



# PRO-RES

## PROMoting ethics and integrity in non-medical REsearch

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## VERSION LOG

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<b>0.1</b>	13/08/2021	Grace Carter	Summary of the roundtable on AI
<b>0.2</b>	21/09/2021	Theodora Famprikezi	Summary of the Sixty Minute Briefing and the roundtable on journalism
<b>0.3</b>	16/10/2021	Marialena Pantazi	Summary of the Final Online Conference
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## EXECUTIVE SUMMARY

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During the 2019-2021 period, the covid-19 pandemic made in-person meetings impractical. The PRO-RES project had planned a major final conference event to take place at the end of the project (Sept/Oct 2021). However, after examining attendance records in the months prior to the period and taking in to account the uncertainty regarding travel restrictions in Europe at the time, it was decided to change the meeting from a physical meeting to a series of events, hoping to increase participation (albeit online) and thus increase dissemination opportunities. This was also taken into consideration in a project amendment. This document (Deliverable 2.5) reports on these events.

Between June and September 2021, the European Policy Centre (EPC), in cooperation with the other members of the PRO-RES consortium organised a series of events to discuss and disseminate the results of the project. This events series included two public events – a Sixty Minute Briefing and the Final Online Conference – as well as two expert roundtables. Due to the COVID-19 situation, all events took place online. The series brought together 21 speakers and more than 200 participants to discuss the PRO-RES framework. The dissemination only also made it possible that more than 130 additional people watched the two public events afterwards.

Whereas all events discussed the framework from a specific angle, the issue of misinformation and disinformation as challenge for evidence-based policymaking was discussed implicitly or explicitly in all events of the final event series – and thus function as a red thread, a crucial challenge for policymaking in the current environment. In more detail, the following events took place as part of the series:

On 3 June 2021, an online roundtable discussed the key challenges that researchers identify regarding accessing data and monitoring it for bias and misinformation. It discussed how more transparency in AI could give way to data and monitoring for bias and misinformation and thus contribute to more transparency and ethical policy advice and policies.

On 7 July, an online Sixty Minute Briefing discussed the critical need for decision-makers dealing with the COVID-19 crisis to be informed with evidence-based and ethically conducted policy advice from experts and researchers. The conversation took stock of the link between public trust and evidence-based policy making and the role of scientific advice in shaping covid response.

On 14 September, an online roundtable took stock of the link between public trust and evidence-based policymaking. It covered the important role of journalists in translating research for policymakers and generating policies. An important point made throughout the discussion was that policy evidence should inform policymaking, otherwise there is the risk of serious cultural and structural damages.

On 21, the Final Conference marked the final public event of the PRO-RES project, and presented and discussed its project outcome, also in the broader context of the current crisis. In doing so, it will touch upon the challenges of providing advice for policymakers during COVID-19 and the road ahead for evidence-based policymaking in an era of seemingly permanent crisis. During the first session Prof Nicole Grobert, Chair of the Group of Chief Scientific Advisors to the European Commission, underlined the importance of trust building in evidence-based policymaking, especially during a crisis. She mentioned that the uncertainty that is created in times of crisis can be dealt with mutual understanding and there is no one-size-fits all approach. In the second panel of discussion, the attention moved towards the STEP Accord, the reasons why this project was undertaken, its impact and its final outcomes. The speakers covered the topic from the perspective of the European Commission, academia, and the publishing sector. Finally, the third session focused on the next steps, the practical implementation of the framework.

Overall, Final Events Series was a successful and important milestone for the PRO-RES project. The event series enabled the project to present and discuss the project and its framework to a large group of stakeholders. Participants and speakers alike found that the PRO-RES framework constitutes a key document that comprises key principles of ethical research and policy advice in all policy areas discussed during the series. However, focus should now be on implementation of the principles in the different disciplines and at institutional level. What is needed is the continuous engagement with the project also beyond October 2021.

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## 1. INTRODUCTION

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The Final Events Series took place between June and September 2021. As such, it concluded the PRO-RES project event efforts. Due to the restrictions connected to the COVID-19 pandemic, however, all events could only take place online. Also the concept of the final event had to be adapted – from a single final conference to a series of online events – public and closed door. Despite COVID-19, this procedure could maintain and even increase visibility of the project: 204 participants followed the events and 134 additional views were created through the recordings of the public events on YouTube.

Hence, the project organised four events, two public and two closed-door debates, in the course of the series:

- An Online Roundtable on Ethics and Artificial Intelligence: Addressing bias in AI datasets? (3 June)
- An Sixty Minute Briefing on Public trust and evidence-based policymaking: Lessons from the COVID-19 response (7 July)
- An Online Roundtable on responsible journalism (14 September)
- The Final Online Conference (21 September)

This report captures the output of the final events series which presented and discussed the final PRO-RES framework with policymakers, experts, academics, think tankers, civil society and other stakeholders. It will outline the series' concept and give an overview over each part of the events series – in terms of organisation, participation, and content. A final chapter will summarise the findings and formulate next steps.

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## 2. CONCEPT – FINAL EVENTS SERIES

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As the COVID-19 situation made it clearer and clearer that the final conference cannot take place as planned in a physical form, the European Policy Centre, in coordination with ESF and the consortium, developed the plan to organise an online event series instead of a single conference. This event series should present the final Accord statement, and discuss it with stakeholders and policymakers, each dedicated to one specific subject. Misinformation and disinformation should form a common thread for this series.

### 2.1 RED THREAD – MISINFORMATION IN POLICYMAKING

In recent years, mis- and dis-information have been frequently present in the political discourse. The rise of social media led to an abundance of online disinformation in the form of fake news – a topic that entered the public debate especially after the US Presidential election in 2016.

However, whereas disinformation – which implies “an intentional, malicious attempt to mislead” – reached the centre of the political agenda, the impact of misinformation, which refers to “material that is simply erroneous, for example due to error or ignorance”,<sup>1</sup> in politics has hardly sparked attention. Still, both disinformation and misinformation can have a huge impact on policymaking, as the current Coronavirus crisis has shown once again. Particularly during an unprecedented crisis like COVID-19, real time analysis is essential for a successful crisis response. Real time policy-advice can thus potentially have a huge impact on policy makers, which is why ethically conducted analysis and the countering of misinformed policy advice in this context becomes even more crucial.

But misinformation in policy advice is not restricted to the COVID-19 context. In the end, misinformation boils down to a lack of accuracy or the presence of bias in research and analysis. This can become relevant for any kind of research which seeks to influence decision making, but the topic is especially salient when it comes to real time analysis and policy advice, for example in the context of journalistic or non-academic research.

The issue of misinformation and disinformation as challenge for evidence-based policymaking therefore were discussed implicitly or explicitly in all events of the final event series – and thus functioned as a red thread, a crucial challenge for policymaking in the current environment.

### 2.2 FORMAT

Instead of one physical Final Conference, as initially planned, the EPC followed a more diversified approach, as the Coronavirus pandemic prevented the consortium from organising big physical events: a Final Online Conference – in shortened form – was complemented by a portfolio of public and closed-door events. Whereas the default planning was to hold all these events online, the organisers hoped that at least smaller workshops could take place in person, if the situation improves. This plan had to be abandoned as it became clearer in spring, that this would not yet be possible.

The new elements included the following types of events:

- A public online event: The public event should take place online in form of a **60 Minute Briefings**. This briefing would feature one or two high level speakers from the EU institutions or other stakeholders, e.g. a Commissioner, a Director General or a Member of the European Parliament. The event should start with a brief presentation of the project and the Accord statement. The main speakers would then

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<sup>1</sup> Butcher, Paul (2019) [Disinformation and democracy: The home front in the information war](#), Brussels: EPC, p. 3.

be tasked to address a particular issue connected to misinformation and ethical policy advice, followed by an interactive discussion with the moderator and a Q&A with the online audience.

- Small roundtable discussions: Two small-scale **roundtable discussions** should present and discuss the framework and its importance for policymaking in times of misinformation with a selected group of high-level policymakers and stakeholders. The small scale of a maximum of 35 participants and the Chatham House Rule would allow for a frank and interactive discussion. The event was planned to start with an introduction of the PRO-RES project, followed by presentations from representatives of one of the relevant European institutions and of relevant experts and an exchange of views and a discussion among participants.
- The **Final Online Conference** should present the final framework to stakeholders, policy makers, funding agencies and public figures and thus bring the project to a formal end. A senior policymaker or advisor was planned to open the Conference with a keynote address on misinformation and policy advice in the COVID-19 context. Afterwards, the PRO-RES consortium would present the results of the project. A final dialogue with the participants on the validity of the framework and the way ahead was planned to close the event.

