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ICT-enabled integration facilitator and life rebuilding guidance
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Deliverable: D7.3 The ARTES impact assessment

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Deliverable coordinator	Júlia Zomignani Barboza (*VUB*) – julia.zomignani.barboza@vub.be
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1

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

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AUTHORS

Author name	Organization	E-Mail
Júlia Zomignani Barboza [EDITOR]	VUB	julia.zomignani.barboza@vub.be
Sergi Vazquez Maymir	VUB	sergi.vazquez.maymir@vub.be
Paul de Hert	VUB	paul.de.hert@vub.be

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Editor Address data	Name: Júlia Zomignani Barboza Partner: VUB Address: Pleinlaan 2, 1050 Elsene, Brussels, Belgium Phone: +32 (0) 26291160 Email: julia.zomignani.barboza@vub.be
Delivery Date	16-12-2019
Peer Review	Paola Seremetis, (MDAT); Dimitris Demertzis (OMNES)

ICT-enabled
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and life rebuilding guidance

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EXECUTIVE SUMMARY

The REBUILD project aims at addressing immigrant integration through the provision of a toolbox of ICT-based solutions that will improve both the management procedures of the local authorities and the life quality of the migrants. To achieve this, REBUILD seeks to develop tools that will gather information on the needs and skills of migrants and match them with the needs emerging in local labour markets and the services provided by local stakeholders. At the same time, migrants will have access to a digital companion, which will help them in the integration process by facilitating the search and contact with local services and obtaining feedback from the users to improve the tool.

In REBUILD, the goal of work package 7 is to ensure compliance of the REBUILD project with the ARTES framework. Such compliance will be ensured during the lifetime of the project through an impact assessment against the ARTES framework as well as through monitoring of the activities of the project. ARTES consists of five principles, namely: Authenticity, Respect, Truthfulness, Equity and Social Responsibility. The framework is built on three pillars: fundamental rights framework, ethical and societal framework and regulatory frameworks relevant to REBUILD.

In this regard, the current Deliverable builds on Deliverable 7.1, which outlined the legal and ethical principles that apply to the REBUILD project, and on Deliverable 7.2, which defined the method used for REBUILD's impact assessment, to produce a report on the foreseen impacts of the project. The present report is based on the answers provided by the partners of the REBUILD consortium to the questionnaire outlined in Deliverable 7.2, which asked questions about the processing of personal data and ethical concerns regarding participation in the project.

3

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

TABLE OF CONTENTS

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

ABSTRACT

This Deliverable constitutes the third step of the ARTES Impact Assessment. Its role within that context is to outline the foreseen data protection related impacts of the project. In this regard, section 1 of this deliverable describes the project activities that are likely to result in the foreseen impacts. Section 2 then analyses these activities in light of data protection and ethical principles that apply to the project, while section 3 identifies potential risks and provides recommendations on how to address possible negative outcomes of REBUILD.

INTRODUCTION

The project REBUILD aims at improving migrants and refugees' inclusion through the provision of a toolbox of ICT-based solutions aimed to enhance both the effectiveness of the services provided by local public administration and organisations, and migrant's quality of life.

This project follows a user-centred and participated design approach, aiming at addressing properly real target users' needs, ethical and cross-cultural dimensions, and at monitoring and validating the socio-economic impact of the proposed solution. Both target groups (immigrants/refugees and local public services providers) will be part of a continuous design process; users and stakeholders' engagement is a key success factor addressed both in the Consortium composition and in its capacity to engage relevant stakeholders external to the project. Users will be engaged since the beginning of the project through interviews and focus groups; then will be part of the application design, participating in three Co-Creation Workshops organized in the three main piloting countries: Italy, Spain and Greece, chosen for their being the "access gates" to Europe for main immigration routes. Then again, in the 2nd and 3rd years of the project, users' engagement in Test and Piloting events in the three target countries, will help the Consortium fine-tune the REBUILD ICT toolbox before the end of the project.

The key technology solutions proposed are:

- GDPR-compliant background information gathering tool (with user consent and anonymisation of personal information) for the integration of migrants;
- AI-based profile analysis to enable both personalised support and policy making on migration-related issues;
- AI-based needs matching tool, to match migrant needs and skills with services provided by local authorities in EU countries and labour market needs at local and regional level;
- a Digital Companion for migrants enabling personalised two-way communication using chatbots to provide them smart support for easy access to local services (training, health, employment, welfare, etc.) and assessment of the level of integration and understanding of the new society, while providing to local authorities data-driven, easy to use decision supporting tools for enhancing capacities and effectiveness in service provision.

To ensure that the abovementioned tools comply with the ethical and legal framework relevant to REBUILD (outlined in Deliverable 7.1), work package 7 is tasked with conducting an impact assessment to identify the risks involved in the project and propose ways to avoid or mitigate them based on their seriousness. In this regard, the present Deliverable, building on Deliverables 7.1 and 7.2, outlines the expected impacts of REBUILD on the processing of personal data, privacy and ethical issues identified in Deliverable 7.1. The identification of such impacts is based on the answers provided by REBUILD partners to the questionnaire contained in Deliverable 7.2.

1 DESCRIPTION OF PROJECT ACTIVITIES INVOLVING PARTICIPANTS

From its inception, REBUILD was designed as a user-centred and participative project, in which both target groups (migrants/refugees and local services providers) would be involved in the development of the REBUILD tools by actively participating in project activities. Consequently, participation of target groups was foreseen at different steps of the project. While users' and stakeholders' engagement is a key success factor for the project, their participation may give rise to legal and ethical concerns. For this reason, the first section provides a general outline of the activities in which they engage in the project and the processing operations of their personal data expected to be conducted throughout REBUILD. The second section, in turn, will analyse the processing activities in view of the data protection and ethical principles identified in D7.1. Possible risks associated with the project, with special attention to the risks that may arise for possible users of the REBUILD tools (represented during the project lifecycle by participants belonging to REBUILD's target population) are outlined in section 3, which also suggests ways to treat such risks.

1.1 CURRENT AND FORESEEN PARTICIPATION OF TARGET POPULATION

In the context of work package 1 (background information gathering), partners OMNES, CIDAS and UAB conducted face to face focus groups with volunteer participants (migrants/refugees) to understand the cultural background of REBUILD target users and how it influences their lives in ways that affect the development of the project tools.

Also in work package 1, the same partners engaged with volunteer participants qualifying as refugees/migrants[1] to gather information from them that will inform the development of the REBUILD tools. Participation occurred in different forms. In Greece, OMNES staff conducted face to face interviews with participants. In Spain, information was either gathered during interviews conducted by UAB staff or through the filling of online questionnaires. Lastly, in Italy, CIDAS conducted face to face interviews but also allowed those who preferred it to fill in a questionnaire..

For work package 2 (codesign processes), partners UNINETTUNO, OMNES, CIDAS, MDAT and UAB interviewed or applied questionnaires to volunteer participants working at local service providers to obtain information about the services offered to migrants/refugees in each REBUILD country. These partners, together with DEN, further held face to face co-creation workshops with volunteer participants, who were either refugees/migrants or worked for local service providers, to present scenarios and prototypes defining how the modules of the REBUILD toolbox are expected to work and interact with real users and obtain valuable feedback and input from their point of view.

