GHENT UNIVERSITY

ETHICAL CODE FOR RESEARCH WITH PARTICIPANTS AND PERSONAL DATA

(approved by the Executive Board of 3 April 2026)

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A. SCOPE AND DEFINITIONS

1. This ethical code applies to researchers and others who work with participants or personal data in a research context at Ghent University (hereafter referred to in this text as researchers). Within the context of this code, researchers include, for example, research staff members or students conducting research as part of a bachelor's or master's dissertation. This code applies to all phases of research – from research design to reporting and valorisation.

2. This code guides and supports researchers in their ethical reflection prior to and throughout the entire research process. It applies to the wide range of research disciplines involving participants and/or the processing of personal data, and to the wide spectrum of research methods used, such as questionnaire research, interviews, participant observation, physical interventions, the study of online sources, ethnographic research, … Where relevant, reference is made to Ghent University research tips containing practical information about relevant legislation or Ghent University policy. These research tips do not form part of the ethical code.

3. Within this ethical code, the following definitions apply:
   - participant: a person who participates in research in which information about that person is collected. This can take various forms, for example, as a test subject (for example, in behavioural research), a respondent (for example, in written surveys, oral interviews or focus groups) or an informant (for example, in case studies).
   - personal data: any information relating to an identified or identifiable living natural person, as defined in the European General Data Protection Regulation (GDPR, see paragraph 5; more information in this research tip on personal data).
   - pseudonymised personal data: personal data that have been processed in such a way that they can no longer be linked to specific persons without the use of additional information. Pseudonymised personal data are still personal data protected by the GDPR.
   - anonymised data: data that were originally personal data but have been processed in such a way that the potential of (re)identification has been irreversibly removed. Up to the moment of anonymisation, these are still personal data protected by the GDPR.
   - anonymous data: data that do not relate to an identified or identifiable living natural person (as indicated in the GDPR).
   - primary use of (personal) data: use of (personal) data that are collected from the person concerned within the framework of the research in question, for example, via an online questionnaire or through observation.
   - secondary use or reuse of (personal) data: use of previously collected (personal) data, for example, collected by the researchers or by others in earlier research, supplied by another party or obtained indirectly in another way, such as from a paper or online source or database.

B. GENERAL GUIDELINES

4. The rights of research participants are anchored in various national and international codes and conventions. The most important source for the rights of participants is the Universal Declaration of Human Rights. Other widely accepted declarations codifying the principles of research ethics and the ethical treatment of participants include the Nuremberg Code, the Declaration of Helsinki and the Belmont Report. In addition, researchers also take into account any discipline-specific ethical guidelines, such as, for example, the Ethical Principles of Psychologists and Code of Conduct.

5. The general legal framework for the processing of personal data and confidential information is determined, among others things, by:
   - the European General Data Protection Regulation (2016/679; GDPR), also known as the General Data Protection Regulation (GDPR),
   - Belgian privacy legislation, in particular the Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data, as well as all associated amendments and implementing decrees, and
   - the European Regulation on AI (2024/1689), also known as the AI Act.

6. Much medically oriented research must comply with legal frameworks, including the Belgian Act of 7 May 2004 concerning experiments on the human person, the Belgian Act of 19 December 2008 concerning the use of human body material, and European Regulations 536/2014 (Clinical Trials Regulation), 2017/745 (Medical Device Regulation) and 2017/746 (In Vitro Diagnostics Regulation).

7. Certain types of research can be misused for human rights violations. This may also include research involving participants or personal data. Examples include technologies or methods that may be used to secure, monitor or track persons (such as facial recognition and cyber surveillance). There is also the possibility that research partners may be involved in human rights violations, for example, companies involved in human trafficking or universities that suspend or dismiss staff because of politically sensitive views. Researchers, therefore, always assess their research against Ghent University's human rights policy.

8. Researchers must comply with the European Code of Conduct for Research Integrity, endorsed by Ghent University, better known as the ALLEA Code. Researchers are also expected to comply with Ghent University's guidelines in the Ghent University Code of Ethics, the Generic Code of Conduct for the processing of personal data and confidential information, the Policy Framework for Research Data Management and the Policy on authorship and recognition of contributions in academic publishing.

9. Researchers are responsible for ensuring that research is conducted in compliance with local laws, customs and practices unless these conflict with international agreements and conventions on human rights.

