

D10.5

GEN-Requirement No.6

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ITFLOWS IEB Members

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Executive Summary

The aim of this second ITFLOWS IEB Annual Report is to present and account for the advisory, reviewing and monitoring activities of the Independent Ethics Board (IEB) during the second year of the project. This report is divided into four sections plus two annexes. Section 1 provides an overview of the activities carried out by the members of the IEB from M13 to M24. Section 2 presents the recommendations provided by the IEB to address different ethical concerns, especially in the context of the Artificial Intelligence Impact Assessments of the ITFLOWS EUMigraTool (EMT). Section 3 reports the IEB members' evaluation of the deliverables reviewed from M13 to M24. Finally, Section 4 concludes with a general evaluation of the project at M24.

Abbreviations

AI: Artificial Intelligence

BUL: Brunel University London

CERTH: Ethniko Kentro Erevnas Kai Technologikis Anaptyxis

DPA: Data Protection Advisor

EMT: EUMigraTool

IEB: Independent Ethics Board

IGC: Independent Gender Committee

FIZ: FIZ Karlsruhe - Leibniz-Institut für Informationsinfstruktur GMBH

GDPR: General Data Protection Regulation (EU) 2018/679

UAB: Autonomous University of Barcelona

IDT-UAB: Institute of Law and Technology of the Autonomous University of Barcelona

WP: Work Package

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SECTION 1. Overview of IEB Activities M13-M24

1.1. Participation in the Review Meeting

On 1 April 2022, the IEB participated in the online Review Meeting of the Project, given its role as an external and independent ethical monitoring body of ITFLOWS. The presentation of the IEB, delivered by Professor Ruth Fee, was scheduled from 14:40 to 15:00 hours, as part of the Legal and Ethics Session (see the agenda in Annex I).

In the IEB presentation, Professor Ruth Fee offered an overview of the deliverables reviewed by the IEB, the deliverables prepared by the IEB, and the range of recommendations made from M1 to M18 (see the presentation in Annex II.).

1.2. Participation in the AI Impact Assessments

In this second year, the work of the IEB has mainly focused on the monitoring of the design and development of the ITFLOWS EUMigraTool (EMT). To ensure the legal and ethical compliance of tool, the IEB has actively participated in the AI Impact Assessments conducted by the ethical partners of the project at the Institute of Law and Technology of the Autonomous University of Barcelona (IDT-UAB). Throughout this process, the IEB has provided guidance and recommendations to the technical partners and has supervised the monitoring activities of the IDT-UAB.

For the list of recommendations provided in the context of the two AI Impact Assessments, see Section 2. In the same vein, we reviewed D6.2 and D6.3, both related to the technical development of the EMT (see Section 3).

1.3. Deliverables Review

Over the second year of the project, we have proceeded to review WP2 deliverables and those related to the development of the EMT given the legal and ethical risks it may pose. We have reviewed the following deliverables (chronological order):

- Deliverable 6.2 'Preliminary release of the EMT' (M18).
- Deliverable 6.3 'Report of migration modelling and simulation' (M22).

- Deliverable 2.5 'Report on the Legal, Societal Impact and Ethical Monitoring of the ITFLOWS' (M23). In this Deliverable we also provided our recommendations to technical partners stemming from the results of the 2nd AI Impact Assessment (see Section 2.3)

SECTION 2. IEB Recommendations M13-M24

In this second year of the project, our task has primarily focused on monitoring the design and development of the EMT (work carried out by WP6). The development of such a predictive tool deployed for migration management purposes in a humanitarian context entails several legal and ethical risks that deserve careful consideration.

In this regard, the IDT-UAB, as the ethical lead partner of the project, together with all WP2 partners—FIZ and BUL—are closely monitoring the design and development of the EMT from various perspectives: data protection (FIZ), ethics (IDT-UAB), societal including human rights considerations (BUL), and gender (UAB and BUL).

As part of the internal monitoring activities, the IDT-UAB team has conducted two AI Impact Assessments to monitor the developments of the EMT. We have been constantly updated on the discussions with the technical partners, we have joined some of these discussions, and we have been regularly informed about the key decisions that have been taken jointly with technical partners.

During this process we have provided recommendations on several aspects of the EMT. Below we have listed some of the main ones.

