



Social Sciences & Humanities for Climate,  
Energy and Transport Research Excellence

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## D7.2 Data Management Plan and Ethics Management Plan

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<b>DESCRIPTION</b>	This deliverable outlines the data management and ethical procedures for data that is collected, stored, and shared as part of the SSH CENTRE project. Within this, the data



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generated throughout the project, the data protection and ethical obligations of project partners, and the process of obtaining ethical approval are outlined.

## Executive Summary

The purpose of this Data and Ethics Management Plan is to support the SSH CENTRE consortium in meeting its responsibilities with regards to the quality, sharing, security and ethics of the data collected, stored, and shared throughout the project.

The plan starts by defining what we consider as 'data' within the SSH CENTRE project and the different data categories present within the project. As part of this it outlines the data management lifecycle of the SSH CENTRE project, specifically:

- How data will be collected, generated or processed;
- How data will be stored, protected and disposed of; and
- How data will be shared internally and externally, including what data will be made 'open access'.

The Data and Ethics Management Plan also provides details on how to identify, address and appropriately monitor any ethical issues in relation to SSH CENTRE data collection activities. The ethics component of this Plan includes detail on the process of obtaining ethical approval for the project and procedures for obtaining informed consent from participants.

As this Data and Ethics Management Plan provides resources related to both the data management and ethical procedures of data collection activities, partners are requested to carefully review and confirm that they are currently following, and will continue to follow, the data management protocols and ethics procedures described herein. This understanding of data and ethics management is further supported by the data and ethics management webinar which is referenced in this deliverable.

ARU, as technical coordinator and ethics lead for the SSH CENTRE project, is leading data management and ethics tasks, including producing this Data and Ethics Management Plan.

We note that SSH CENTRE's approach and procedures related to data and ethics management has received ethical approval by ARU's Global Sustainability Institute (GSI) research ethics panel, with the intention to submit further applications/amendments as required (as described in this Plan). The approaches and procedures outlined in this plan have also been independently reviewed by the Anglia Ruskin University (ARU) Institutional Information Compliance Manager, who has also provided written approval.

## Table of Figures/Tables/Figures & Tables

Table 1: Data- and ethics-related risks currently in the SSH CENTRE Risk Register.	8
Table 2: SSH CENTRE activity categories and their respective informed consent procedures.	21

## List of Partner Acronyms used

<b>ARU</b>	Anglia University	Ruskin
<b>CON S</b>	Consensus	
<b>FOE</b>	Friends of Europe	

## Table of contents

Executive Summary	2
List of Partner Acronyms used	3
1. Context	6
1.1. What is 'data'?	6
1.2. How do other project outputs engage with data management?	6
2. Data Generated	8
2.1 Events	9
2.2. Interviews	10
2.3. Focus Groups	10
2.4. Surveys	11
2.5. Online applications	11
2.6. Videos	11
2.7. Project management documents	12
2.8. Summary of data to be generated	12
3. Regulatory Frameworks	13
3.1 Horizon Europe and the SSH CENTRE Grant Agreement	13
3.1.1 Relevant Horizon Europe regulations	13
3.1.2. Relevant SSH CENTRE Grant Agreement Actions	14
3.2. EU regulations, in particular GDPR	17
3.3. National laws and institutional regulations	18
	4

4. Stages in the data life cycle process	18
4.1 Data collection and data processing	19
4.1.1. Recruitment of participants	19
4.1.2. Information sheet details	19
4.1.3. Use of recordings	20
4.1.4. Data processing	21
4.2 Data storage, protection, archiving and disposal	21
4.2.1. Data minimisation	22
4.2.2. Secure storage of data	22
4.2.3. Anonymisation	22
4.2.4. Withdrawal of data	23
4.2.5. Disposal of data	23
4.2.6. Privacy policy and website	23
4.3 Data sharing, including with non-EU countries	23
4.3.1 Open Data Repository	24
5. Ethics Management Plan	25
5.1 Obtaining ethical approvals	25
5.1.1 Current ethics application	25
5.1.2 Future review processes and ethics applications	26
5.2. Ethics webinar for consortium partners	26
5.3. Informed consent procedures/templates	27
5.3.1. Current informed consent forms and information sheets	27
5.3.2. Future tailored informed consent forms and information sheets	27
5.4 Ethics and Data Management	27
5.4.1 Data minimisation	27
5.4.2 Anonymisation and Open Data Repository	28
5.4.3 Measures to safeguard the rights and freedoms of research participants	28
5.4.4 Security measures to prevent unauthorised access to personal data	28
5.5 Data Protection Policy on SSH CENTRE website	28
Appendix 1 – FOE Focus Group Template	29
Appendix 2 – Confirmation of approval from Technical Coordinator/Ethics Leads’ Data Protection Officer	30
Appendix 3 - Letter confirming formal ethical approval from Global Sustainability Institute School Research Ethics Panel	31
Appendix 4 - Tailored Information and consent form template for SSH CENTRE Literature Brief interviews (T1.2.1)	33

Appendix 5 - Tailored Information and consent form template for SSH CENTRE HEU Policy Stakeholder Interviews (T1.2.2)	35
Appendix 6 - Tailored Information and consent survey front matter (T1.3)	37
Appendix 7 - Information and consent form template for SSH CENTRE in-person events	39
Appendix 8 – Information slide template on the use of data for SSH CENTRE online events	40
Appendix 9 – SSH CENTRE Data Protection Policy	41

## 1. Context

We begin by outlining what data is and the data to be collected as part of the SSH CENTRE project. This is followed by highlighting other project outputs which engage with relevant ideas of data and its management.

### 1.1. What is 'data'?

**Personal data** is defined under the EU General Data Protection Regulation 2016/679 (GDPR) as follows:

*“personal data’ means 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”.* All personal data must be treated in line with relevant EU and national regulations, as outlined in section 3.

**Research data** is defined in this project as ‘any sort of information, be it qualitative or quantitative, that will be used for research purposes (i.e. will undergo some form of analysis, rather than just information on events or contacts that will be merely collated rather than analysed)’.

Collection of **research data which includes personal data** needs to obtain ethical approval in advance, in order to ensure the informed consent and data protection procedures in place are appropriate.

As part of the SSH CENTRE project, a range of research data (only some of which will contain personal data) will be collected including:

- (1) Notes from 30 interactive events (T1.3 workshops; T2.3 symposium; T3.2 training; T3.3 city tours; T4.1 SET-Plan engagements; T4.2 Mission Board panels; T4.3 Partnership meetings; CENTRE events (WP5/6);
- (2) 20 STEM/SSH/community lead and 15 policy stakeholder interview recordings/notes (T1.2);
- (3) Call for evidence survey responses (T1.3);
- (4) Application data for authorship teams (T2.1) and Early Career Researchers (T3.1);
- (5) Data from collaborative SSH-STEM experiments (T2.2);
- (6) Transcripts from 4 HEU Mission focus groups (T4.2) and 1 final recommendations focus group (T5.3.3);
- (7) T5.1 evaluation data, including selected 6 hrs of consortium meeting recordings/transcripts, 15 interview recordings/transcripts with selected WP2-4 participants (5 per WP).

### 1.2. How do other project outputs engage with data management?

The management of ‘data’ is discussed in a number of different SSH CENTRE project outputs. Ensuring consistency in data management approaches is critical, as such this subsection will now outline other SSH CENTRE Deliverable and Milestone reports which engage with data management.

These other project outputs are linked to a range of Work Packages (WPs) including WP7 (Project management and coordination), WP2 (Epistemic laboratories for the EU Green Deal), WP3 (SSH knowledge brokers for regional-level governance) and WP6 (Dissemination, communication, and exploitation). The data management aspects of these WPs are outlined in more detail below.

