

Electronic, didactic and innovative platform for learning based on multimedia assets



e-DIPLOMA



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D7.4: Report on Ethics Screening and Overall Legal Compliance

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3. Introduction

3.1 Executive Summary

The e-DIPLOMA consortium has a dedicated work-package (WP7) on data management and ethics, gender, privacy, security, and regulatory aspects to ensure that all these components are applied consistently and in harmony with each other throughout the project's lifecycle and beyond. Part of this was deliverable 7.2 Ethics Plan (EP) which is a strategic document describing all the fundamental ethical issues relevant to the e-DIPLOMA project and defining the procedures to be followed by all Consortium partners and Associate Partners working on the project. The Ethics Plan specifies all the ethical issues and provides information on how they will be processed during e-DIPLOMA project actions. In addition, D1.3 Data Management Plan sets out guidelines for the safe and compliant use of data, including safeguarding the protection of personal information and ensuring the provision of informed consent in relation to the sharing of data for processing in the context of project tasks.

For this project to be realised, various actions have been carried out by the consortium, which include third parties as research participants in conducting interviews and focus groups with relevant stakeholders, dissemination of surveys to the public, conducting of workshops, piloting and testing of the produced material during different phases of realisation.

As expected, the e-DIPLOMA project faced three main categories of ethical challenges:

- Human participation in research and training activities of the project, and in particular, the involvement of minors.
- The collection of sensitive/personal data used in both research and technology development.
- The use of Artificial Intelligence and, possibly invasive, new technologies

The present document provides an account of the consortium's compliance with the ethical and data protection guidelines issued, in relation to all the relevant tasks completed during the lifespan of the project and the associated tasks, including:

- Subtask 2.1.2: Survey on sustainability and ethical dimensions of e-learning systems and practices. Aim: (i) to analyse the European current situation of e-learning in teacher training and (ii) to co-create the educational practices with emerging technologies to satisfy real needs.
- Task 2.2: Analysis of remote e-learning in teacher training. Aim: (i) to analyse the ethical dimensions of e-learning systems and practices and, (ii) to assess the potential benefits and vulnerabilities, which might arise from the use of emerging technologies in educational systems at different levels.
- Task 3.1: Coordinating the codesign. Aim: To perform hackathons for the purpose of collecting feedback to develop and adapt innovative educational practices and technology-enhanced learning tools for the development of the three learning modules.
- Task 3.2: Pilots with e-learning modules. Aim: to conduct national pilots of the e-learning modules, collect evaluation feedback, and document the outcomes as good practice case studies.
- T6.2: Co-design with Stakeholders and Selection of the Best Policy Options. Aim: to gather and discuss proposals from stakeholders through brainstorming sessions, leading to the selection of key ideas by participant consensus.

In addition to adhering to existing EU ethics and data protection standards, the e-DIPLOMA project has offered practical methods for managing ethics in new educational technologies. Significantly, the initiative implemented ethical guidelines in the deployment of AR and VR during pilots, created varied and inclusive recruitment measures, and set up organized discussions on ethics with sister projects.

These actions illustrate how EU recommendations can be utilized in practical, inventive manners within digital education

3.2 Abbreviation List

This is the list of the acronyms that are used in the present document:

- EP: Ethics Plan
- AR: Augmented Reality
- VR: Virtual Reality
- AI: Artificial Intelligence
- WP: Work Packages
- EU: European Union
- EC: European Commission
- ALLEA: All European Academies
- FAIR: Findability, Accessibility, Interoperability, and Reusability
- GA: Grant Agreement
- EEA: External Ethics Advisor
- DMP: Data Management Plan
- GDPR: General Data Protection Regulation

3.3 Reference Documents

Sources used for developing ethics requirements of the e-DIPLOMA project:

- Artificial Intelligence Act <https://eur-lex.europa.eu/eli/reg/2024/1689/oj/eng>
- [D1.3 Data Management Plan \(DMP\)](#)
- [D7.2 Ethics Plan](#)
- [D9.1 H - Requirement No. 1 - Annex 1 Informed Consent Form](#)
- [D9.1 H - Requirement No. 1 - Annex 2 Informed Consent Form \(Minors\)](#)
- [D9.1 H - Requirement No. 1 - Annex 3 Virtual Reality side effects information form](#)
- Data transfers outside the EU: International data transfers using model contracts
- [Directive 95/46/EC](#)
- Ethical guidelines on the use of artificial intelligence and data in teaching and learning for educators (<https://education.ec.europa.eu/news/ethical-guidelines-on-the-use-of-artificial-intelligence-and-data-in-teaching-and-learning-for-educators>)
- Ethics and data protection (2021) (https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/ethics-and-data-protection_he_en.pdf)
- Ethics Issues Table and Ethics Self-Assessment for Horizon 2020 proposals; Horizon 2020 regulation No 1291/2013
- EU Directive 2016/680 of the European Parliament and of the Council of 27 April 2016
- European Code of Conduct for Research Integrity of ALLEA (All European Academies) http://ec.europa.eu/research/participants/data/ref/h2020/other/hi/h2020-ethics_code-of-conduct_en.pdf



