

# Research proposal to the Swedish Citizen Panel at the University of Gothenburg

## Procedure for collaborating with the Swedish Citizen Panel

*The proposal is submitted and reviewed* – the research proposal is received and reviewed by the SOM Institute. A preliminary notice of collaboration is provided.

*Ethical review* – if the study contains sensitive personal data, ethical review must be conducted by the principal investigator. The SOM Institute can assist with formulations in the application, but the researcher is responsible for applying to the Swedish Ethical Review Authority.

*Agreement* – specified agreement on cost, setup and schedule.

*Survey programming* – a preliminary version of the survey is tested and discussed internally at the SOM Institute.

*Review* – the SOM Institute discusses any revisions that have occurred during testing with the principal investigator.

*Survey finalization* – the final version of the survey is determined, and no more changes are made.

*Distribution* – the survey is sent out to the respondents.

*Survey closure* – the survey is closed and data collection ends.

*Processing* – collected data is validated, a technical report and a codebook is produced.

*Data delivery* – the processed data file is sent via Citrix ShareFile to the principal investigator.

*Data validation* – within three months after the data delivery, the principal investigator is requested to check the data file and submit any comments. After this time, the SOM Institute is no longer able to make changes or additions to the data file.

*Feedback* – all research projects that collect data through the Swedish Citizen Panel are asked to submit a brief popular scientific summary of the main research results within six months after data delivery. The purpose of this is to keep a record of all research projects that have participated in the Swedish Citizen Panel and to use the reports as feedback to respondents.

Submit the proposal to [citizenpanel@som.gu.se](mailto:citizenpanel@som.gu.se)

Please direct any questions you might have to [citizenpanel@som.gu.se](mailto:citizenpanel@som.gu.se).

## Legal Guidance for Research Data from the Swedish Citizen Panel

1. All relevant parts of the Swedish Research Council's publication *Good Research Practice* (2024)<sup>1</sup> must be followed.
2. The data of the Swedish Citizen Panel are processed within the legality of public authorities at the university and, therefore, the Public Access to Information and Secrecy Act (2009:400) must always be considered. Specifically, data from the Swedish Citizen Panel are, where applicable, considered personal data — either pseudonymised personal data or as a case when there is a theoretical possibility of re-identifying individuals by combining several indirect personal identifiers. When combined with sensitive personal data (for example, health, sexual orientation, or political affiliation), there is a high likelihood that confidentiality applies. This means that sharing data with unauthorized parties may be considered unlawful disclosure of personal data. Such unauthorized sharing includes, among other things, publishing data files on OSF, storing data in U.S.-based cloud service, or handing out data files to students and colleagues — particularly if such sharing occurs via open networks such as email. It is therefore the responsibility of the sharing authority (including, but not limited to, researchers at Swedish universities) to conduct a confidentiality assessment. If confidentiality applies, the information may in general not be disclosed, even if the processing or transfer would otherwise be compatible with the General Data Protection Regulation, GDPR. As a rule, the confidentiality assessment must be carried out before assessing transfers to third countries under GDPR.
3. Data from the Swedish Citizen Panel are, where applicable, regarded as pseudonymised personal data, since the SOM Institute holds a code key that allows the data to be linked to individual persons (see Article 4.5 of the GDPR). This means that the handling of data from the Swedish Citizen Panel involves the processing of personal data, and in some cases also special categories of personal data (see Articles 4 and 9 of the GDPR, respectively).
4. Data from the Swedish Citizen Panel shall be processed in accordance with Article 5 of the GDPR, which means that personal data may only be processed for the specific, explicit, and legitimate research purposes stated in the application for collaboration with the Swedish Citizen Panel. Further processing for other purposes may be assessed by the entity responsible for research in accordance with the principle of compatibility; see Article 6.4 of the GDPR.
5. Data from the Swedish Citizen Panel are delivered to the responsible researcher or another authorized person in accordance with the authorization list completed in the application for collaboration. Further sharing or transfer of data to unauthorized parties may constitute unauthorized access or unauthorized disclosure of personal data and is generally classified as a personal data breach that should be reported to the Data Protection Officer and/or the Swedish Authority for Privacy Protection (IMY). An “unauthorized” party refers to any natural or legal person who has not been explicitly approved by the data controller to process the personal data for the specified research purpose (see point 3). See Articles 4.9 and 4.10 of the GDPR. The sharing of personal data within the EU/EEA may, however, be possible provided that the principles of the GDPR as a whole are complied with. Particular consideration should be given to the legal basis, purpose limitation, and data and storage minimization. In addition, there may be an obligation to inform the data subjects that their personal data are being shared with a new data controller (Articles 13.3 and 14.4 of the GDPR), or to enter into a data processing agreement (Article 28 of the GDPR), as well as corresponding agreements relating, for example, to research collaboration.