#### WP7 (Project management and coordination):

- Data-specific risks have been identified as part of the SSH CENTRE Risk Register (which is included in D7.1 'Project Handbook', section 3). Table 1 of the current deliverable outlines the identified risks which relate to data management. Throughout the course of the project, the identified risks will be reflected upon at the 3-monthly Work Package leader meetings.
- ARU, as Ethics lead and Technical Project Coordinator, are delivering an Ethics and Data Management webinar which outlines ethical procedures and data management practices (MS7.2) in M4 (December 2023). All consortium partners will be required to watch this webinar. Further detail on the webinar is included in subsection 5.2.
- An updated Data Management Plan (MS7.3) is to be produced by ARU in M28 (Dec 2024). This will reflect any changes (typically minor) to data management processes as a result of changing research activities.

#### WP2 (Epistemic laboratories for the EU Green Deal)

- A total of 30 interdisciplinary collaborative SSH-STEM teams will be funded to undertake epistemic experiments and contribute book chapters based on their results - within these experiments data may be collected. As part of the recruitment process, all teams will be required to confirm their understanding of, and compliance with, the project's data protection and ethical requirements (MS2.1). Collaborative SSH-STEM teams involved in WP2 will need to explain at the application stage any ethical issues that may arise; they will be required to confirm that they have ethics approval from the PI's local board.

#### WP3 (SSH knowledge brokers for regional-level governance)

- Teams of Early Career Researchers will receive training on knowledge brokerage and will undertake projects in partnership with European cities. Within these projects it is possible data may be collected and analysed. As part of developing these projects, ECRs will confirm their understanding of relevant data management (and ethical) procedures (MS3.2). Once the teams' projects are confirmed, if needed a further ethics submission/amendment to ARU's ethics committee will be submitted (more detail of this in subsection 5.1.2).

#### WP6 (Dissemination, communication, and exploitation)

- An Open Science/Education guidebook for Cluster 5 projects is being developed which will summarise project experiences with Open Science/Education practices, with the intention of supporting other Horizon Europe Cluster 5 projects to go 'Open' through their e.g. repositories, peer-review, handbooks, courses, platforms, co-production (D5.4).
- During the SSH CENTRE project, the project's website will be upgraded into the SSH Open Knowledge Platform, in line with our Open Science/ Education practices (D6.2) with this



providing access to resources, documents and outputs of the project as well as facilitating networking.

**Table 1: Data- and ethics-related risks currently in the SSH CENTRE Risk Register.**

WP No.	WP Lead	Risk No.	Description of Risk	Proposed Risk-Mitigation Measures
WP5	CZG	5c	External participants withdraw consent or participation before the follow up interviews take place (T5.1)	Task 5.1 lead builds trust with participants and invites discussion and problem-solving if a participant wishes to withdraw. Thus 'quitting' is unlikely, and the final interview provides a 'debriefing' opportunity.
WP7	ACC/ARU	7c	Partners do not follow agreed project ethics procedures leading to participants feeling unhappy with how their data is used (e.g. being made open access)	Templates provided for use and all partners watch a webinar about ethics processes.

If at any point consortium partners notice potentially conflicting data management procedures across different outputs of the SSH CENTRE project, they should inform the Administrative Coordinator (ACC) and the Technical Coordinator and Ethics lead (ARU).

## 2. Data Generated

In this section we present the relevant categories of research and/or personal data collection specific to the SSH CENTRE project.

Within the SSH CENTRE project, data will be collected for analysis as well as to support dissemination activities. All of the data collection undertaken as part of the SSH CENTRE will involve original data (there are no planned activities to analyse secondary data), and can be grouped under seven broad categories: (1) events, (2) interviews, (3) focus groups, (4) surveys, (5) online applications, (6) videos, and (7) project management documents. Each category will have its own distinct ways of collecting and managing data. Where appropriate, information and/or consent form templates will be designed and be submitted for ethical approval from relevant ethics panels (see subsection 5.3).

It is possible that additional research activities, which fall outside the five broad categories outlined above, will occur during the project's lifetime. Any partners planning additional activities which will collect research and/or personal data must let the administrative coordinator (ACC) and the technical coordinator (ARU) know as soon as possible. Where a change in planned activities may impact on ethical or data protection matters, partners must let ARU know as soon as possible as they are the ethics lead of the project.

Whilst every effort has been made to ensure this document includes the latest plans of the consortium, these are subject to (usually minor) changes. Any changes which are implemented throughout the project's lifetime will be captured in the Updated Data Management Plan (MS7.3) in M28 Dec 2024).

The five categories are now discussed in turn.

## 2.1 Events

A number of in-person, hybrid and online events will be held during the project.

These include:

In WP1, BC3 and CERS will each lead on a workshop with 20 climate-energy-mobility SSH researchers (40 researchers in total) targeting those who have spent part of their career or research training in Southern Europe and Central and Eastern Europe respectively. The workshops will focus on experiences of undertaking SSH Research in these locations. Hybrid participation will be provided as an option.

As part of WP2, ARU will lead a virtual symposium whereby the collaborative SSH-STEM teams will present, and receive formative feedback, on the work they have undertaken. The symposium will promote reflexivity and enable networking across climate, energy and mobility communities

In WP3, ECRs will receive online training to support them in acting as brokers between research and policy. The training will discuss: (i) the SSH research landscape; (ii) what policy work involves and policy views on engagement methods (from T1.1); and (iii) the roles that one may adopt in engaging with policy. These ECR teams will also meet representatives from all the city municipalities involved with each hub at a hub workshop (including city tour with local stakeholders) hosted by the hub lead city. As part of this workshop ECRs will receive feedback on work conducted so far and discuss the realities of 'doing policy work' (e.g. politics, tensions, hierarchies, decision making procedures). ECR teams will submit short briefings of their findings.

In WP4, FOE will organise online live panels discussing a number of the EU Missions (1. Adaptation to Climate Change: support at least 150 European regions and communities to become climate resilient by 2030, 2. Restore our Ocean and Waters by 2030, 3. 100 Climate-Neutral and Smart Cities by 2030 and 4. A Soil Deal for Europe: 100 living labs and lighthouses to lead the transition towards healthy soils by 2030) with these panels providing Missions policymakers the opportunity to reflect on the recommendations for missions developed through the focus groups conducted as part of T4.2. Further, EERA are organising up to 6 high-level virtual meetings with Partnerships' programme managers to transmit and discuss the results of their analysis of the SSH aspects (including citizen engagement) of the 11 target Horizon Europe Cluster 5 Partnerships.

As part of WP5, FOE will lead on the organisation of 3 Policy Insight transdisciplinary events. These Policy Insight events will focus on 1) WP2's provisional work on EU Green Deal strategies, 2) WP4 citizen engagement strategies for HEU, including both Pillar II and III partnerships, and 3) the role of cities/regions as policy-shapers. The Policy Insight events will have 100+ physical/virtual participants. Panels will include senior representatives from EC/European Parliament, civil society, academia, and private sector. FOE will also lead on a final multi-stakeholder conference, involving a Policy Insight plus an evening networking event. As part of WP5, reflexive workshops at consortium

meetings with partners will enable additional dialogue and allow WPs2-4 to adapt to the emerging findings.