- EU Grants: How to complete your ethics self-assessment, European Commission's guidance (https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/how-to-complete-your-ethics-self-assessment_en.pdf)
- FAIR Principles: <https://www.go-fair.org/fair-principles/>
- Grant Agreement (GA) of the project
- Guidelines, Recommendations and Best Practices, European Data Protection Board https://edpb.europa.eu/our-work-tools/general-guidance/guidelines-recommendations-best-practices_en
- Handbook on European data protection law (2018 edition), European Union Agency for Fundamental Rights and Council of Europe, European Court of Human Rights, European Data Protection supervisor <https://fra.europa.eu/en/publication/2018/handbook-european-data-protection-law-2018-edition>
- Manual for Researchers: Information related to Ethics and Gender Issues (July 2019).
- Manual for Researchers: Interview guidelines (July 2019).
- Manual for Researchers: Work methodology and guidelines for the project (July 2019).
- Meetings with the project officer prior to sign the Grant Agreement.
- Regulation (EU) 2021/695 <https://eurlex.europa.eu/legalcontent/EN/ALL/?uri=CELEX:32021R0695>

4. Project Description

Distance learning became a great ally in the post-pandemic situation. The e-DIPLOMA project wants to establish e-learning in an upper quality level in a three years' research initiative, posing the use of Augmented Reality/Virtual Reality, Artificial Intelligence (Machine Learning/Deep Learning), Interactive Technologies, chatbots and gamification in a newly designed e-learning platform. This project uses techniques and technologies previously proven successfully in the broadcasting, gaming, and eSports industries. They have been adapted to the educational world, developing innovative learning practices. A co-creation methodology has been employed to involve the primary educational stakeholders (teachers, educators, pupils, families, course providers, and policymakers) and their social connections. Inclusiveness, accessibility, and sustainability has also been taken into account.

The objectives of the e-DIPLOMA are:

- To optimize the potential and opportunities of e-learning practices with emerging technologies on experiential topics and to reduce risks and barriers.
- To design and evaluate new educational practices with emerging technologies to modify the e-learning process to overcome existing barriers and mitigate the risks.
- To develop an innovative e-learning platform with emerging technologies, and describe its impacts on learning, educational policies, and society.

An innovative e-learning platform, e-DIPLOMA, is developed as the interface component, incorporating AR, VR, 3D environments, interaction, and immersion to support a personalized and effective learning process. In addition to the platform, three different e-learning module prototypes are developed, each focusing on a different learning subject. These prototypes integrate educational practices with emerging technologies co-designed, combining experiential learning practice scenarios with sequences of specified learning practices, following the 'learning by doing' methodology.

The three learning modules are:

- Using Virtual Reality for learning Block Programming and managing sensors over a virtual environment: This course uses VR/AR to instruct students in block programming and the use of sensors and actuators.
- Next Social Entrepreneurs Generation: This prototype covers the achievement of a Social Entrepreneurship project development with the support of a e-learning training course that encloses the new opportunities generated by the ICT innovation for learning.
- VR Education: This learning module is addressed to get acquainted with the use of VR solutions in education.

This project also considers the demand for adequate teacher training in relation to new educational technologies, analysing the shifting role of teachers, trainers and educational leaders in the digital transition affecting education and training as well as their training needs, including digital and leadership skills, required in an emerging society of permanent and quick technological change.