Besides the abovementioned activities in which participants were already involved in the first year of REBUILD, work package 6 (deployment, piloting and user validation) foresees the participation of target users during testing activities, in which participants will test certain features of the REBUILD tools and give feedback for further development. Lastly, piloting sessions will be held in all three target countries (i.e. Greece, Spain and Italy) in which participants will test the full REBUILD tools. In these activities, DEN will also collect information from participants to inform the socio-economic impact assessment conducted in work package 9.

1.2 CURRENT AND FORESEEN PROCESSING OF PERSONAL DATA

For the questionnaires and interviews conducted in work package 1 (mentioned above), data provided by migrants and refugees from different backgrounds were aggregated in a report analysing the different needs and expectations of REBUILD's target population (D1.2). Information from the focus groups, in turn, were

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[1] Although REBUILD's main target population is refugees, REBUILD tools, once deployed, could also benefit migrants in general. During the project, however, participants are mostly recognised refugees or asylum seekers.

ICT-enabled
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and life rebuilding guidance

Re_Build

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added to a report on cultural markers affecting users' interaction with technology (D1.4). As for the interviews with service providers in work package 2 (also mentioned above), the information obtained through them was gathered in an aggregated report that provides an overview of the different services and levels of assistance available for migrants in each REBUILD country (D2.2). These reports only contained aggregated data and no direct personal identifiers were included. To partake in the activities, however, all participants had to sign consent forms, which contained direct identifiers (full name and signatures). Such forms are stored by UAB and UNINETTUNO and are not available to other partners to keep participants' identity undisclosed.

Information obtained through the co-creation workshops has been processed in a similar way. While UAB holds the consent forms of participants, aggregated data without personal identifiers will be included in reports (D2.5 and D2.6, due in M24 and M36 respectively) to be shared with other partners in the consortium.

All the above-mentioned data was processed to obtain target users' opinions and insights on the project. These opinions and insights will be taken into account by the technical partners (UPM, CERTH and ENG) while developing the REBUILD tools. The present deliverable will deal mostly with the risks associated with the processing of such data. However, more data will be processed in the next years of the project.

In this regard, it is useful to recall that some of the REBUILD tools will be based on artificial intelligence and, more specifically, a machine learning model will match the needs and skills of migrants and refugees with the needs emerging at local level and the services provided by local stakeholders. Similarly, a machine learning trained chatbot will provide migrants with the information they seek and support them in the integration process step-by-step.

Machine learning is a specific form of artificial intelligence that can be defined as the study of algorithms that improve their performance when completing a certain task with experience in the form of machine-readable data.[2] These technologies are not a set of instructions for a machine to complete the task at hand, but are, instead, a set of instructions for the machine to generate strategies or solutions to complete such task. As most technologies based on machine learning 'learn' from data that is fed into the system (training data), it follows that most types of machine learning rely on being fed large amounts of data to be developed.

To develop and improve the REBUILD tools, therefore, technical partners will also need to have training data. These data will come from participants involved in the testing and piloting activities of work package 6 (mentioned above). In these occasions, DEN will also collect information from participants in the context of the socio-economic impact assessment. The collection of data for work packages 6 and 9 has not yet taken place and the partners involved in these activities, at this stage, are still determining the exact type of data that will be required from participants to achieve the projects' aims.

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[2] T. Mitchell, 'Machine Learning' (1997), page 2.

8

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

2 PROCESSING OF PERSONAL DATA IN REBUILD

The sections below describe, in light of data protection and ethical principles, the processing activities undertaken during the first year of the REBUILD project as well as the foreseen processing in the next years. The said description is based on the answers provided by REBUILD partners to the questionnaire contained in D7.2.

2.1 PERSONAL DATA

As mentioned in section 1 above, REBUILD gathered and is expected to continue to gather data from volunteer participants. In the project, data is handled as prescribed in D10.2 – Data Management Plan (DMP). This section will identify the type of data processed thus far as well as the data that, at the moment, is expected to be processed in future activities of the project. Apart from the answers to the questionnaires, the datasets related to the project are also detailed in the DMP.

In the context of work package 1, data was collected from migrants and refugees by OMNES, CIDAS and UAB through the interviews and questionnaires applied as well as through the focus groups conducted. From those who participated in the interviews/questionnaires, the following data was gathered: nationality, gender, mother tongue, age, migration status, education and training background, family constitution, religion (except in Spain), employment background, and expectations and desires in their host country.

From those who participated in the focus groups, the following information was collected: age, country of origin, country of residence, length of stay in country of residence and education background. Furthermore, the audio of the focus group sessions was recorded, and the recordings are stored in a restricted folder in UAB's servers. Other partners were given access to UAB's server (Nebula) to upload the audio recordings directly.

For work package 2, UNINETTUNO, OMNES, MDAT, CIDAS and UAB conducted interviews/questionnaires with participants who work at institutions that provide services to migrants/refugees locally. Such participants were only asked about the services provided by the institution they were affiliated with and not about personal aspects of their lives.

Also in work package 2, co-creation workshops were held by the same partners, together with DEN. Participants of these workshops include refugees/migrants and representatives from local service providers. The data collected from participants of the workshops were the following: a nickname, nationality, gender, mother tongue, fluency in other languages, education background including field of study, employment status, dietary preferences, and accessibility constraints.

Furthermore, every participant signed a consent form containing their full name and signature. Such forms are currently held by UAB and UNINETTUNO and are the only documents that contain participants' direct identifiers. Partners that collected such forms delivered them by hand to UAB and UNINETTUNO during face-to-face project meetings.

In the next years of REBUILD, participants (migrants/refugees) are expected to be engaged in the project during the testing and piloting activities. Once again, all participants will be asked to sign consent forms, which will contain their full names and signatures and such forms will be held by UAB. At the moment, it is still unclear which data technical partners will need from participants to develop the REBUILD tools. For the time being, the following data is foreseen to be needed: full name, mobile phone number, mobile phone location, nationality, personal interests, services users wish to access, work experience and skills, education background and current occupation. Furthermore, DEN will also collect information from participants during these activities to inform the socio-economic impact assessment. The types of data to be collected by DEN are not yet defined, but may include gender, age group, national/ethnic origins, employment/educational history and possibly political opinion and religious belief.

ICT-enabled
integration facilitator
and life rebuilding guidance

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2.2 LAWFULNESS, FAIRNESS AND TRANSPARENCY OF PROCESSING

The principle of lawfulness states that a legitimate legal basis is required for any processing of personal data to take place. During the REBUILD project, all processing of personal data is based on participants' consent.

2.2.1 Consent

Consent as a legal basis of processing personal data has three building blocks:

1. Data subjects must give their consent freely, without undue pressure. The consent is freely given if the data subject is able to exercise a real choice and there is no risk of deception, intimidation, coercion or significant negative consequences if he/she does not consent;[3]
2. Data subjects must have sufficient information before taking a decision; the language used must be clear and understandable and the consequences of not giving consent must be included as well;
3. The consent must be specific, given in unambiguous terms, taking into consideration the reasonable expectations of an average person. There ought to be no reasonable doubt that the data subject wanted to convey his/her agreement to allow the processing of data.

These building blocks are based on the principles of fairness and transparency, which prescribe that data subjects should be able to know what information has been collected about them, the purpose of collection and processing, who can access and use their data, how to gain access to information collected about them, and how to control who has access to it.