2.1 Design and Development of the EMT (WP6)

From M3 onwards, we monitored and provided recommendations for the design and early development of the EMT, which crystallized in D6.2 (see Section 3.1). The suggested measures aimed at ensuring the proper processing of data from an ethical and legal perspective, putting special emphasis on data protection compliance. We can classify our recommendations into four categories:

1. Data Protection by Design: we proposed a range of Data Protection requirements to be embedded by design into the EMT (See Sections 2.2, 2.3, and 3.1).

2. The methodology followed for the design of the EMT: this methodology must be properly and clearly described. It shall include the justification of the chosen approaches, datasets, and sources, and how they feed into the project and inform the EMT.
3. Use of Big Data: clear explanations on the use of Big Data in the project, and especially in the EMT, must be provided.
4. Use of Twitter data: we demanded careful consideration of the existence of bots, which may alter the quantification of the actual number of Twitter users in the countries under analysis. Likewise, we asked for thorough explanations on how technical partners were going to comply with data protection requirements when processing Twitter data.

2.2 Preliminary AI Impact Assessment and Release of the EMT (M14)

We participated in the discussion of the results of the Preliminary AI Impact Assessment and had the opportunity to ask technical partners for some clarifications. As a result of the discussion, we proposed a number of recommendations aimed at addressing the potential legal and ethical risks that the development of the EMT might entail (these recommendations are included in D6.2):

Human agency and oversight

1. Provide further information about the EMT explainability features.
2. The main issue is "how" the EMT outcomes/results are produced. The outcomes produced are not self-justifiable and, consequently, "accountable" and "responsible". Additional difficulties arise due to the lack of transparency or explainability and comprehensibility of how these outcomes/results have been produced, as it is nearly impossible for an outsider to review such processes and the basis of an output. Measures to improve transparency, explainability and comprehensibility need to be implemented.
3. Provide clarifications on the selection criteria followed for the datasets fed into the EMT.

4. EMT training must also cover appropriate decision-making based on outputs.

Technical robustness and safety

1. Negative societal impacts due to malfunctions of the EMT: Need to consider measures for end-users to be aware of: (i) how and when actions would be taken and (ii) by whom. This is to minimise negative societal impacts.
2. Provide clarifications on how bias and accuracy of the EMT are evaluated at the design phase.
3. Provide clarifications on who/what warns technical partners about the need for additional data.
4. Provide clarifications on how EMT end-users will be provided with instructions specifying that the EMT results are only for guidelines and consulting.

Privacy and data governance

1. Potentially identifiable data will be used by individual EMT components during the training phase. Provide clarifications on what will be delivered during the training phase.
2. Provide clarifications on how data is going to be used and mitigation measures to reduce the potential misuse of data during the lifespan of the project.
3. Provide clarifications on how the planned 'indirect use of data via a model' will fix any issues relating to bad quality.

Transparency

1. Provide clarifications on the implementation of the explainability principle within the EMT.

Diversity, non-discrimination and fairness

1. Provide clarifications on how technical partners have assessed and acknowledged limitations related to the composition of the used data sets.
2. Provide clarifications on how diversity and representativeness are ensured during the data assessment process.

3. Provide clarifications on how end-users' feedback will be used to enhance/develop the EMT.

Societal and environmental well-being

1. Provide precise information on how the EMT is compliant with the “do no significant harm principle” (Articles 9 and 17 of the EU Sustainable Finance Taxonomy Regulation).

Accountability

1. Provide clarifications on the implementation of mitigation measures in the EMT to minimise the risk of misuse.

2.3 2nd AI Impact Assessment (M22)

We reviewed the answers to the 2nd AI Impact Assessment of the EMT provided by technical partners, and provided recommendations to be implemented by technical partners. This is the full list of recommendations for each ethical requirement under assessment (these recommendations are included in D2.5):

Human agency and oversight

1. Provide clarifications on what is meant by “quality of the results” and how this quality is evaluated.
2. It is key to make the tool understandable to end-users. Concepts such as “system’s malfunctions” should be explained to ensure that end-users are capable of flagging potential errors in the system.
3. There are currently no guidelines for end-users on how to avoid/report bias. A plan of the next steps to be undertaken to fill this gap is needed.

Technical robustness and safety

1. Provide the full list of mechanisms and measures implemented to ensure the protection of the EMT against cyberattacks.
2. Provide clarifications on how the system’s malfunctions might lead to a negative social impact. Clarify whether the malfunction itself will produce

this negative impact or whether it will be caused by the poor outputs/data resulting from the malfunction.