5. Ethics in e-DIPLOMA project

Amongst the basics of Ethical Research Conduct relevant to the project research domain, the following guidelines were issued to be complied with by all consortium members:

- Respect the integrity and dignity of persons.
- Follow the “Do no harm” principle. Any risks must be clearly communicated to the subjects involved.
- Recognise the rights of individuals to privacy, personal data protection and freedom of movement.
- Honour the requirement for informed consent and continuous dialogue with research subjects.
- Respect the principle of proportionality: not imposing more than is necessary on your subjects or going beyond stated objectives.
- Respect biodiversity and do not impose irreversible changes that threaten the environment or ecological balance.
- Build on the understanding that any benefits are for the good of society, and any widely shared expressions of concern about threats from your research must be considered.
- Use of trustworthy, legal, and ethical AI; human-centric approach.
- Ensure gender diversity and inclusivity are taken into account during project activities (e.g. participant selection etc) and in the final system design

The main concerns addressed by WP7 include different types of ethical considerations, such as:

- 1) Human agency and oversight of the digital system (e.g., carrying out an impact assessment, ensuring that fundamental human rights and principles are upheld).
- 2) Technical robustness and safety (i.e., ensuring the integrity and resilience of the project results against vulnerabilities such as data pollution, physical infrastructure, and cyber-attacks).
- 3) Privacy and data governance (e.g., align e-DIPLOMA’s system with relevant standards and widely adopted protocols for data management and governance).
- 4) Transparency regarding the methodology of data collection, analysis, and outcome production by AI and communication of all these to end-users.

- 5) Diversity (in terms of gender identity, race, ability, sexual orientation, etc), non-discrimination, and fairness (including concerns regarding accessibility, inclusivity of users and universal design that accommodates a wide array of individual preferences and approaches).
- 6) Societal and environmental well-being (including an assessment of the wider societal impact of the e-DIPLOMA system's use beyond the individual end-users, or the ecological impact of deploying and maintaining a system such as the one developed by the e-DIPLOMA system).
- 7) Accountability (for instance addressing concerns such as how to carry out risk or impact assessment of the system that adequately considers its effect on users, stakeholders, and the broader society in which it operates, or how to respond to major risks that might occur in the running of the system)

6. Ethics Screening

6.1 Contents and Access to Ethics Plan (EP)

The Ethics Plan developed within the project provided procedures to be followed by all project partners, including those in the consortium and associate partners. The objective of ethical guidelines was to ensure that all partners worked in an ethically acceptable way with respect to involving participants in any of their actions in the project. This plan outlines how the consortium ensures that security, privacy, and confidentiality norms, as well as common values of autonomy, independence, beneficence, non-maleficence, and justice, are respected. Furthermore, it advised all partners in the consortium on how to work with participants, respecting the combined ethical standards of the consortium members, as well as the national regulations.

The main safeguards put in place for consortium partners related to the following topics: **1) Human Participation, 2) Protection of Personal Data, and 3) Use of Artificial Intelligence**. Additional considerations that were accounted for during the recruitment of participants included considerations around gender and the provision of informed consent when participating in the project activities as a subject.

The EP and other project materials discussing ethical guidelines were made available to consortium partners in English. Each partner organisation was responsible for ensuring that all involved staff and associate partners were aware of and understood the guidelines.

6.2 Assessment of Project Activities

The procedures described in the EP were implemented to protect participants' best interests and ensure their security without increasing their vulnerability.

6.2.1 Gender perspective & Inclusivity

As per the Data Management Plan reports provided by consortium partners, measures were taken to ensure a fair and unbiased selection of individuals, ensuring gender diversity and inclusion of the involved participants as well as avoiding any conflicts of interest with the aim of collect representative data.

During the pilot implementation of the e-learning modules in WP3, the recruitment processes across consortium partners ensured diversity and inclusion by leveraging multiple channels and criteria. CSI collaborated with Alexander College, issuing an open call to students and educators, while UJI Spain utilised university courses, personal networks, classroom outreach, secondary schools, institutional emails, and business collaborators. Tallinn University recruited voluntarily among students, educators, technologists, and entrepreneurs, with specific age and language proficiency criteria. BME Hungary offered the pilot as a for-credit course, contacted volunteers via Teams, recruited teachers through partners, faculty staff via email lists, social entrepreneurs through business contacts, and developers

through associations. These varied approaches facilitated the inclusion of participants from different backgrounds, ensuring a diverse and representative sample. The same rigor was also applied in all project phases.

For instance, UPV outsourced recruitment to an external company. The external company's role was limited to identifying and contacting potential participants who met the criteria for the survey and workshop that were implemented during the WP2 implementation. Specifically, the external company engaged was Empymer, (<https://empymer.com/>), a company focused on opinion polls and market research. One of the services offered by the company is the recruitment of subjects to carry out this type of research. To carry out this sample recruitment for market research, Empymer relies on recruiting people who are interested in participating in research studies and who register through their website. When someone registers, they typically provide some basic demographic information such as age, gender, and location, as well as their interests. This information is stored in a database, only accessible by Empymer, which allows the company to make the necessary selections for their clients, ensuring diversity and inclusion in the subject population. The purpose of collecting this information is solely to contact interested persons to complete their profiles and inform them of the selected collaborations in the case of being chosen as candidates. During this process, the protection of the participants' data was a top priority. It is noted that similar principles to ensure diversity, fairness, and representation during participant recruitment activities were followed by all Consortium partners.