As part of WP6, 3 joint events with sister HEU projects will be organised, with SSH-projects prioritised, the dates for these are yet to be confirmed. A Centre Launch, organised by FOR will occur in M5 (Jan 2023), showcasing the Centre on the EU stage and ensuring problems tackled in WPs2-4 are co-designed with policy

Any data being collected from all these events will predominantly be partners' own participant observation notes - records of their own reflections of project experiences - and materials which support those notes, rather than personal data linked to participants. These notes will be a key data category throughout the SSH CENTRE project.

In addition, video or audio with participants may be recorded for the purpose of public dissemination.

A variety of information and consent procedures will be appropriate across this range of different types of events (including differences in procedures between in-person and online events), as detailed in subsection 4.2. In the case of events associated with WP3, once activities and locations are finalised, consent procedures will be defined and included in an ethics application amendment if needed.

## 2.2. Interviews

Interviews and focus groups are to be conducted as part of various WP activities.

Throughout the SSH CENTRE project, three sets of interviews and two series of focus groups will be undertaken.

As part of WP1 and to support the writing of the 10 literature briefs (aligned with current EU policy priorities), 20 interviews are to be undertaken with project/community leads across STEM and SSH. The interviews will discuss the particular literature brief topic, help confirm methods to include in the toolbox (T1.1) and discuss collaboration in SSH CENTRE activities.

Also as part of WP1, 15 interviews will also be conducted with HEU policy stakeholders, to assess: (i) their use of SSH/STEM research evidence; (ii) roles of citizens; (iii) how the Centre could support their work. These interviews support work being conducted as part of WP4.

In WP5, reflective interviews will be conducted with a sample of participants (5 per WP, 15 total) both before and after the WP2, WP3 and WP4 epistemic experiments (=30 total), with selected participant observation also occurring.

Participants in all interviews will be required to confirm their consent to how the data will be used, using approved project consent form templates (see subsection 4.1 and 5.3).

## 2.3. Focus Groups

As part of WP4, FOE will undertake four series of virtual focus groups based on the four relevant Missions (1. Adaptation to Climate Change: support at least 150 European regions and communities to become climate resilient by 2030, 2. Restore our Ocean and Waters by 2030, 3. 100 Climate-Neutral and Smart Cities by 2030 and 4. A Soil Deal for Europe: 100 living labs and

lighthouses to lead the transition towards healthy soils by 2030), with 40 participants for each - a total of 160 participants. The intention of the focus groups is to explore how citizens engage (or do not engage with) with the priorities identified by the Missions. Participants will be sourced from FOE's existing Debating Europe online user community, with selection being sensitive to gender, ethnicity, age, background, geography.

In WP5, a focus group series involving 40 EU citizens from FOE Debating Europe's community will gather views on the project outcomes/recommendations.

Participants in all focus groups will be required to confirm their consent to how the data will be used, using approved project consent form templates (see subsection 4.1 and 5.3). For the focus groups, the information/consent form will draw upon FOE's Debating Europe standard template (Appendix 1).

## 2.4. Surveys

A call for evidence survey is being conducted as part of WP1, with the insights obtained from this survey (coupled with discussions from the T1.3 workshops) being used to develop a position statement to be submitted to the European Commission on how to better support SSH research in Southern and Central Eastern Europe. The T1.3 call for evidence survey is targeted at SSH (and STEM) researchers who have carried out part of their career or research training in Southern and/or Central Eastern Europe. The survey will explore the current role(s) of SSH in Cluster 5 relevant research, and innovation opportunities in those regions. A target of at least 100 responses has been outlined.

Participants responding to the call for evidence survey will be required to confirm their consent to the data collected (Age, Gender, Countries where they have lived/worked/studied, Experiences, Opinions, Employment experience) and how the data will be used (see Appendix 6 for the survey front matter outlining this).

## 2.5. Online applications

Online applications for both the WP2 SSH-STEM collaborative teams and the WP3 ECR Knowledge Broker training may be analysed and contribute to project outputs.

The WP2 collaborative team applications will include justifications for how their climate/energy/mobility policy recommendation will use interdisciplinary insights spanning SSH and STEM.

The WP3 ECR applications will also include information that may be of use to the research analysis.

As part of the application process, applicants will be required to consent to their (anonymised) application data contributing to project outputs. The information sheet and consent statements will be subject to a future ethics submission by the project.

## 2.6. Videos

As part of WP2, ECRs will produce a video on their area of research, to make up a library that showcases a breadth of SSH insights.

To support the dissemination activities of WP6, short video/audio interviews may be recorded with participants (in-person or online).

Before contributing/participating in a video individuals will provide their consent for the video to be used in the way outlined by signing and dating a form (which may be captured electronically).

## 2.7. Project management documents

A range of other documentation and data will also be created and used throughout the SSH CENTRE project, which does not fall under the category of original research 'data'. This documentation and data includes mailing lists, project templates, planning materials, reporting and financial information, contracts, sign up forms for events and activities. All relevant regulation, institutional guidance and good practice (as set out in sections 3, 4 and 5) should be followed by project partners in relation to such data – in particular regarding compliance with GDPR regulations. Any personal data of consortium members should be treated with the same degree of care as that of external 'participants' in SSH CENTRE activities. For example, individuals' consent will be required before adding them to the mailing list.

## 2.8. Summary of data to be generated

In summary, the current planned activities of the SSH CENTRE project will produce the following data:

### **Events**

- T1.3: workshop with 20 climate-energy-mobility SSH researchers targeting those who have spent part of their career in Southern Europe and Central and Eastern Europe
- T2.3: virtual symposium with collaborative SSH-STEM teams
- T3.2: ECR online training
- T3.3: city hub workshop
- T4.2: 4 online Missions live panels for Missions policymakers (organised by FOE)
- T4.3: 6 high-level virtual meetings with Partnerships' programme managers (organised by EERA)
- T5.1: reflexive workshops at consortium meetings with partners (conducted by CZG)
- T5.3: 3 Policy Insight transdisciplinary events, and a final multi-stakeholder conference, involving a Policy Insight plus an evening networking event (led by FOE)
- T6.3: 3 joint events with sister HEU projects will be organised

### **Interviews and Focus Groups**

- T1.2: 20 interviews are to be undertaken with project/community leads across STEM and SSH to support literature briefs
- T1.2.2: 15 interviews with HEU policymakers
- T5.1: reflective interviews will be conducted with a sample of participants (5 per WP, 15 total) both before and after the WP2, WP3 and WP4 epistemic experiments.
- T4.2: virtual focus groups based on the 4 relevant Missions (1. Adaptation to Climate Change: support at least 150 European regions and communities to become climate resilient by 2030, 2. Restore our Ocean and Waters by 2030, 3. 100 Climate-Neutral and Smart

Cities by 2030 and 4. A Soil Deal for Europe: 100 living labs and lighthouses to lead the transition towards healthy soils by 2030)

- T5.3.3: focus group series focused on the project outcomes/recommendations.

### **Surveys**

- T1.3: call for evidence survey exploring the current role(s) of SSH in Cluster 5 relevant research, and innovation opportunities in Southern and Central Eastern Europe

### **Videos**

- WP2: ECRs will produce a video on their area of research, to make up a library that showcases a breadth of SSH insights.
- WP6: short video/audio interviews to support the dissemination activities

### **Online Applications**

- T2.1: WP2 SSH-STEM collaborative teams
- T3.1: ECR knowledge brokers

### **Project Management Documentation**

- Mailing lists, project templates, planning materials, reporting and financial information, contracts, sign up forms for events and activities

Whilst mindful of ensuring that potential inclusion does not jeopardise activities themselves (e.g. people's sense of being able to speak freely), some data within the project is considered relevant and useful for making open access (subject to explicit consent, appropriately anonymised). Further details on open access data are outlined in subsection 4.2.3.

