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***Deep Decarbonisation: The Democratic Challenge of Navigating Governance Traps***  
**(ERC grant agreement ID: 882601)**

**Disclosure Policy**

**Prepared by Prof Andrew Jordan (PI)**

**Revised 14 December 2022**

**1. Background**

This revised Policy supplements existing institutional policies and commitments to good research practice at the University of East Anglia and the University of Heidelberg to ensure all DeepDCarb researchers are working to the same standards of ethical research conduct.

Following the ERC's Ethics Review of the DeepDCarb project, a specific data "Disclosure Policy" was requested. According to ERC:

"This must outline what guidance will be given to researchers about how to deal with unexpected findings, for which disclosure might be legally required, or for which dissemination should be avoided in order to respect the privacy of impacted persons."

As this matter relates to the wider issue of research ethics, and hence is directly relevant to all Work Packages, the Policy should align with the ERC's (2021a) overriding ethical aim which is to ensure that:

"expected standards are met and that risks to research subjects and researchers are minimised".

Thus, this Policy relates to all DeepDCarb researchers, both those working with secondary data and especially those collecting primary data from human participants.

**2. Core ethical principles of ERC research**

This Disclosure Policy aligns with the core principles underpinning all ERC funded research, namely that (ERC, 2021a):

- *“Responsibility for ‘ethics’ lies with the individuals carrying out the research”, i.e. all DeepDCarb researchers.*
- *Researchers are “expected to “**keep on file**” all documentation (authorisations, certificates, consent declarations, etc.) pertaining to ethics compliance. Beneficiaries may be requested to submit this documentation as a matter of maintaining trust and assurance.” For example, “it should be demonstrable [ultimately by the PI] that information sheets and consent forms were obtained prior to the start of an experiment”.*
- *Ethical issues should always be borne in mind, including when the research takes new directions. “It is important to be aware of this kind of possibility, and to flag significant new issues to the ERC”.*

Above all, researchers will “plan ahead” (ERC 2021c: 15), seek guidance and not deal with ethical issues in an *ad hoc* manner.

### **3. Commitments of all DeepDCarb researchers**

In order to meet the core principles listed above, all DeepDCarb researchers will:

- *Be fully aware of the legal context in which they are working (ERC 2021c: 15), e.g. through staff training, speaking to line managers and consulting with the respective data protection units (e.g. Freedom of Information Acts, UK Data Protection Act, EU GDPR)*
- *Follow the UEA Principles of Good Research Practice to ensure the qualities of honesty, openness, accountability and integrity are maintained (UEA 2022).*
- *Consult and notify managers and other relevant bodies where the research is to be conducted (ERC 2021c: 16).*
- *Apply for Ethics Approval well in advance (ERC 2021c: 16), including a check of whether the research is potentially vulnerable to misuse (ERC 2021d: 1).*
- *Ensuring that any research undertaken in non-EU countries (2021b: 8) does not fall foul of “double standards”.*
- *Ensuring that all data is properly archived and protected (ERC 2021b: 8).*

### **4. Guidelines for working with human participants**

Certain tasks within the DeepDCarb project involve collecting primary data from human participants.

The surveys within **Tasks 3.2** and **4.1** will minimise the risk of disclosure by involving reputable polling companies to collect data which is anonymous at the point of collection.

**Tasks 3.3** (interviews with politicians), **4.2** (focus groups with members of the public), and **4.3** (citizen assemblies) will collect data directly with participants which is later pseudonymised. These three tasks pose the highest risks for potential ethical issues, such as:

- Ethical issues that are deemed to be *especially “serious” and/or “complex”* (for details, see ERC, 2021b: 4).
- *The handling of “unexpected findings”*, especially those subject to positive disclosure obligations (ERC, 2021b: 7). Such findings may lead to “a dilemma: whether to preserve confidentiality or to disclose the information to relevant authorities or services” (ERC, 2021c: 14).

Unexpected findings could potentially emerge out of Task 3.3.

DeepDCarb researchers will therefore:

- *Complete a Risk Assessment* (ERC 2021c: 17) before commencing the research, where there are more than minimal risks (e.g. sensitive topics or issues) (ERC 2021c: 19). A risk mitigation strategy should be developed where relevant (ERC 2021c: 21) – covering security measures and other mitigation stapes (part publishing results, anonymization of data, staff training etc.) (2021d, 3).
- *Report criminal activity witnessed or uncovered in the course of research to the responsible and appropriate authorities*, even if this means overriding commitments to participants to maintain confidentiality and anonymity (ERC 2021c: 15).
- *Inform participants of any limits to their confidentiality clearly in the Information Sheet* (ERC 2021c). This should inform the participants, or their guardians or other responsible people, of their intentions and reasons for disclosure, provided that doing so does not undermine the act of disclosure (ERC 2014c: 14). This is stated as follows in the information sheet for the politician interviews (see D1.1):

“There are only two instances where this confidentiality cannot be kept in line with the project’s Disclosure Policy on ‘unexpected findings’:

1. If the researcher becomes aware of the existence of illegal or criminal activity
2. If the researcher has legitimate concerns about the welfare of a research participant or individual

In these cases, the researcher is legally and ethically required to disclose this information to the relevant authorities and subsequently comply with any legal investigations”.

Similar passages will be included on information sheets for Tasks 4.2 and 4.3.

## **5. Implementation of the Policy**

The DeepDCarb team have taken the following actions to implement this Policy:

- This Policy has been discussed with all WP leaders and the whole research team.

- It has been discussed with all project staff and placed in the secure shared online folders and hosted online on the project website for transparency with research participants.
- All staff have read and are fully aware of ERC ethics requirements.
- All staff regularly attend appropriate and timely staff training on data collection/management, ethics and risk, as part of their terms of employment.
- A nominated person in the project is responsible for overseeing the implementation of ethical requirements, including this Policy: Prof. Irene Lorenzoni ([i.lorenzoni@uea.ac.uk](mailto:i.lorenzoni@uea.ac.uk)).
- All WPs will maintain a 'keep on file' policy: all meetings (and decisions taken therein) are being minuted and stored for future reference.
- Ethics will be a standing item on all meeting agendas; ethics will have a dedicated slot at all cross WP / biannual meetings.
- This Policy will be reviewed as and when necessary (e.g. changing legal situation, updates in institutional policies).

## 6. References

ERC – *Ethics Summary Report – Proposal 882601 – DeepDCarb* (dated 5-5-20).

ERC (2021a) Webpage on *Ethics* - ([europa.eu](http://europa.eu)).

ERC (2021b) *Identifying Serious and Complex Ethics Issues in EU-funded research* - (5 July 2021) ([europa.eu](http://europa.eu))

ERC (2021c) *Ethics in Social Science and Humanities* (5 July 2021) ([europa.eu](http://europa.eu))

ERC (2021d) *Guidance Note – potential misuse of research* (ERC, 14 September 2021) ([europa.eu](http://europa.eu))

UEA (2022) *Guidelines on Good Practice in Research* – ([uea.ac.uk](http://uea.ac.uk))