6.2.2 Ethical and Compliant Use of Data

During project activities, partners conducting workshops, hackathons and pilots were responsible for following ethical data collection and data management procedures. These partners reported the procedure in specific questionnaires collected by the Ethical Committee of the project.

To safeguard human participants, the following actions were taken by e-DIPLOMA during the recruitment of subjects:

1. Obtaining informed consent.
2. Protecting the anonymity and confidentiality of participants.
4. Providing participants with the right to withdraw from the research activities at any time.

As reported within D1.3 Data Management Plan, all consortium partners adhered to the following procedures to ensure compliance and ethical use of data:

- Obtaining Informed Consent
- Ensuring materials clearly communicated the purpose of data collection, potential risks and benefits, usage and other GDPR-related considerations
- Anonymising or de-identifying personal information to protect the privacy of participants
- Implementing secure storage and transmission methods to prevent unauthorised access to participant data including consent forms
- Clearly defining data ownership and establishing guidelines for sharing data
- Documenting the data collection process and any potential sources of bias or error in the data
- Establishing clear guidelines for the retention and disposal of data, considering legal and ethical requirements defined within the Ethics Plan
- Safely storing participants' data ensuring accessibility only to authorised personnel
- In the case of minors, obtaining informed consent from parents or legal representatives
- Adhering to practices ensuring the safe and secure disposal of data when it is no longer needed for research purposes (not practiced yet but planned)

6.2.3 Development and Use of AI

During the AI development and piloting phases of the project, ethical principles were adhered to by ensuring transparency, fairness, and accountability. In addition to informed consent that was obtained



from all participants, data privacy was maintained through secure storage and encryption, and intellectual property rights were respected by properly attributing contributions and obtaining explicit permission for publication. Additionally, bias was mitigated by promoting diversity and inclusion in participant recruitment, and no sensitive personal data was collected to avoid privacy violations.

All participants interacting with AI-supported tools were informed accordingly with consent forms specifying the use of AI and associated risks. Specifically, regarding Prototype 2, developed by the Budapest University of Technology and Economics (BME) – Social Entrepreneurship, transparency was ensured by clearly informing participants about the presence of AI chatbots and about the risk of mistakes, hallucination and/or bias that the relevant systems may exhibit. Similarly, for the Recommendation System, developed by Jaume I University (UJI), clear information to participants about the use of AI (AI disclosure message) was provided. Furthermore, several measures were taken during the development cycle to ensure ethical AI principles were adhered to. These included:

1. Data Privacy and Bias Mitigation: The recommendation system is trained exclusively on user interaction data and does not use any personal or sensitive data. This minimizes the risk of bias linked to demographic or private user information.
2. Restricted Recommendation Scope: The system can only recommend educational resources that fall within the predefined scope of the course, eliminating the possibility of harmful or unrelated recommendations.
3. Expert-Guided Knowledge Module: A key system component is a knowledge-based module where the course instructor defines the pedagogical rules and resource progression. This ensures alignment with the course structure and learning goals.
4. Collaborative Insight for Trust: The second module leverages aggregated user interactions to guide recommendations. This helps identify common successful learning paths while maintaining trust by reflecting collective behaviour.
5. User Autonomy: Students are never obligated to follow the AI recommendations. The system serves as a supportive tool, not a directive one, and the user always retains full control over their learning journey.

6.2.4 Ethics self-assessment

Based on European Commission's guidance for ethics self-assessment it is significant to have information on the participants' specific vulnerable characteristics, the research has to be relevant to both source and host communities, and its objectives must not be harmful or prejudicial to participants. Ethics self-assessment also requires that, in cases of incidental findings that might compromise the security or integrity of an interviewee or someone in their surroundings, the appropriate authorities should be notified.

The e-DIPLOMA project conducted evaluation meetings to ensure that all partners adhered to ethical standards throughout the research. Although no such issues occurred, a procedure was established whereby, if ethical concerns were to arise unexpectedly during the research process, the Ethics Committee would immediately contact the Commission or Agency to seek appropriate support and guidance.