10. In particular, when conducting research activities outside the EU, researchers avoid any form of ethics dumping, that is, intentionally or unintentionally conducting ethically

sensitive research in a way that would not be tolerated in Belgium. The Global Code of Conduct for Equitable Research Partnerships, endorsed by Ghent University (also called the TRUST Code), serves as the general ethical framework for research carried out in partnership with, or conducted in, low(er)- and middle-income countries.

11. Knowledge resulting from research often has value beyond the academic world. Particularly when participants or personal data contribute to the development of academic knowledge, researchers share this knowledge with relevant stakeholders (including the participants themselves, see paragraph 22) or with society at large – a process known as (societal) value creation. Such knowledge sharing also contributes to the transparency and accountability of academic research. In research conducted in low(er)- and middle-income countries, sharing research results also forms part of the recommendation to contribute to local research and capacity building (benefit sharing).

C. RESPECT, WELL-BEING AND DIGNITY OF PARTICIPANTS AND OTHER PERSONS INVOLVED

12. All research involving persons imposes a certain burden on participants. Researchers, therefore, first assess whether it is necessary to work with participants and, if so, whether the intended composition and size of the participant group, as well as the expected burden, duration and risks of participation, are proportionate to the objective of the research, taking into account the type and methodology of the research.

13. Researchers protect the well-being and safety of individual participants and ensure that participants are treated with respect. During the professional relationship, they do not use methods that undermine the participants' integrity or intrude further into the private lives of those involved than necessary for the set purpose. Researchers take into account inequalities and cultural sensitivities, especially when conducting research in (or with participants/ or communities from) low(er)- or middle-income countries.

14. The research is designed in such a way that risks to participants are minimised as far as possible. Researchers consider the risk of psychological or physical suffering or discomfort, and the risk of harm to social status, privacy, relationships with family and the wider community, position within the work environment and access to medical or psychosocial treatment or support. During data collection, researchers monitor this and may decide to modify or discontinue the research when they notice signs of discomfort or dissatisfaction (this is particularly important if working with vulnerable participants; see paragraph 41).

15. If research is carried out in situations or locations with potential economic, political, cultural, emotional or health risks, researchers take appropriate measures to maximise the safety, well-being and integrity of participants, researchers and other persons involved.

16. If the risks (as mentioned in paragraphs 14–15) are substantial, researchers look for alternative methods. If none can be found, the research cannot be carried out.

17. When drafting their research proposal, researchers also take into account the potential that their research methods or results could, in the future, serve unethical purposes or cause harm to persons, communities or their environment. If necessary, researchers take measures to minimise the risk of misuse of their research and results (see also paragraph 7). When reporting or publishing the research, researchers take into account the potential impact.

D. RECRUITMENT AND COMPENSATION OF PARTICIPANTS

18. Participants can be recruited in various ways (direct contact or advertising via, for example, posters, flyers, the internet or social media). Recruitment material is tailored to the target group, does not exploit sensitivities and is not misleading (for exceptions see paragraphs 49–51: deception in research). This is especially important when recruiting minor or vulnerable participants (paragraphs 32–41), and when recruiting via the internet or social media (paragraphs 61–62).

19. If schools, care institutions, employers or other organisations are involved in the research, it may be advisable to contact them in advance. In certain cases, organisations may require that their consent be sought. Researchers verify whether this is the case; if so, they provide the necessary information and obtain the required consent before approaching the target group. They subsequently conduct the research in accordance with the agreements made.

20. When recruitment takes place with the consent of, or in consultation with, organisations with which participants have a relationship of dependency (see paragraph 32), researchers ensure that participants can freely and autonomously decide whether or not to participate. Participants must not experience adverse consequences as a result of participation or refusal to participate. Paragraph 28 discusses the voluntary nature of participation in more detail.

21. Researchers may offer participants compensation for participation or reimbursement for expenses incurred. In doing so, the following principles must be respected:
    - transparency: participants are fully informed about the compensation scheme and the conditions;
    - equivalence: all participants receive equivalent compensation according to the same compensation scheme;
    - autonomy: the compensation is not a basic good or right that can only be obtained through participation in the research (for example, therapy), and the compensation scheme is not of such a nature as to encourage participants to remain involved longer than they wish;
    - proportionality: the compensation is not excessive and is proportionate to the time and effort spent and the costs incurred by the participants;
    - appropriateness: researchers do not offer compensation that is illegal (such as drugs), harmful (such as cigarettes) or otherwise inappropriate.