3. Provide clarifications on what is meant by “administrative bias” and the scientific literature used to mitigate “administrative bias”. Provide further explanations on how administrative bias of asylum applications were mitigated. It must be clarified what positive steps to mitigate bias to the highest possible level were taken during the design process, as well as how these measures will be reviewed.

Privacy and data governance

1. Make it clear as to why all the original Twitter data is reserved only by the data collector and for research purpose only.
2. Provide clarifications on the accuracy of the geo-information obtained from Twitter analysis.

Transparency

1. The relationship between “transparency” and “traceability” should be made clear.
2. The information regarding the limitations and shortcomings of the EMT must be easily accessible, visible, and clearly explained to end-users on the website. A disclaimer cannot be considered an explanation.
3. Provide clarifications on the arrangements in place to audit the outputs of the EMT in terms of accuracy and potential risks.

Diversity, non-discrimination and fairness

1. Provide clarifications on the actions taken at the various stages of the EMT to resolve issues of bias. A disclaimer is insufficient and does not provide solutions.
2. Provide clarifications on the nature/contribution of information gained by the scientific literature to assess limitations in the specific/specified datasets. Provide clarifications on how scientific literature informed design and how this information is provided to end-users.
3. Further mechanisms to mitigate limitations for persons with disabilities

must be put in place. It cannot be stated that the EMT has no limitations for people with disabilities. Consider, for instance, the effects of colour contrast for users with colour blindness, dyslexia or other conditions.

4. Provide more detail on the explainability features that have been embedded into the models underlying the EMT.

Societal and environmental well-being

1. Provide details on how the work undertaken in WP2 has been weaved into all design phases of the EMT.
2. Provide clarifications on how compliance with the “Do no significant harm principle” has been assessed.
3. It must be considered that incorrect outputs that are taken as verbatim by a human who has no malicious intent can indeed do significant harm.

Accountability

1. Automated methods to review activity logs will require tracking and follow-up actions.
2. An auditing plan to assess compliance and ensure accountability must be put in place.

SECTION 3. Deliverables Review M13-M24

During the second year of the project, our tasks have also included the review of the following deliverables:

3.1 D6.2. Preliminary release of the EMT (M18)

In D6.2, CERTH analysed and presented the data gathering and data updating methods that were chosen for the design of the EMT, as well as the models that were developed as part of the ITFLOWS project alongside an overview of the available routes in the backend server. CERTH also included a section incorporating the ethical and legal obligations with which the EMT must comply. The deliverable finishes with a manual for the first release of the EMT.

The deliverable accompanied the release of the first version of the EMT, which brings together all the knowledge generated by the ITFLOWS project. As stated by CERTH, the aim of this tool is to provide NGOs and municipalities (both stakeholders with different roles and access in the EMT) with a set of tools that can allow them to conduct simulations and forecasts on different facets of migration, ranging from the number of people foreseen to leave from a specific region within specified origin countries towards a country within the EU, to potential tensions that may arise when migrant populations enter EU territory.

Our review focused on the Preliminary AI Impact Assessment, as discussed in Section 2.2. Nevertheless, we additionally proposed a number of recommendations aimed at ensuring the precision of the ethical requirements to be embedded into the tool, especially in terms of human agency, explainability, accountability, and reporting mechanisms of the EMT. We also requested further clarifications on the strategy for collecting, evaluating, and classifying data from Twitter to conduct the Sentiment Analysis. Likewise, we asked for more mechanisms to ensure the quality of the collected data and the understandability of the EMT's manual for users.

The following list compiles the specific recommendations that we provided for this deliverable:

1. Provide more information on the methods that will be used to detect anti-migration attitudes, besides Twitter Sentiment Analysis.
2. Clarify what is meant by “various factors that may affect the attitude”. Provide clarifications on where these “various factors” are drawn from.
3. Provide clarifications on the methodology followed to categorise emotions.
4. Provide clarifications on how the factors that have a negative/positive attitude towards migration are determined.
5. Use General Data Protection Regulation (EU) 2018/679 (GDPR) terminology for data protection issues.
6. Note that the use of data must be both legal and ethical.
7. Provide clarifications on who evaluates the accuracy and bias of the EMT.
8. Provide clarifications on how quality of the data gathered from social media is evaluated.
9. Provide clarifications on the EMT’s cookies policy.

