

DOWN2EARTH Ethics Deliverable

POPD - GEN - Requirement No. 5

12.5. An ethics mentor must be appointed before the activities begin, to advise the project participants on ethics issues. A report on the activities and proposed activities of the project must be included in the data management plan. In addition, the ethics mentor must evaluate the ethics risks related to the data processing activities of the project. This includes also an opinion if data protection impact assessment should be conducted under art.35 General Data Protection Regulation 2016/679. The risk evaluation and the opinion must be submitted as a deliverable.

4.6 A description of the technical and organisational measures that will be implemented to safeguard the rights and freedoms of the data subjects/research participants must be submitted as a deliverable.

4.7 A description of the security measures that will be implemented to prevent unauthorised access to personal data or the equipment used for processing must be submitted as a deliverable.

4.8 Description of the anonymization/pseudonymization techniques that will be implemented must be submitted as a deliverable.

The ethics officer for the project is Dr. Amiera Sawas (Action Aid International).

The ethics protocol on the following pages covers all of the points above.

Study participants

They will be divided into two categories: 1) local communities and 2) key informants.

All participants will be over 18 years of age.

1) Local Communities

this will be gender disaggregated between women and men. A minimum of Two hundred and eight-eight (288) participants from 9 field sites (3 in each country) will be recruited for the focus group discussions and then the individual interviews.

2) Key informants

Key informants will include individuals across government, civil society, media and the private sector. We do not have a target number, because it is most important than we speak to the people with the right expertise and/or positionality that is relevant to the needs of the project.

Justification for the sample size

While we know that findings from 288 people/households is insufficient to create statistically significant and generalizable results, it is sufficient to support the agent-based modelling process. Further, we feel that this number over a 48 month study will help to build a picture of the challenges

posed by environmental and climate change, water stress as well as the types of adaptation inhabitants are or can develop in each locality.

Exclusion Criteria

Those who are defined as 'vulnerable' in the University of East Anglia research ethics documentation, will be excluded from the study e.g.

- those unable to give their own informed consent
- those in a dependent position and unable to make their own decisions
- those under the age of 18
- those from over-researched groups
- people with learning difficulties
- people with mental health problems
- young offenders
- people in care facilities, including prisons.

SUMMARY OF ETHICS ISSUES

The primary research will be undertaken by experienced researchers ('research coordinators' or RCs) in each country, supporting 'research assistants' (RAs). Investigators across the consortium will also visit to conduct some research, in partnership with those research teams or directly with 'elite' stakeholders, such as government actors. All communities have ongoing relationships with ActionAid, and are known as 'LRPs', or Local Rights Programmes, where they have engaged with ActionAid for several years, typically over 5. The RCs and RAs will be employed by ActionAid in each country, who will facilitate access through their ongoing trusting relationships.

Ongoing guidance and support on direct engagement with individuals and communities will be provided by Dr. Roger Few (University of East Anglia), Dr. Mark Tebboth (UEA), Dr. Oliver Wasonga (University of Nairobi), Dr. Mohammed Assen (University of Addis Ababa), Dr. Asmamaw Leggas (University of Addis Ababa), Mr. Latif Ismail (Transparency Solutions) and Dr. Amiera Sawas (AA-UK). These consortium members will also join for some parts of the research, in partnership with the RCs/RAs at ActionAid.

The team will take into account their experiences and theoretical guidance on pursuing research in a conflict sensitive, gender sensitive and intersectional approach – to ensure the research does not contribute to conflict or harm (Goldwyn and Chigas, 2013; Brown et al, 2009; Goodhand, 2000; ActionAid, 2020; Anwar and Niqar, 2016).

Overall, the research project has been designed with [ActionAid's Feminist Research Guidelines](#) as a guiding tool. These consider power dynamics, privilege and do no harm at all stages of the research cycle, from conceptualization through to dissemination. They do so through an intersectional lens, which ensures that no one gets left behind, or harmed by the research, because of their identity. The guidelines provide checklists at each stage of the research, to ensure all the key issues have been considered.

