kosovës,  
Tel: +383 38 600 005; +383 45 284 797  
Mail: [info@aab.edu.net](mailto:info@aab.edu.net);  
[www.aab.edu.net](http://www.aab.edu.net)

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Ref. nr.
Prishtinë, 23.04.2025

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Based on Article 112 of the Statute of the AAB College, the Scientific Research Ethics Code<sup>1</sup> of AAB College, the European Code of Conduct for Research Integrity<sup>2</sup>, as well as with reference to European Commission's (Regulation (EU) 2016/679) on General Data Protection Regulation (GDPR) and Kosovo Law 06 – L/082 on the Protection of Personal Data, the Ethics Commission of the AAB College at the meeting held on April 22, 2025, considered the request – Ethics Statement – submitted on April 18 by Prof. Ass. Dr. Xhavit Rexhaj for the implementation of research as part of the project “European Youth in Transition to Education and Labour”) EDU-LAB, funded by the European Commission’s Horizon Europe programme.

In reviewing the request, the Ethics Commission noted that:

- (a) The research is carried out by the AAB local research team (LRT) as part of a consortium of European higher education and research institutions (named in the Ethics Statement), headed by Vienna based Economica institute (details in the submitted request). Overall coordination is carried out by Prof. Ass. Dr. Xhavit Rexhaj, EDU-LAB Kosovo team leader.  
Other members of the local research team included in the research:
  1. Prof. Assoc. Dr. Arberore Bicaj, WP 4 Leader;
  2. PhD.C. Qendresa Kukaj, -WP 4 Deputy Leader;
  3. Prof. Assoc. Dr. Violeta Buza, Senior Researcher;
  4. PhD. C. Ilirjana Geci, Senior Researcher
  5. PhD.C. Jeton Brajshori, Junior Researcher
  6. PhD.C. Kaltrina Cermini Bajraktari, Junior Researcher
  7. PhD.C. Etleva Namligjiu, Junior Researcher
  8. Elita Hoxha, Technical support (data storage, platforms and software).
- (b) As part of the request the team also submitted and the Ethics Commission reviewed:
  - Ethics Statement
  - Data Management Plan
  - Non-Disclosure Agreement
  - Information Sheet and consent form
  - Privacy Notice
- (c) This request and the Ethics Statement refer specifically to the qualitative research carried out as part of the Work Package 4 of the EDU-LAB project. As such, it envisages qualitative research in the region of Prishtina involving 60-80 young persons aged 15-30, aiming to explore the perceptions, ambitions and personal experiences, during their transition through different levels of education and the labour market.
- (d) all needed permissions and consents have either been obtained or respective requests have been duly submitted to the respective authorities / institutions as per the legal provisions cited in the preamble and the LRT plan of activities;

---

<sup>1</sup> <https://aab.edu.net/wp-content/uploads/2022/01/12.-Kodi-Etik-i-Kerkimit-Shkencor.pdf>  
<sup>2</sup> [https://ec.europa.eu/research/participants/data/ref/h2020/other/hi/h2020-ethics\\_code-of-conduct\\_en.pdf](https://ec.europa.eu/research/participants/data/ref/h2020/other/hi/h2020-ethics_code-of-conduct_en.pdf)

Ref. nr.

Prishtinë, 23.04.2025

- (e) Another request – ethics statement – is forthcoming by the LRT with reference to the quantitative (Delphi Survey) and qualitative (Exploratory Interviews) research components of the EDU-LAB project.

In conclusion and after analyzing the Ethics Statement with its accompanying documents, the purpose and procedures of the research, AAB College Ethics Commission issues this:

### APPROVAL

which recognizes that the Ethics Declaration submitted by Prof. Ass. Dr. Xhavit Rexhaj for implementation of research activities within the EDU-LAB project (Work Package 4) is fully compliant with the ethical rules of the above-mentioned regulations including the following criteria:

- Data obtained from research and personal data are confidential and used only for research purposes. That data will not be shared with third parties;
- The researchers follow the national and international ethical guidelines for human studies;
- The researchers use non-stigmatizing and non-discriminatory language when describing different groups according to race, ethnicity, age, disease, disabilities, religion, gender, sexual orientation, etc.
- Research activities are based on research freedom, academic freedom, professionalism, academic and personal integrity, and research honesty, as provided for in the AAB Code of Ethics.