2.2.2 Informed consent

Everyone who participated in REBUILD activities thus far was asked to sign a consent form to express their consent, as predicted in the DMP. Such forms were developed by UAB and validated by VUB. They contained the purpose of the activity and of the REBUILD project as a whole and explained how participants' personal data would be dealt with by project partners. They also included the identification and contact information of the data controller and a form to be filled in case participants wished to exercise their right to access, rectification or erasure. Furthermore, an information sheet was presented to participants before they signed the form. This sheet was also developed by UAB and validated by VUB. The sheet further explained how the activity would be conducted, what were its objectives and how the information obtained from data subjects would be treated. In some cases, consent forms and information sheets were translated to participants' mother tongue and partners leading the activity had staff available to answer participants' questions before signing the consent form and participating in the activity.

English copies of the full text of consent forms and information sheets used in all project activities are annexed to this to the present deliverable.

2.2.3 Freely given consent

No power relationship existed between project partners and members of local service providers who engaged in project activities. Furthermore, UAB, UNINETTUNO, MDAT and DEN had no previous relationship with the migrants/refugees involved in the project activities. CIDAS and OMNES, however, provide services to the refugees/migrants that engaged in the activities they conducted and, therefore, there was concern over a possible power relationship that may exist between the parties involved, which may compel participants to partake in the project activities. To overcome this, participants were not contacted by the researchers who were leading the activities but were instead invited to participate by members of CIDAS and OMNES staff they already knew and trusted and who informed them that participation was voluntary and not accepting to partake in the project would not have any negative effects in their relationship with the organisation.

On the day of the activities, project partners told participants, before they signed the consent forms and participated in the project, that their participation was voluntary, that no negative consequences could arise from non-participation, that they could stop participation and leave at any time without justification and that

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[3] Article 29 Data Protection Working Party, 'Guidelines on Consent under Regulation 2016/679' (2017).

10

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

ICT-enabled
integration facilitator
and life rebuilding guidance

This project has received funding from the *European Union's Horizon 2020 research and innovation programme* under grant agreement No 822215

Re_Build

they could choose not to answer questions asked. This information was also contained in the consent forms and information sheets.

For future activities involving participants, the same procedures are expected to be followed.

2.3 Data Subjects' Rights

The DMP mentions how data subjects can exercise their rights in REBUILD. In this regard, partners declared that consent forms signed by participants included an explanation of their data protection rights and a form to be filled in case they wished to exercise their rights. The contact details of Dr. Pilar Orero, from UAB, were included so that participants could contact her in case they wished to exercise their rights or had questions about their participation in the project after the activities in which they took part.

2.4 Data Minimisation and Purpose Limitation

The goal of the activities involving participants in work packages 1 and 2 was to gather target users' thoughts and expectations on the REBUILD tools and to obtain information about the services offered to migrants/refugees in each REBUILD country. As explained in section 2.1 above, migrants/refugees involved in the activities of work packages 1 and 2 provided personal data such as their country of origin, professional and educational background, languages spoken etc. Although the sample of the participants involved in the project is statistically not representative, such information was requested to ensure different backgrounds were represented. Considering the complexity of the migrant population that may be affected by REBUILD, ensuring diversity of participants was needed to allow the design of the project's toolbox as closely as possible to migrants/refugees' expectation. Therefore, the purpose of collecting such data was to ensure participants from different backgrounds were represented and the amount of data collected was defined by the factors that are likely to be relevant for REBUILD's target population (e.g. since the REBUILD tools will match migrants' skills with offers in the job market, it was important to know participants' employment background to ensure migrants with different qualifications and skills were represented). Other information such as dietary restrictions were requested so the events could be organised appropriately (e.g. to ensure all participants had a food option they could eat).

As for participants who work for local service providers, they were only asked to provide their full names and signatures in the consent forms and consortium partners organising the activities they participated in had their contact information, which was needed to communicate with them regarding the activities.

In future project activities, personal data from participants will be processed to develop the REBUILD tools in a way that allows these tools to provide personalised information to users. At the moment, however, it is not yet defined which (and how much) data will be processed for such purpose.

2.5 Documentation of Processing Operations

Partners replied that no documentation of processing operations is foreseen.

2.6 Data Retention

Personal data should be kept for a period of 5 years after the end of the project for audit purposes. Following this period, all personal data should be destroyed.

2.7 Data Security

The DMP states that "All data, data collected, created or processed, including personal data processed by the project partners, will be protected against the risks of unauthorized access, modification and loss." In this regard, project deliverables reporting on activities with participants include only aggregated data. The questionnaires applied in work package 1 and 2, as well as the notes on the focus groups and co-design

ICT-enabled
integration facilitator
and life rebuilding guidance

This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 822215

Re_Build

workshops are currently stored in the project's shared Google Drive folder, to which all project partners have access. Furthermore, MDAT and OMNES informed that for the questionnaires applied in Greece, they conduct periodic backups of the copies they store to external hard drives, which are stored in lockers. The consent forms, which are the only documents that contain direct personal identifiers, are stored at UAB and UNINETTUNO. Project partners who were responsible for obtaining consent from participants stored the forms in lockers until such forms could be delivered in hands to UAB for safe keeping. UNINETTUNO kept the consent form it collected directly from participants and these forms are currently stored in a locker at the university. The audio recordings of the focus groups conducted in work package 1 are stored in UAB's internal system, NEBULA, in a restricted folder.

OMNES, MDAT and DEN informed that their staff has been trained on how to handle participants' data while UAB reported that they assign one member of its staff to control access permissions to participants' data stored in their servers.

Concerning the data that will be processed by the technical partners to develop the REBUILD tools, UPM, CERTH and ENG informed that cryptographic methods will be used to protect participants' data.

2.8 DATA TRANSFERS

Partners reported that no data from the project would be transferred outside the EU. It should be taken into consideration, however, that project partners use a shared folder on Google Drive to share project documents and that some of the forms administered in work package 1 and 2 are kept in Google Forms.

2.9 PARTICIPANTS' COMFORT

To ensure participants were comfortable and did not feel compelled to take part in activities they did not want to, questions were designed in a gender/religion/nationality neutral way and participants were informed that they could refuse to answer any question or end their participation at any moment without negative consequences. Questions were formulated in an easy to understand manner and culture mediators were present during all activities to answer any doubt that may arise from participants.

12

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

3 RISK ASSESSMENT AND RECOMMENDATIONS

The term 'risk' is usually used in the context of an adverse consequence of an event. Risk analysis focuses on understanding the identified risk by measuring the probability of occurrence and the weight of the possible consequences. The analysis can be based on different scaling systems,[4] which depend on the type of risk, its possible consequences or the purpose of the analysis.[5]

3.1 RISK ANALYSIS

Generally, the analysis is based on two factors of the risk: the probability of its occurrence and the weight of its impact.

The probability of a risk to occur can be rated to one of the following four scale:

- **Very unlikely**: risk nature is known to REBUILD partners and no known occurrences of the risk happened in similar activities. Risk shall be periodically monitored.

- **Rather unlikely**: few occurrences of the risk happened in similar activities; thus risk can be handled relatively reliably. Threat or failure is possible and high-level action plan in case risk occurs should be elaborated. Depending on the nature or root cause, a set of **preventive or mitigation actions should be identified**.