The role of the researcher

The consortium members, and team of researchers will be subject to their own narratives, schemas and biases. We must remain self-reflexive at all times and moderate or mitigate any subjectivities as they arise. All members of the consortium involved in primary research and analysis will undergo a mandatory training session on managing subjectivities, and the RCs will support the RAs to continue to practice this on an ongoing basis. This process will ensure that all involved in primary research and analysis are fully aware that their presence can create an effect on the social world they are observing, participating in and analysing (May, 2011). It is important for each person to consider how their presence may have affected the social scene, what happened within it and so their self-reflexivity will take this into account.

The project intends to recruit RCs and RAs from the local region (not the specific community, but the district, town, or city), wherever possible. Steps will be taken to try to ensure opportunity for applicants from lower income and/or marginalized backgrounds. This not only creates better opportunities for diverse candidates, but it also helps to mitigate the power differentials between the researchers and the participants. Furthermore, if the power differentials are minimized, we anticipate that the RAs will be more comfortable spending periods of time in the villages, and their presence will create less social change than perhaps a researcher from a more wealthy or 'elite' class. Nevertheless, we do not forget that by being an outsider, and a researcher, means that unequal power relations continue to exist. We will keep this in mind at all times and try, where possible, to mitigate it through our interactions with the community members.

As outlined by Anwar and Viqar (2016) research projects should take steps to mitigate the 'triple subjectivities' emerging across researchers, participants and RAs. They illustrate the importance of the role of research assistants (RAs) in the production of knowledge and underscore that they are a key aspect of the social ontology of the field. Building on an emergent literature, they argue that RAs are key partners in research processes but are commonly rendered invisible, or labelled as 'enumerators', which is a reflection of 'hidden colonialism' in northern led research in the global south (Sanjek 1993). *"The agency and subjectivity of RAs is crucial to both the process of knowledge production and research writing. Moving RAs from invisible to visible allows us to collectively reflect on the influence of agency on the research outcomes and the power dynamics of the RA–researcher relationship, especially as this pertains to the challenging conditions of fieldwork in unstable places."* (p:1). Methodological reflexivity is an essential ongoing process in the researchers and the RAs, to ensure that the process is not only doing no harm to the participants, it is also doing no harm to the RAs, and ensuring that multiple subjectivities are mitigated for in the process of data collection and analysis. These reflexive processes are cascaded throughout the research ethics processes, which will become clear below.

1. Researcher health, safety and security

- As some regions of each country (Kenya, Ethiopia and Somaliland) periodically face disasters, insecurity, and now the risk of Covid-19, one key ethical issue is maintaining the safety and mitigating for any safety risks of researchers and institutions associated with this project.

2. Safety and security of all participants – 'do no harm'

- As we intend to conduct qualitative research through interviews, focus group discussions and participatory research with citizens from low-income dryland communities, a key ethical issue is to ensure they are not harmed or affected by this research in any way.
- It will be critical to generating safe spaces for participants, regardless of their identities and positionalities in society.
- Since the research is being conducted in communities working with ActionAid, ActionAid International's Safeguarding and Sexual Harassment, Exploitation and Abuse (SHEA) Policies will be in place to provide clear guidance on steps forward in the case of any complaint related to safeguarding and SHEA.