The EPC, in cooperation with the entire consortium therefore organised the following events as part of the final events series:

Event	Speakers
Online Roundtable, 3 June <b>Ethics and Artificial Intelligence: Addressing bias in AI datasets?</b>	<ul style="list-style-type: none"> <li>• Eva Kaili, MEP</li> <li>• Matthias Spielkamp, Director, AlgorithmWatch</li> <li>• Caroline Gans Combe, Associate Professor, INSEEC U</li> <li>• Andreas Aktoudianakis, Policy Analyst, EPC (moderator)</li> </ul>
Sixty Minute Briefing, 7 July <b>Public trust and evidence-based policymaking: Lessons from the COVID-19 response</b>	<ul style="list-style-type: none"> <li>• Lene Næsager, Director for Strategy and Corporate Communication, European Commission</li> <li>• Dónal O'Mathúna, Associate Professor, Ohio State University; Founding Director, Center for Disaster and Humanitarian Ethics</li> <li>• Johannes Greubel, Policy Analyst, EPC (moderator)</li> </ul>
Online Roundtable, 14 September <b>Responsible journalism</b>	<ul style="list-style-type: none"> <li>• Claire O'Connell, Health Reporter, Irish Times</li> <li>• Deborah Cohen, Health Correspondent, BBC Newsnight</li> <li>• Johannes Greubel, EPC Policy Analyst</li> <li>• Dónal O'Mathúna, Associate Professor, Ohio State University, Founding Director, Center for Disaster and Humanitarian Ethics (moderator)</li> </ul>
21 September <b>Online Final Conference</b>	<ul style="list-style-type: none"> <li>• Prof Nicole Grobert, Chair of the Group of Chief Scientific Advisors to the European Commission</li> <li>• David Mair, Head of Unit Knowledge for Policy, Joint Research Centre, European Commission</li> <li>• Roger Casale, Executive Director, New Europeans</li> <li>• Dr Gabi Lombardo, Director, European Alliance of Social Sciences</li> <li>• Dr Fabian Zuleeg, Chief Executive, European Policy Centre</li> <li>• Dr Emmanuel Detsis, Science Officer- European Science Foundation</li> <li>• Yves Dumont, Policy Officer (DG RTD), European Commission</li> <li>• Dr Su-Ming Khoo, Senior Lecturer- National University of Ireland, Galway</li> <li>• Dr Sabina Alam, Director of Publishing Ethics and Integrity-Taylor and Francis Group</li> <li>• Jacki Davis, Meade Davis Communications (moderator)</li> </ul>



### 3. SUMMARY OF THE ROUNDTABLE ON ETHICS AND AI

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**Title:** Ethics and Artificial Intelligence: Addressing Bias in AI Datasets?

**Date:** Thursday 3 June 2021, 14.00-15.30

**Type:** Online Roundtable

**Participation:** 39 policymakers and experts (personal invitations)

#### Speakers

- **Caroline Gans Combe**, Associate Professor, INSEEC U
- **Eva Kaili**, Member of the European Parliament
- **Matthias Spielkamp**, Executive Director, AlgorithmWatch
- **Andreas Aktoudianakis**, Policy Analyst, European Policy Centre

#### 3.1 CONCEPT

The European Commission unveiled its proposal last April for the regulation of Artificial Intelligence applications in the EU, introducing a number of important safeguards for a balanced approach to AI. However, there are still important concerns about the quality of data that is used for training AI in making observations that can inform policy. Data that contains inaccuracies could allow room for cognitive bias and undermine effective evidence-based policymaking.

Addressing these gaps will be key to ensuring that researchers, and other actors such as civil society, can cross-monitor datasets for bias and misinformation. Otherwise, replicating bias in our world into the world of AI could be catastrophic, and an obstacle to a smooth digital transition for the EU.

This roundtable discussion discussed the key challenges that researchers and other stakeholders identify in their work with regard to accessing important data and monitoring it for bias and misinformation. The event debates how more transparency in AI could give way to data and monitoring for bias and misinformation, and thus contribute to more transparent and ethical policy advice and policies. In doing so, it presented the results of the PRO-RES project in view of Artificial Intelligence. The goal was to allow for a frank and open discussion after input from project partners and policymakers

#### 3.2 ORGANISATION & PROMOTION

To start the organisation of the event in practical terms, the EPC, after having agreed on the concept, approached possible speakers that could contribute to this event. The goal was to strike a balance between project-internal and external views on the matter discussed. To do so, the consortium agreed that Caroline Gans Combe would participate as speaker to give an overview over the outcome of the PRO-RES project in the context of AI. Eva Kaili and Matthias Spielkamp were contacted to provide external views. Johannes Greubel and Andreas Aktoudianakis, both EPC, would introduce and moderate the discussion. Technical equipment and event platform (Zoom) were handled by the EPC.

For the event promotion, EPC sent out personalised invitations to a selected group of stakeholders and policymakers. Two broad categories of invitees can be distinguished here. First, those stakeholders working on AI that have been part of the PRO-RES project before, participated in previous events or contributed to the design of the framework or other activities. Second, the organisers spend considerable efforts to broaden the promotion of the event, by an additional screening exercise that identified policymakers in the European institutions and beyond, as well as experts that have not yet been in touch with the PRO-RES project.

These efforts led to great interest in this event, so that 39 representatives from European and national institutions as well as the expert community participated in the event.

### 3.3 SUMMARY

This online roundtable discussed the key challenges that researchers identify regarding accessing data and monitoring it for bias and misinformation. It discussed how more transparency in AI could give way to data and monitoring for bias and misinformation and thus contribute to more transparency and ethical policy advice and policies.

After the introduction of the PRO-RES project to all participants, speakers kicked off the event with their input.<sup>2</sup> They highlighted the importance of the issue, as bias in AI can lead to increased inequalities, an aspect that must be strongly avoided in the development of AI. At the same time, however, it is important to find the adequate balance as it is not helpful if AI datasets are compromised so much that one cannot benefit from the potential of this technology. Already now, the development of AI has led to challenges that we have and have not expected, so what is needed is smart regulation to have human-centric AI. Three main issues for the future were pointed out: First, 'super-intelligence, as seen in science fiction, could be as short as 30 years away and it should be ensured by decisionmakers that there is regulation to manage this. Secondly, the risk to jobs needs to be assessed as well. Finally, whilst AI can draw conclusions, it is still not immune from human bias from those collecting data. What is needed are methodologies to prevent this from becoming a reality.

Another speaker underlined deep concern that AI models will make decisions for humans. The bias framework within the EU Commission proposal is quite problematic, particularly regarding facial recognition, the speaker emphasised. Another challenging aspect of the proposal could be the ability to use facial recognition for surveillance – this could be problematic as the risk for bias in these technologies is still too big.

With respect to the PRO-RES project and its link to Artificial Intelligence it was pointed out that the flexibility of the PRO-RES guidance framework is malleable and adaptable to accommodate current and future research, including AI. Speakers emphasised that PRO-RES is not only about ethics in research but also how ethical conducts can be promoted through research activities considering societal and technological evolution. In this context, three needs within for ethical AI were pointed out: (1) to reshape GDPR to protect data owners (which the AI proposal does not); (2) to reassess the pillars of research design considering technologies; (3) to reconsider researchers safeguards including best practices and peer accepted waivers with unforeseen usage.

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<sup>2</sup> The following section will respect the Chatham House Rule, which was basis of this event.

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## 4. SUMMARY OF THE SIXTY MINUTE BRIEFING ON PUBLIC TRUST AND EVIDENCE-BASED POLICYMAKING

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**Title:** Public Trust and Evidence-based Policymaking – Lessons from the COVID-19 Response

**Date:** Wednesday 7 July 2021, 11.30-12.30 (CEST)

**Type:** Sixty Minute Briefing

**Participation:** 56 (live) + 74 (via the [YouTube recording](#))

### Speakers

- **Lene Næsager**, Director for Strategy and Corporate Communication, European Commission
- **Dónal O'Mathúna**, Associate Professor, Ohio State University; Founding Director, Center for Disaster and Humanitarian Ethics
- **Johannes Greubel**, Policy Analyst, European Policy Centre (Moderator)

### 4.1 CONCEPT

COVID-19 has confronted European, national and regional decision-makers with the need to react in a fast and effective way to an unprecedented and unpredictable crisis situation. Evidence-based and ethically conducted policy advice from experts has been critical for decision-makers to manage this crisis. Conversely, misinformation has aggravated the situation and public trust in the governments' COVID-19 response suffered with restrictions enduring for months. Moreover trust in the vaccines, especially towards certain vaccine types, is lagging among parts of the EU's population.