- **Reasonably possible**: risks of similar nature have happened rarely in other similar activities and current situation has few assumptions that are somewhat favourable to occurrence of the risk. A detailed action plan in case risks occur should be developed. Depending on the nature or root cause, a set of preventive or **mitigation actions should be assessed and broke down into steps**.

- **Likely**: the situation is favourable to occurrence of risks and/or similar risks happened in similar activities before. Major trade-offs between ARTES requirements and REBUILD actions should be thoroughly discussed and a set of preventive or **mitigation actions** (depending on the nature or root cause) **should be ready to be triggered**.

The weight of the risk to the fundamental rights and freedoms of individuals should be properly assessed. Three scales of impact are assigned as follows:

- **Low**: in case of occurrence, the risk does not threaten the rights and freedoms of individuals or causes necessity of only minor adaptation of the project.

- **Moderate**: in case of occurrence, risk can be deemed as a threat to the rights and freedoms of individuals. Several elements in the project should be revised and/or modified (however stay on acceptable level).

- **High**: in case of risk occurrence, rights and freedoms of individuals are highly threatened, thus one or more goals of the project will not be met. Significant revision and re-orientation (e.g. technical) is needed.

In case of data protection related risks, the impacts will be qualified by a two-grade scale:[6]

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[4] Such as qualitative, semi-quantitative or quantitative. Read more at: ISO 31000:2009 5.4.3.

[5] ISO 31000:2009 5.4.3.

[6] A limitation of a right in itself is usually not quantifiable (or qualifiable), therefore the severity of risk should be described in a two-grade scale: the processing of personal data is either compliant or non-compliant. To analyse the nature of the severity the data controller must find out, whether the processing operation is in compliance with data protection law. Although the analysis of risk is not regulated by the GDPR, the severity of the risk can be measured, based on the governing principles of data protection law, the opinions of the Article 29 Data Protection Working Party and the national supervisory authorities.

ICT-enabled
integration facilitator
and life rebuilding guidance

This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 822215

Re_Build

- **Compliant**: the limitation of the right to the protection of personal data complies with data protection law.

- **Non-compliant**: the limitation of the right to the protection of personal data does not comply with data protection law.

To describe the significance of the identified risk the qualified weight and occurrence will be quantified and placed in a matrix:

		Probability			
		Very unlikely (1)	Rather unlikely (2)	Reasonably possible (3)	Likely (4)
Weight	Low (1)	1	2	3	4
	Moderate (2)	2	4	6	8
	High (3)	3	6	9	12

The significance of risk will be divided into three categories, based on the quantified risk:

- **Low**: 1-4
- **Moderate**: 5-8
- **High**: 9-12

These categories will help the consortium prioritise between risks and decide which risks should be mitigated first and which ones leave space for other treatment options. The answers provided to the questionnaire of D7.2 contain enough information to identify, assess and categorise the probability and weight of risks against ARTES requirements. In case of the data protection risks the matrix will not be applicable as risks must be mitigated or avoided when data processing operation is not compliant with the legal provisions.

There are four main strategies that can be used for negative risks identified in the project:

- **Avoid**: When you avoid the risk it means you change your plan to completely eliminate the probability of the risk occurring or the effect of the risk if it does occur;
- **Transfer**: Risk transference occurs when the negative impact is shifted to a third party, such as through an insurance policy or penalty clause in a contract. The risk may still occur however the financial impact will be somewhat displaced. Risk transference usually involves some type of contractual agreement;
- **Mitigate**: Risk mitigation occurs when you proactively change the plan to minimize the impact or probability of the risk occurring. Risk mitigation does not eliminate the risk and as such there will be some residual risk remaining;
- **Accept**: There are few risks which are out of control of project organization and project manager has no other option but to accept them and still continue running the project by finding alternate ways to tackle the issues arising from these risks.

14

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

3.2 RISKS RELATED TO LAWFULNESS, FAIRNESS AND TRANSPARENCY OF PROCESSING

- **Consent is not freely given:** participants feel pressured to partake in project activities and do not feel able to exercise a real choice when giving their consent.
  - o Probability: **reasonably possible**. Considering that some of the partners provide services to the refugee/migrants who participate in REBUILD activities, such participants may feel compelled to partake in activities organised by such organisations.
  - o Weight: **non-compliant**. All processing of personal data needs a legal basis. As specified in REBUILD's proposal and description of action, data collection and processing of personal data throughout the project will be based on the consent of the data subjects. Should consent not be freely given, it is not valid.
  - o Significance: **high.** Besides the non-compliance with the applicable data protection rules, this severely undermines participants' agency, especially considering the vulnerable character of REBUILD's main target population (i.e. migrant/refugees).

⇒ Risk response plan type: **MITIGATE** (measures already taken)
⇒ Risk response plan: ensure participants are well informed that no negative consequence will arise from their refusal to participate in the project and that refusing to give consent will not in any way affect their relationship with service providers involved in REBUILD. This should be communicated in a simple and easy to understand manner and in an environment in which participants feel comfortable. These measures were already implemented in project activities that took place in the first year of the project and should continue to be followed in future interactions with participants.

- **Consent is not informed:** participants do not understand what their participation consists of, how the information they provide will be treated, what are their rights and how to exercise them.
  - o Probability: **rather unlikely**. From its inception, the procedure for participation in REBUILD was foreseen to be approved by UAB's Ethical Commission on Human and Animal Research. Such procedure includes both the provision of a consent form and information sheet for all participants explaining all the above-mentioned information in easy to understand language.
  - o Weight: **non-compliant**. All processing of personal data needs a legal basis. As specified in REBUILD's proposal and description of action, data collection and processing of personal data throughout the project will be based on the consent of the data subjects. Should consent not be informed, it is not valid.
  - o Significance: **high.** Besides the non-compliance with the applicable data protection rules, this severely undermines participants' agency, especially considering the vulnerable character of REBUILD's main target population (i.e. migrant/refugees).

⇒ Risk response plan type: **AVOID** (measures already taken)
⇒ Risk response plan: ensure participants are well informed of the purposes of the project and of their participation. This should include explaining how the information they provide will be treated and how they can exercise their rights. This should be communicated in a simple and easy to understand manner and, when needed, translated into their mother tongue or another language they understand. These measures were already implemented in project activities that took place in the first year of the project and should continue to be followed in future interactions with participants.

3.3 DATA SUBJECTS' RIGHTS

- **Data subjects cannot exercise their rights:** participants do not understand their rights and do not know how to exercise them if they wish to do so.
  - o Probability: **rather unlikely**. From its inception, the procedure for participation in REBUILD was foreseen to be approved by UAB's Ethical Commission on Human and Animal Research. Such procedure includes both the provision of a consent form and information sheet for all participants

ICT-enabled
integration facilitator
and life rebuilding guidance

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explaining their rights and providing a form to be filled should they wish to exercise them. These documents are written in easy to understand language. The contact information of Dr. Pilar Orero, from UAB, is also included in the form so data subjects can direct their request to the correct person in the consortium.

- o Weight: **non-compliant**. Data subject rights are prescribed by the GDPR and data subjects must be able to exercise them.
- o Significance: **high.** Besides the non-compliance with the applicable data protection rules, this severely undermines participants' agency, especially considering the vulnerable character of REBUILD's main target population (i.e. migrant/refugees).