22. Researchers inform participants how they will be able to consult the general research results (for example, on a website) or offer to share the results with them if participants agree to be contacted for this purpose. Researchers are aware that, for this, they often need to request additional personal data such as contact details, which are normally collected and stored separately (see also paragraph 29). In addition to general research results, researchers may also share results or information about individual participation with participants, provided the participants agree. Particularly when sharing individual results, and depending on the nature of the research, researchers take into account the potential of unexpected findings (see paragraphs 68–71). In some cases, there may be substantiated reasons not to share certain results with participants, for example, when results could be used or misused in ongoing legal proceedings.

E. INFORMATION FOR PARTICIPANTS

23. Before the research, researchers identify themselves and their affiliations. They inform participants about the nature and purpose of the research and participation, about the associated elements of the research, such as analyses, publications and other uses (and possible reuse) of the research data and results, and about factors that could influence willingness to participate (such as risks, discomfort, adverse consequences, potential compensation, limitations in confidentiality or other partners involved in the research). Researchers answer all questions from participants. They inform participants that participation is voluntary and that they may refuse or discontinue participation without giving reasons (see also paragraph 28).

24. If personal data will be collected or further processed, researchers also provide participants with specific information about this (for example, the legal basis for the processing, which rights participants have and how they can exercise them, how long the data will be stored, how the data will be protected and with whom the data will be shared). This is a legal requirement (cf. the GDPR; see paragraphs 55–59, see also this research tip on transparency).

25. The information is shared with participants in understandable language, adapted to the target group, and therefore taking into account age, cultural and socioeconomic differences, linguistic barriers and educational level. The information is provided prior to the request to participate and preferably in writing (via a physical or online form). Participants must have access to the information during and after the research. In the case of a hard-copy information letter, this is, for example, separated from the consent form, or the researcher and participant each receive a copy of both documents (if they cannot be separated). When participating online, participants can download the information letter. Forms other than written are only possible if the rights and integrity of participants are not compromised. For example, the information may be provided orally when the written form would significantly reduce participants' willingness to participate, or in cases of illiteracy.

26. Researchers are obliged to provide information to participants, even if these are not authorised or unable to give consent themselves to participate in the research or to the processing of their data. See also paragraphs 32–41 on working with vulnerable participants. Deviations from the duty to inform are only possible for specific types of

research when thoroughly substantiated (see paragraphs 49–51: deception and covert research). See also paragraphs 3 and 54 concerning secondary use of (personal) data.

F. CONSENT TO PARTICIPATE IN RESEARCH

27. Before participating in research and after receiving all relevant information, participants give their consent to this participation and to the associated elements of the research ('informed consent'). For research involving participants, this consent is an ethical requirement. In certain types of research, deviation from the requirement of prior active consent to participate may be justified when sufficiently substantiated (see paragraphs 49–51: deception and covert research).

28. Consent to participate is given entirely voluntarily, based on a conscious, autonomous decision by the individual participants. Researchers, therefore, avoid any form of pressure (for example, emotional or financial). They take measures when there is a possibility that the relationship between researchers and participants, such as a dependency relationship (see paragraph 34) or even a purely friendly relationship, could influence the autonomy and voluntary nature of the decision to participate. Participants may refuse or discontinue participation at any time during the research. They must not experience any adverse consequences as a result. They do not need to substantiate their refusal or withdrawal.

29. Consent to participate must be demonstrable and traceable. If possible, it is confirmed in writing. In specific situations (for example, online questionnaires or research with participants who are unable or unwilling to provide written consent), consent may be expressed through another demonstrable and traceable action. Consent, including identification and any contact details, is collected and stored separately from the research data, where possible. Researchers ensure secure storage and keep a record of who consented, ideally for as long as the research data concerned are stored. In exceptional cases, there may be justified reasons not to keep this information, for example, when doing so may pose a risk to participants or when the research is conducted anonymously.

30. In certain situations, it may be mandatory to request renewed consent from participants, for example, when participants reach adulthood during the phase of the research in which their personal data are collected or when there is an important change in the nature or purpose of the research or in the burden or risk caused by the research. In other situations, it may be advisable to request renewed consent from participants, for example, when data are collected over a long period of time (longitudinal research).