## **3. Regulatory Frameworks**

This section provides an overview of the regulatory context that all SSH CENTRE institutional data management and protection approvals have been (and will be) set within. It is included here with the particular purpose of acting as a reference for partners.

There is a focus on three sets of regulatory frameworks from across the wider data protection compliance landscape: (1) Horizon Europe and the SSH CENTRE Grant Agreement; (2) EU regulations, in particular GDPR; and (3) national laws and institutional regulations, including research ethics procedures.

### **3.1 Horizon Europe and the SSH CENTRE Grant Agreement**

#### *3.1.1 Relevant Horizon Europe regulations*

As per the minimum requirements for all Horizon Europe projects, the rules for participation and dissemination<sup>1</sup> specifies ethical and data-related issues in several articles (here we highlight those

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<sup>1</sup> Horizon Europe rules for participation and dissemination - <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32021R0695&from=EN>

obligations which are specific to the beneficiaries, rather than obligations on the European Commission itself):

#### **Article 14 Open science**

1. The Programme shall encourage open science as an approach to the scientific process based on cooperative work and diffusing knowledge...:

(a) open access to scientific publications resulting from research funded under the Programme;

(b) open access to research data, including those underlying scientific publications, in accordance with the principle 'as open as possible, as closed as necessary'.

3. Responsible management of research data shall be ensured in line with the principles 'findability', 'accessibility', 'interoperability' and 'reusability' (the 'FAIR principles'). Attention shall also be paid to the long-term preservation of data.

#### **Article 19 Ethics**

1. Actions carried out under the Programme shall comply with ethical principles and relevant Union, national and international law, including the Charter and the European Convention for the Protection of Human Rights and Fundamental Freedoms and its Supplementary Protocols.

Particular attention shall be paid to the principle of proportionality, to the right to privacy, the right to the protection of personal data, the right to the physical and mental integrity of a person, the right to non-discrimination and to the need to ensure protection of the environment and high levels of human health protection.

4. Legal entities participating in an action shall obtain all approvals or other mandatory documents from the relevant national, local ethics committees or other bodies, such as data protection authorities, before the start of the relevant activities. Those documents shall be kept on file and provided to the Commission or the relevant funding body upon request.

##### **3.1.2. Relevant SSH CENTRE Grant Agreement Actions**

The SSH CENTRE Grant Agreement (GA), which all partners have committed themselves to, incorporates the Rules above related to data management and ethics at various points. Those relevant to SSH CENTRE are included here:

#### **ARTICLE 11 — PROPER IMPLEMENTATION OF THE ACTION**

##### **11.1 Obligation to properly implement the action**

*The beneficiaries must implement the action as described in Annex 1 and in compliance with the provisions of the Agreement, the call conditions and all legal obligations under applicable EU, international and national law.*

#### **ARTICLE 14 — ETHICS AND VALUES**

##### **14.1 Ethics**

*The action must be carried out in line with the highest ethical standards and the applicable EU, international and national law on ethical principles. Specific ethics rules (if any) are set out in Annex 5.*

#### **14.2 Values**

*The beneficiaries must commit to and ensure the respect of basic EU values (such as respect for human dignity, freedom, democracy, equality, the rule of law and human rights, including the rights of minorities).*

Specific rules related to Article 14 are further outlined in Annex 5 of the document:

#### **Ethics and research integrity**

*The beneficiaries must carry out the action in compliance with:*

- *ethical principles (including the highest standards of research integrity)*

*and*

- *applicable EU, international and national law, including the EU Charter of Fundamental Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms and its Supplementary Protocols.*

*In addition, the beneficiaries must respect the fundamental principle of research integrity — as set out in the European Code of Conduct for Research Integrity*

*This implies compliance with the following principles:*

- *reliability in ensuring the quality of research reflected in the design, the methodology, the analysis and the use of resources*
- *honesty in developing, undertaking, reviewing, reporting and communicating research in a transparent, fair and unbiased way*
- *respect for colleagues, research participants, society, ecosystems, cultural heritage and the environment*
- *accountability for the research from idea to publication, for its management and organisation, for training, supervision and mentoring, and for its wider impacts and means that beneficiaries must ensure that persons carrying out research tasks follow the good research practices including ensuring, where possible, openness, reproducibility and traceability and refrain from the research integrity violations described in the Code.*

*Before starting an action task raising ethical issues, the beneficiaries must have obtained all approvals or other mandatory documents needed for implementing the task, notably from any (national or local) ethics committee or other bodies such as data protection authorities.*

*The documents must be kept on file and be submitted upon request by the coordinator to the granting authority. If they are not in English, they must be submitted together with an English summary, which shows that the documents cover the action tasks in question and includes the conclusions of the committee or authority concerned (if any).*



*In addition, the beneficiaries must respect the fundamental principle of research integrity as set out in the European Code of Conduct for Research Integrity. This implies compliance with the following principles:*

- *reliability in ensuring the quality of research reflected in the design, the methodology, the analysis and the use of resources*
- *honesty in developing, undertaking, reviewing, reporting and communicating research in a transparent, fair and unbiased way*
- *respect for colleagues, research participants, society, ecosystems, cultural heritage and the environment*
- *accountability for the research from idea to publication, for its management and organisation, for training, supervision and mentoring, and for its wider impacts and means that beneficiaries must ensure that persons carrying out research tasks follow the good research practices including ensuring, where possible, openness, reproducibility and traceability and refrain from the research integrity violations described in the Code.*

## **ARTICLE 15 — DATA PROTECTION**

### *15.1 Data processing by the granting authority*

*Any personal data under the Agreement will be processed under the responsibility of the data controller of the granting authority in accordance with and for the purposes set out in the Portal Privacy Statement.*

*For grants where the granting authority is the European Commission, an EU regulatory or executive agency, joint undertaking or other EU body, the processing will be subject to Regulation 2018/172515.*

### *15.2 Data processing by the beneficiaries*

*The beneficiaries must process personal data under the Agreement in compliance with the applicable EU, international and national law on data protection (in particular, Regulation 2016/67916).*

*They must ensure that personal data is:*

- *processed lawfully, fairly and in a transparent manner in relation to the data subjects*
- *collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes*
- *adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed*
- *accurate and, where necessary, kept up to date*
- *kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed and*
- *processed in a manner that ensures appropriate security of the data.*

*The beneficiaries may grant their personnel access to personal data only if it is strictly necessary for implementing, managing and monitoring the Agreement. The beneficiaries must ensure that the personnel is under a confidentiality obligation.*

*The beneficiaries must inform the persons whose data are transferred to the granting authority and provide them with the Portal Privacy Statement.*

## **ARTICLE 17 — COMMUNICATION, DISSEMINATION AND VISIBILITY**

### *17.1 Communication — Dissemination — Promoting the action*

*Unless otherwise agreed with the granting authority, the beneficiaries must promote the action and its results by providing targeted information to multiple audiences (including the media and the public), in accordance with Annex 1 and in a strategic, coherent and effective manner.*

*Before engaging in a communication or dissemination activity expected to have a major media impact, the beneficiaries must inform the granting authority.*

*Specific rules related to dissemination as outlined in Annex 5*

*The beneficiaries must disseminate their results as soon as feasible, in a publicly available format, subject to any restrictions due to the protection of intellectual property, security rules or legitimate interests.*

### **3.2. EU regulations, in particular GDPR**

SSH CENTRE consortium members must also remain mindful of all relevant EU legislation that relates to data management and protection compliance. Among those relevant to SSH CENTRE is EU General Data Protection Regulation 2016/679 (GDPR), which is the reference text at the European level on the protection of personal data. This sets up a regulatory framework, which seeks to strike a balance between a high level of protection for the privacy of individuals and the free movement of personal data within the EU.