⇒ Risk response plan type: **MITIGATE** (measures already taken)
⇒ Risk response plan: ensure participants are well informed of their rights and have the means to exercise them. This can be done by including this information on the consent forms and information sheets prepared for participants with further clarifications given to them in person during the project activities. These measures were already implemented in project activities that took place in the first year of the project and should continue to be followed in future interactions with participants.

3.4 DATA MINIMISATION AND PURPOSE LIMITATION
- **Processed data is not minimised:** more data than needed is processed.
    - o Probability: **reasonably possible**. While thus far the information to be requested from participants in project activities has been shared and discussed with project partners beforehand to ensure only the necessary data was being collected, REBUILD tools will be developed using machine learning techniques, which rely on receiving large amounts of data to be improved. As it may be unclear at first which data is necessary to train such machine learning systems, there is a risk that more data than necessary is processed.
    - o Weight: **non-compliant**. All processing of personal data should be minimised.
    - o Significance: **moderate.** All data are collected from participants after receiving their consent and only a minimum number of direct identifiers are collected during project activities. The risks to participants, therefore, is moderate.

⇒ Risk response plan type: **MITIGATE**
⇒ Risk response plan: thus far, information that would be asked from participants has been shared with project partners beforehand to ensure the whole REBUILD consortium agreed with was being asked. This action helped make sure data processed during the first year of the project was minimised. As the data that will be collected in the next years are not yet defined, it is recommended that the same procedure be taken and that technical partners adopt a progressive approach when designing the REBUILD technologies (see D7.4 for more details on this).

3.5 DOCUMENTATION OF PROCESSING OPERATIONS
- **Processing of personal data is not documented**.
    - o Probability: **likely**. In the answers to the questionnaire, all project partners mentioned that no documentation of processing operations was foreseen.
    - o Weight: **non-compliant/non-compliant** (depending on the partner and its role). Article 30 GDPR requires controllers to keep a detailed documentation of the processing of personal data, including the names and contact details of the controllers and processors involved. Such documentation should assist in the identification of risks, both for the controller and, upon request, for the supervisory authority. Although the Regulation mentions an exception – i.e. when the data controller has less than 250 employees -, maintaining a record of the processing activities could be advantageous in multiple cases - e.g. in case the information it contains is needed during the assessment of risks or when data subjects request it.

16

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

ICT-enabled
integration facilitator
and life rebuilding guidance

This project has received funding from the *European Union's Horizon 2020 research and innovation programme* under grant agreement No 822215

Re_Build

o Significance: **low.** As long as data subjects can exercise their rights, documentation does not affect them in a direct way. It may, however, have consequences for controllers in case of e.g. audits.

⇒ Risk response plan type: **MITIGATE**
⇒ Risk response plan: as some partners in the REBUILD consortium may be obliged to document processing operations and considering the consortium as a whole would benefit from documentation, as it helps keep track of all the data that has been processed in the project, it is advised that all partners document the processing activities they are involved in.

3.6 DATA RETENTION

- **Personal data is retained for longer than necessary**.
  o Probability: **reasonably possible**. While some partners indicated that all personal data will be destroyed 5 years after the project finishes, most partners mentioned that the end data for processing and what would happen to the data afterwards had not been discussed in the consortium.
  o Weight: **non-compliant**. According to the GDPR, data that allows the identification of data subjects should be kept for no longer than what is necessary to achieve the aims for which they were collected.
  o Significance: **moderate.** Data subjects were informed through the consent forms and information sheets that all personal data would be deleted 5 years after the end of the project.

⇒ Risk response plan type: **AVOID**
⇒ Risk response plan: all partners must ensure information gathered from participants (e.g. consent forms, focus groups notes, filled questionnaires etc.), except for anonymised aggregated data contained in deliverables, are deleted 5 years after the end of the project. This period is set to ensure audits are possible after the project is finished.

3.7 DATA SECURITY

- **Security of personal data is not ensured**.
  o Probability: **rather unlikely**. Consortium partners informed of different measures taken to ensure participants data are stored in a secure manner. For example, some partners train their staff on how to handle data and store physical or digital archives containing direct identifiers on locked facilities. Others ensure safety by having restricted folders in their digital storage for project files and ensuring only a limited number of researchers have access to such files. Furthermore, technical partners reported that the REBUILD tools will be secured with encryption techniques to protect users' data. While project files are shared through Google Drive, no direct identifier of participants is stored in such platform. Notes on activities involving participants and participants' answers to questionnaires, however, are also stored on the shared folder.
  o Weight: **non-compliant**.
  o Significance: **high.** In case of security breaches, data subjects' data may be accessed by unwanted actors.

⇒ Risk response plan type: **MITIGATE**
⇒ Risk response plan: all partners must ensure information gathered from participants is safely stored. Encryption techniques should be used to enhance security and access to such information should be granted on a need to know basis, without any unnecessary sharing. Partners' staff should be aware of and respect such measures. No personal identifier should be shared, even among consortium partners, unless absolutely necessary. Furthermore, it is recommended to move participants' answers to questionnaires and notes on activities involving participants to the responsible partner's own servers and remove them from the shared platform, leaving only aggregated data available for the consortium.

3.8 DATA TRANSFERS

- **Data is transferred in disrespect of the applicable legislation**.
  - o Probability: **rather unlikely**. In principle, the GDPR prohibits transfers of data outside the EU, although there are exceptions to such general rule. In REBUILD, documents containing direct identifiers (i.e. consent forms signed by participants) are all stored locally with UAB and UNINETTUNO and, therefore, not transferred to any other country. Furthermore, documents containing direct identifiers are always delivered by project partners to UAB and UNINETTUNO by hand. As for notes, questionnaires and reports, they are kept either on Google Forms or in the shared folder on Google Drive. While all consortium partners informed that no data would be transferred outside the EU, the storage of project files on these platforms indicate otherwise. Google cloud services transfer data to Google storage facilities (data centres), which may be located outside the EU. While Google uses contractual clauses as a GDPR exception to transfer data outside the EU, it also offers users an option to choose a geographical location to store their data.[7] At the moment, it is not clear which option has been chosen by the project coordinator and UAB (regarding the Google Forms).
  - o Weight: depends on whether data is currently held in the EU or not and, if not, which contractual clauses justified the transfer.
  - o Significance: **moderate.** Transfer outside the EU may submit participants' data to less protective data protection rules.

⇒ Risk response plan type: **AVOID**
⇒ Risk response plan: it is recommended that UAB extract the relevant information from the Google Forms, store it locally, and remove all data from the platform. As for the project's shared folder on Google Drive, it is recommended that UNINETTUNO as coordinators choose the option to store data in the EU.[8]

3.9 PARTICIPANTS' COMFORT

- **Participants are uncomfortable during REBUILD activities**: participants do not feel respected by those organising the activity or by other participants. Participants feel uncomfortable because their religion, gender, nationality, literacy or other aspect of their identity is not respected or taken into consideration.
  - o Probability: **rather unlikely**. REBUILD partners engaged in activities involving participants are used to interacting with participants, including vulnerable ones, either for research purposes or in their role of service providers. Questions asked to participants were developed in neutral terms, taking into account participants diverse backgrounds. Cultural moderators were present in project activities to assist participants in case needed.
  - o Weight: not applicable.
  - o Significance: **high.** Project activities should in no way bring harm or discomfort to participants.