31. If during the research, personal data are collected or processed on the legal basis of consent, additional legally required consent is necessary for each separate processing activity involving personal data (GDPR requirement; see also paragraph 56). Analogous to consent to participate (see paragraph 28), consent to the processing of personal data must also be given autonomously and voluntarily.

G. VULNERABLE PARTICIPANTS

32. The following groups are generally defined as vulnerable participants within the context of research:
    - participants in a vulnerable position (for example, refugees, migrants without legal status, sex workers, traumatised persons, dissidents or detained persons), when participation in the research exposes them to an additional risk, such as stigmatisation, discrimination, persecution, violence or (re)traumatisation;
    - participants who may be at risk because of a dependency relationship with the researchers or the organisations involved (see paragraph 20) (see also paragraph 34);
    - participants who are not competent to give consent to participate and/or who may not be able to sufficiently assess the consequences of participation in the research (for example, certain persons with cognitive impairments, participants who lack legal capacity or certain minors; see also paragraphs 35–41).

33. Researchers substantiate their wish to involve vulnerable participants in their research. When they wish to involve participants with specific vulnerabilities or participants for whom the research may have negative consequences, they familiarise themselves thoroughly with the sensitivities and potential risks and, if necessary, consult experts in the field. If required, they provide professional follow-up care to participants free of charge. If the participation of vulnerable participants is not specifically required and participation in the research could cause them harm (see paragraph 14), researchers consider whether their access to the research should be restricted. This may be a particular point of attention in, for example, openly accessible online surveys.

34. When a dependency relationship exists between participants and researchers, and participants may therefore be at risk, these participants are considered vulnerable. This may be the case, for example, when participants participate in the capacity of a student (paragraphs 45–47), a patient or an employee. When such a dependency relationship exists, researchers take the necessary measures to protect participants against perceived pressure to participate, and against potential adverse consequences of participation or of refusal or discontinuation of participation. The impact of the dependency relationship may, for example, be reduced by conducting the research anonymously or by having it conducted by other researchers.

35. Minors (persons younger than 18 years) are often considered a special group of vulnerable participants. Although young persons under 18 should not necessarily be regarded as vulnerable in every research context, their ability to assess the consequences of their participation in research may still be insufficiently developed (see paragraph 36). Researchers, therefore, explicitly substantiate the necessity of conducting research with minors. Important points of attention include the proportionality of the burden, the protection of minors and the provision of information and consent to participate, in relation to the level of understanding and decision-making capacity of the minor participants.

36. Before data collection, researchers make a carefully substantiated assessment of the ability of minor participants to provide consent to participate in the intended research after receiving the necessary information. This assessment of competence takes into account:
    - the maturity of the minors, in particular their general level of understanding and decision-making ability;
    - the nature and complexity of the research;
    - the nature of participation: short or long duration, lighter or heavier burden and whether emotional or other burden during or after participation is expected.

    Ideally, this assessment is based on the individual minor participant or, when this is not practical, at the level of groups of participants (class group, residential group, ...). When a reasonable variation in this ability is expected, researchers adapt the format and language (see paragraph 25) of the information and consent according to the subgroup of minor participants.

37. When the ability of minor participants to provide consent is assessed as sufficient, the minors give their consent; additional passive consent from a parent or guardian is acceptable (but see also paragraph 39 for an exception). Passive consent means that the parents or guardian receive all the necessary information and are asked to express any refusal or objections. If no refusal or objections are reported, researchers assume consent. Depending on the research or circumstances, additional active consent from a parent or guardian may nevertheless be desirable.

38. When the ability of minor participants to give consent is assessed as insufficient, they are considered vulnerable participants. In that case, consent is given by a parent or guardian (or, when substantiated by the researchers, by another trusted person). Minors who are unable to give this consent themselves (for example, very young children) should be provided with as much information as possible about the research and any associated risks and benefits, in proportion to their ability to understand it. If possible, they also give their own assent to participate. In certain cases, the consent of the parent(s) or guardian may be waived if the researchers can argue that this is not possible or desirable, for example, because of the nature of the research or the relationship between the minors and their parent(s) or guardian.

39. If personal data of minors are collected during the research (regardless of their age) on the legal basis of consent, additional legal consent to the processing of these personal data from a parent or guardian is required (see also paragraph 56).