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<sup>1</sup> <https://www.vr.se/english/analysis/reports/our-reports/2025-07-03-good-research-practice-2024.html>

6. In the event of a transfer of data from the Swedish Citizen Panel to a third country (outside the EU/EEA), it is particularly important that the processing of personal data is supported by Article 5 of the GDPR in order to be lawful. In practice, this means that either (1) the European Commission has decided that a specific country outside the EU/EEA ensures an adequate level of protection, or (2) other appropriate safeguards and technical measures are in place. This is especially of importance after the NIS2-directive has been implemented in Sweden through the Swedish Cybersecurity Act (Cybersäkerhetslagen, 2025:1506). For research purposes, the United States is a significant third country, and the responsible researcher should therefore first and foremost verify whether the receiving party in the United States has joined the EU–U.S. Data Privacy Framework<sup>2</sup>. In any other case, the authorities who wish to transfer data to a third-party must enter into a Standard Contractual Clause (SCC), ensuring continued legal protection. See the recommendations of the European Data Protection Board (EDPB)<sup>3</sup> for further guidance.
7. According to Article 32 of the GDPR, parties shall ensure an appropriate level of technical security in relation to the assessed risk of the personal data processing. Pseudonymised data from the Swedish Citizen Panel are delivered to the responsible researcher or another authorized person via an encrypted file-sharing service (Nextcloud). The data should therefore be processed by the responsible researcher or another authorized person on a workstation with encryption and must under no circumstances be distributed via open networks (e.g. email), nor for sending between individual authorized users.

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<sup>2</sup> <https://www.dataprivacyframework.gov/list>

<sup>3</sup> [https://www.edpb.europa.eu/our-work-tools/our-documents/recommendations/recommendations-012020-measures-supplement-transfer\\_sv](https://www.edpb.europa.eu/our-work-tools/our-documents/recommendations/recommendations-012020-measures-supplement-transfer_sv)

## **I Project title**

*Title of the project/study.*

## **2 Principal investigator**

*Name, affiliation and email address of main applicant.*

### **2.1 Name and affiliation of other participants in the project**

*Name, affiliation and email address of associated applicants.*

### **2.2 Financing**

*State how the study is funded.*

### **2.3 Signatory**

*Name of the person authorized to sign contracts for the unit, and invoice recipient.*

### **2.4 Invoice or requisition**

*Name and contact address to receiver of the invoice or requisition.*

### **3 Abstract**

*A short description of the research background and the purpose of the project.*

### **4 Project description**

*A short description of the project and the purpose of using the Swedish Citizen Panel. Please list key references for the study and if it is a replication of earlier studies or not.*

#### **4.1 Purpose of study**

*The overarching purpose of the study.*

#### **4.2 Hypotheses or research questions**

*State the hypotheses/research questions of the project.*

## 5 Research design

*Please describe the general research design, for example if it is an experimental, a cross-sectional or a panel design.*

## 6 Survey questions (in an attached file)

*List the questions to be included in the survey and note for each variable if it is a dependent or independent variable. If your questions have been used previously and it is important that they are fully comparable, please specify this clearly and include original wording. Please structure the survey questions in rows and avoid bullet points and other non-relevant formatting.*

### 6.1 Background variables

*List any background variables needed.*

*Please note that ethics review must also be carried out for studies that wish to merge sensitive personal data from the Swedish Citizen Panel's pool of background characteristics (see section 9 on ethical review).*

## 7 Sample description

*Specify what type of sample your study needs (probability or non-probability sample) and whether it needs stratification of any sort. If stratification is required, please state by which variables. Specify the number of responses your study requires. Note that probability and stratified samples are more costly.*

## 8 Time frame of the project and planned publications

Please indicate if there are any important dates that we need to adhere to. Please note that if an ethical vetting is required, it will affect the time frame.

## 9 Ethical review

Do you need an ethical review?

If yes, please attach the complete ethics review application including the decision when one has been made.

Researchers at Swedish universities are required to have their research study reviewed by the Swedish Ethical Review Authority if the study intends to handle sensitive personal data. Examples of sensitive personal data include information about political affiliations, voting intentions, ideological position (left, right, liberal, conservative, etc.), self-rated health, ethnicity, etc. (non-exhaustive list).

Please note that an ethics review must also be carried out if sensitive personal data is used to select respondents for the study or if such data is desired to be obtained from the Swedish Citizen Panel's database of collected background variables.

In addition to sensitive personal data, there may be other reasons why an ethics review is necessary. For more information on ethics reviews, consult the Swedish Ethical Review Authority or the data protection officer in your organization.

## 10 File format

Specify your preferred format for data delivery, for example Stata, SPSS or .csv.