This Sixty Minute Briefing picked up on these themes and drew lessons learned from the crisis response so far. It discusses the role of scientific and policy advice in shaping the EU's and national COVID-19 responses, how to avoid misinformed decision-making and how to foster public trust in the decisions taken during crisis management. It also built on the findings the PRO-RES project and to disseminate them to a broader audience.

### 4.2 ORGANISATION & PROMOTION

Again, the goal was to represent a project-internal and external voice on the panel, which would be moderated by a representative of the EPC. Dónal O'Mathúna, who has worked on this topic for the past years in several capacities agreed to speak on behalf of the project. Furthermore, Lene Næsager, Director in the Commission's Directorate-General on Communications represented the institutions in this event. Technical equipment and event platform (Zoom) were handled by the EPC.

To promote the event, the EPC used its database of contacts and stakeholders to disseminate the event. Invitations were also sent to PRO-RES stakeholders and consortium partners shared the event with their contacts. The event was also promoted via the EPC account and the PRO-RES account on social media, especially on Twitter. After the event, the recording was shared via YouTube and social media, which has been watched 74 times so far.

### 4.3 SUMMARY

This online Sixty Minute Briefing discussed the critical need for decision-makers dealing with the COVID-19 crisis to be informed with evidence-based and ethically conducted policy advice from experts and

researchers. The conversation took stock of the link between public trust and evidence-based policy making and the role of scientific advice in shaping covid response.

Johannes Greubel introduced the PRO-RES project highlighting its goal to 'encourage policymakers and their advisors to seek evidence for their decisions from research that has been conducted both ethically and with integrity'. He emphasised that ethics, policy, and quality go hand in hand and explained the PRO-RES framework and its three elements: the accord, a toolbox, and resources.

Turning to the discussion on public trust and evidence-based policymaking, Lene Næsager emphasised the important role of the European Commission's approach to Corona crisis management, including the Recovery Plan in restoring trust. She also highlighted the work of the Commission's taskforce against disinformation.

Dónal O'Mathúna, when asked by Johannes Greubel about the challenges in situations where evidence is changing constantly and how this challenge the PRO-RES might contribute to the solution of this challenge, referred to the very important role of the researchers in two areas. Firstly, the research itself. He drew examples from the roadmap of research published in March 2020 by the WHO, highlighting also the moral responsibility researchers have to respond accurately and quickly. Secondly, the responsibility to communicate. It is a moral obligation of the those who understand the details of issues such as vaccines, to communicate the information accurately and transparently.

Later, Næsager emphasised that attempts to suppress disinformation bring the risk of further spreading it. One of the good practices followed by the Commission, she mentioned, is mapping and presenting clear facts on the media. O'Mathuna highlighted that the public tends to trust specific people rather than figures and data. Such relations of trust could be built between the public and healthcare professionals or public officials, but it is now challenging to establish those trust bonds given that people tend to navigate towards stories rather than hard facts. He underlined that a core part of this process is the need to keep the communication open and not shut it down.

One participant raised the issue of how to deal with data voids, which can easily be exploited by disinformation actors; Should researchers and policymakers more openly communicate what is known and what is not known, while preventing other from trying to fill these gaps with wrong or misleading information? O'Mathuna responded that indeed, in line with the PRO-RES project, the focus should be on clear and transparent communication. Næsager agreed and replied that this is a challenge for the EU as a communicator.

The discussion showed that PRO-RES, although not designed for crisis situations such as COVID-19 introduces tools and principles that are also applicable in these situations. The importance of evidence-based decision-making became clearer in the past months, and so did the issue of transparency and clear communication and information. In a broader sense, the event fundamentally contributed to promoting PRO-RES within the institutions and the broader public.

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## 5. SUMMARY OF THE ROUNDTABLE ON RESPONSIBLE JOURNALISM

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**Title:** Responsible Journalism in the Age of Misinformation

**Date:** Tuesday 14 September 2021, 11.30-13.00 (CEST)

**Type:** Online Roundtable

**Participation:** 37 journalists, policymakers, civil society representatives and experts (personal invitations)

### Speakers

- **Claire O’Connell**, Health Reporter, Irish Times
- **Deborah Cohen**, Health Correspondent, BBC Newsnight
- **Johannes Greubel**, EPC Policy Analyst
- **Dónal O’Mathúna**, Associate Professor, Ohio State University, Founding Director, Center for Disaster and Humanitarian Ethics (Moderator)

### 5.1 CONCEPT

Journalistic reporting plays an essential role in informing the public and policymakers alike, and therefore in ensuring that public discourse, and ultimately also policymaking, are based on facts. Crises like the COVID-19 pandemic, furthermore, show the important role of journalists in mediating between research and the public. In the age of disinformation and with public discourse increasingly moving online, responsible journalism meets entirely new challenges. What steps can journalists take to preserve ethical standards in reporting? How to counter disinformation to ensure accurate reporting which informs policymaking and public opinion? Which role can the PRO-RES framework play in this context and which value could it bring for journalists? The roundtable discussed these and other questions with participants from EU institutions, journalists, and other stakeholders.

### 5.2 ORGANISATION & PROMOTION

The event was co-organised with Donal O’Mathúna. With his help and that of other consortium members, the organisers could secure two journalists as speakers who have worked on ethical reporting as well as the translation between research and journalism. Technical equipment, the invitation process, and event platform (Zoom) were handled by the EPC.

For the event promotion, EPC again sent out personalised invitations to a selected group of journalists, experts and policymakers. The organisers made use of the extensive list of contacts, PRO-RES assembled in the course of the project. EPC also made use of its own database of (mainly) Brussels-based journalists. Finally, the organisers carried out an additional screening exercise that identified policymakers in the European institutions and beyond, as well as experts that have not yet been in touch with the PRO-RES project.

These efforts led to 37 journalists, policymakers, civil society representatives, and experts participating in the roundtable.

### 5.3 SUMMARY

Johannes Greubel introduced the PRO-RES project highlighting its goal to ‘encourage policymakers and their advisors to seek evidence for their decisions from research that has been conducted both ethically and with integrity. He emphasised that ethics, policy, and quality go hand in hand and explained the PRO-RES framework and its three elements: an accord, a toolbox, and resources.

The event included the following main lines of discussion.<sup>3</sup> One speaker referred to the challenge of reporting on health areas during a global pandemic and the lack of the peer reviewing process. The speaker emphasised the complexity of the situation and the difficulty to communicate the science to the general public. Another speaker focused on the process of science. The speaker pointed out the complexity of issues like healthcare and the need to adapt the message accordingly as evidence evolves.

Several participants agreed with the speakers' messages, including the level of uncertainty in reporting health news during the pandemic. It was emphasised that in some instances during a crisis like the present COVID-19 pandemic, journalists need to report and politicians implement policies before having definitive evidence. Transparency is key here – an aspect that is also highlighted by the PRO-RES project.

With respect to the PRO-RES project, the importance of training and capacity building for researchers and journalist was emphasised. It was added that the goal of PRO-RES is especially to provide recommendations, applicable for policy-makers and their advisers – a process where many overlaps with journalistic research can be observed.

On the issue of trust, speakers agreed that expertise plays a vital role and stressed the importance of getting experts who can think about the limitations of research, a key part of the reviewing process. Other participants pointed out the challenge of trust between European institutions and media, and the importance of validating content. He suggested we need to build new ground with institutions.

Another problem that was mentioned is a division which can be observed within press in the context of political polarisation. The participant emphasised the difficulty to maintain trust in these circumstances, especially when the press is partisan.