40. For adult participants with cognitive impairments and participants who lack legal capacity, researchers also assess their ability to provide consent prior to the research (analogous to the assessment in paragraph 36). For adult participants who are assessed as unable to give consent to participate in the research, consent must be obtained from the legal representative (and see also paragraph 56 for the processing of personal data). In any case, participants who cannot provide this consent themselves must be provided with as much information as possible and in proportion to their ability to understand the research and any associated risks and benefits and, where possible, they also give their assent to participate.

41. Under no circumstances does the consent of a parent, guardian, other legal representative or trusted person relieve the researchers of the obligation to ensure that the (minor or adult) participants do not object to participation in the research, both prior to and during the research. Researchers respond appropriately to such verbal or non-verbal signals by alleviating discomfort, discontinuing the research and/or terminating the use of the data.

H. RESEARCH WITH STUDENTS WITHIN THE CONTEXT OF A COURSE UNIT

42. Course units may include activities with a research component, provided there is clear substantiation that these activities are necessary for acquiring one or more competencies and that this is communicated to the students in advance. In other words, students may be involved in research activities within the context of a course unit, for example, as co-researchers (paragraph 43) or as participants (paragraphs 44–47).

43. When students contribute to research as (co-)researchers within the context of a course unit, the content of this ethical code also applies to them (see paragraph 1). The lecturer or supervisor is therefore responsible for preparing the research, including a risk analysis regarding the use of personal data, the privacy and integrity of the participants and the burden placed on the students. The lecturer or supervisor limits possible risks by:
    - ensuring that the content and scope of the research correspond to the expected research capacity of the students;
    - briefing students in advance about relevant ethical points of attention;
    - supervising the students and verifying that they conduct their research activities in a sufficiently professional manner.

    Specific points of attention include, for example, recruiting participants for surveys (for example, whether or not participants may be recruited from the students' own circle of acquaintances), communicating in a professional manner and handling personal data correctly (cf. security, discretion).

44. When students participate in research as participants within the context of a course unit, this can only be regarded as a purely educational activity ('practicum') if the students' data are not processed for research purposes beyond the educational purpose of the course unit.

45. When students participate in research as participants within the context of a course unit and the lecturers or researchers wish to process the students' data beyond the educational purpose of the course unit, this is only possible under the following conditions:
    - The researchers explicitly inform the students in advance of the dual nature of the activity, namely, the pedagogical purpose (the educational activity) and the research purpose.
    - The researchers also ask the students in advance for consent to participate in the context of the research purpose (see paragraph 28). Only when this consent is obtained may the researchers use the data for research purposes. When consent is not obtained, students only participate within the educational purpose of the course unit. The researchers ensure that students do not experience any adverse consequences if they do not provide this consent (see also paragraph 28).

- The researchers also inform the students in advance that they may withdraw their consent to participate in the context of this research purpose after completion. They assure them that they will not suffer any adverse consequences as a result.
- Researchers take the necessary measures to avoid identification of the students concerned, for example, through pseudonymisation or anonymisation of the data.

46. Students may participate in research but must be considered vulnerable participants because of a dependency relationship with the researcher or lecturer (see paragraph 34) in each of the following situations:
    - the lecturer announces the research in such a way that students may feel pressure to participate in the research component;
    - the lecturer is present during data collection;
    - the lecturer has access to data from the research that may lead to the identification of the students;
    - the lecturer has access to the identity of those students who refused or withdrew consent to participate in the context of the research purpose.

    Researchers, therefore, investigate whether and how these situations can be avoided.

47. When researchers wish to process personal data of students beyond the educational purpose of the course unit, they must, in accordance with the GDPR, indicate a legal basis for the processing of students' personal data in the research (see paragraphs 55–58). Regardless of the legal basis used, researchers have the ethical obligation to always request students' consent (as described in paragraph 45).

48. A legal basis is also required when students are not participants but are nevertheless involved because their personal data are processed in covert research (see paragraphs 49–51) or because of secondary processing of their personal data (see paragraphs 3 and 54).

I. DECEPTION AND COVERT RESEARCH

49. In research involving deception, participants are deliberately given incorrect or incomplete information prior to or during the research. In covert research, the persons involved are unaware that they are the subject of a research; in such cases, they cannot usually be regarded as participants. In principle, researchers do not conduct covert research or research involving deception, as this conflicts with the fundamental principle of informed and prior consent to participate.