6.2.5 External Ethics Advisor (EEA) and Ethics Committee.

An additional way in which the project plans to remedy the ethical quandaries established is through the involvement of the External Ethics Advisor (EEA), Dr. Jahna Otterbacher, who is responsible to monitor and guide all actions to ensure compliance with the project's ethical requirements and deliverables. The appointment of an EEA was a commitment in the Ethics Summary Report we received for the project to be funded. The EEA had annual meetings with the members of e-DIPLOMA's ethics committee, where topics related to the ethics compliance for the last 12 months, the preparation of deliverables, as well as the next steps were discussed. After the meetings, the EEA used to prepare ethics screening and ethics reports. The meetings were held in November 2022 (M3), in September 2023 (M12), in September 2024 (M23), and in August 2025 (M36). These reports describe and evaluate the actions that the consortium has developed to handle the ethical problems that this project faced.

Another safeguard to ensure that all applicable regulations and guidelines are followed throughout the project is the establishment of an Ethics Committee, of which Dr. Jahna Otterbacher is a member. This Ethics Committee is also composed by:

- Dr. Inmaculada Remolar, as the project leader,
- Mr. Kleovoulos Stylianou, as the representative of CSI, the partner in charge of WP7,
- Dr. Vladislav Slavov, as member of the Advisory Board, specialist on the Ethics related to AI.

The committee met regularly and discussed the actions that are currently in progress and are related to the ethics or data management process, especially related to the AI development in the different stages of the project. Those meetings were recorded, and minutes were made available to all involved parties. The internal members of the Ethics Committee held regular meetings with the Ethics Committee of the sister projects: Exten.D.T.2, EMPOWER, augMENTOR and i-MASTER. These meetings focused on discussing how the projects were addressing ethical concerns during their various phases and explored opportunities to exchange best practices. The meetings took place in September 2023 and March 2024.

6.2.5 Additional Safeguards for Data Usage

Data collection and interviews/surveys/forms

The ethical aspects of data collection and research were continuously monitored throughout the project to prevent any intentional or unintentional misuse of information that could harm participants or be misapplied in other contexts. Across all forms, ethical and legal considerations were addressed through informed consent, privacy protection, data ownership, accuracy, transparency, security, and responsible data use. Each institution adhered to guidelines and standards, ensuring compliance with GDPR and other regulations. Furthermore, all partners performing research acted according to national and European legislation and in line with national data protection provisions and European data protection rules. They followed the agreed rules for the recruitment of participants, the implementation of activities, recording, analysis, and storage of data collected in the project.

As proposed within the Ethics Plan and Data Management Plan, the researchers of all partners adhered to the following data management safeguards (see report on [Data Management Plan](#)):

- A document with information about the research and the researchers was provided to participants, so they could decide in an informed manner if they want to participate in the research.
- Interviews were recorded with digital voice recorders or smartphone applications (in the latter case, with careful handling of sending and sharing the recordings via online channels). After transcription, all voice records were destroyed.
- Names, addresses, or specific locations and exact dates were not collected, unless essential.
- Any collected information that participants wished to hide for reasons of personal safety or privacy remained anonymous.
- Signatures were collected only according to Horizon Europe stipulations, e.g. informed consent, withdrawal rights, etc.
- Data was stored securely and governed by the Data Controller in each participating entity

The Regulation (EU) 2016/679, General Data Protection Regulation (GDPR), was considered in every phase.

7. Conclusion

In e-DIPLOMA project, ethics and data management are of high importance for quality assurance, therefore guidelines were provided to participants in terms of an Ethics Plan (EP) and a Data Management Plan, which aimed to describe all the fundamental ethical issues relevant to the project and present all the procedures to be followed by all Consortium partners working in the project.

Our ethics screening exercise, based on information provided by the consortium, confirmed that project activities were conducted in accordance with ethical principles, as well as applicable international, EU,

and national laws. These actions followed the project's established guidelines, procedures, and measures designed to protect ethical standards in research.

As the project activities progressed, additional ethical considerations were applied, such as those related to the use of AI, and the ethics screening that were updated from the previous version of the deliverable, ensuring the project activities were carried out with full respect of ethics guidelines, respect for human participants, and compliance with all relevant regulations and laws.

Establishing a comprehensive Ethics Plan and Data Management Plan at the outset of the e-DIPLOMA project ensured full compliance with current legislation and ethical standards throughout its duration. Consistent communication and ongoing support from CSI and Jaume University enabled the partnership to proactively identify and address any ethical or legal concerns. This report thus goes beyond compliance by sharing replicable practices—AI disclosure, participant diversity, and ethics collaboration—that can guide future projects. This collaborative and forward-looking approach contributed to the smooth and uninterrupted implementation of project activities, with no significant issues encountered.



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