⇒ Risk response plan type: **MITIGATE** (measures already taken)
⇒ Risk response plan: partners involved in activities engaging participants should create a comfortable and safe environment where participants can express themselves freely. Rules must be in place to ensure no disrespect arises between participants. Questions should be asked in a neutral way, respecting participants' diversity regarding nationality, gender, religion or other aspects of their identity.

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[7] See Google's Compliance at: https://support.google.com/googlecloud/answer/6056694?hl=en. See also Google's Privacy Policy at: https://policies.google.com/privacy?hl=en-US#infochoices and Terms of Service at: https://policies.google.com/terms?hl=en-US#toc-account.
[8] See how to choose the geographical location of data at: https://support.google.com/a/answer/7630496?hl=en

ICT-enabled
integration facilitator
and life rebuilding guidance

Re_Build

This project has received funding from the European
Union's Horizon 2020 research and innovation
programme under grant agreement No 822215

- **Participants are unwilling to participate in project activities**.
  - o Probability: **very unlikely**. During the first year of the project, participants seemed willing to participant in REBUILD activities and reports from the activities show they were interested in the project and had no opposition to be engaged in it.
  - o Weight: not applicable.
  - o Significance: **low.** While there are no risks to participants for non-participation, such lack of participation would affect the project as a whole.

⇒ Risk response plan type: **ACCEPT**
⇒ Risk response plan: considering this is a very unlikely risk with low consequences for participants, it is an acceptable one.

19

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

4 CONCLUSION

REBUILD is being designed as a user-centred and participative project, and, consequently, participation of the project target groups (migrants/refugees and service providers) is foreseen at different steps of the project. While recognising that users' and stakeholders' engagement is a key success factor for the project, their participation may give rise to legal and ethical concerns. In this regard, the present deliverable described the activities involving participants that have already taken place and the ones that are foreseen to be conducted in the next years of the project in light of the data protection and ethical principles that are applicable to REBUILD. The risks arising from such activities were identified and, lastly, recommendations were made for the coordinators and consortium partners to implement to ensure the project's compliance with the ARTES framework (identified in D7.1). This impact assessment report completes the impact assessment, the implementation of which will be monitored in the next deliverable of work package 7 (D7.5). Regarding the processing of personal data in the testing and piloting activities, while a preliminary analysis of the possible impacts of such processing was done in this deliverable, a more concrete evaluation will be presented in the monitoring of the present impact assessment.

20

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

5 REFERENCES

- T. Mitchell, 'Machine Learning' (1997)
- Article 29 Data Protection Working Party, 'Guidelines on Consent under Regulation 2016/679' (2017).

ANNEX 1 - CONSENT FORMS AND INFORMATION SHEETS

The following pages of this annex contain, respectively:

1. The full text of the consent form related to the questionnaires applied in WP 1.
2. The full text of the information sheet related to such questionnaires.
3. The full text of the consent form related to the focus groups held in WP 1.
4. The full text of the information sheet related to these focus groups.
5. The full text of the consent form related to the co-creation workshops held in WP 3.
6. The full text of the information sheet related to the co-creation workshops.

ICT-enabled
integration facilitator
and life rebuilding guidance

Re_Build

This project has received funding from the *European Union's Horizon 2020 research and innovation programme* under grant agreement No 822215

CONSENT FORM – QUESTIONNAIRE

The purpose of this study is the development of technological tools that will help integrate refugees and migrants and improve communication and the management procedures of the local authorities in relation to the integration of migrants.

Through this questionnaire we want to identify your needs, obstacles, shortcomings and possible improvements in relation to your migration project and your integration with the territory, in particular with regard to the areas of training, employment and access to services.

Your answers will allow us to design the toolbox as close as possible to the needs and expectations of migrants and refugees.

The information you provide in the questionnaire are anonymous and they will be used in the project. All information that you give will be treated in the strictest confidence and it will only be used for the purposes of this study. After you sign this consent form, no further personal data will be collected that permits your identification.

This consent will be kept in a safe place by the principal investigators at UAB and will be destroyed five years after the investigation finishes. It will not be shared with anyone outside UAB working on this project. The data analysed and the entire data base will be available to other interested researchers through open data repositories. This data will be anonymised.

Your participation in this study is absolutely voluntary, and there is no economic compensation. There is no penalty for not participating and there are no risks of any kind in your participation. You can discontinue your involvement in the study at any time without prior justification. This shall have no repercussions or negative consequences of any sort.

REBUILD is a European project led by UNINETUNNO (Italy). The ethical adviser responsible of ethical procedures is Pilar Orero. You can contact her to ask for more information about the project and the project results. Besides, you can exercise your rights recognized by the European Regulation on the Protection of Personal Data on the data file of this project by contacting the researcher responsible for this project, Dr. Pilar Orero, with your request and a photocopy of your ID (form ARCO is attached):

Dra. Pilar Orero (pilar.orero@uab.cat), Dept. de Traducció i Interpretació i Estudis de l'Àsia Oriental. Campus UAB, Plaça del Coneixement, MRA/126. 08193 Bellaterra (Cerdanyola del Vallès)

I authorize

• a qualitative and quantitative analysis of my responses

• the use of my answers for purposes of scientific dissemination

If you are willing to participate, please confirm the following statements by signing at the end of this document.

• I have read and understood the information given for this research or have had the information read to me,

• I have had the opportunity to ask questions about the research.

• I consent to take part in the research sessions and I received a copy of this consent.

Name of the participant   Date   Signature

Name of the researcher   Date   Signature

ICT-enabled
integration facilitator
and life rebuilding guidance

This project has received funding from the *European Union's Horizon 2020 research and innovation programme* under grant agreement No 822215

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Application of access to rectification, cancelation, opposition, and personal data portability (Optional)

You are taking part in a research project named «REBUILD ICT-enabled integration facilitator and life rebuilding guidance».

According to the UE regulation 2016/679 of the European Parliament and the European Council dated 27 April 2016 regarding Data Protection (GRPD), and the organic Law15/1999, from 13 December, of personal data protection, and its normative. The personal data gathered in this study will be part of a data file under the responsibility of TransMedia Catalonia (Universitat Autònoma de Barcelona) with the sole objective of performing the abovementioned research.

In the future to exercise your access rights, rectify, cancel, oppose and control the portability of the person responsible for the data file, please fill in this form and give it to any of the responsible researchers responsible for the study, together with a photocopy of your ID card or any other means of identification available to you.

INFORMATION OF THE DATA FILE RESPONSIBLE

Dr Pilar Orero (pilar.orero@uab.cat), Dept. de Traducció i Interpretació i Estudis de l'Àsia Oriental. Campus UAB, Plaça del Coneixement, Edifici MRA, Oficina 126. 08193 Bellaterra, Spain.

INFORMATION OF THE PERSON/LEGAL REPRESENTATIVE

I, _____, over 18 and with the address _____ City_____ Province _____ Zip _____ with passport or ID card no. _____, of which I attach a photocopy, through this letter I want to take on board the personal data protection regarding the data gathered by the study for «HELIOS – A Context-aware Distributed Social Networking Framework», according to the personal data protection Organic Law 15/1999, of December 13th and its related laws thereafter.

I REQUEST (please choose the option/s)

☐That the right of access to my data be facilitated to me, within a maximum period of one month from the collection of this request, and the information relative to my person relative to the cited study

☐To agree to rectify the personal data on which the right is exercised, within ten days after receipt of this request, and to notify me in writing of the result of the rectification practiced.