Other participants outlined the importance of reaching out to groups working to support ethical journalism, international associations, and anyone working on tackling disinformation. One speaker mentioned three main problems for journalists: The lack of resources, role and responsibility of technology (unregulated Social Media with no ethical values), and the third one being a heavily biased political world. It was mentioned that PRO-RES constitutes a major step towards setting standards for research and journalists alike, but more steps need to follow to implement these guidelines in several circumstances. This includes especially capacity building, but also the elaboration separate tools drawing on the PRO-RES principles, for example for journalists and journalistic training, which can provide more concrete guidance. In this context, a participant underlined the importance of teaching younger generations about the ethics of journalism – and PRO-RES could contribute here considerably.

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<sup>3</sup> The following section will respect the Chatham House Rule, which was basis of this event.

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## 6. SUMMARY OF THE FINAL CONFERENCE OF THE PRO-RES PROJECT

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**Title:** Responsible policy advice in times of permanent crisis-what role for the PRO-RES framework?

**Date:** Tuesday 21 September 2021, 10.00-12.30 (CEST)

**Type:** Final Online Conference

**Participation:** 77 (live) + 60 (via the [YouTube recording](#))

### 6.1 CONCEPT

The EU has faced a multitude of crises over the past 15 years, including the 2008 financial crisis, the refugee crisis, and the looming climate emergency. The COVID-19 pandemic, like the crises that came before, required the knowledge and experience of experts and researchers to navigate the uncertainties of lockdowns and vaccines. The pandemic has underlined, once again, how crucial it is for policy-making in times of crisis to be based on the highest standards of research ethics and scientific integrity, not least to combat the risk of misinformation that could undermine an effective response. This raises the question: how can we ensure that policy-making is based on accurate, unbiased research and analysis?

This conference marked the final public event of the PRO-RES project, and presented and discussed its project outcome, also in the broader context of the current crisis. In doing so, it touched upon the challenges of providing advice for policy-makers during COVID-19 and the road ahead for evidence-based policy-making in an era of seemingly permanent crisis.

The event started with a keynote, setting the stage and embedding the project into current challenges, followed by a short Q&A. Following this first session, the project leaders introduced the audience to the final PRO-RES framework and gave an overview over the project activities of the last years. This framework was then be discussed by three respondents, providing a view from their particular backgrounds. These respondents came from three different backgrounds, a policymaker, an academic and a publisher. Finally, a panel discussion discussed challenges and next steps for the PRO-RES framework and its application.

### 6.2 ORGANISATION & PROMOTION

Organisers started the preparation for the Final Online Conference in May, with several internal meetings and discussions with consortium members upon the implementation of the concept. The EPC team took the lead over the overall organisation of this conference, in close contact with the project lead. In order to ensure a consecutive and professional moderation of the event, the project engaged an experienced professional moderator with the facilitation of the online event. Technical support was provided by the EPC events staff.

Speaking invitations were sent out in July to a range of speakers, in close coordination with the moderator, Jacki Davis. For the keynote address, EPC managed to confirm Prof Nicole Grobert, Chair of the Group of Chief Scientific Advisors to the European Commission. In a coordination meeting with her staff, the topic of her keynote was discussed and agreed upon.

For session two, Yves Dumont, Policy Officer at DG Research and Innovation of the European Commission confirmed to act as a first respondent to the project presentation. Dr Su-Ming Khoo, Senior Lecturer at the National University of Ireland, Galway and Dr Sabina Alam, Director of Publishing Ethics and Integrity at the Taylor and Francis Group who both already provided valuable feedback to project in previous stages of the project complemented the respondents.

The final session should then reflect both internal and external views on the next steps. Gabi Lombardo and Fabian Zuleeg agreed to talk about the project and their specific priorities next steps, this providing internal perspectives. Roger Casale, Executive Director of the Civil Society organisation New Europeans and David Mair, Head of Unit Knowledge for Policy at the Commission's Joint Research Centre agreed to provide external views.

Speakers were briefed extensively before the event, with a briefing note and moderation grid provided by moderator Jacki Davis. The following agenda emerged from this setup:

Time	Agenda
10.00	<p><b>SESSION 1: Keynote on Evidence-based policymaking &amp; advice during COVID-19</b></p> <ul style="list-style-type: none"> <li>• <b>Prof Nicole Grobert</b>, Chair of the Group of Chief Scientific Advisors to the European Commission</li> </ul> <p><i>Followed by a Q&amp;A with the moderator &amp; audience</i></p>
10.20	<p><b>SESSION 2: Presentation of the STEP Accord</b></p> <ul style="list-style-type: none"> <li>• <b>Dr Emmanuel Detsis</b>, Science Officer, European Science Foundation</li> </ul> <p><b>Reactions from</b></p> <ul style="list-style-type: none"> <li>• <b>Yves Dumont</b>, Policy Officer (DG RTD), European Commission</li> <li>• <b>Dr Su-Ming Khoo</b>, Senior Lecturer, National University of Ireland, Galway</li> <li>• <b>Dr Sabina Alam</b>, Director of Publishing Ethics &amp; Integrity, Taylor &amp; Francis Group</li> </ul> <p><i>Open debate</i></p>
11.15	<b>Virtual coffee break</b>
11.30	<p><b>SESSION 3: Panel discussion: Evidence-based policymaking &amp; advice – the road ahead</b></p> <ul style="list-style-type: none"> <li>• <b>David Mair</b>, Head of Unit Knowledge for Policy, Joint Research Centre, European Commission</li> <li>• <b>Roger Casale</b>, Executive Director, New Europeans</li> <li>• <b>Dr Gabi Lombardo</b>, Director, European Alliance of Social Sciences</li> <li>• <b>Dr Fabian Zuleeg</b>, Chief Executive, European Policy Centre</li> </ul>
12.30	<b>End</b>

As for previous events, the promotion strategy for the final conference was based on a number of different channels. The PRO-RES website as well as several partner websites advertised for the series. The EPC also sent personalised emails to participants of previous events of the final events series as well as a mailing to stakeholders that were identified in previous phases of the project. Several consortium partners shared the invitation via their databases and networks.

Finally a social media campaign promoted the event on Twitter and LinkedIn. Led by the EPC, several partners coordinated a joint communication approach to promote the event. This also included coordination with communication departments of the European Commission. To this end, the [EPC produced an advertising banner](#) to define a joint messaging around the event. Several partners and the PRO-RES Twitter Account contributed to the implementation of this strategy.





During the event, the EPC and the PRO-RES Twitter accounts tweeted live about the event with various posts summarising the discussions in all sessions. After the event, the recording was shared via the EPC's YouTube account.

## 6.3 SUMMARY

### 6.3.1 Session 1: Keynote: Evidence-based policymaking and advice during COVID-19

#### Speakers

- **Prof Nicole Grobert**, Chair of the Group of Chief Scientific Advisors to the European Commission
- **Jacki Davis**, Meade Davis Communications (moderator)

#### Summary

In brief: Prof Nicole Grobert, Chair of the Group of Chief Scientific Advisors to the European Commission, underlined the importance of trust building in evidence-based policymaking, especially during a crisis. She mentioned that the uncertainty that is created in times of crisis can be dealt with mutual understanding and there is no one-size-fits all approach.

Prof Nicole Grobert kicked off the final conference of the PRO-RES project by talking about evidence-based policy making and scientific advice during the COVID-19 pandemic. COVID-19, she said, brought science advice to the centre stage of political action. At the same time, however, scientific evidence was limited.

She emphasized the importance of trust, as a basis for a society and as the foundation for research. In the latter context, she distinguished between trust of science advisors in the data, trust of policymaker towards scientists and trust of the society towards scientists and policymakers. All dimensions are essential for our society. The unrealistic expectation that science will provide absolute answers constitutes a challenge that can undermine this foundation. Furthermore, she emphasized the importance of an adequate mechanism for ethical advice which can give policymakers the right incentives. Thus, she concluded that achieving scientific integrity and ethically sound evidence for science advice is the basis to build trust.

Moreover, Prof Grobert underlined that in order to avoid the assumption that science can offer one absolute answer, it is crucial to communicate this uncertainty. A potential suggestion to achieve that would be expert panels and evidence reports that should aim at consensus. She also emphasized that a better-connected science advice ecosystem that would bring advisors from across thematic areas together.

