European Association of Social Anthropologists
Association Européenne des Anthropologues Sociaux

EASA's Statement on Data Governance in Ethnographic Projects[1]

This statement describes some of the core methodical and ethical practices of ethnographic research.[2] These practices have implications for the norms and forms of data management in ethnography.[3] We issue this statement to help ethnographers respond to current mandates for data archiving, storage, and sharing from governments, universities, and funders.

This statement places ethnographic research within the special clause on "academic expression" included in Article 85(2) of the GDPR. This derogation has been designed to guarantee the critical social value of humanities and social sciences research. We call on universities, funders, and academic institutions to fully execute and implement this special clause in the case of ethnographic research.

1. Ownership: Ethnographic materials are coproduced by researchers and research participants and are embedded in particular social contexts. A such, they cannot be fully owned or controlled by researchers, research participants or third parties. The use of standard intellectual property licenses and protocols may not apply to all ethnographic materials.

2. Archiving: In ethnographic research "data" are always part of a social relationship. It is not easily reducible to a fixed and finished product. As such, it may not always be possible to archive or store research materials. In other cases, the archiving of ethnographic materials will require specific technical features (e.g. different roles for access, editing, sharing or privacy) not available in most institutional repositories.

3. Consent: Ethnographic participation in a social milieu can lead to situations and dynamics that are not always controllable by researchers and for which it is not always possible (indeed, it is often impossible) to obtain prior informed consent. Moreover, since research materials are never completely fixed, written consent can never fully determine its future uses or interpretations as "data". In contexts of violence or vulnerability, written consent may violate research participants' privacy and confidentiality, and even put them at risk. For ethnographers, informed consent is an ongoing process.

4. Custodianship: Researchers have a scientific and ethical responsibility to preserve and protect the integrity of ethnographic materials. This is a responsibility that is usually negotiated with research participants. These forms of custodianship, caretaking or archiving cannot always be anticipated or pre-formatted.

5. Embargo: Researchers have a special duty to consider controlling third party access to ethnographic materials and retain the rights of embargo and confidentiality over those materials that cannot be anonymized or turned into data entries.

6. Public access and sharing: The collaborative nature of ethnographic research implies that ethnographers have a special duty to consider requests by research participants (or their descendants) to share materials, unless this actively and unnecessarily harms (some of) them. Ethnographers also have a duty to consider appropriate ways of making research materials publicly accessible when this will not violate ethical principles of ethnographic research. Making such materials accessible may require special technical features not available in most institutional repositories.

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[1] This statement is based on the Leiden Statement on Data Management and Anthropology, as published in Pels et al. (2018) Data Management in Anthropology: The Next Phase in Ethics Governance? *Social Anthropology/Anthropologie sociale* 26/3: 1-23.

[2] See the Principles of Professional Responsibility (2012) of the American Anthropological Association and the Ethical Guidelines for Good Research Practice (2011) of the Association of Social Anthropologists.

[3] For an example of a data governance framework for ethnographic research, see Corsín Jiménez, A. (2018) *Data Governance Framework for Ethnography v 1.0*, Madrid: CSIC.