3. Recruitment Process, Selection Criteria and Sustaining participants' ongoing consent

- As we are utilising qualitative research approaches which require studying and engaging with participants over extended periods of time (in a project timeline of 48 months); it is essential that we ensure sustained on-going consent and participants' right to withdraw their data or to express any concerns to the Researchers, Principal Investigators or a neutral third party.
- All participants will be briefed verbally and in writing in their local language (i.e.XXX) about the research purpose, objectives and methods. How their information will be used will be disclosed in as much detail as possible. Further, since more complex quantitative methods such as Agent Based Modelling and the Wajiha Cast app will be employed – communicating about what they are, their purpose and potential benefits and risks for each participant, household and community will be critical.
- Written and Verbal consent will be obtained for all participants.
- For illiterate participants, the RCs will request a waiver of consent; it will not adversely affect the participants' rights and welfare.
- In the case of any videotaping or photographing written consent will be secured, to include release of photos/images of participants and their life spaces. Thumb print signatures will be taken for those unable to write. The consent form will not adversely affect participants' rights and welfare.
- Finally, since the project has plans to impact local and regional policies and governance of climate change, it is necessary to be continuously checking in with participants about the impacts of those policy engagements on their communal needs, visions and wellbeing.

4. Right to Withdraw

- Participants being involved of their right to withdraw their data (the date of which is yet to be confirmed, but will be nearer the end of the project) will be emphasized and contact details for Dr. Sawas, Dr. Few and Dr. Michael Singer. Will be provided.

5. Confidentiality

- Anonymising data through coding, and ensuring no uncoded data is saved in notebooks, on computers, phones or the cloud.

6. Data Management

- Managing data protection and anonymity will be essential to the research integrity and to the safety of participants and researchers
- It will comply with GDPR, through ActionAid International and UEA's institutional policies on data management and IT security.
- This will also be critically important for mitigating any risks to institutions involved in the research.
- A comprehensive data management plan is in place

APPROACH AND PROCEDURES TO ETHICS ISSUES

Researcher health, safety and security

- Recent research highlights the risks of physical and psychological harm and emotional distress for researchers and the importance of developing strategies to deal with these issues prior to data being collected (Bahn, 2012; Mitchell & Irvine, 2008).
- This project and the institutions across it have a duty of care to researchers, to ensure any risks to them are considered and managed. The researcher also has a duty to engage in such active and ongoing risk management and mitigation.
- We will be employing the Royal Geographical Society's Research Ethics and Code of Practice (2006), the RGS' Development Geographies Research Group's Ethical Guidelines, and the Code of Practice on Researcher Safety issued by the UK-based Social Research Association (2001). Iphofen (2009), quoted in Camfield and Palmer-Jones (2013) when discussing international development research highlights that *"all research contains harm, since it is, to varying degrees, intrusive upon the lives of others. But that intrusion can and should be justified in terms of the benefits accruing – to individuals, communities and/or societies"* (p. 255). Camfield and Palmer-Jones believe that some key activities to managing this balance between justification and harm include 'respect, rigour and responsibility' including self-reflexivity as researchers, managing the expectations of participants and being morally obligated to communicate honestly with participants about the purpose of the research and how the research will be analysed and shared. This research project has and will take into account these elements at all phases of the research process.
- Although the majority of those engaging in primary research (RCs and RAs) are from the countries and the regions in which the project is focusing, they will be trained on safety precautions related to their health and basic first aid. This will include protecting themselves from vector and water-borne diseases; eating hygienically safe food and water; carrying first-aid kits with them; what to do in an emergency and always travelling/working in groups. A special additional sub-module will focus on health and safety with regards to Covid-19.
- This will include mental health and wellbeing. Mental health first aiders will conduct a sub-module on how to manage the risks and issues around mental health and wellbeing, how to spot and respond to signs of mental distress in others.
- This process will include a standard operating procedure to be able to identify any issues early on and direct the colleague or stakeholder to appropriate support services in the country.
- Participants will have the numbers of local hospitals in their mobile phones in case of a medical emergency.
- RAs and RCs will be trained not to discuss findings with anyone outside of the research team – because it may put them at risk or incite existing grievances amongst individuals, communities, government and other stakeholders. The team will carefully discuss (and seek institutional advice) when/how to share this data in a conflict-sensitive manner in dissemination processes. Lunn (2014) and Wood (2006) suggest ensuring institutional and legal support is available should the research face difficulty with government or other actors. The research consortium will ensure the information on legal and institutional support is completed before the commencement of any primary research.
- The research team may witness ethically questionable behaviours in or on the way to the research sites, such as incidences of violence. There is debate in social science research as to whether the researcher is entitled to make a judgement about whether such behaviour should be reported if doing so would terminate their research. In some circumstances, such as

potential harm to vulnerable individuals, there would be a presupposition that behaviour should be disclosed to the relevant authorities before harm is caused. This is a decision that would need to be made on a case-by-case, or contextual basis.