### 6.3.2 Session 2: Presentation of the STEP Accord

#### Speakers

- **Dr Emmanuel Detsis**, Science Officer, European Science Foundation

#### Reactions from:

- **Yves Dumont**, Policy Officer (DG RTD), European Commission
- **Dr Su-Ming Khoo**, Senior Lecturer, National University of Ireland, Galway
- **Dr Sabina Alam**, Director of Publishing Ethics and Integrity, Taylor and Francis Group
- **Jacki Davis**, Meade Davis Communications (moderator)

#### Summary

In the second panel of discussion, the attention moved towards the STEP Accord, the premises of the project, its impact and its final outcomes. The speakers reacted to this presentation from the perspective of the European Commission, academia and the publishing sector.

It was recognized by all speakers that the PRO-RES project is the first project that has touched the ethics of science advisory process. The conversation covered the role and the importance of the Accord and examined ways of how it should be implemented more effectively in the future. It concluded with the key next steps that will put the Accord into action.

Dr Emmanuel Detsis introduced the STEP Accord and gave a broader context of the PRO-RES project. He underlined that the main goal of the project was to encourage policymakers and their advisors to seek evidence for their decisions from research that has been conducted ethically and with integrity. The basic premise of the project is that that “ethically sound evidence should have a role in evidence-based policy”. Furthermore, he provided a thorough analysis of the framework (STEP Accord, toolbox and resources) and presented a



number of other project outcomes, such as a survey on trust in knowledge economy, underlining the importance of creating a tool that would strengthen confidence in the knowledge economy by giving invisibility to tracking down misuse in research- in other words, a trust indicator. He emphasized that the next step for the practical implementation of the Accord would be to find a way to a continuous engagement with the project.

As a first respondent, Yves Dumont characterized the outcome of the project as rich, and regarding its impact he underlined that it should not be expected to transform the way science advice is conducted in the EU, but its first impact is to be measured in terms of increased awareness. He emphasized that the Commission should find practical ways to further contribute to the project and see how the STEP Accord could be referenced to the Horizon guidelines. He concluded that the key next step for the practical implementation of the Accord would be awareness raising.

Dr Su-Ming Khoo started her input with the question “how can we do research for society to pull back better amidst this destabilized knowledge?”. She stressed that COVID-19 showed that the normal science disciplinary approach to knowledge is not sufficient. She gave Taiwan as an example of a successful pandemic management that also reflected the necessity for trust in public goods. Dr Su-Ming Khoo highlighted that this Accord “sets the ethical foundation and discuss methods, tools and examples and it is a generative response that steers research public interaction away from epistemic nihilism and epistemic cynicism”. She underlined that this Project reflects a crucial step beyond an ad hoc approach from within the sciences to a broader approach. Lastly, Dr Khoo concluded that “the present, fast crises act by placing a magnifying glass on longer term, slow structural crises of harm and injustice”. Therefore, in the context of these crises, responses require care, resilience and ethical creativity. Her personal most important next steps for the Accord are to seed and grow researchers their own ethical creativity – a mission the framework is very well-equipped for. She herself already uses the Accord for her own university courses.

Dr Sabina Alam gave her input on the project from a publishing perspective. She highlighted that the key is to understand the toolbox and interpret it beyond the reappraised tool. Her main point was that the first step is to understand the core principles which will simplify the adaptation to a crisis. Regarding the next steps she emphasized on the importance to work on and with the toolbox and distill some of the specific advice.



The first question that is raised by the moderator to all speakers is how they see the framework's implementation challenge. Dr Alam responded that it can be used as a complementary set of guidance in terms of what to look for and how this can impact a decision. Dr Khoo emphasized that it is about avoiding a very top-down

regulatory approach since it will not be effective with scientists. Regarding the implementation of the toolbox, she suggested a forum discussion, a glossary in the resources which could reinforce chats with early career and researchers; it is about building a community who is interested in having ethics in its research.

Mr Dumont highlighted that the next “building blocks” that will translate this framework from words to action is the dissemination of this idea through networks that are willing to use effectively the research results. Dr Detsis was asked the question of how could balance be achieved between keeping it general enough in order to cover all the areas while at the same time being specific enough to be genuinely useful. Through his answer he put emphasis on the importance of revisions and discussions.

Another question asked by the audience concerned whether there was a risk of creating too many hoops for research to jump over. Dr Detsis replied that when you have a crisis it is your reflexes that matter; therefore, the aim is to develop an integrated reflex to the process, which can happen through the education of researchers and policymakers. Mr Dumont commented on the progressive adaptation of the culture that we see as a dynamic process which needs to be fine-tuned. As Sabina, he also underlined the importance of principles as part of the “updating” of this dynamic process.

Moreover, the moderator raised the question to Dr Khoo of how we can move from an ad hoc to systematic accord, making it at the same time an instinct but also flexible in order to adapt and change. Dr Khoo emphasized that the key is the principled approach. As Emmanuel Detsis also noted, the principles are simple and the ethical knowhow is rooted in the principle of preservation of life. It is thus, important to bring people in this mentality, even during a crisis.

### 6.3.3 Session 3: Panel discussion: Evidence-based policymaking and advice – the road ahead

#### Speakers

- **David Mair**, Head of Unit Knowledge for Policy, Joint Research Centre, European Commission
- **Roger Casale**, Executive Director, New Europeans
- **Dr Gabi Lombardo**, Director, European Alliance of Social Sciences
- **Dr Fabian Zuleeg**, Chief Executive, European Policy Centre
- **Jacki Davis**, Meade Davis Communications (moderator)

## Summary

The third session focused on the next steps for the practical implementation of the framework. The speakers also analysed the most important challenges to ensure that policymaking is based on ethically sound and transparent research. An important question that was also raised was how to avoid turning the task of evidence-based policymaking into a tick box exercise. In the last part of the discussion, the speakers gave their input regarding the immediate road ahead.



The debate started off with the question to all speakers, which is the most important challenge to ensure that policymaking is based on ethical and transparent research. David Mair analysed two main points; firstly, it is important to understand the values and identities of human beings as they can provide feedback on how science is perceived. Secondly, the scientific process should open to citizens and a mistake that we need to overcome is the perception that trust is only

about excellence and transparency; it is also about being a community of values. He further focused on the importance of understanding the values and identities, as science itself is not value free. As previous speakers, he also put an emphasis on transparency, key component of the PRO-RES principles.

Roger Casale approached the topic from a political side and called the current situation “an epistemic nightmare” which does not allow trust to be built. He also underlined the importance of starting a conversation with the public and focus on relation-building. As David Mair, he also emphasized transparency but also shared responsibility.

Gabi Lombardo talked about the project and how the consortium tried to make sure that the evidence that is produced is ethically sounded. She also focused on building trust building and shared responsibility.

Fabian Zuleeg added on the aim of the project and emphasized the importance of its applicability to a wide range of non-academic analysis providers. The greatest challenge is the lack of consistency and regulation that is seen in this sector. He underlined that in the non-academic sector it is easier to find incentives to behave non ethically; thus, the key is to encourage a more ethical analysis of this sector. His main point was therefore the importance of hard incentives, like public recognition and funding, as crucial elements for the development of this framework into practice.

Gaby Lombardo agreed that the knowledge providers to who we often refer at are not only scientists, but a range of people who work in the evidence; therefore, it is necessary to have some tools that bring people to some standards.

David Mair agreed with previous remarks on incentives and emphasized the importance of persuading non-academics about the significance of these principles as without structural incentives within the system of research, the framework cannot be applied in practice. Roger Casale went a step further and talked about incentivizing politicians underlining that it is not only important for the public to trust the politicians but also the politicians to trust the public. Gaby Lombardo said that it is crucial to work in a systemic way since liability of individuals is usually boycotted by time.

From the perspective of a think tank, Fabian Zuleeg said that in order to avoid making the project a simple “tick box”, structure is important. Gaby Lombardo added that by creating an interactive platform, people

could bring in a case study and bring out the knowledge that they gained. David Mair suggested that peer pressure could motivate scientists by explaining to them that if you want to become an excellent scientist it is necessary to align with these principles. Furthermore, another speaker remarked, it is necessary to ask politicians what they would base their evidence on.

Fabian Zuleeg challenged David Mair's idea about peer pressure arguing that in the non-academic sector that does not have a great significance, since some people might be, for instance, motivated by profit. Gaby agreed and remarked that the creation of standards as ethics is a process and a mindset that is evolving.



Regarding the steps forward, Gaby Lombardo suggested establishing a network of trust, to carry on the existing conversation in practice and not aspirational. David Mair emphasized that the first step needs to be to grow the demand of ethical policy advice within institutions. He also suggested to focus on identifying skills that European policymakers need to meet this demand.