50. If the objectives of the research cannot be achieved without the use of deception or covert research, the necessity for this must be well substantiated. Any covert research and any research involving deception must be designed in such a way that the integrity and autonomy of participants or persons involved are protected. Researchers do not withhold information or mislead participants about important aspects that could influence their willingness to participate.

51. When using deception or covert research, researchers explain this use to the participants or the persons involved as soon as possible, preferably at the end of participation and certainly no later than the end of the data collection for the research. Subsequently, researchers request consent from the participants or persons involved to use their data based on the correct and complete information. Exceptions must be substantiated in detail.

J. PROCESSING OF PERSONAL DATA

52. Researchers collect only these personal data that are required to achieve the objectives of the research (principles of data minimisation and purpose limitation). Whenever possible, researchers work with anonymous data. If the objective of the research cannot be achieved using anonymous data, researchers may use pseudonymised personal data (see definitions in paragraph 3). Only where it can be thoroughly substantiated that these also do not allow the research objective to be achieved may researchers use non-pseudonymised ('raw') personal data. Researchers are aware that combining and analysing different datasets containing data that appear to be anonymous at first sight may result in those datasets generating personal data, precisely because of that combination or analysis.

53. Some personal data are so sensitive that they may only be processed in very specific cases. The GDPR (see paragraph 5) lists the following special categories of personal data: data relating to race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric and health data and data concerning a person's sex behaviour or sexual orientation. The GDPR also protects data concerning criminal convictions and criminal offences. Further explanation and examples are provided in this research tip on special categories of personal data. When researchers process one of these categories of sensitive personal data, increased protection of those personal data is required. In addition to the categories defined in the GDPR, (personal) data may sometimes be considered sensitive because of the research context (for example, research on job satisfaction within a company where there is a risk that the employer could obtain the data).

54. The GDPR defines the concept of 'processing' of personal data very broadly. Examples include collecting, recording, analysing, storing, updating, consulting, publishing and sharing. Processing includes both primary use and secondary use (or reuse) of personal data (see definitions in paragraph 3). This research tip on research involving secondary processing of personal data offers important recommendations.

55. Any processing of personal data is lawful (cf. the GDPR) only when it is based on a legal basis or 'legal ground'. Researchers are transparent with participants about the legal ground and about all processing of personal data (see also paragraph 24).

56. Researchers preferably use consent as the legal ground for processing personal data. The legal ground of consent gives participants or other persons involved (data subjects) whose personal data are used maximum control over the processing of their personal data, as they can decide for themselves whether or not to have their personal data

processed. Consent as a legal ground is valid only if given voluntarily and by an active action prior to processing. Consent is therefore not considered voluntary when a dependency relationship exists between the participant and the researcher, for example, in the relationship between student and lecturer or between employee and employer (see paragraphs 34 and 46). Consent to the processing of personal data must not be confused with consent to participate in research, which is relevant in research involving participants (paragraphs 27 and 31).

57. Processing of personal data in research may also be based on a legal ground other than consent, namely:
    - the legal ground 'public interest' (when the processing is necessary for the performance of a task carried out in the public interest), or
    - the legal ground 'legitimate interest' (when the processing is necessary for the purposes of the legitimate interests pursued by the institution or organisation or by a third party).

58. For a legal ground to be valid, it must meet several conditions (see this research tip on legal grounds under the GDPR). Furthermore, the legal ground also affects which rights the persons involved may or may not exercise, for example, the right to access, rectification or be forgotten (see this research tip on these rights). For these reasons, the choice of legal ground must be made only after careful consideration by the researchers.

59. Researchers handle the personal data they process in a confidential manner. They take the necessary measures to guarantee the confidentiality and integrity of the personal data during and after the research, as well as when publishing results or potentially sharing personal data. Measures include, for example, anonymisation or pseudonymisation, ensuring secure storage and limiting access to personal data. There is a research tip on anonymisation, pseudonymisation and encryption, and there are university-wide guidelines on research data management.

60. Under the GDPR, every research project that processes personal data must be registered in the Ghent University register of processing activities. Instructions can be found in this research tip on GDPR registration.

K. RESEARCH USING THE INTERNET AND SOCIAL MEDIA

61. Research using the internet, social media or other online forums or platforms, for example, to recruit participants or to collect or reuse online or social media data, is subject to the same ethical principles and legal provisions as any other research involving participants and personal data. However, such research may present additional challenges.