The AAB College Ethics Commission states that failure to comply with ethical regulations during the implementation of research activities is dealt with by this Ethics Commission as per internal AAB College regulations.

#### A copy of this approval is given to:

- The requesting party
- AAB Legal Office
- Members of the Commission

#### Ethics Commission:

Prof. Assoc. Dr. Hasan Saliu- head

Prof. Asst. Dr. Aida Alla- member

Prof. Assoc. Dr. Veton Vula- member





## Annex Thirteen: Ethics Approval for the Case Study in Portugal

**Reunião da Comissão de Ética do CeIED****Ata n.º 11****26 de março de 2025****Ano letivo 2024/2025****Parecer - 26**

**Título do Projeto:** “Hearing Young People’s Voices: Qualitative Case Studies (Portugal)”

**Autor/es:** Filomena Parada et al

**Decisão Final Comissão de Ética do CeIED**

- Após análise do projeto, documentação submetida e parecer dos revisores, a Comissão de Ética do CeIED emite o parecer final de “Favorável”.

A Presidente da Comissão de Ética do CeIED

Assinado por: **ALCINA MANUELA DE OLIVEIRA MARTINS**

Num. de Identificação: 05939259

Data: 2025.03.31 18:06:19+01'00'

Professora Doutora Alcina de Oliveira Martins



## Annex Fourteen: Ethics Approval for the Case Study in Poland

AKADEMIA PEDAGOGIKI SPECJALNEJ IM. MARII GRZEGORZEWSKIEJ  
THE MARIA GRZEGORZEWSKA UNIVERSITY  
02-353 Warszawa, ul. Szczęśliwicka 40, tel. +48 22 589 36 00, [www.aps.edu.pl](http://www.aps.edu.pl)

założona w 1922



Warszawa, 2.04.2025

OPINIA NR 33 - 2024/2025

Senacka Komisja ds. Etyki Akademii Pedagogiki Specjalnej im. Marii Grzegorzewskiej **opiniuje pozytywnie** projekt badawczy Pani prof. dr hab. Renaty Siemieńskiej-Żochowskiej pt. ***European Youth in Education and in Transition to the Labour Market.***

A handwritten signature in blue ink, appearing to read 'B. Hintze', is written over the printed name of the chairperson.

Przewodnicząca Komisji  
dr hab. Beata Hintze, prof. APS

## Annex Fifteen: Ethics Approval for the Case Study in Finland



Tampereen yliopisto

TUNI Luottamuksellinen - Confidential (3)  
1 (1)

TAMPEREEN ALUEEN IHMISTIEDEIDEN EETTINEN TOIMIKUNTA

Lausunto 48/2025 Lausuntopyyntö 21/2025: "EDU-LAB European youth in education and in transition to the labour market" (professori Petri Nokelainen, tekniikan pedagogikka, kasvatustieteiden ja kulttuurin tiedekunta)

Toimikunnan lausunto: Toimikunnalle on lähetetty pyydetyt selvitykset, ei eettisiä ongelmia.

Tampere 22.4.2025

Puheenjohtaja	<i>Kirsti Uusi-Rasi</i> Kirsti Uusi-Rasi
Sihteeri	<i>Heikki Eilo</i> Heikki Eilo

## Annex Sixteen: Ethics Approval for the Case Study in Italy (excerpts)



### Dichiarazione etica WP4 – Consorzio Interuniversitario AlmaLaurea

#### Responsabile scientifico e gruppo di ricerca in Italia

- Team leader: Prof.ssa Marina Timoteo
- Membri del team coinvolti nello studio: Dott.ssa Luisa Mengoni (PhD), Dott.ssa Malgorzata Dudko (M.A.), Dott.ssa Silvia Galeazzi (M.A.), Dott. Enrico Dongiovanni (M.A.), Dott. Dorel Manitiu (M.A.), Dott.ssa Daniela Perozzi (PhD), Dott. Leonardo Pagliacci (M.A.).

#### Finanziamento

Il presente studio è realizzato nell'ambito del progetto di ricerca internazionale "European youth in education and in transition to the labour market", EDU-LAB ([www.edu-lab-project.eu](http://www.edu-lab-project.eu)), finanziato dalla Commissione Europea nell'ambito del programma Horizon Europe (Grant Agreement # 101177428).