Concluding the conference, the moderator asked the speakers for their suggested practical, first step. Roger Casale suggested to put the toolkit out for public consultation and engage with big organizations in civil society, such as the European Civic Forum. David Mair would engage with colleagues from the Commission who are in charge of the better regulation process and if possible include it in their guidelines. Gaby confirmed that this is exactly what will follow now, and Fabian would support the establishment of the European Alliance of Think Tanks as this would create the practical steps that would also provide incentives.

## 7. OVERALL EVENTS STATISTICS

Overall, the Final Events Series brought together 209 participants and 21 speakers and moderators to discuss the outcome of the PRO-RES project. Recordings of the public events, the Sixty Minute Briefing and the Final Online Conference created additional 134 views.

With an attendance of overall 209, the attendance rate (participants/registrations) was 67% – which is in line with the EPC’s usual turnout for online events.

Event	Participants	Registrations	Attendance Rate
Ethics and AI	39	42	93%
Public trust & evidence-based policymaking	56	90	62%
Responsible journalism	37	50	74%
Online Final Conference	77	131	59%
<b>TOTAL</b>	<b>209</b>	<b>313</b>	<b>67%</b>

Throughout the organisation of the series, like for the whole project, the consortium worked towards gender-balanced panels in all events. In the end 52 per cent of all speakers involved were male, and 48 per cent female. The detailed breakdown is shown below:

Event	Male	Female
Ethics and AI	2	2
Public trust & evidence-based policymaking	2	1
Responsible journalism	2	2
Online Final Conference	5	5
<b>TOTAL</b>	<b>11</b>	<b>10</b>

## 8. POLICY BRIEF: TOWARDS A EUROPEAN CODE OF CONDUCT FOR ETHICAL CAMPAIGNING

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Although not formally part of the events series, a final building block to promote the results of the PRO-RES project has been the publication of a Policy Brief on Ethical Campaigning. The Policy Brief has been drafted by two analysts from the European Policy Centre, Paul Butcher and Johannes Greubel. It outlines, how the PRO-RES project and its outcome could also inspire other areas, which are not explicitly covered by the project.

The paper proposes to develop a European Code of Conduct for Ethical Campaigning which could be based on the PRO-RES framework and other initiatives to make election campaigns more ethical. It outlines what ethical campaigning should look like, discusses existing initiatives that seek to promote it, and lay out the steps towards improving this aspect of European democratic debate. And, as it is difficult to apply blanket solutions to such a multifaceted problem, it attempts to identify a process to arrive at a code of ethics that is realistic, practical and ultimately enforceable. In doing so, the paper finds that while there are sporadic initiatives on ethical campaigning in several member states, the debate needs a European push to achieve a stronger codification of ethical standards across the EU to improve democracy on European, national, regional and local levels.

The Policy Brief “Towards a European Code of Conduct for Ethical Campaigning” will be published by the European Policy Centre and will be disseminated via its network, database and social media. A preliminary version of this paper can be found in Annex I.



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## 9. CONCLUSIONS AND NEXT STEPS

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The Final Events Series was a successful and important milestone for the PRO-RES project. The event series enabled the project to present and discuss the project and its framework to a large group of stakeholders. This dissemination effect will be valuable to further promote the project results beyond the project. The events also gave an opportunity to discuss the most important next steps for the accord and the toolbox. It allowed for perspectives from different disciplines for a more targeted follow up of the project results – so that the framework will truly represent all non-medical research.

Overall, the following main messages can be distilled from the four events of the Final Events Series: Participants and speakers alike found that the PRO-RES framework constitutes a key document that comprises key principles of ethical research and policy advice in all policy areas discussed during the series. It was recognized that the PRO-RES Project is the first project that has touched the ethics of science advisory process and has the potential to cover all non-medical sciences.

However, focus should now be on implementation of the principles in the different disciplines and at institutional level. Continuous promotion and endorsement by key stakeholders will therefore be very important for the time to come. What is needed is the continuous engagement with the project also beyond October 2021.

Speakers in several events emphasized the importance of training and capacity building for researchers and journalists, both in the academic and the non-academic sphere. Here, the added value of the project was to provide guidelines both for addressees and recipients of policy advice.

Also, the elaboration of separate tools for each area, which draws on the PRO-RES principles, was highlighted. For example, in this next step, more detailed tools as to aid journalists and journalistic training could be developed, which can provide more concrete guidance. This could be mirrored in other disciplines.

However, a top-down regulatory approach will not be effective with researchers, participants concluded. The challenge will be to establish a culture in which ethical research and the PRO-RES guidelines are applied naturally by scientists. In this context the importance of teaching younger generations about the ethics of research, e.g. by including it in university curricula, was highlighted – and PRO-RES could contribute here considerably.

For the non-academic sector, it will be crucial to create incentives for ethical behaviour. Public recognition or funding which is conditional to ethical behaviour are therefore an important step to translate the framework into practice in the non-academic area. The development of a [European Alliance of Think Tanks](#) would be a practical step to promote both aspects and make non-academic research more ethical.

From an institutional point of view, participants suggested to implement the project results into the Commission's daily working, for example by including the STEP accord into the Horizon2020 guidelines or the Commission's better regulation guidelines.

In the end, it should be pointed out that the PRO-RES framework was recognised as an important step towards more ethical policy advice. But it cannot end with this framework. What will be needed is a dynamic process in which the framework is filled with life and continuously fine-tuned.

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## ANNEX I: DRAFT POLICY BRIEF

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### Policy Brief

#### **Towards a European code of conduct for ethical campaigning**

Paul Butcher & Johannes Greubel

This paper advocates for a European Code of Conduct for ethical political campaigning that would more rigorously define what counts as moral or acceptable conduct, set standards for parties and candidates, and raise expectations for all actors to contribute to a less aggressive political scene.

#### **Background – Setting the boundaries for acceptable conduct**

Election campaigns tend to be spirited affairs. Robust debate is part of a healthy democracy, and candidates very rarely limit their messages to matter-of-fact discussion of policy options. At times it gets personal, and entering the political arena usually means being prepared to fight. But there are boundaries to what counts as moral or acceptable conduct on the part of candidates, parties, media, and campaign organisations. In recent elections across Europe, those boundaries have shifted, become increasingly blurred, or have even been crossed.

Unethical campaign practices have especially proliferated online in recent years. In 2019, Twitter revealed that they had removed a network of bots (automated accounts that imitate real people) operated by the Spanish Popular Party during that year's Spanish General Election, which had been "falsely boosting public sentiment online in Spain" in favour of the party, in violation of the platform's terms and conditions.<sup>4</sup> During the 2019 General Election in the UK, the Conservative Party temporarily changed the name of its Twitter page to "Fact Check UK" and posted a series of tweets masquerading as an independent voice in the debate.<sup>5</sup>

But unethical campaigning can also take other forms where the boundaries are less clear, and it is not limited to online spaces. The 2021 Parliamentary Elections in Germany were marked by cases of personal abuse directed against individual candidates and parties. The Green Party lead candidate Annalena Baerbock was subject to smear and disinformation campaigns, and misogynistic comments.<sup>6</sup> A small right-wing party also received significant media attention for their placards reading "Hang the Greens".<sup>7</sup>

These examples illustrate that democratic elections are increasingly faced with unethical campaign practices – and that preventing them is not straightforward. They are not used by radical fringe forces alone; traditional 'mainstream' parties are guilty too. They contribute to a hostile atmosphere through personal abuse, but generally do not cross the line into hate speech or other illegal content. They may exploit digital tools to artificially increase their reach or impersonate others.

While there are clear legal rules for many aspects of traditional, offline campaigns (like placard placement or TV party broadcasts), it is "mostly up to private companies to define the conditions for digital

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<sup>4</sup> Twitter (2019), "[Disclosing new data to our archive of information operations](#)" (accessed 12 October 2021).

<sup>5</sup> Perraudin, Frances (2019), "[Twitter accuses Tories of misleading public with 'factcheck' foray](#)", The Guardian, 20 November 2019 (accessed 21 October 2021).

<sup>6</sup> Kovalčíková, Nad'a and Melanie Weiser (2021), "[Targeting Baerbock: Gendered Disinformation in Germany's 2021 Federal Election](#)", Berlin: GMFUS.