In the SSH CENTRE Grant Agreement, the consortium has affirmed that ‘all personal data will be held securely by the relevant lead partner, will be treated confidentially and handled in accordance with EU GDPR legislation, including individuals having the right to amend/remove personal data’. In the case of data shared with partners outside of the EU (e.g. UK), all partners are nevertheless bound to abide by EU data protection law, including GDPR.

The Principles of GDPR are set out in Article 5 of Regulation (EU) 2016/679 (General Data Protection Regulation):

*‘5.1. Personal data shall be:*

- *processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);*
- *collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in*

*accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');*

- *adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');*
- *accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');*
- *kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');*
- *processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').*

*5.2. The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability').'*

All of the procedures outlined in this Data Management Plan are compliant with the GDPR Principles.

In addition, some partner institutions in the SSH CENTRE consortium will have their own internal data protection regulations to follow. For example, ARU's data protection policy is very closely linked to the EU General Data Protection Regulation 2016/679.

### **3.3. National laws and institutional regulations**

All SSH CENTRE partners are required to act in accordance with any relevant national legislation and other data protection or ethics related regulations which apply to them. This will be the responsibility of each partner, as they will be best placed to understand the needs dictated by their local / national contexts.

Additionally, research-based partners may have specific institutional or national ethical procedures they are required to follow in order to be able to publish results, for example submission of plans to local ethics panels.

## **4. Stages in the data life cycle process**

This section focuses on the data lifecycle of the SSH CENTRE project, focusing on three different stages, specifically: (1) data collection and data processing; (2) data storage, protection, archiving and disposal; and (3) data sharing (including with non-EU countries).

## 4.1 Data collection and data processing

Many, but not all, of the data collection activities in SSH CENTRE involve recruiting human participants. Participation in all SSH CENTRE activities is entirely voluntary, and informed consent (which may be given electronically, or audio/video recorded) is mandatory from all participants from whom personal data will be collected before their active engagement in SSH CENTRE research data collection activities. Before consenting to participate, potential participants are provided with adequate and transparent information about the general purpose and nature of the SSH CENTRE project, as well as how the personal data they submitted or helped produce will be used.

### 4.1.1. Recruitment of participants

The SSH CENTRE project will engage with a wide range of stakeholders (e.g. HEU Policy Stakeholders, Researchers, Local Government Actors, General Public) throughout the duration of its activities.

In organising and running these activities, the consortium partners will responsibly recruit research participants through:

- Their own network of contacts – e.g. at the proposal stage, the SSH CENTRE partners invited some contacts to join, follow or participate in their activities (as evidenced in the original proposal's letters of support)
- Contacts made throughout the lifetime of the project – as part of dissemination and outreach activities, consortium partners will be making new contacts that are invited to follow or participate in the project activities;
- Active and targeted research according to established criteria - e.g. Workshops with Southern and Central Eastern European Researchers as part of scoping (WP1).

In recruiting participants to participate in the SSH CENTRE project, all consortium partners will follow the principles outlined in the sections below.

### 4.1.2. Information sheet details

Partners responsible for research activities which collect personal data will ensure that informed consent is obtained before individuals actively engage in any research activities. This informed consent is provided voluntarily and informed by adequate information (facilitated by the information sheets provided).

This implies that, prior to consenting to participation, participants will be clearly informed of the public engagement goals, how data will be used and processed, possible adverse events and mitigation strategies in place, possibilities to refuse participation or withdraw from the research process without giving any reason or incurring any penalties.

Information sheets will be produced to support informed consent procedures, specifically these information sheets will include:

- the objectives of the project;
- what the collected data will be used for (including that data may be used in published research findings, and whether data will be anonymised in outputs);
- how long personal data will be stored for, and that data may be shared amongst SSH CENTRE partners / specific others;

- that as part of SSH CENTRE's commitment to open science, data may be uploaded to the online open database;
- contact details for further queries, and how to modify / delete information;
- link to the project privacy policy (see subsection 5.5).

Consent forms for currently planned activities, including templates which can be tailored, are included in subsection 5.3.1. These templates are also available in the WP7 folder on the consortium's shared SSH CENTRE MS Teams.

Consent forms should be stored locally by activity leads when completed.

For the WP4 and WP5 focus groups (T4.2 and T5.3.3) undertaken by Friends of Europe (FOE), consent forms and recruitment processes will be informed by Friends of Europe's established practices and procedures (see Appendix 1).

Research activities undertaken by CZG as part of WP5 (i.e. participant observations, reflective interviews) will be submitted for ethical approval by WP Lead CZG's to their institutional ethics committee (Czech Academy of Sciences).

It is not anticipated that children or adults unable to give consent will be involved in any of the research activities of the SSH CENTRE project.

This research, being non-medical, is highly unlikely to generate incidental findings (i.e. to identify previously unknown conditions of clinical significance in participants) however partners will actively consider this possibility when designing consent forms and if deemed necessary will flag this up to participants.

Unless explicit consent is given for use, respondents' names will not be included in project outputs. Within some of the data collection and subsequent outputs, e.g. WP1 Literature Briefs, there is the intention to name the interview participants but only if the participant gives their consent.

#### *4.1.3. Use of recordings*

Participants will always be made aware when recording equipment is being used in activities.

Participants at in-person events will be asked to confirm, via an informative sign-in sheet, that they understand how data will be used. This will include details as to how they can request audio or video recording of themselves not to be used (see Appendix 7).

Any participants at online events who may be visible in recordings will be explicitly informed (through use of a slide outlined by the presenter) that photos and videos from the event may be used in our evaluation and/or dissemination and that if they prefer their data not to be used, they should turn their camera off. They will also be notified of recording taking place through standard software pop-ups.

Short video/audio interviews may be recorded with participants (in-person or online), for the purpose of public dissemination. In this case a signed and dated form (which may be captured electronically) will be required indicating the participant consents to the recording being used in this way.

**Table 2: SSH CENTRE activity categories and their respective informed consent procedures.**

Activity Category (as per section 2)	Informed Consent Procedure
Events (where personal data collected)	In-person: Physical sign-in sheet, which includes information about the project and details of how to request their data not be used. Consent obtained via signature.
	Online: Slide presented on the use of data from the event, and how to request their data not be used. Consent obtained via pop-up.
Interviews and Focus Groups (where personal data collected)	Combined information and consent form, run through prior to or at the start of the interview/focus group. Consent recorded in writing (which may be electronically) or by audio/video recording.
Surveys	Combined information and consent form at the start of survey. Consent recorded through the use of tick boxes
Online Applications	Combined information and consent form at the start of application. Consent recorded through the use of tick boxes
Project Management Documents (where personal data collected)	A range of procedures will be appropriate but must always comply with GDPR. For example, project activities and opportunities may be disseminated via e.g. beneficiary newsletters and contact lists, where the recipients have given consent to be included on these mailing lists.

#### 4.1.4. Data processing

SSH CENTRE does not currently plan to process any previously collected personal data. All activities will involve primary data (and therefore informed consent).

In the unlikely event that SSH CENTRE does seek access to pre-existing data that was collected by partners before the start of the project (such as a contact database of stakeholders), consent must still be obtained from the original participants in the same manner as with new data if it is to be included in SSH CENTRE project-specific outputs and records. This should happen before any data is transferred to the project.