- There is a possibility that participants will disclose information about being involved in (domestic or public) violent incidences or reveal their impressions about other participants or community members being engaged in unethical or illegal behaviour. This is an ethical dilemma that we as researchers may have to face. Bryman (2012) states that, “*blowing the whistle on violence may result in the loss of a researcher’s credibility, premature termination of the investigation or inability to gain research access in future*” (p.136). While maintaining legitimacy as researchers within these environments is key, each case would have to be considered carefully. In certain circumstances there may be a need for disclosures to be communicated beyond the research team, in accordance with ActionAid International’s Safeguarding and Sexual Harassment, Exploitation and Abuse (SHEA) policies and particularly if in our judgement there is tangible evidence of imminent threat to somebody’s life or well-being. The limits to confidentiality must be made clear to participants at the outset. The Information Sheet should make it clear to potential participants under which circumstances action may be taken by the researcher.
- In terms of the safety and wellbeing of the researchers, they will be instructed to inform the RCs immediately (once in a confidential and private space) about the incidence/disclosure and the RCs will encourage them to discuss any feelings or concerns that have arisen. These issues, will also be disclosed to the PIs of the relevant work package by the RC. Where the witness feels comfortable, these issues may be discussed at the weekly team calls/meetings, so that the team can reflect upon these experiences and plan any additional researcher support.

Safety and security of all participants – ‘do no harm’

Both interviews and FGDs can be fraught with negative power dynamics, and in their worst iterations they can be extractive, and triggering of unwelcome emotions without recourse to support. In organizing and undertaking the FGDs and interviews, we will carefully consider, and consult on:

- **How to mitigate the power** - or perceived power of the interviewer through careful researcher selection and process. If a focus group, consider asking someone to observe the focus group for power dynamics as the ethnological observation can lead to useful analysis. Methodological reflexivity will be encouraged and conducted in an ongoing basis to reflect on and mitigate the multiple subjectivities that arise in conducting and analysing research.
- **Who to involve** - i.e. not only the most powerful in the community, but a seeking out the unheard voices amongst the community and key stakeholders. When seeking out unheard voices from marginalised and vulnerable groups put participants’ needs and safety first and be sensitive to risk.
- **Participants’ time** - focus groups often take a lot longer to set up than we usually plan for and have a time burden on either side of the questions for the participants. Given the time involved, consider participants’ unpaid care and domestic work, other responsibilities, and whether the location is accessible.
- **Participants’ safety** - we will consider whether the venue is safe and accessible physically and whether participants’ psychological needs are accounted for. We will ensure that the spaces are safe for children, in case participants bring their children. In advance we will assess and take steps to mitigate any risk.

- **Voice** – we are aware that FGDs may not be the best way to solicit minorities' views, as the loudest in the groups are likely to dominate, even where groups have been disaggregated. Our facilitation will be very attentive to power dynamics within the community, based on ActionAid's long experience of working with the community, especially those who are the most marginalised.
- **Triggering** - some questions may trigger an unwelcome emotional response from participants including re-traumatization of participants who are survivors issues like disasters or violence. Aftercare support will in place before any questions are asked; participants will be made aware of this beforehand, and informed that some questions may be triggering so they can refuse to answer, ask for a break, seek support etc. (For more info see section X: adverse events)

In weekly team meetings between the research coordinators (RCs) and the research assistants (RAs) – which are planned to be highly self-reflexive – the team will discuss key issues around gender relations, conflict sensitivity, researcher and stakeholder subjectivities, and develop mitigation plans. Wood (2006) notes, 'do no harm' dilemmas will arise, and often research ethics procedures from the global north are insufficient; so a constant self-reflective process is needed, to ensure researchers respond rationally, not emotionally, to ethical challenges. Dr. Sawas, the ethics officer, will be engaged on any ethical challenges/issues, to discuss and produce a rational mitigation plan.