3.2 D6.3. Report of migration modelling and simulation (M22)

D6.3 was led by BUL. The aim of this report was to design the simulation component of the EMT. It analysed the information obtained from WP2, WP3, WP4, WP5 and WP6 related to the global management of migration movements. It contains the latest achievements of backend-services including small and large-scale models, Twitter sentiment analysis and Google analytics. The authors described the construction and execution of migration simulations for conflict countries, namely Mali, Nigeria, Syria, Venezuela, and Ukraine, using the small-scale model. Moreover, the large-scale model section describes two fundamental functionalities predicting European asylum applications and the attitudes towards immigration for most European destination countries. In the Twitter sentiment analysis, they proposed a pipeline to extract and process tweets and their metadata. Google analytics introduces applied methodology and preliminary results of predicting bilateral migration flows using Google Trends.

These prediction models and analyses are integrated into the EMT. The main aim of the tool is to predict movements of migrants arriving in the EU. As part of this task,

the authors also identified and integrated a range of data sources, which will be used either as input for the simulations, or as validation targets.

Although our evaluation of the deliverable was generally positive, we requested several clarifications and suggested some minor changes. Regarding the technical description of the EMT, we advocate for the use of a plain language as far as possible. We consider that overusing technicisms would make the deliverable less accessible for non-technical partners and for the general public. We also asked for further clarifications on the meaning of some ambiguous terms and expressions (e.g., 'validation file', 'algorithm assumptions', or 'forecasting'), as well as on the functionalities of the tool.

In this sense, we put special emphasis on the use of data. We requested additional explanations on the methods of manual extraction of data and its posterior validation (e.g. to avoid the presence of 'bots'). The deliverable must make clear at all times that the EMT is compliant with the EU's highest ethical and legal standards.

We also made several suggestions related to the presentation of the use cases. Our aim was to ensure that these were well-documented and presented to ensure the accuracy of the prediction. Most of these suggestions focused on the context, the sources, the precision of the terminology, the presentation, and the conclusions drawn from each case.

Our recommendations can be summarised as follows:

1. Use of a plain language as far as possible for the technical description of the tool. Overuse of technical jargon would make the deliverable less accessible for non-technical partners.
2. Clarifications on the meaning of some ambiguous terms and expressions (e.g., 'validation file', 'algorithm assumptions', or 'forecasting').
3. Clarifications on the functionalities of the tool, especially on the use of data. Additional explanations on the methods of manual extraction of data and its posterior validation (e.g., to avoid the presence of 'bots') were requested.

4. The deliverable must always make clear that the EMT is designed to be compliant with the EU's highest ethical and legal standards.
5. Clarifications on the context, the sources, the precision of the terminology, the presentation, and the conclusions drawn from the use cases, to ensure that they were well-documented and presented to ensure the accuracy of the predictions.

3.3 D2.5. Report on the Legal, Societal Impact and Ethical Monitoring of the ITFLOWS (M23)

D2.5 was led by the IDT-UAB with the participation of all WP2 partners, namely, FIZ, BUL, and the Gender Committee (UAB and BUL). The deliverable reports the ongoing monitoring tasks conducted by the ethical and legal partners during the first two years of the project to ensure the implementation of the ITFLOWS Regulatory Model at all stages of the project's research activities. Special emphasis is placed on its implementation in relation to the design and development of the EMT. The report distinguishes between the data protection perspective (FIZ), the ethical perspective (IDT-UAB), the societal perspective (BUL), and the gender perspective of the monitoring activities. The report also includes a review of the monitoring activities of the three external monitoring bodies (IEB, DPA, and IGC) during the same period. Given the ongoing nature of the monitoring activities, D2.5 is an initial version. The overall results will be included in a final report in M36.

Our evaluation was very positive. We considered that it was a well-structured and written deliverable. It clearly reflected the high quality of the work done by WP2 partners. For this reason, we only made some minor comments on grammatical issues.

SECTION 4. IEB General Evaluation M24

Our general evaluation of the project is very positive. The constant cooperation and communication between the technical and ethical and legal partners is key to achieve the ethical and legal compliance of the EMT. Notwithstanding the potential ethical and legal risks associated with the development of such a predictive tool, the ITFLOWS Consortium is implementing strong safeguards to properly identify and mitigate these risks. As the development of the EMT has not finalised, the Consortium must ensure the implementation of additional safeguards and be vigilant to identify and mitigate new ethical and legal risks that might arise in the upcoming months.