## 4.2 Data storage, protection, archiving and disposal

This subsection focuses on the protection of personal data. The SSH CENTRE project will be compliant with the data protection legislation of member countries and General Data Protection Regulation (GDPR) as outlined in section 3, with details given in this subsection.

All partners have appropriate technical and organisational measures in place to safeguard the rights of the data subjects according to GDPR requirements. GDPR requirements will also be outlined in

the (recorded) ethics webinar (MS7.2) provided by ARU in M4 (December 2023) of the project. All partners are required to watch this webinar.

#### 4.2.1. Data minimisation

Under GDPR, all partners are obliged to limit the data they intend to process to that which is relevant and limited to the purposes of the research project (in accordance with the 'data minimisation' principle):

*"[personal data shall be] adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')"* - Article 5(1)(c) of the GDPR

Personal data will only be collected where necessary, and all personal data will be held securely by the relevant lead partner, will be treated confidentially, and handled in accordance with EU GDPR legislation, including individuals having the right to amend or remove personal data (within timeframes outlined).

Further details of SSH CENTRE's procedures in accordance with the 'data minimisation' principle, will be discussed in subsection 5.4.1.

#### 4.2.2. Secure storage of data

In most of SSH CENTRE's data collection activities, identifiable data will be rendered irreversibly anonymous wherever practicable. Where it is not possible to anonymise data, stringent measures in relation to data protection will be taken, such as security of records, encryption, coding, use of pseudonyms or removal of identifying contextual information. Participants' identities will only be shared between the partners where necessary. Within some of the data collection activities, there is the intention to name participants (upon the provision of consent).

Project data must be kept on password protected computers. In addition, it is recommended that all consortium partners store any personal data related to the project in encrypted files. It is important to be mindful about safeguarding passwords of encrypted files, as they often cannot be retrieved if lost. Network drives will be backed up as part of each partners' IT Service practice. Management of project folders will be the responsibility of each partner.

In all project activities, when stored electronically, identifying information (name, email, gender, job title, organisation) will be held separately from main responses, except in the case when individuals need to be recontacted on the basis of their response, but here again any file containing identifying information would be on password protected computers, with a recommendation for encryption.

It is recommended that any paper data produced, containing sensitive or personal information (e.g. when reimbursing travel and subsistence expenses), is stored in locked filing cabinets within each institution and access restricted to authorised users only. No sensitive paperwork should be left on the desks when unattended.

#### 4.2.3. Anonymisation

Respondents' names will be erased from project outputs, and they will be anonymised, unless explicit consent is given for names to be used. As many participants will be acting in a professional capacity in their interactions with SSH CENTRE (e.g. stakeholder interviews, workshops/event sessions) they may be asked if they are happy to be named (as an individual/organisation) in the

general acknowledgements section of SSH CENTRE outputs. The inclusion of names in project outputs is dependent on informed consent being obtained, the procedure for obtaining this consent is outlined in subsection 5.3.

#### *4.2.4. Withdrawal of data*

All participants have the right to withdraw their data from the project and for their data to be discarded, the timescale for withdrawing data is outlined on the relevant participant information sheet/consent form. Where there is a time limit beyond which data will no longer be identifiable (e.g., in the case of anonymisation or publication of results), and therefore it will be impossible to remove a participant's responses, this will be indicated in the information sheets provided ahead of participant's active involvement in data collection activities.

Participants can amend or withdraw non-anonymised personal data (e.g., names, emails, organisations, job titles, etc.) from records held by SSH CENTRE by requesting the consortium partners to do so at any point. Project contact email addresses will be provided for follow-up purposes such as this.

#### *4.2.5. Disposal of data*

Information sheets and consent forms (i.e., for interviews and surveys) will always indicate how long personal data will be stored for. In the majority of cases, they will indicate that personal data will be destroyed 3 years after it is collected.

As a maximum, and only where indicated, personal details and consent forms will be retained for three years following the project end (i.e. up to 28 Feb 2029).

#### *4.2.6. Privacy policy and website*

SSH CENTRE has an initial published data protection policy in place (<https://sshcentre.eu/data-protection-policy/>), which will be updated and detailed throughout the project when required.

Personal data is only collected through the SSH CENTRE website in two cases: (1) when people want to be included in our mailing list in order to receive updates and information via our e-newsletter every 1-2 months or (2) when people want to sign-up to or be informed about specific activities.

Processing of personal data submitted via the website will be carried out by Mailchimp on behalf of SSH CENTRE for the Newsletter subscription, or by ACC (together with specific activity leads, and potentially the use of online services such as Google forms) on behalf of SSH CENTRE for activity sign-up.

Further detail, and the full data protection policy, are outlined in subsection 5.5.

### **4.3 Data sharing, including with non-EU countries**

Some SSH CENTRE research activities may be taking place in non-EU countries and participants may come from non-EU countries. Data from SSH CENTRE activities may also be shared with



partners or transcribers/translators in non-EU countries. Additionally, as many project deliverables will be publicly available on the project website, the results of the project will be disseminated in non-EU countries as well.

Relevant information sheets must always make clear who data may be shared with.

All those with access to SSH CENTRE data, regardless of location, must confirm they will adhere to the relevant project data management requirements, in particular EU data protection law.

Whilst the advisory board members will not access raw data, they will have privileged access to the emerging data analysis (anonymised) and internal project dynamics throughout the project's lifetime.

All data and digital objects appropriate for sharing will be managed in line with the FAIR (Findable, Accessible, Interoperable, Reusable) principles, i.e. accompanied by persistent identifiers and codes used for processing and analysis, metadata and relevant contextual documentation. This information will be included in a comprehensive data support document that will be produced for each piece of data made available to allow for discovery, citation and reuse. Certain data from the project will be shared on the SSH CENTRE's Open Data Repository (see subsection 4.3.1 and 5.4.2).

#### *4.3.1 Open Data Repository*

SSH CENTRE will, wherever possible, publish research data on a trusted open repository (e.g. Zenodo, OSF). Data to be shared on this open data repository includes, for example, datasets, protocols, methodological guidance, peer review materials, presentations. The uploading and management of these open resources will be led by CONS. Further detail on the Open Science and Open Data component of the SSH CENTRE project can be found in section 8 of the Project Handbook.

Data which has been identified to be shared on an open data repository include:

- 20 STEM/SSH/community lead and 15 policy stakeholder interview notes (T1.2)
- Call for evidence survey responses (T1.3).
- Data from the collaborative SSH-STEM experiments (T2.2)
- Transcripts from 4 'HEU Mission' focus groups (T4.2) and 1 'final recommendations' focus group (T5.3.3)
- Evaluation data (transcripts from: 6 hrs of consortium meetings, 30 WP2-4 interviews, 5 events) (T5.1)

Research data will only be published on the open data repository when explicit consent has been obtained, and the data has been appropriately anonymised (which in the case of evaluation data may mean removing significant portions).

As part of the SSH CENTRE project's commitment to Open Science and Education, the SSH Open Knowledge Platform (D6.2) will be built on the SSH CENTRE's website by M18 (Feb 2024). The Platform will support researchers and other interested stakeholders to find, share and produce the knowledge they need to stimulate effective collaborations between transition focussed SSH and STEM. The platform will include additional educational, awareness-raising and networking features to create an interactive collaboration space. Selected parts will be offered as OER (Open

Educational Resources) that are ready for use, reuse, remix and other forms of adaptation tailored to stakeholders' research, educational, community, business or other needs.

## 5. Ethics Management Plan

ARU is the assigned Ethics lead for the SSH CENTRE project.

The SSH CENTRE project needs to ensure best practice ethical standards are maintained throughout all its activities. This section supports the achievement of ethical standards by outlining procedures and supporting documentation.