☐To agree to the erasure of the personal data on which the right is exercised, within ten days from receipt of this request, and to be notified in writing to me result of the cancellation practiced.

☐That the restriction of processing should be agreed that my personal data on which the right is exercised are included in the aforementioned registry within ten days after receipt of this request and that I am notified in writing of the result of the rectification practiced.

☐That it is avoided to share my personal data with third parties, as long as they are not duly completely and irreversibly anonymised.

Place / date

Signature

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

ICT-enabled
integration facilitator
and life rebuilding guidance

This project has received funding from the European
Union's Horizon 2020 research and innovation
programme under grant agreement No 822215

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INFORMATION SHEET

Project: REBUILD ICT-enabled integration facilitator and life rebuilding guidance

Main researcher: Maria Amata Garito

Ethical adviser: Pilar Orero

We would like to invite you to answer a questionnaire for a research study. The purpose of this study is the development of technological tools that will help integrate refugees and migrants and improve communication and the management procedures of the local authorities in relation to the integration of migrants.

The objective of the questionnaire is to carry out an analysis of the needs and expectations of migrants regarding their integration in the new country of residence, in order to implement the technological development of the tools in the most coherent way possible with the information provided through the questionnaire.

In the questionnaire you will be asked to provide some demographic data, such as your nationality and country of residence. Afterwards, you will be asked questions about your previous experiences in education and work, your relationship with public services and bureaucracy. Then, some questions about current affairs (family status, work, access to services, expectations, wishes).

The answers you provide will be aggregated with those of the other participants and will be used to produce a needs report and to inform the developments of the project. This report will be published online and will be available for all participants of the Questionnaire.

If you encounter any type of discomfort you can stop at any time without prior justification.

Now please read the consent form.

25

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

ICT-enabled
integration facilitator
and life rebuilding guidance

This project has received funding from the *European Union's Horizon 2020 research and innovation programme* under grant agreement No 822215

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CONSENT FORM – FOCUS GROUP

In this focus group, we want to talk about the impact of culture in the use of technology. The purpose of this study is the development of technological tools that will help integrate refugees and migrants and improve communication and the management procedures of the local authorities in relation to the integration of migrants. This focus group will last approximately 60 minutes.

The information and opinions you provide during the focus group will be used in the project, but it will remain anonymous (we will not use your name during the debate or in the project). The focus group will be audio recorded. All information that you give will be treated in the strictest confidence and it will only be used for the purposes of this study. After you sign this consent form, no further personal data will be collected that permits your identification. This consent will be kept in a safe place by the principal investigators at UAB and will be destroyed five years after the investigation finishes. It will not be shared with anyone outside UAB working on this project. The data analysed and the entire data base will be available to other interested researchers through open data repositories. This data will be anonymised.

Your participation in this study is absolutely voluntary, and there is no economic compensation. There is no penalty for not participating and there are no risks of any kind in your participation. You can discontinue your involvement in the study at any time without prior justification. This shall have no repercussions or negative consequences of any sort.

REBUILD is a European project led by UNINETUNNO (Italy). The ethical adviser responsible of ethical procedures is Pilar Orero. You can contact her to ask for more information about the project and the project results. Besides, you can exercise your rights recognized by the European Regulation on the Protection of Personal Data on the data file of this project by contacting the researcher responsible for this project with your request and a photocopy of your ID (form ARCO is attached): Dra. Pilar Orero (pilar.orero@uab.cat), Dept. de Traducció i Interpretació i Estudis de l'Àsia Oriental. Campus UAB, Plaça del Coneixement, MRA/126. 08193 Bellaterra (Cerdanyola del Vallès).

Authorize:

☐ I agree that this be focus group will be audio recorded.

☐ I authorize the use of literal quotation of my interventions without saying my name

☐ I authorize the use of my audio interventions for purposes of scientific dissemination

If you are willing to participate, please confirm the following statements by signing at the end of this document.

● I have read and understood the information given for this research or have had the information read to me,

● I have had the opportunity to ask questions about the research.

● I consent to take part in the research sessions and I received a copy of this consent.

● I agree to maintain the confidentiality of the information discussed by all participants and researchers during the focus group session.

Name of the participant   Date   Signature

Name of the researcher   Date   Signature

ICT-enabled
integration facilitator
and life rebuilding guidance

Re_Build

This project has received funding from the European
Union's Horizon 2020 research and innovation
programme under grant agreement No 822215

ACCESS, RECTIFICATION, CANCELLATION, OPPOSITION AND PORTABILITY OF PERSONAL DATA FORM (ARCO) (Optional)

You are taking part in a research project named «REBUILD ICT-enabled integration facilitator and life rebuilding guidance».

In accordance with EU Regulation 2016/679 of the European Parliament and the Council of 27th of April 2016 on Data Protection (GDPR), and Organic Law 15/1999, 13th of December, on the protection of personal data, and the regulations that administer them, we inform you that the personal data collected in the framework of this study will become part of a personal data file, for which TransMedia Catalonia (Autonomous University of Barcelona) is responsible, for the sole purpose of carrying out the aforementioned search.

If in the future, you wish to exercise your rights of access, rectification, cancellation, opposition and portability of your personal data before the person responsible for the file, fill out this form and deliver it to any of the researchers responsible for the study, together with a photocopy of your identity card or any other means of identification available to you.

<div align="center">DATA OF THE PERSON RESPONSIBLE FOR THE FILE</div>

Dra. Pilar Orero (pilar.orero@uab.cat), Dept. of Translation and Interpreting and East Asian Studies. UAB Campus, Plaça del Coneixement, MRA Building, Office 126. 08193 Bellaterra (Cerdanyola del Vallès).

<div align="center">YOUR DETAILS / OR YOUR LEGAL REPRESENTATIVE</div>

I, _____, of legal age and resident at (optional) _____ Locality (optional)_____ Province(optional) _____ Postal Code(optional) _____ with DNI / NIE / OTHER (optional) _____, of which I enclose a copy, by means of this writing I want to exercise my rights to protect personal data with reference to the data collected in the framework of the study «REBUILD ICT-enabled integration facilitator and life rebuilding guidance», in accordance with Organic Law 15/1999, of December 13, on the protection of personal data, and the regulations that develops it and consequently,

I REQUEST (select the option that applies)

  • To exercise my right of access to my personal data, within a maximum period of one month from the collection of this request, and I am provided with the information that you store about me in relation to the aforementioned study.

  • That my personal data is rectified, within ten days of receipt of this request, and that I be notified in writing of the result of the rectification made.

  • That you proceed to the cancellation of my personal data, within ten days of receipt of this request, and that I be notified in writing of the result of the cancellation practiced.

  • That I oppose to my personal data being stored the said registry within ten days of receipt of this request, and that I am notified in writing of the result of the rectification practiced.

  • That I request that my personal data is not shared with any third party, as long as these are not duly anonymized completely and irreversibly.

  Place / date

  Signature

INFORMATION SHEET

Project: REBUILD ICT-enabled integration facilitator and life rebuilding guidance

Main researcher: Alessandro Cafforio

Ethical adviser: Pilar Orero

We would like to invite you to take part in a focus group for a research study. The purpose of this study is the development of technological tools that will help integrate refugees and migrants and improve communication and the management procedures of the local authorities in relation to the integration of migrants.