62. In research involving participants via the internet or social media, researchers typically have no physical contact with the participants. This makes it more difficult for the researchers to ensure that all necessary information (as described in paragraph 23) has been received and understood by participants. This may influence the participants' decision (whether or not) to give consent, both to participate in the research and to the

processing of personal data. This is a particular point of attention when research involves (potentially) vulnerable participants.

63. In research that uses data from online sources, researchers acknowledge that not all information openly available in such online sources should be considered public. Users of social media platforms or online forums are not always aware of the potentially public nature of their data. The content of, for example, non-protected social media accounts or online forums is not necessarily intended for a general public and for any possible use. The mere fact that online data are publicly available does not, therefore, imply consent from the persons involved to their use (see also paragraphs 55–58 when personal data are involved). More information can be found in this research tip on the use of social media.

L. USE OF ARTIFICIAL INTELLIGENCE AND OTHER EMERGING TECHNOLOGIES

64. The use of artificial intelligence (AI) in research may relate to:
    - the application of AI systems during and in support of the research process, or
    - the development of new AI technology within or through the research process.

    Other emerging technologies, often linked to AI, include, for example, collecting data from participants or other persons involved through tracking and the automatic profiling (evaluating, analysing or predicting) of personal data. This research tip on profiling and exclusively automated decision-making in relation to the GDPR provides further information.

65. Researchers are aware of the risk that AI and other emerging technologies may influence or replace human decision-making in undesirable ways, for example, when making decisions, predictions or recommendations. Article 14 of the European Regulation on AI emphasises the importance of human oversight in high-risk AI systems. Researchers are responsible for the decision-making of AI systems and are accountable for the underlying processes and the control of outcomes. In any use of AI and other emerging technologies, special attention is required when personal data are used in developing the technology or when the intended technology may be applied to persons or their data. Researchers reflect on the potential risks to which participants and other persons involved may be exposed.

66. When applying or developing AI technology, researchers strive for maximum transparency and traceability regarding how data are collected and used and regarding where and how AI systems are involved in the research process. Researchers also ensure that the AI systems used or developed comply with legal and ethical requirements and that the technology protects personal data and the integrity of all persons involved throughout the entire lifecycle of the system. There is a risk that certain biases may exist in the data used to train an AI application or in the way an AI technology is developed. The subsequent application of an AI technology must also not result in persons or groups being stigmatised or discriminated against (see also paragraph 17).

67. The very rapid evolution of new technologies such as AI implies that potential risks, as well as ethical frameworks and guidelines, are also evolving rapidly. In addition to the GDPR, which applies to these technologies, the European Regulation on AI is the most important legislative framework in this regard. Researchers who use AI or other emerging

technologies ensure that they are sufficiently familiar with all applicable frameworks and guidelines. Information and practical tips can be found in this research tip on personal data and AI.

M. UNEXPECTED FINDINGS

68. Sometimes research produces information that researchers were not looking for and that falls outside the purpose of the research. Unexpected findings may be sensitive in nature. For example, they may indicate a concerning medical or psychological situation, depressive or suicidal thoughts, bullying behaviour, domestic violence, abuse or human trafficking or other criminal activities. Unexpected findings are also not necessarily limited to the participants or persons to whom the research initially relates.

69. When designing the research, researchers analyse whether, because of the target population or the nature of the research, there is a reasonable possibility of unexpected findings that may require action. If this is the case, they consider how to anticipate this. Examples of proactive measures include conducting a risk analysis beforehand and developing an intervention plan. In some cases, collaboration with persons or institutions that can provide participants with support and treatment is recommended.

70. When planning research that has a reasonable chance of serious unexpected findings (for example, concerning the physical or mental health of participants), researchers anticipate this by asking participants at the start of the research for consent to inform them about such findings (see also paragraph 22).

71. Researchers consider, on ethical grounds, how to handle serious findings, such as when it appears that participants may pose a danger to themselves or others. In some situations, researchers may be legally obliged to share certain personal data or other confidential information, for example, with parents or guardians or with child protection services or the police. For example, in Belgium, the duty to assist is laid down in Articles 299 to 304 of the Belgian Criminal Code of 2024 on culpable negligence. Researchers are also aware that there may be a legal obligation to report serious crimes; in Belgium, this is laid down in Article 30 of the Belgian Code of Criminal Procedure. In such situations, it is often advisable to inform participants in advance about these obligations and the associated limits of confidentiality.