The consortium research partners are knowledgeable about the ethical requirements of research involving humans. Many have received formal training and have professional experience in relevant research methodologies, including interviews, surveys, and workshops.

Further to this existing knowledge and experience, consortium partners are required to review this Data and Ethics Management Plan. Additionally, the (recorded) data management and ethics management webinar provided by ARU (MS7.2) outlines the content of this plan and requires partners to confirm that they will follow the protocols outlined. The webinar recording will be shared with new members throughout the project's lifetime to ensure understanding of ethical procedures, processes and supporting documents.

The research plans for the SSH CENTRE project were submitted to the appropriate ARU research ethics panel and ARU Institutional Information Compliance Manager, for review and possible amendment, helping ensure that ethical matters were given the fullest consideration.

### 5.1 Obtaining ethical approvals

#### 5.1.1 Current ethics application

On the 20th October 2022 the SSH CENTRE project submitted its first ethics application to the Global Sustainability Institute School Research Ethics Panel (Anglia Ruskin University).

This application introduced the concept of the project, and covered initial project research activities including T1.2 Interviews and T1.3 Survey, as well as standard templates to use at events/workshops. For the ethics application, participant information sheets/consent forms and draft interview protocols were submitted for the T1.2 Interviews. For the T1.3 survey the ethics front matter was submitted as part of the ethics application. A standard template for activities (i.e. events and workshops) in which photos/videos/notes may be taken was submitted as part of this ethics application, with this covering research activities such as the T1.3 workshops and the T2.3 symposium.

Following review, initial ethical approval was granted on 11th November (Appendix 2 and Appendix 3) with no updates required (application number ETH2223-0756). The participant information sheets/consent forms, survey front matter and consent form for activities whereby photos/videos/notes may be taken are provided as appendices (Appendix 4-8).

These institutional approval processes confirmed that no additional data management, e.g., from national committees, are required under national law.

Not all data collection activities for project outputs are appropriate for submission to ethics panels, as they do not involve the creation of new data for a research study (see definition of ‘research data’ in subsection 1.1). The outputs that were therefore not included in the full ethics submission included material (visual or auditory) collected for use in our dissemination, including project management/communications data, such as meeting minutes (T7.2), reporting interactions (T7.4), social media (T6.2.2), videos (T6.2.3), event attendance (T6.3.2), advisory board exchanges (T7.2.2), and SSH CENTRE member mailing list. These outputs were not included in the full ethics submission, because these are either not classed as research activities or do not involve personal data. However the data protection principles described in these guidelines document apply to these materials in equal measure – see section 3.

### *5.1.2 Future review processes and ethics applications*

The SSH CENTRE project intends to submit further ethics applications/amendments if required once research activities in future Work Packages are finalised, in particular covering the application data of the SSH-STEM experiment teams (T2.1), the application data for ECRs receiving knowledge-brokerage training (T3.1) and the focus groups conducted by FOE (T4.2, T5.3). For the focus groups, ethical procedures and information sheets will draw upon the content of FOEs current ethical documentation, with this being adapted to suit the SSH project and ensure consistency across the ethics documentation of each research methodology.

Ethics approval sought through ARU’s ethics panel will cover the majority of research activities. The exception is the research activities being undertaken by CZG as part of WP5 (T5.1) and the activities of the SSH-STEM teams involved in WP2. Research activities undertaken as part of T5.1 (reflexive interviews and focus groups with partners and participants engaging with WP2, WP3 and WP4, as well as participant observations of consortium meetings and other research activities) will obtain ethical approval from the WP Lead, CZG’s, ethics panel at the Czech Academy of Sciences. To bring consistency to the project, the templates created by ARU have been shared with CZG. Collaborative SSH-STEM teams involved in WP2 will need to explain at application stage any ethical issues that may arise; they will be required to confirm that they will seek ethics approval from PI’s local board before commencing activities (if required).

## **5.2. Ethics webinar for consortium partners**

In December 2022 (M4), ARU (the ethics lead) recorded a webinar which outlined the ethical components of the research project, using this document as a guideline. At least one member of each consortium partner is required to watch this webinar, with a record being kept of who has watched the webinar. This webinar was submitted as MS7.2.

The webinar covered the following (related sections within this report are given in brackets):

1. Regulations the project must comply with (section 3)
2. What ‘data’ is, and project activity categories (subsection 1.1, and section 2)
3. The ethics application process and project timeline: what has been done so far, and planned future amendments (section 5)
4. Informed consent, and the template consent forms and participant information sheets, including when to use them, where to find them, and how to store them when completed (subsection 4.2 and subsection 5.2)

5. Anonymisation processes (subsection 4.2.3 and subsection 5.5).
6. Confirmation of consent procedures (subsection 5.2)
7. Data storage and sharing of data, including uploading data to an Open Repository (subsections 4.2, 4.3 and 5.5).
8. Checklist of what all partners need to do in relation to ethics and data protection.

Partners are also reminded in the video to confirm they have watched the webinar by filling in a shared spreadsheet. Partners will also share the webinar with any colleagues that may join the project at a later point with involvement in data collection or data management activities.

### 5.3. Informed consent procedures/templates

To facilitate informed consent procedures throughout the SSH CENTRE project, participant information sheets/consent form templates relevant to various research activities have been created and shared with consortium members. These consent forms and information sheets are also discussed in detail during the Data Management and Ethics Webinar (see subsection 5.2).

#### 5.3.1. Current informed consent forms and information sheets

Participant information sheets/informed consent forms have been developed for initial research activities including interviews and surveys, as well as standard templates produced for activities in which photos/videos/notes may be taken.

#### 5.3.2. Future tailored informed consent forms and information sheets

The SSH CENTRE project plans to submit further ethics applications/amendments as research plans are developed and finalised, in particular in relation to the application processes within WP2 and 3, and any data collection which may take place as part of WP3.

If new activities arise during the project, but the nature of these new activities can be included in the categories described in section 2 (i.e. interviews, surveys, events/workshops), tailored information sheets and consent forms based on the existing templates (see section 5.3.1) will be created and submitted for Chair's Action to ARU's Global Sustainability Institute (GSI) research ethics panel as an amendment. Therefore, further ethical approval processes will only be undertaken if any of the consortium partners propose to undertake new types of activities not included in those categories.

Any further templates developed during the life of the project - once approved through the ethics amendment - will be uploaded and stored on MS Teams.

## 5.4 Ethics and Data Management

### 5.4.1 Data minimisation

Under GDPR, all partners are obliged to limit the data they intend to process to that which is relevant and limited to the purposes of the research project (in accordance with the 'data minimisation' principle):

*"[personal data shall be] adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')"* - Article 5(1)(c) of the GDPR

As indicated in subsection 4.2.1, personal data will only be collected where necessary, and all personal data will be held securely by the relevant lead partner, will be treated confidentially, and handled in accordance with EU General Data Protection Regulation (GDPR) legislation, including individuals having the right to amend or remove personal data.

As part of the ethics committee review conducted by the Global Sustainability Institute School Research Ethics Panel (Anglia Ruskin University), the extent to which the data to be collected is appropriate for the research purposes of the project was assessed.

#### *5.4.2 Anonymisation and Open Data Repository*

As outlined in subsection 4.2.3, data anonymisation procedures have been developed, with these procedures being outlined in all relevant participant information sheets/consent forms.

Similarly, participants providing data which has been highlighted as useful to include on the open data repository (see subsection INSERT) are informed of this and consent obtained.