Data Management and Confidentiality

Policy Compliance

All primary research data will be handled in accordance with [ActionAid International's Data Protection Policy](#), which is GDPR compliant. ActionAid International has a legal requirement to ensure compliance with the General Data Protection Regulation (GDPR)¹, the Directive on Privacy and Electronic Communications² and local legislation in-country pertaining to Data Protection. However, AAI, also believes in a strong duty of care to data subjects above that required by law. Our processes are designed to ensure legal compliance, but our subject centred approach means that there will be instances where we go beyond the minimum requirements in the legislation.

Further ActionAid International's '[Information Security Policy](#)' provides the infrastructural foundation upon which it is possible to ensure data protection. We take a risk based approach to managing information, informed by an assessment of the: nature of the Information and therefore the consequence of the loss (see appendix I); probability of an Information loss occurring; Restrictions and controls are then determined according to the interplay of these factors (see appendix II). We use Microsoft Office365, which provides robust security measures to classify and label data stored in the Microsoft cloud. The classification adopted is General, Sensitive, Confidential and Highly Confidential. Examples of what is covered by these classifications is included in Appendix 1. Additionally, Data Loss Prevention has been deployed and is used to protect sensitive information such as personally identifiable information from being shared externally.

The steps that will be taken in the DOWN2EARTH project:

i) Survey interviews and qualitative semi-structured interviews will be conducted in a private space, appropriate to the local social and cultural norms.

ii) Personal or contextual information (which could lead to identification) will be excluded or avoided whilst writing field notes. If interviews are audio-recorded they will not include participant's names and will be deleted after transcription.

iii) The focus group discussions content will be treated as confidential and all participants will be requested to agree and adhere to the confidential nature of the discussions.

iv) The research team will immediately apply 'code names' or numbers to participants while writing fieldnotes and audio-recording, e.g. Sabba Boru 1. Personal, contextual information and actual names will never be documented – because if data is lost or secured by citizens it could put them at risk. If interviews are audio-recorded they will not include participant's names and will be deleted after transcription.

v) This coded data will be held in a secure encrypted Office 365 database at ActionAid UK offices, only accessible by the RCs and RAs and their encrypted and password protected mobile and computer devices. No other members of ActionAid staff, except for Dr. Amiera Sawas (the Ethics Officer) will have direct access to these folders.

vi) Data shared with investigators internationally will be done through the secure (password protected) cloud system at XXX (if slack is compliant yes, if not, Office365).

vii) After completion, data used in publications will be retained for at least 10 years in case the dataset needs to be referred to.

viii) When publishing, we will ensure not to disclose contextual details about participants, which could be revealing when looked at analytically (e.g. details about their family structure). We will ensure to always put the interests of participants ahead of our research interests (Howell, 2004).

Our research team will be extremely sensitive when interviewing all participants, but especially those impacted most by power relations, for example women, minoritized communities, people living with disabilities, in particular. Focus groups will be carefully curated, with a stratified sample of 6-8 people. We will ensure a safe and confidential space that can not be heard or observed by other members of the community.

For individual or household interviews, it will be key to ensure that they are in a completely confidential environment, especially for those who may have experienced distressing situations related to climate change, livelihood issues, water insecurity, governance and community politics. All data will be anonymised, and this will be emphasized to the participants, to ensure there is no risk to them in participating.

When interviewing women and young people, the research will be carried out at strategic times of the day, during which the adult males of the household are often out of the house. This should help in providing a more comfortable environment for honesty. In this case though, only our female RAs would be conducting interviews/entering the house, because cultural norms may prevent women from interacting with non-familial males, especially when their male family members are not present.