#### 1. Contesto

EDU-LAB è uno studio comparativo europeo volto ad esaminare i fattori e le determinanti che influenzano le scelte, i percorsi e le transizioni nell'istruzione e nella formazione (E&T) e dal E&T al mercato del lavoro dei giovani dai 15 ai 30 anni. L'attenzione del progetto è all'equità

l'opportunità di entrare in relazione con coetanei che condividono esperienze simili o hanno affrontato sfide analoghe.

## 7. Incentivi per i partecipanti

Non sono previsti incentivi monetari (ad esempio, denaro). Gli incentivi consisteranno in buoni regalo o altre forme simboliche, quali riconoscimento per il coinvolgimento nello studio. Tutti i partecipanti ai focus group e ai workshop partecipativi riceveranno un Diploma/Certificato che specificherà il livello di partecipazione allo studio.

Ogni individuo che parteciperà ai 4 workshop partecipativi e che compilerà almeno 10 diari strutturati sui 16 previsti, avrà diritto a un incentivo non monetario, sotto forma di buono regalo del valore di 50 €, la cui erogazione è prevista a conclusione del ciclo delle attività.

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**Luogo e data**

**Firma**



Ivano Dionigi  
12.06.2025  
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## Annex Seventeen: Non-disclosure Agreement (template)

### Master Template in English

#### NON-DISCLOSURE AGREEMENT (NDA)

For EDU-LAB Research Cooperation & Data Processing

This Non-Disclosure Agreement ("*Agreement*") for the research project titled "**European youth in education and in transition to the labour market (Horizon Europe #101177428)**" is made and entered into as of the date of signing by and between:

[Name of Team Leader / Principal Investigator ], hereinafter referred to as the "*Disclosing Party*"; and

[Name and Affiliation of Researcher], hereinafter referred to as the "*Receiving Party*"

#### Purpose

The purpose of this *Agreement* is to ensure the proper handling, protection, and confidentiality of information disclosed to the *Receiving Party* as part of the research project, who will have access to confidential and sensitive information of the research project.

#### Definition of confidential information

For the purposes of this *Agreement*, "Confidential Information" includes, but is not limited to:

- Personal data and socio-demographic details of research participants
- Survey responses, interview transcripts, and research datasets
- Research methodologies, models, and findings
- Unpublished research materials, reports, and working papers
- Any information designated as confidential by the *Disclosing Party*
- Any information subject to General Data Protection Regulation (GDPR) and applicable national and EU data protection laws.

Exclusions:

Confidential Information does not include information that:

- was publicly available at the time of disclosure
- becomes publicly available through no fault of the *Receiving Party*
- is obtained lawfully from a third party without confidentiality obligations
- is disclosed with prior written consent from the *Disclosing Party*.

#### Obligations of the receiving party

The *Receiving Party* agrees to:

- Maintain strict confidentiality and not disclose Confidential Information to any third party without prior written consent from the *Disclosing Party*
- Use Confidential Information solely for the purposes of conducting research under the project and not for any personal, commercial, or non-research-related purpose
- Implement appropriate technical and organizational measures to protect Confidential Information from unauthorized access, disclosure, alteration, or destruction, which includes but is not limited to
  - Handle raw data requiring transcription or pseudonymization in a secure environment designed for confidential information and refrain from saving copies on personal devices or cloud storage services
  - Ensures that individuals, schools, or other personal information within the research data are not directly or indirectly identifiable
- Ensure compliance with GDPR, national data protection laws, and ethical guidelines established by the *Disclosing Party*
- Notify the *Disclosing Party* immediately upon becoming aware of any unauthorized disclosure, breach, or suspected compromise of Confidential Information.



### Duration and termination

- This Agreement shall remain in effect for the duration of the *Receiving Party's* involvement in the research project and for a period of five (5) years after the conclusion of the project.
- Upon termination of the *Receiving Party's* involvement, they shall return or securely destroy all Confidential Information in accordance with data protection regulations and provide written confirmation of such action to the *Disclosing Party*.

### Breach and remedies

- Any unauthorized disclosure or misuse of Confidential Information shall be considered a material breach of this *Agreement*.
- In the event of a breach, the *Disclosing Party* reserves the right to take legal action, terminate the *Receiving Party's* involvement in the project, and seek remedies under applicable law, including compensation for damages and injunctive relief.