<sup>7</sup> Haak, Jessica (2021), "[Ist das noch Wahlkampf, oder muss das weg? Negativkampagnen gegen die Grünen im Vergleich](#)", Zahlen zur Wahl (accessed 12 October 2021).

campaigns.”<sup>8</sup> When it comes to abuse, personal attacks, and the use of disinformation there are no legal standards, blurring the lines between freedom of expression and unacceptable bullying or manipulation. In other words, the landscape, tone and techniques of political campaigning has changed, but the rules have not.<sup>9</sup> Despite being a crucial part of our democratic life, election campaigns remain largely unregulated when it comes to ethical behaviour.<sup>10</sup>

‘Election integrity’ is a subject that receives considerable policy attention, mostly in connection with cybersecurity, disinformation and threats to the rule of law or media freedom. But the integrity of elections also depends on the integrity of candidates. This paper will outline what ethical campaigning should look like, discuss existing initiatives that seek to promote it, and lay out the steps towards improving this aspect of European democratic debate. And, as it is difficult to apply blanket solutions to such a multifaceted problem, it will attempt to identify a process to arrive at a code of ethics at the EU level that is realistic, practical and ultimately enforceable.

### State of Play – First steps towards a set of standards

#### *Honesty, transparency, decency*

Precisely which actions may be considered ethical or unethical in a political campaign may be subject to some interpretation, but there are general standards and principles that have been established in the literature and in practice. The PRO-RES project,<sup>11</sup> for example, established ethical guidelines for policymakers, advisers and researchers trying to influence politics. Its principles do not directly refer to elections, but paired with existing campaigning initiatives, they can contribute to a solid framework for campaign ethics.<sup>12</sup>

Ethical campaigning supports free, open contestation and pluralistic political processes.<sup>13</sup> An ethical campaign would be one in which candidates and parties **avoid deliberately using false, misleading or manipulative content**; party manifestos are evidence-based, and parties not only refrain from spreading disinformation themselves, but distance themselves from it when it emerges in the debate.

In digital campaigns, ethical conduct may also include renouncing manipulative tactics such as the use of **bots or astroturfing**.<sup>14</sup> Although negative campaigning and personal attacks on opponents are part of the political process, campaigning becomes unethical when the **personal integrity** of a candidate is infringed, or arguments include **racist, antisemitic or violent content**.<sup>15</sup>

Ethical campaigning also requires not only a minimum degree of **transparency**, but the labelling of any party- or campaign-affiliated account, post, or article. Links to affiliated organisations or advertisement

<sup>8</sup> Jaurisch, Julian (2021), “[Selbstverpflichtungen für einen fairen digitalen Wahlkampf](#)”, Bundeszentrale für Politische Bildung, 23 August 2021.

<sup>9</sup> Bland, Archie (2016), “[How did the language of politics get so toxic?](#)”, *The Guardian*, 31 July 2016.

<sup>10</sup> Bagg, Samuel and Isak Travnik (2019), “An Adversarial Ethics for Campaigns and Elections”, in: *Perspectives on Politics*, Vol. 17(4), p. 3.

<sup>11</sup> One of the authors of the paper was part of this project, which ran from 2018-2021. More information [here](#).

<sup>12</sup> The following section builds on the general PRO-RES principles and transfers them into the campaigning context, making connections with existing campaigning frameworks.

<sup>13</sup> Bagg, Samuel & Isak Travnik (2019), “An Adversarial Ethics for Campaigns and Elections”, in: *Perspectives on Politics*, Vol. 17(4), p. 3.

<sup>14</sup> ‘Astroturfing’ refers to the practice of setting up campaigns or organisations that masquerade as independent ‘grassroots’ movements, but in reality are supported and organised by an ‘official’ channel such as a political party or government.

<sup>15</sup> Althaus, Marco (2005), “Über und unter der Gürtellinie: Negative Campaigning und die professionelle Ethik des Angriffs”, in: Lars Rademacher (ed.), *Politik nach Drehbuch, von der politischen Kommunikation zum Politischen Marketing*, Münster: Lit, p. 124ff.

partnerships with private companies are to be indicated clearly. In the spirit of an evidence-based political discourse, the **use of properly-cited sources** is important. Finally, ethical campaigning supports the integrity and legitimacy of political processes and does not contribute to any attempts to **prevent and discourage eligible voters** from casting their ballots.

Each of these principles is easy to subscribe to in theory. Their enforcement in practice is often more difficult, as they are partly subjective in nature and not formally codified. However, obtaining a declaration of principle from candidates is a good first step in enforcing positive change. Such a statement can contribute to boosting “public trust and confidence in political parties and fulfil the heightened legal and ethical standards to which voters hold parties and candidates accountable.”<sup>16</sup>

#### *From PR stunt to pledge*

During the German elections in 2017, the Green party and SPD candidate Martin Schulz called for a “fairness agreement”,<sup>17</sup> but the idea was not taken up by any party. Peter Tauber, then Secretary General of the CDU, even called the idea a “cheap PR stunt”,<sup>18</sup> mockingly suggesting that it is “remarkable that apparently the SPD has to oblige itself to a fair election campaign.”<sup>19</sup>

Four years later, all but one of the largest parties in the Bundestag signed pledges for the fair conduct of the 2021 election campaign, indicating a rising awareness of the issue.<sup>20</sup> Still, it took a push from civil society to really start the discussion.<sup>21</sup> And despite the fact that each of the parties now recognised the importance of such a document, they were still not able to agree on a unified approach. Instead, each party developed its own statement.

Even though the individual documents overlap on many issues, not all of them share the same level of commitment. All parties agreed to conduct a fair “competition of arguments” based on facts, not spread disinformation, and take action against hate speech and discriminatory messages. But their commitments regarding microtargeting or the use of bots differed.<sup>22</sup> Many parties did not shy away from including political messages from their election manifestos in the pledges, thus blurring the line between an ethical code of conduct and a campaign document. There was also one conspicuous absence: the far-right Alternative for Germany (AfD).

Similar examples can be found in other member states. In 2017, all major Austrian parties – except for the right-wing Freedom Party (FPÖ) – signed a Fairness and Transparency Pact, initiated and drafted by NETPEACE, an initiative of Greenpeace.<sup>23</sup> In 2020, the Dutch House of Representatives requested the government to establish a code of conduct, signed by all actors, parties and online platforms, to ensure fairer, fact-based, and more transparent online campaigns for the parliamentary elections in 2021 and beyond.<sup>24</sup>

<sup>16</sup> Thomas, Paul G. et al. (2014), “[A code of ethics or code of conduct for political parties as a potential tool to strengthen electoral democracy in Canada](#)”, Quebec: Elections Canada.

<sup>17</sup> Jacobsen, Lenz (2017), “[Was ist schon fair?](#)“, Zeit Online, 16 March 2017.

<sup>18</sup> Tauber, Peter (2016), “[Ehrlichkeit ist eine bürgerliche Tugend](#)“, Blog Peter Tauber, 31 December 2016.

<sup>19</sup> Jacobsen, Lenz (2017), “[Was ist schon fair?](#)“, Zeit Online, 16 March 2017.

<sup>20</sup> The [CDU/CSU](#), [SPD](#), [Greens](#), [FDP](#) and Die Linke (the pledge of Die Linke is no longer available online).

<sup>21</sup> See, for example, the initiatives of the [organisation D64](#) or the initiative [Campaign Watch](#).

<sup>22</sup> Jaurisch, Julian (2021), “[Selbstverpflichtungen für einen fairen digitalen Wahlkampf](#)“, Bundeszentrale für Politische Bildung, 23 August 2021; Barthelmes, M. (2021), “[Wahl-Watching](#)“, Hamburg: Leibniz Institut für Medienforschung.

<sup>23</sup> Greenpeace (2017), “[NETPEACE: Matznetter und Köstinger unterstützen Fairness- und Transparenzakt für Social Media](#)“ (accessed 12 October 2021).

<sup>24</sup> Ministry of Interior and Kingdom Relations and IDEA (2021) “[Dutch Code of Conduct: Transparency Online. Political Advertisements](#)” (accessed 21 October 2021).