Assurance

All staff employed by ActionAid (which includes the RCs and RAs who are the ones collecting primary data from communities) will undergo mandatory cyber security training upon induction, which outlines basic data protection requirements.

Passwords

In accordance with ActionAid International's Information Security Policy, all devices through which Information is accessed must be protected by user log out and or password protected screensavers when left unattended for any length of time, and outside of general office hours.

- ActionAid employees are responsible for the maintenance of passwords, used for all systems and devices through which ActionAid UK Information can be accessed, and to prevent their misuse. Passwords must be set and maintained in line with the standards set in the Information Security Guidelines.
- Unauthorised access of ActionAid Information including other people's email and other accounts may result in disciplinary action
- The owners of systems that are not domain integrated (i.e. which require additional passwords) are responsible that passwords are changed regularly and comply with the strong password policy.

Verbal information sharing

RCs and RAs will be trained not to discuss findings with anyone outside of the research team – because it may put them at risk, cause reputational damage to the project, or worse - incite existing grievances amongst citizens, government and other stakeholders.

The team will carefully discuss (and seek institutional advice) when/how to share this data in a conflict-sensitive manner in dissemination processes.

Lunn (2014) and Wood (2006) offer insights on ensuring safety and security in researching contentious issues around land and resources – they suggest ensuring institutional and legal support is available should the research face difficulty with government or other actors. The institutions across the consortium have excellent linkages to institutions in Kenya, Ethiopia and Somaliland, as well as legal support – if needed.

Stakeholders' rights with regards to data processing

In accordance with ActionAid International's [Data Protection](#) and [Information Security Policies](#), the rights of Data Subjects apply to the organisation as a whole and are not restricted to each / any individual function. The specific rights established under the GDPR are detailed below, along with AAI's approach to ensuring that these rights are fully protected and upheld.

1. Right to be informed

Our privacy information outlined in paragraph 4.1 above ensures that data subjects are made aware of how we operate. Our [AAI Privacy Policy](#) is date stamped for transparency of last review and in the event of material update, we will also communicate changes to supporters.

2. Right of access

ActionAid International has a Subject Access Request (SAR) Policy and Process, owned by our Data Protection Officer (DPO). Should any participant request to access their data, the DPO will work with the relevant members of the consortium to collate the information, for data subjects exercising this right. Reporting on Subject Access Requests is provided to the International Board on an annual basis at minimum.

3. Right to rectification

As per Principle 4 (Accuracy), we take a strong stance on the accuracy of the data on our systems and use our AAI Privacy Policy to openly encourage individuals to advise us of any detail that they view as inaccurate.

Since the data collected with community members on this research project is anonymised, it is highly unlikely that such an issue would ever arise with regards to their participation in the research. However, this could be a possibility in any direct attributions to other stakeholders (e.g. government stakeholders, for example).

4. Right to erasure / to be forgotten

Our AAI process is to always clarify an individual's request to determine whether their intention is erasure, or restricted processing.

Whilst the right to erasure is not an absolute right, AAI will always endeavour to honour the request of the individual. Where there are implications for AAI of us enacting this request (ie the risk to a Gift Aid audit if we delete information before the end of the audit period) we will explain these to the individual before going ahead.

5. Right to restrict processing

We encourage individuals to discuss their right to restrict processing, so that we can understand their request and answer any concerns that they may have. Restrictions are likely to relate to supporter data, and as such are applied by our Supporter Admin and Data & Insight teams. Other requests are passed to the DPO to coordinate with appropriate teams on a case by case basis.

6. Right to data portability

Individuals can obtain a copy and reuse their personal data for their own purposes. If a data portability request is received, then the DPO will coordinate this with the relevant department.

7. Right to object

We offer the right to object wherever possible when we use Legitimate Interest as our legal basis for any processing. For Fundraising in particular we are unlikely to proceed with the processing where this cannot be offered.

8. Rights related to automated decision-making including profiling

Automated decision-making is classified as a decision made by automated means without any human involvement. Currently, AAI does not conduct any automated decision-making.