

POLICY ON RESEARCH INVOLVING VULNERABLE PARTICIPANTS

COMMUNITY ORGANIZATION "UKRAINIAN MODERN DIGITAL SCIENCE"

1. General Provisions

This Policy establishes the principles and additional safeguards applied by the Community Organization "Ukrainian Modern Digital Science" (hereinafter referred to as **UMDS** or the **Organization**) when conducting research involving individuals who, because of personal, social, economic, professional, legal, security-related or other circumstances, may be in a vulnerable position.

The purpose of this Policy is to ensure respect for the dignity, autonomy, safety, privacy and rights of research participants and to prevent exploitation, coercion, discrimination or unjustified harm.

This Policy applies to:

- questionnaires and surveys;
- interviews;
- focus groups;
- case studies;
- research and analytical projects;
- evaluation activities;
- other forms of collecting information directly from individuals.

UMDS does not conduct research involving children.

2. Concept of Vulnerability

For the purposes of this Policy, a **vulnerable participant** is an individual whose ability to make a free decision regarding participation in research, protect their own interests or avoid adverse consequences may be reduced because of their circumstances or the context of the research.

UMDS does not regard vulnerability as an immutable characteristic of an individual.

Vulnerability may be:

- permanent;
- temporary;
- situational;
- directly related to the subject matter or conditions of the research.

More than one vulnerability factor may apply to the same participant at the same time.

3. Factors That May Create Vulnerability

Additional safeguards may be required, in particular, for individuals:

- experiencing socioeconomic disadvantage;
- affected by fraud, financial crime or cybercrime;
- who have suffered financial loss;
- in a dependent professional or institutional position;
- where there is a significant power imbalance between the researcher and the participant;
- experiencing severe stress or the effects of traumatic events;
- who are refugees, internally displaced persons, migrants or other persons whose legal or social status may increase risk;
- for whom participation may create professional, reputational, financial, legal or security risks;
- who provide information concerning possible unlawful activity, corruption, fraud or other offences;
- whose particular circumstances in the context of the research otherwise create an increased level of risk.

Membership of a particular social or professional group does not, by itself, mean that every member of that group is automatically considered vulnerable.

4. Core Principles

Research involving vulnerable participants is based on the principles of:

- respect for human dignity;
- individual autonomy;
- voluntary participation;
- non-discrimination;
- proportionality;
- minimisation of harm;

- maximisation of scientific and societal benefit;
 - confidentiality;
 - personal data minimisation;
 - fair selection of participants;
 - additional protection where necessary.
- An individual's vulnerability must not be used as a means of facilitating access to participants or obtaining information.

5. Justification for Involving Vulnerable Participants

Vulnerable individuals are involved in research only where their participation is scientifically or socially justified.

The research team must consider:

- why it is necessary to involve this particular category of participants;
- whether the research objective could be achieved with less risk;
- whether the research method is proportionate;
- which additional safeguards are required.

Vulnerable participants must not be recruited merely because they are readily accessible or have a reduced ability to refuse participation.

6. Prior Risk Assessment

Before research begins, UMDS assesses potential risks to participants.

The assessment may include:

- psychological or emotional distress;
- re-traumatisation;
- financial consequences;
- professional and reputational risks;
- risks of discrimination;
- risk of identification or disclosure of identity;
- legal risks;
- physical or digital security risks;
- risks arising from disclosure of confidential information.

The level of risk must be proportionate to the anticipated scientific or societal benefit of the research.

7. Voluntary Participation

Participation in research is voluntary.

The following are prohibited:

- coercion;
- pressure;
- manipulation;
- deception regarding material conditions of participation;
- use of professional, financial or other dependency to obtain consent.

Refusal to participate must not result in punishment, loss of services, professional advantages or other unjustified adverse consequences.

8. Informed Consent

Before participating, an individual must be provided with clear and understandable information concerning:

- the purpose of the research;
- the nature of their participation;
- its duration;
- the types of information to be collected;
- potential risks and inconveniences;
- potential benefits, where applicable;
- use of audio or video recording;
- processing of personal data;
- confidentiality;
- potential use of the results;
- the right to refuse or withdraw from participation;
- contact details for questions or complaints.

Information must be provided in a language and format that the participant can reasonably understand.

Provision of information and obtaining consent are documented where appropriate to the nature of the research.

9. Right to Withdraw

A participant may withdraw from research at any time without being required to provide a reason.

Before participation begins, the participant must be informed of what will happen to data already collected if they withdraw.

Whether data already collected can be deleted depends on the legal basis for processing, the stage of the research, the extent to which the data have been anonymised and applicable law.

10. Sensitive Topics and Participant Distress

Particular care must be taken in research concerning:

- fraud;
- financial losses;
- crime;
- cybercrime;
- violence;
- corruption;
- harassment or persecution;
- sanctions;
- traumatic events;
- other information capable of causing significant psychological or social distress.

A participant has the right to:

- decline to answer any question;
- request a break;
- stop an interview;
- withdraw from further participation.