The biggest self-commitment project so far, and the only one with a transnational perspective, is the “Pledge for Election Integrity” launched in 2019 by the Transatlantic Commission on Election Integrity. The Pledge offers a concise statement which candidates for any political office can sign, focusing mainly on disinformation and fair digital campaigning. It calls on “all democratic parties, as well as candidates themselves, to commit to take no action to aid and abet those who seek to undermine our democracies.”<sup>25</sup> Unlike the national efforts mentioned above, signatories to the Pledge are individual candidates rather than political parties. However, despite the open-ended nature of the Pledge, in practice it is not open to any candidate in any election: when signing up, the candidate is asked to select a particular election or national context from a drop-down list with limited options.<sup>26</sup>

So far, only about 350 individuals have signed the Pledge. Although signatures from individual candidates are important to personalise the commitments, this suggests that such a code needs backing from entire parties and their leaderships to have a sizeable outreach. For lasting impact, it also needs a long-term approach that does not restrict signatories to singular elections.

Each of the above examples reflects candidates and campaigners becoming more aware of the need to signal their commitment to ethical campaign standards. However, each of them has limitations. Most notably, radical or populist parties are generally absent from such initiatives, although three AfD candidates signed the Transatlantic Pledge. It is also clear that the existence of these commitments on a party basis did not prevent widespread unethical behaviour during the German election campaign, especially as much of the questionable material came from independent organisations without any official connection to a particular party.<sup>27</sup> Each of the existing examples are limited in time or connected explicitly to a particular election and were not promoted to the extent that the general public was aware of them. In the case of the Transatlantic Pledge, the low number of signatories suggests that even many candidates themselves may not have known of its existence. Finally, they provide no means through which their voluntary commitments can be enforced.

All these weaknesses point towards the need for an agreement that would ultimately lead towards enforceable regulation – preferably coordinated at the European level. While there may be sporadic efforts towards establishing campaigning guidelines in some member states, the debate needs a European push to achieve a stronger codification of ethical standards across the EU. By uniting disparate national efforts, an EU-level agreement would harmonise standards across the continent, and potentially create a spill-over effect to national, regional, and local levels that have not yet considered the topic. Implementing a set of common European standards for ethical campaigning would also help secure the integrity of the European Parliament elections, bringing them under a single set of guidelines rather than leaving each country’s politicians to work out separate – but inevitably rather similar – rules. Finally, the Commission can function as a neutral intermediary between political parties and campaigners from across the continent to ensure balance in the drafting and implementation of such an agreement.

## **Prospects – Working together to draft common rules**

### *Self-regulation and co-regulation*

The concept of applying voluntary codes of conduct to address complex challenges is not new, especially in fields that, like unethical campaigning, are not simply or strictly divided into legal and illegal. In such

<sup>25</sup> Transatlantic Commission for Election Integrity (2021), “[The Pledge for Election Integrity](#)” (accessed 14 October 2021).

<sup>26</sup> Currently, the only available options are “EU” (for the 2019 European Parliament elections), the US, Georgia, Canada, and Germany, with a version for France under preparation.

<sup>27</sup> Haak, Jessica (2021), “[Mehr als eine Plakatkampagne – Wie sich #GruenerMist bei Facebook und YouTube ausbreitet](#)“, Zahlen zur Wahl (accessed 12 October 2021).

circumstances, codified guidelines are required. But jumping straight into strict and inflexible regulation may risk introducing a chilling effect on the freedom of expression.

The European Commission has introduced numerous initiatives on such issues through coordination and dialogue with stakeholders, seeking to establish **self-regulatory commitments**. Self-regulation can serve as a ‘backstop’ to address urgent issues informally while legislation is being developed. **Co-regulation** goes further and can be used to explore the appropriateness and potential weaknesses of regulatory ideas in practice before committing them to formal legislation.<sup>28</sup>

The Code of Practice on disinformation is one example that can serve as inspiration for a future European Code of Conduct on ethical campaigning.<sup>29</sup> The Code, a self-regulatory mechanism introduced in 2018, was negotiated by the Commission with social media platforms (including Facebook, Google and Twitter) and advertising agencies, who worked together to ensure that the commitments were fair and realistic. It has increased dialogue between the Commission and tech companies and provides some much-needed guidelines for the platforms to know what is expected of them.

However, it is important to also learn from the Code’s mistakes. Its results and self-regulatory nature are widely considered to be insufficient.<sup>30</sup> The Digital Services Act thus lays out a path for the Code to move from self-regulation to co-regulation: from a system whereby signatories police themselves in line with generally approved principles to one where they help shape the drafting of specific legislation that will ultimately apply to them. All stakeholders have an incentive to demonstrate their good faith and ability to meet the commitments, so that when they do become law (and infringements can be punished) they have already adapted their business models and working cultures. It also seeks to ensure ownership and wide acceptance of the ultimate regulation, as all stakeholders had the opportunity to participate actively in its formulation.

#### *The PRO-RES project*

Other initiatives also deal with integrity and ethics in politics, and should be consulted in drafting guidelines for campaigners. The PRO-RES project, for example, designed a guidance framework for policymakers and advisers which encourages them to “seek evidence for their decisions from research that has been conducted ethically, responsibly and with integrity.”<sup>31</sup> In the centre of this framework is the STEP Accord (Scientific, Trustworthy, and Ethical evidence for Policy), which outlines principles for responsible, transparent, independent and evidence-based research and policymaking.

Most of these principles are also applicable to ethical campaigning and can therefore lead the way to a comprehensive code of conduct. Furthermore, the project introduces a comprehensive toolbox and resources for ethical research, which can help with the implementation of the code and guide parties and individual candidates or campaigns in applying its principles.

#### *Towards a Code of Conduct for Ethical Campaigning*

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<sup>28</sup> European Economic and Social Committee (2021) “[Definitions, Concepts and Examples](#)” (accessed 21 October 2021).

<sup>29</sup> European Commission (2018), “[Code of Practice on Disinformation](#)”, Brussels. Other examples include the Product Safety Pledge for consumer products sold online through third-party sellers, the Memorandum of Understanding against the sale of counterfeit goods on the internet, and the Code of Conduct against illegal hate speech.

<sup>30</sup> European Commission (2020), “[Study for the assessment of implementation of the Code of Practice on Disinformation](#)”, Brussels.

<sup>31</sup> PRO-RES (2021), “[Project homepage](#)” (accessed 14 October 2021).

The Commission's Democracy Action Plan foresees EU measures to address many aspects of election integrity and promoting and sustaining democracy. As part of these efforts, the Commission is preparing a legislative package that includes initiatives on transparency in political advertising, the European elections and the statute and financing of European political parties and foundations.<sup>32</sup> This important work to support the formal channels of democracy should be complemented by a Code of Conduct for ethical campaigning. The Code should be established through co-regulation in cooperation with prospective signatories (European political parties), experts and civil society, and should draw on existing expertise, such as the PRO-RES project, to determine suitable measures for ensuring ethical conduct. Taking previous initiatives such as the German parties' commitments as examples, it can and should be drafted and implemented ahead of the 2024 European Parliament elections, at least in a first, experimental form. To this end, the Commission should issue a call for parties and campaigners to signal their interest in participating in the drafting process as soon as possible.

Co-regulation will allow commitments to be drafted in a spirit of cooperation and dialogue, and to be adjusted or adapted where necessary. But in the end, voluntary commitments are insufficient. By making it clear that the end goal is proper regulation, signatories will be incentivised to take the process seriously. And while radicals will likely not sign up to an entirely voluntary Code, they must be given the opportunity to join in the co-regulation stage so that they cannot claim it was imposed unfairly.

A co-regulatory approach to crafting a Code of Conduct for ethical campaigning is not only appropriate given the challenges of identifying proportionate and realistic measures in this complex field. It also allows flexibility to adapt to circumstances. Democracy is not fixed: expectations, norms and methods shift over time. Any regulation emerging from the process must therefore be continuously monitored and revised, in dialogue with the Code signatories, to ensure that it remains relevant and makes a strong and lasting impact.

Without a codified set of standards for appropriate conduct by candidates and parties, political campaigns across Europe are likely to continue to be subject to manipulative practices, personal abuse and disinformation. A Code of Conduct for ethical campaigning may not resolve these issues overnight, but it would set the boundaries more clearly and indicate the expectations that candidates should be bound to – an important step on the path towards fairer, less divisive and ill-tempered politics.

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<sup>32</sup> European Commission (2020), "Commission Work Programme 2021: A Union of vitality in a world of fragility", Brussels, COM/2020/690 final.