The aim of the Focus Groups is to get feedback on the impact of culture in the use of technology. This will allow us to identify the needs and requirements of refugee and migrant communities for technology development.

During the focus group, you will be asked to provide some demographic data, such as your nationality and country of residence. Then, you will be asked questions on your use of technology and give your opinion on various aspects related to technology use. The data collected from you will be aggregated with the data from other participants and it will be used to produce a report on cultural markers and to inform project developments. This report will be published online and will be available for all participants of the Focus Groups.

The focus group will be audio recorded and we will take notes to gather the feedback and comments. At the end of the session these comments and feedback will be read aloud for you to approve. These will be considered the result of the focus group. Please ask as many questions as needed to clarify the procedure.

If you encounter any type of discomfort you can stop at any time without prior justification.

Now please read the consent form.

ICT-enabled
integration facilitator
and life rebuilding guidance

Re_Build

This project has received funding from the European
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programme under grant agreement No 822215

CONSENT FORM – QUESTIONNAIRE

The purpose of this study is the development of technological tools (hereafter referred to as the app) that will help integrate refugees and migrants and improve communication and management procedures of the local authorities in relation to the integration of migrants.

In this co-creation workshop, we will gather your views on the latest developments of the app. To that end, we will ask you to interact with it and tell us your experience. We will also ask you to discuss with other participants and facilitators your expectations, recommendations and suggestions for the future technological developments of the app.

The information you provide during the workshop is anonymous and will be used exclusively for the project. All information that you give will be treated in the strictest confidentiality and it will only be used for the purposes of this study. After you sign this consent form, no further personal data will be collected that permits your identification.

This consent form will be kept in a safe place by the principal researchers at Universitat Autònoma de Barcelona (UAB), the partner responsible for human participation in the project, and will be destroyed five years after the project finishes. It will not be shared with anyone outside UAB working on this project. The data analysed and the entire database will be available to other interested researchers through open data repositories. This data will be anonymised.

Your participation in this study is voluntary, and there is no economic compensation. There is no penalty for not participating and you can discontinue your involvement in the study at any time without justification. This shall have no repercussions or negative consequences of any sort.

REBUILD is a European project led by UNINETUNNO (Italy). The ethical adviser responsible for ethical procedures is Pilar Orero, from UAB. You can contact her to ask for more information about the project and the project results. Besides, you can exercise your rights recognized by the European Regulation on the Protection of Personal Data on the data file of this project by contacting the researcher responsible for this project, Dr. Pilar Orero, with your request (sent by filling the 'ARCO' form attached) and a photocopy of your ID:

Dra. Pilar Orero (pilar.orero@uab.cat), Dept. de Traducció i Interpretació i Estudis de l'Àsia Oriental. Campus UAB, Plaça del Coneixement, MRA/126. 08193 Bellaterra (Cerdanyola del Vallès)

I authorize

● a qualitative and quantitative analysis of my responses

● the use of my answers for purposes of scientific research and dissemination

If you are willing to participate, please confirm the following statements by signing at the end of this document.

● I have read and understood the information given for this research or have had the information read to me,

● I have had the opportunity to ask questions about the research,

● I consent to take part in the research sessions, and I received a copy of this consent.

Name of the participant   Date   Signature

Name of the researcher   Date   Signature

29

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

ICT-enabled
integration facilitator
and life rebuilding guidance

Re_Build

This project has received funding from the *European Union's Horizon 2020 research and innovation programme* under grant agreement No 822215

Application of access to rectification, cancelation, opposition, and personal data portability (Optional)

You are taking part in a research project named «REBUILD ICT-enabled integration facilitator and life rebuilding guidance».

According to the EU regulation 2016/679 of the European Parliament and the European Council dated 27 April 2016 regarding Data Protection (GRPD), and the organic Law15/1999, from 13 December, of personal data protection, and its normative. The personal data gathered in this study will be part of a data file under the responsibility of TransMedia Catalonia (Universitat Autònoma de Barcelona) with the sole objective of performing the abovementioned research.

In the future if you wish to exercise your access rights, rectify, cancel, oppose to the processing and control the portability of the data you provided, please fill in this form and give it to any of the researchers responsible for the study, together with a photocopy of your ID card or any other means of identification available to you.

INFORMATION OF THE DATA FILE RESPONSIBLE

Dr Pilar Orero (pilar.orero@uab.cat), Dept. de Traducció i Interpretació i Estudis de l'Àsia Oriental. Campus UAB, Plaça del Coneixement, Edifici MRA, Oficina 126. 08193 Bellaterra, Spain.

INFORMATION OF THE PERSON/LEGAL REPRESENTATIVE

I, _____, over 18 and with the address (optional) _____ City (optional) _____ Province (optional) _____ Postal code (optional) _____ holder of passport or ID card no. _____, of which I attach a photocopy, through this letter I wish to exercise my rights regarding the data gathered by the study for «

«REBUILD ICT-enabled integration facilitator and life rebuilding guidance», according to the EU regulation 2016/679 (GDPR) and the personal data protection Organic Law 15/1999, of December 13th and its related laws thereafter.

I REQUEST (please choose the option/s)

☐ That the right of access to my data be facilitated to me, within a maximum period of one month from the collection of this request, and the information related to my person being processed in the cited study

☐ To rectify the personal data on which the right is exercised, within ten days after receipt of this request, and to notify me in writing of the result of the rectification practiced.

☐ The erasure of the personal data on which the right is exercised, within ten days from receipt of this request, and to be notified in writing of the result of the cancellation practiced.

☐ The restriction of processing of my personal data on which the right is exercised within ten days after receipt of this request and that I am notified in writing of the result of the restriction practiced.

☐ That it is avoided to share my personal data with third parties, as long as they are not duly, completely and irreversibly anonymised.

Place / date

Signature

30

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0

INFORMATION SHEET

Project: REBUILD ICT-enabled integration facilitator and life rebuilding guidance

Main researcher: Maria Amata Garito

Ethical adviser: Pilar Orero

We would like to invite you to take part in a co-creation workshop for a research study. The purpose of this activity is the development of technological tools (the REBUILD app) that will help integrate refugees and migrants and improve communication and management procedures of the local authorities in relation to the integration of migrants.

The objective of the co-creation workshop is two-fold. First, to gather feedback from stakeholders and end-users about the latest developments of the REBUILD app in terms of user experience and interaction, use cases and the mapping of the services available in your area. Second, to jointly design and prototype the tools to be developed in the most coherent way possible, based on their opinion and experience.

The co-creation workshop is structured in different sessions, where participants will be asked to interact with others and to exchange opinions based on the content and services presented by the facilitators. You will also be asked to take part in two tests focusing on visual communication. You will not be asked to provide any demographic or personal data.

The answers that you provide during the co-creation workshop will be aggregated with those of the other participants and will be used to produce a report and to inform the development of the project. This report will not contain your personal information and will be published online and will be available for all participants.

If you encounter any type of discomfort you can stop at any time without any justification.

Now please read the consent form.

REBUILD
ICT-enabled integration facilitator and life rebuilding guidance

Deliverable: D7.3 The ARTES impact assessment

32

REBUILD – ICT-enabled integration facilitator and life rebuilding guidance
D7.3 The ARTES impact assessment – Version 1.0