## Annex Eighteen: Jointed Controllership Agreement (Annex F to the Consortium Agreement)

This **Joint Controllership Agreement** ("Agreement") for the research project titled "**European youth in education and in transition to the labour market (Horizon Europe #101177428)**" is made and entered into as of the date of signing by and between the project partners (beneficiaries) and their respective Data Controllers:

- **Economica** Institute of Economic Research, Austria, alongside with their authorized Data Controller indicated on the signatory page;
- **National and Kapodistrian University of Athens**, Greece alongside with their authorized Data Controller indicated on the signatory page;
- **Lusófona University**, Portugal alongside with their authorized Data Controller indicated on the signatory page;
- **Evaluation Agency Baden-Württemberg**, Germany alongside with their authorized Data Controller indicated on the signatory page;
- **Bamberg University**, Germany alongside with their authorized Data Controller indicated on the signatory page;
- **AlmaLaurea Interuniversity Consortium**, Italy alongside with their authorized Data Controller indicated on the signatory page;
- **Kolegji AAB**, Kosovo alongside with their authorized Data Controller indicated on the signatory page;
- **Birmingham City University**, United Kingdom alongside with their authorized Data Controller indicated on the signatory page;
- **Maria Grzegorzewska University**, Poland alongside with their authorized Data Controller indicated on the signatory page;
- **University of Graz**, Austria alongside with their authorized Data Controller indicated on the signatory page;
- **Tampere University**, Finland alongside with their authorized Data Controller indicated on the signatory page;

### Purpose

The purpose of this *Agreement* is to ensure the joint controllers determine their respective responsibilities of data processing in a transparent manner for compliance with the obligations under the EU's *General Data Protection Regulation*.

### Definition of data subject

*Data subjects* are individuals whose personal data is collected, processed, or stored by an organization. Under data protection laws like the GDPR (General Data Protection Regulation), a *data subject* is any identified or identifiable natural person whose data is being processed.

The *data subjects* in this research project are research participants, such as young people (aged 15 to 30) and adult experts representing various groups of stakeholders.

### Obligations of all parties

- All parties acknowledge the GDPR (EU 2016/679) and commit to complying with its requirements.
- Each party will ensure that data subjects receive the required information, as outlined in Articles 13 and 14 of the GDPR (EU 2016/679), when their personal data is collected. This includes providing details such as the identity of the data controller, the data protection officer (if applicable), the purpose and legal basis for processing, and the recipients of the data. This information may be communicated through a privacy statement or other appropriate means.

- Each party agrees to implement reasonable and appropriate technical and organizational measures to safeguard personal data, minimizing the risk of data breaches.
- In the event of a serious information security incident, the affected party will immediately notify all other parties. This ensures a joint assessment of whether the incident qualifies as a reportable data breach. The parties will keep each other informed about any breach notifications made by the data controller and any communications with data subjects regarding the breach.
- Each party will ensure that data subjects can exercise their GDPR rights, including the right to access, rectify, erase, restrict processing, and request data portability, where applicable.
- If a data subject submits a GDPR request to one party, that party will inform all other relevant parties. The parties will collaborate to ensure the request is fully addressed. The first party receiving the request will be responsible for communicating with the data subject.
- If a party undergoes an audit by a supervisory authority related to a joint activity, the other parties will provide support, including supplying any relevant information requested by the authority.
- This Joint Controllership Agreement is based on Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and applies across all relevant jurisdictions. Where national data protection laws impose more stringent provisions than the GDPR (EU 2016/679), the applicable national legislation shall take precedence. However, compliance with national laws shall not result in a violation of the fundamental principles and obligations set out in the GDPR (EU 2016/679). In cases where national laws prevail, all data controllers must be informed in detail. This includes a comprehensive explanation of the applicable national provisions, the specific requirements that differ from the GDPR (EU 2016/679), and any necessary adjustments to our data protection practices to ensure full compliance with both legal frameworks. The data controllers will assess the impact with the data controllers and ensure that all measures align with our overarching commitment to data privacy and security.
- It is further acknowledged that all project partners, including those from associated countries such as the United Kingdom and Kosovo, are participating under the Horizon Europe programme framework. This association requires them to adhere to the same data protection, ethical, and legal standards as EU-based partners, thereby ensuring consistent application of GDPR principles and related obligations throughout the consortium.

### Duration

This *Agreement* shall remain in effect for the duration of the involvement of all parties in the research project.

### Signatures

By signing below, the *Parties* acknowledge that they have read, understood, and agreed to the terms of this *Agreement*.