

## Data protection and ethics concept for i-EVAL surveys

### Relevant documents

The present concept reflects the following principles and handouts:

1) *EU General Data Protection Regulation (GDPR) of 2018*

The GDPR and related recitals can be found, for example, under: <https://dsgvo-gesetz.de/>

2) *RatSWD 2020: Rat für Sozial- und Wirtschaftsdaten (2020, 2nd edition): Handreichung Datenschutz. 2nd fully revised edition. RatSWD Output 8 (6). Berlin, Rat für Sozial- und Wirtschaftsdaten (RatSWD). Online: <https://doi.org/10.17620/02671.50>*

(Note: An English version can be accessed via the URL above)

RatSWD (known in English as the German Data Forum) was set up by the Federal Ministry of Education and Research (BMBF) and advises the federal and regional governments on research issues related to data use.

3) *ADM 2021: Arbeitskreis Deutscher Markt- und Sozialforschungsinstitute ADM e.V. (2021): Richtlinie für die Befragung von Minderjährigen. Online: <https://www.adm-ev.de/wp-content/uploads/2021/01/RL-Minderjaehrigen-neu-2021.pdf>*

### Background

The online tools i-EVAL (for international youth exchanges) and i-EVAL for youth camps were made available online after a relaunch in 2021. This concept applies to both tools, which are largely identical from a technical point of view but are offered as independent platforms for the purposes of youth exchanges (multilingual) and youth camps (German-language only). In the following, the term "i-EVAL" is used to refer to both.

i-EVAL offers scientifically developed questionnaires which can be used to perform a shared self-evaluation of group travel. The team in charge of an activity uses the standardised form, which they make available to participants via QR code. The participants answer the questions on their smartphones. The responses are immediately available to the team on site, enabling them to improve the quality of their work on the basis of this feedback. The organisations providing the activity can also make the data available to a central organisation and the research team on a voluntary basis.

The i-EVAL project is based on preparatory work that has been carried out since 2001. Technical responsibility lies with Forschungsverbund Freizeitenevaluation, a research network for the evaluation of youth camps ([www.freizeitenevaluation.de](http://www.freizeitenevaluation.de)). A large number of organisations support i-EVAL (cf. details in the respective online systems). The new i-EVAL platform was developed in close cooperation with the scientific research project i-konf, which is supported by Humboldt-Universität zu Berlin and Evangelische Hochschule Ludwigsburg ([www.i-konf.eu](http://www.i-konf.eu)). GESIS Leibniz Institute for the Social Sciences advises the i-konf project on technical matters, which means the recommendations of GESIS are also part of this concept. The online tool i-EVAL was developed by the Berlin-based company Cosmoblond. Cosmoblond has its own detailed documentation on data protection issues and a contract on

commissioned data processing, in which technical and organisational security measures are specified in detail.

The respondents surveyed with i-EVAL are full-time and volunteer staff, on the one hand, and participants in youth camps, youth exchanges and professional youth worker events, on the other.

General evaluation guidelines are set out in the following document, which is available here <https://i-eval.eu/en/help>, section: "Is there a self-commitment concerning the use of the data?".

The principles for handling data in connection with i-EVAL are set out in the following.

## 1) No personal data is collected

Data must always be collected with a high degree of caution. This is particularly the case if the data is personal. i-EVAL is conducted in such a way that it dispenses with personal data entirely.

*According to Article 4 (1) GDPR, the term "personal data" refers to any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person."*

Data is therefore always deemed personal if it can be traced back (even with a certain amount of effort) to a natural person. If anonymisation of the data renders identification impossible, on the other hand, the data is not considered personal (cf. RatSWD 2020, 9). The GDPR does not apply to non-personal data.

i-EVAL collects neither name nor contact details. Nor does it save the IP address of the device used. However, it does include certain socio-demographic questions, the responses to which could be combined and allow conclusions to be drawn about certain identities. Depending on the questionnaire used, these questions may include ("W" is the respective item code):

- W206: Gender
- W202: Age
- W214: School type
- W224: Were both your parents born in Germany?

Safeguards are in place to ensure that despite these questions, no personal data is collected at any point. A distinction has to be made between two different levels: the team that is responsible locally and the team in charge of the scientific overall evaluation.