ANNEX I: Review Meeting Agenda



ITFLOWS Review Meeting

AGENDA

Friday, 1 April 2022

[CLICK HERE TO ACCESS
THE MEETING](#)



"This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement N° 882986".

Timeslot	Section	Subsection	WP Deliverable	Presenters
8:45 – 8:55	Connection of the participants			
9:00 – 9:30	Introduction What migration challenges ITFLOWS is addressing and trying to solve; Requirements - what is the project about	Motivation, Vision & Objectives	WP1	Cristina Blasi & Colleen Boland (UAB)
		Concept & Approach, Project Structure		
		Status Overview, Main Achievements		
		Main Challenges & Proposed solutions		
09:30 – 10:00	Scientific and Policy objectives Policy recommendations	O5. To provide policy solutions for optimising integration of refugees in the EU	WP4 D4.2, D4.3	Tobias Heidland / Lena Detlefsen (IfW)
		Questions & Answers (15 min)		
10:00 – 10:30		O3. To provide policy solutions for the management irregular arrivals and asylum systems in the EU	WP3 D3.1, D3.2	Asli Okyay (IAI)
		Questions & Answers (15 min)		
10:30 – 11:00		O4. To minimise potential risks of tension and conflict between migrants and EU citizens	WP5 D5.1, D5.2	Lenka Drazanova (EUI)
		Questions & Answers (15 min)		

		Policy implications based on WP3, WP4, WP5 findings	WP8	Gergana Tzvetkova (CSD)
Questions & Answers (15 min)				
11:30 -12:00 Break				

12:00 – 13:00	Technical Objectives Creation of models & the EUMigraTool	Objective 1. To make accurate models and predictions on migration in the EU	WP6 D6.1, D6.2 WP3 D3.1, D3.3, D3.4, WP5 D5.3, D5.4	Georgios Stavropoulos (CERTH), Derek Groen (BUL) & Mehwish Alam (FIZ)
		Objective 2. To create the EUMigraTool for municipalities and civil society organisations	WP7 D7.1	Haitthem Afli (MTU)
		Demo of the EMT	WP6	Nikolaos Gkevrekis (CERTH)
Questions & Answers (10 min)				
13:00 –14:00 Lunch Break				

14:00 – 14:40	Legal and Ethics Session		WP2 D2.1, D2.2, D2.3, D2.4	Emma Teodoro & Andrea Guillen (UAB)
	Ethics and data protection, addressing the challenges	Ethical, data protection and legal requirements	WP10 D10.1, D10.2, D10.3, D10.4	Thilo Gottschalk (FIZ)

ITFLOWS Review Meeting



14:40 – 15:00		Independent ethical and legal monitoring		Lillian Mitrou, Ruth Fee, Marta Poblet & Jonathan Andrew
Questions & Answers (10 min)				
15:00 – 15:30	Project Management and Implementation Management & finance reporting on WPs progress	Overall Management	WP1 D1.1 - D1.2	Colleen Boland & Santi Villar (UAB)
Questions & Answers (10 min)				
15:30 – 16:00 Break				
16:00 – 16:30	Impact & Exploitation Objectives	Dissemination and Communication	WP9 D9.1, D9.2, D9.3, D9.4	Miriam Mir (CEPS) & Anna Pappa (TRC)
Questions & Answers (10 min)				
16:30 – 17:15 Deliberation Project Officer - Evaluators				
17:15 - 17:30 Feedback and conclusions				
17:30 – 18:00 Closing of the Review Meeting				

ANNEX II: IEB Presentation (Review Meeting)

ITFLOWS Review Meeting
1 April 2022
Independent Ethics Board

itflows
IT TOOLS AND METHODS
FOR MANAGING
MIGRATION FLOWS

Presented by
Prof. Ruth Fee

Independent Ethics Board

- Tasks and responsibilities
- Deliverables reviewed (M1 – M18)
- Deliverables submitted (M1 – M18)
- Recommendations (M1 – M18)

Independent Ethics Board



Professor Lilian Mitrou
University of the Aegean-Greece



Professor Marta Poblet
RMIT University (Australia)



Professor Ruth Fee
Ulster University

Tasks and responsibilities



Deliverables Reviewed (M1-M18)



The IEB has reviewed the following WP2, WP6 and WP10 deliverables:

Due date	Deliverable Number	Title	Lead Beneficiary	Status
M5	D2.1	Report on the ITFLOWS Legal and Ethical framework	BUL	SUBMITTED
M6	D2.3	Report on Human Rights, Ethical, Societal and Data protection risks assessment	UAB	SUBMITTED
M6	D10.1	H - Requirement No. 1.	UAB	SUBMITTED
M6	D10.2	H - Requirement No. 2.	UAB	SUBMITTED
M6	D10.3	POPD - Requirement No. 3.	UAB	SUBMITTED
M9	D6.1	Report on the specifications and architecture of the EMT platform	CERTH	SUBMITTED
M10	D2.4	Report on the ITFLOWS Regulatory Model	UAB	SUBMITTED
M18	D6.2	Preliminary release of the EMT	CERTH	SUBMITTED

All IEB members signed a letter of approval supporting and accepting the outcomes of the ethics deliverables (D10.1; D10.2 and D10.3)

Deliverables Submitted (M1-M18)

WP10 Ethics Deliverables include two IEB Annual Reports:

1. D10.4. GEN-Requirement No.5 (M12) **SUBMITTED**
2. D10.5. GEN-Requirement No.6 (M24) **WORK IN PROGRESS**

D10.4. GEN-Requirement No.5 (M12):

In this deliverable, the IEB reported their activities between M1 and M12. The First Annual Report was structured as follows:

1. IEB constitution and meetings.
2. Preliminary recommendations.
3. Deliverables reviewed.
4. IEB General Evaluation M12.

IEB Recommendations (M1-M18)

Interviews with migrants, refugees and asylum seekers (T3.4):

- Recruitment plan
 - Interviewees may be provided with a small compensation to be decided by the NGOs in charge of the interviews and approved by the UAB.
 - Monetary compensation is strongly discouraged.
- Informed consent procedures and template
 - Clear and plain language.
 - Clearly defined retention periods.
- Anonymisation techniques
 - The anonymisation procedure suggested is robust: two-stage process and additional data protection safeguards in place.

IEB Recommendations (M1-M18)



Interviews with migrants, refugees and asylum seekers (T3.4):

- Incidental findings policy (IFP)
 - Supporting the adopted approach, the classification of incidental findings (IF) and the Incidental Findings Procedure.
- Two-step incidental findings transcription procedure
 - All interviewers to be well trained in the IFP, the national referral system and in how to manage the transcription process.
 - Interviewers to submit their opinion on the relevance / irrelevance of the information related to a disclosed IF during the interview.
 - IAI and UAB assessments on the relevance of such information to be properly documented. In case of discrepancy IAI opinion prevails.
 - IAI and UAB assessments to take into consideration the interviewer opinion
 - If the outcome of the relevance assessment is unclear, the information should be deemed irrelevant and should not be included in the transcript.

IEB Recommendations (M1-M18)



Design and development of the EMT (WP6):

- Data protection by Design: Data Protection requirements must be embedded by design into the EMT.
- Inclusion/enhancement of the methodology followed for the EMT: rationale behind the choice of approaches, datasets and sources. Explain how the different datasets feed into the project and how do they inform the EMT.
- Explain the use of big data in the project in general, and how it fits in the design process of the EMT.
- Careful consideration of the use of Twitter data:
 - Existence of Twitter bots
 - Revise the number of actual Twitter users (excluded bots) in the countries considered
 - Explain how to deal with data protection issues while collecting this data.

IEB Recommendations (M1-M18)



Preliminary AI impact assessment and release of the EMT (WP6):

- Human agency and oversight
 - EMT training must also cover appropriate (fair/ transparent/ explainable) decision-making based on outputs.
 - Technical robustness and safety
 - Clarifications on how bias and accuracy of the EMT is evaluated.
 - Transparency
 - The EMT should be designed to ensure/provide explainability with focus on providing explanations and clarity on how outcomes are produced.
-

IEB Recommendations (M1-M18)



Preliminary AI impact assessment and release of the EMT (WP6):

- Privacy and data governance
 - Clarifications on how data is going to be used/processed and mitigation measures to reduce the potential misuse of data during and beyond the lifespan of the project.
 - Diversity, non-discrimination and fairness
 - Clarifications on how end-users' feedback will be used to enhance/develop the EMT.
 - Accountability
 - Reporting mechanisms in place for end-users to flag wrong results.
 - Clarifications on the auditability and traceability of the EMT.
-