Researchers should avoid unnecessary re-exposure of participants to traumatic experiences.

11. Confidentiality and Anonymity

The identity of vulnerable participants is protected to the extent compatible with the purpose of the research.

Where possible, UMDS applies:

- anonymisation;
- pseudonymisation;
- participant coding;
- separation of contact details from research materials;
- restricted access to data;
- removal of direct identifiers from research outputs.

The publication of a participant's quotation must not create an unjustified risk of identifying that participant.

12. Audio and Video Recording

Audio or video recording of interviews or focus groups is carried out only after the participant has been informed in advance and where an appropriate legal basis exists.

Participants are informed:

- why the recording is being made;
- who will have access to it;
- how long it will be retained;
- whether a transcript will be produced;
- whether the material may be used in public communications.

Consent to participate in research must not automatically be interpreted as consent to public use of a participant's image, voice or video recording.

13. Focus Groups

Before a focus group begins, participants are informed that UMDS may establish confidentiality rules for all participants but cannot provide an absolute guarantee that other participants will not disclose information they have heard.

For this reason, the researcher should minimise the collection of particularly sensitive information in a group setting where disclosure could create a significant risk to an individual.

14. Financial or Other Incentives

Where participants are offered reimbursement of expenses or another incentive, its amount and form must not create a disproportionate inducement to participate.

An incentive must not turn an individual's economic vulnerability into a means of obtaining consent.

15. Disclosure of Information Concerning Unlawful Conduct

In research relating to fraud, AML/CFT, cybercrime, corruption or other unlawful conduct, a participant may disclose highly sensitive information.

Before commencing the research, the team should, as far as reasonably possible, determine:

- the limits of confidentiality;
- possible legal obligations to disclose information;
- procedures for responding to information indicating an immediate threat to life or safety;
- procedures for protecting research materials.

Researchers must not provide absolute assurances of confidentiality where such assurances cannot legally be guaranteed.

16. Personal Data Protection

Personal data are processed in accordance with the **UMDS Data Protection and Privacy Policy**.

Special categories of personal data are collected only to the extent necessary and where an appropriate legal basis and applicable condition for processing exist.

Where necessary, a **Data Protection Impact Assessment (DPIA)** is carried out.

17. Preparation of Researchers

Persons who work directly with vulnerable participants must be familiar with:

- the purpose and methodology of the research;
- applicable ethical requirements;
- informed consent procedures;
- confidentiality requirements;
- procedures for responding to participant distress;
- personal data protection requirements;
- procedures for reporting ethical or security incidents.

18. Suspension or Modification of Research

Research or a particular research activity may be suspended, modified or terminated where:

- an unforeseen significant risk arises;
- existing safeguards prove insufficient;
- participants' rights or safety may be compromised;
- information obtained indicates that the methodology should be reviewed.

The safety and rights of participants take priority over completing the research procedure in the form originally planned.

19. Ethics Review

For research presenting an increased level of risk, UMDS may require prior ethics review.

When determining whether such review is necessary, consideration is given to:

- the degree of participant vulnerability;
- the sensitivity of the research topic;
- the volume and nature of personal data;
- use of special categories of personal data;
- possible legal, professional, physical or psychological consequences;
- requirements of the funder or project partner.

Where an international or grant-funded project requires approval by an independent **Ethics Committee** or **Institutional Review Board (IRB)**, the research is conducted in accordance with that requirement.

20. Complaints and Reporting Concerns

A participant may report an ethical concern or submit a complaint regarding the conduct of the research.

Reports and complaints are considered confidentially, impartially and without undue delay.

A participant who raises a concern or submits a complaint in good faith must not suffer adverse consequences for doing so.

Reports and complaints may be submitted to:

hello@umdigital.science

Questions specifically concerning personal data may be submitted to:

privacy@umdigital.science

21. Responsibility

Overall responsibility for implementation of this Policy rests with the **Head of UMDS**.

The leader of the relevant research project is responsible for:

- conducting the prior risk assessment;
- determining appropriate safeguards;
- ensuring that participants are properly informed;
- compliance with consent procedures;

- protection of confidentiality;
- reporting significant ethical incidents.

22. Relationship with Other UMDS Policies

This Policy is applied together with:

- the **UMDS Ethics, Integrity and Responsible Research Policy**;
- the **UMDS Data Protection and Privacy Policy**;
- specific ethical and data protection requirements applicable to the relevant project.

Where a funder or partner establishes a higher standard of participant protection, UMDS seeks to apply that higher standard provided that it is consistent with applicable law.

23. Review of the Policy

UMDS may review this Policy in response to changes in legislation, international standards, the nature of its research or the Organization's practices.

The current version is published on the official UMDS website.

24. Contact Information

COMMUNITY ORGANIZATION "UKRAINIAN MODERN DIGITAL SCIENCE"

Identification code: **44851106**

Kyiv, Ukraine

General and ethics enquiries: hello@umdigital.science

Data Protection & Privacy: privacy@umdigital.science

Website: umdigital.science