- a. The survey is carried out using the i-EVAL tool, which enables the **persons responsible for the activity to be evaluated** (and possibly the umbrella organisations they are part of, for example a national association) to directly process the collected data. The i-EVAL online tool is programmed so that the above-mentioned socio-demographic data is only evaluated univariately, however it cannot be assigned to specific answers. Someone who surveys a group of 15 boys and one girl will receive statistics on the gender distribution, but the answers are not assigned to the gender of the respondents. This means it is impossible for the responses to be traced back to the one girl.
- b. For **scientific evaluation** purposes, the consolidated data is made available to the research team in the form of a CSV file, which also contains the socio-demographic data. This data is analysed in a data set, each with several thousand respondents. Even if all the above data is combined, it is not possible to identify a specific person, especially

since the research team only has the contact details of the group leaders, but never the names of individual participants (the young people are addressed only via the group leaders, not directly).

Technical and organisational measures are in place to ensure that an organisation cannot be linked to the feedback of the organisation's respondent, or that this would be possible only with considerable effort. Specifically, the names and contact details of participating organisations will not be disclosed to anyone outside the research team of the research network for the evaluation of youth camps (Forschungsverbund Freizeitenevaluation).

This method of anonymising data complies with the GDPR, as set out in Recital 26 of GDPR, sentences 5+6:

*"The principles of data protection should therefore not apply to anonymous information, namely information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable. This Regulation does not therefore concern the processing of such anonymous information, including for statistical or research purposes."*

## **2) Active parental consent is required for under 14-year-olds**

The GDPR specifies that parental consent is necessary only if personal data is processed. Given that the data processed in the project is not personal as defined in the GDPR, this does not apply. In terms of data protection, consent to the processing of personal data is not initially required.

However, it is of course useful and necessary for the principle of "informed consent" to be applied to the surveys. At the start of the questionnaire, respondents are informed that participation is voluntary. They are also given detailed information about the context in which the survey is conducted, how it is evaluated and what purpose it serves. Extensive information about the research project, use of data and all questionnaires are available online ahead of time. Respondents and their parents can therefore obtain comprehensive information at any time.

Respondents give their consent at the start of the survey and can withdraw it at any time by discontinuing the questionnaire. However, it is not technically possible to request the deletion of submitted data at a later stage since data can no longer be assigned to a respondent once it has been submitted.

Respondents are usually over the age of 14. According to the above-mentioned guidelines, they are then deemed old enough to decide for themselves whether to take part in the survey. A special situation exists if respondents are under 14. In this case, the organisation is responsible for obtaining the consent of parents or guardians. The organisations can either include this consent in the registration form or in an information letter with a separate consent form, or they can use a form provided by the project leader. The organisations archive the consent form locally so that participants' names (which are mentioned on the forms) are not disclosed to the project leader in accordance with the principle of data minimisation.

Note: In addition to participants, some of the staff surveyed by i-EVAL are not yet of age. In this case too, no personal data is collected. Given that all staff members are trained in youth work, it can be assumed that they generally have the capacity to reflect on their actions and that it is not necessary for parents to be informed.

## **3) Named data controller and data protection officer**

As mentioned above, the questionnaire itself does not collect any personal data. However, the situation is different for group leaders. To access i-EVAL, valid e-mail addresses must be

provided. Personal data is therefore stored for these group leaders, so that the GDPR does apply in this case.

According to the GDPR, a “controller” who is in charge of processing data must be named. Under Article 4 (7) GDPR: *“for the purpose of this Regulation [...] ‘controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data”* (cf. RatSWD 2020, 20).

The person in charge of data processing in i-EVAL is currently (1 May 2023) the scientific director of the research network for the evaluation of youth camps, Prof. Dr Wolfgang Ilg, Evangelische Hochschule Ludwigsburg, Paulusweg 6, 71638 Ludwigsburg, Germany, e-mail: [w.ilg@eh-ludwigsburg.de](mailto:w.ilg@eh-ludwigsburg.de). In consultation with the responsible bodies, he decides on the purpose for which and the means by which data is processed, including the appointment and participation of support persons (e.g., research associates) or external processors (e.g., IT service providers).

The address of the IJAB data protection officer is:  
IJAB – Fachstelle für Internationale Jugendarbeit der Bundesrepublik Deutschland e.V.,  
Frank Rattmann, Godesberger Allee 142-148, 53175 Bonn, Germany, e-mail:  
[datenschutz@ijab.de](mailto:datenschutz@ijab.de)

Information on data storage in the i-EVAL system as well as data protection information is available at [www.i-eval.eu](http://www.i-eval.eu), [www.i-eval-freizeiten.de](http://www.i-eval-freizeiten.de) and [www.freizeitenevaluation.de](http://www.freizeitenevaluation.de).