#### *5.4.3 Measures to safeguard the rights and freedoms of research participants*

All human participants involved in SSH CENTRE research activities will have provided informed consent, and are aware of their right to withdraw themselves/their data from the research (subject to timelines outlined in respective participant information sheets/consent forms). Consent procedures and templates for obtaining this consent are outlined in subsection 4.1 and 5.3.

#### *5.4.4 Security measures to prevent unauthorised access to personal data*

Stringent measures for data protection are outlined in subsection 4.2. These measures include practices related to the (physical and digital) storage, anonymisation and safeguarding of research data.

### **5.5 Data Protection Policy on SSH CENTRE website**

As part of obtaining informed consent, all research participants will be made aware that they can find the project's full Data Protection Policy via the project website at: <https://sshcentre.eu/data-protection-policy/>. The full Data Protection Policy is provided in Appendix 9.

## Appendix 1 – FOE Focus Group Template

### Debating Europe - participate in our Focus Groups!

Since 2019, Debating Europe organises focus groups to understand the opinions of its community of European citizens, to crowdsource ideas, to develop policy recommendations and to inspire future activities. By participating in a focus group, you will have the chance to discuss the most pressing topics on the European policy agenda with participants from all over Europe. Your ideas and opinions will be then used to spark further reflection and discussion, and will be heard by policy and decision makers.

As part of a focus group, you will be placed in an online group of around 5 individuals. A moderator will ask you several questions while facilitating the discussion. Your opinions will be quoted within a report (which can be internal or publicly available) and attributed to you using only your first name and nationality. There are no right or wrong answers to focus group questions, we want to hear the many varying viewpoints and would like for everyone to contribute their thoughts.

As thanks for your participation in each focus group, you will receive a 20€ Amazon gift voucher.

By filling in this form, you are willing to be contacted by email and invited to participate in future focus groups.

Please note that your personal data will be kept absolutely confidential and will not be shared with any third party.

## Appendix 2 – Confirmation of approval from Technical Coordinator/Ethics Leads' Data Protection Officer

**From:** Humphreys, David <david.humphreys@aru.ac.uk>  
**Sent:** 22 November 2022 16:22  
**To:** Crowther, Ami <ami.crowther@aru.ac.uk>  
**Subject:** [SSH CENTRE] Data Protection and Content Statement

Dear Ami

Please find the statement below as discussed for forwarding for the Funder's consideration and record:

I, David Humphreys, acting as Data Protection Officer for Anglia Ruskin University (ARU), can confirm that I have reviewed the data protection and consent issues relating to the SSH CENTRE project, project number 101069529, funded by the EU's Horizon Europe Programme.

It is my understanding that the project started in September 2022 and will run for 3 and a half years, during which time a number activities will involve the collection, processing, storage, sharing and protection of participant data, such as surveys, interviews, events and project management processes. Following a recent internal application, the technical coordinator and ethics lead of the SSH CENTRE project, the Global Sustainability Institute at ARU, has sought and obtained initial approval from its departmental Ethics Panel. I attach the guidance which supports the University's ethics application process in terms of Data Protection Compliance as evidence of the aspects of processing within the Project that have been considered. This reinforces that the project consortium has been able to identify and deal correctly with ethics issues that may arise SSH CENTRE activities. Further Ethics Panel reviews/amendments are planned should they be required. Having reviewed the intended personal data processing provisions, I am able to confirm that the research and other activities to be undertaken in the project are in line with UK and EU law relating to Data Protection and comply with the University's research standards as they relate to processing personal data.

Thank you

---

**David Humphreys**

Information Compliance Manager

ARU, Bishop Hall Lane, Chelmsford, CM1 1SQ

T: +44 (0) 1245 683696 | Internal ext. 3696

[aru.ac.uk](http://aru.ac.uk)

## Appendix 3 - Letter confirming formal ethical approval from Global Sustainability Institute School Research Ethics Panel

11 Nov 2022

Dear Ami

**Principal Investigator: Ami Crowther**

**Research ethics application number: ETH2223-0756**

**Project Title: SSH CENTRE: Social Sciences & Humanities for Climate, Energy aNd Transport Research Excellence**

**Risk Level: Yellow (Medium)**

### **Notification of ethical approval**

*I am pleased to inform you that your ethics application has been approved by the School Research Ethics Panel (SREP) under the terms of ARU's Research Ethics Policy (available on the research ethics website at [www.aru.ac.uk/researchethics](http://www.aru.ac.uk/researchethics)).*

*Ethical approval is given for a period of 3 years for staff from the date of this letter.*

*If your research will extend beyond this period, it is your responsibility to apply for an extension before your approval expires.*

*It is your responsibility to ensure that you comply with ARU's Research Ethics Policy and the Code of Practice for Applying for Ethical Approval available at [www.aru.ac.uk/researchethics](http://www.aru.ac.uk/researchethics), including the following:*

- *Following the procedure for submitting amendments to the panel, should there be any substantial change to your research. You cannot implement substantial amendments to your research prior to receiving approval from the SREP.*
- *Following the procedure for reporting accidents, adverse events and incidents.*
- *Complying with the General Data Protection Requirement and Data Protection Act (2018).*
- *Complying with any other legislation relevant to your research. You must also ensure that you are aware of any emerging legislation related to your research and that you make all relevant changes of legal compliance to your study (for which you will need to obtain ethical approval).*
- *Obtaining any further ethical approval required from the organisation or country (if not carrying out research in the UK) where you will be carrying out the research. This includes other Higher Education Institutions, if you intend to carry out any research involving their students, staff or premises. Please ensure that you send copies of this documentation to the SREP Secretary, if required, prior to starting your research.*



- *Complying with any laws of the country where you are carrying out the research and obtaining any other approvals or permissions that are required.*
- *Abiding by any professional codes of conduct relating to your research or requirements from your funding body (please note that for externally funded research, where the funding has been obtained via ARU, a Project Risk Assessment must have been carried out prior to starting the research).*
- *Completing a Risk Assessment (Health and Safety), if required, and updating this annually or whenever any aspects of your study change which might affect this.*
- *Notifying the SREP Secretary when your study has ended.*

*Please also note that your research may be subject to monitoring.*

*Should you have any queries, please do not hesitate to contact me.*

*I wish you an interesting and successful research experience.*

*Yours sincerely,*

*Prof Aled Jones*

*Global Sustainability Institute (GSI) SREP*

*ARU Chelmsford, Bishop Hall Lane, Chelmsford, CM1 1SQ 01245 493 131*

*ARU Cambridge, East Road, Cambridge, CB1 1PT 01245 493 131*

## Appendix 4 - Tailored Information and consent form template for SSH CENTRE Literature Brief interviews (T1.2.1)

*Text in red is for tailoring to specific activities.*

### SSH CENTRE literature brief interviews

Thank you for agreeing to participate in this **interview** as part of the SSH CENTRE research project. The [SSH CENTRE](#) (*Social Sciences & Humanities for Climate, Energy aNd Transport Research Excellence*) project aims to generate best practices for incorporating Social Sciences & Humanities (SSH) and transdisciplinary research into the European Union's (EU's) climate transition policy.

#### Interview details

- We are undertaking **20 interviews** between **November and December 2022** with **project and network leads, researchers and other experts** on 10 EU priority policy areas.
- The interview will last around **30 minutes** (online) and will be **video-recorded with research notes made from this recording**.
- Your interview will focus on **INSERT LITERATURE BRIEF TOPIC**, and the information provided through the interview will support the development of a 4-page literature brief which will be published online.
- You may be asked for the following **Personal Data**: Name/ Contact details, Experiences, Opinions

#### Outputs

- This interview will feed into a **publicly available literature brief**. We would like to note your contribution by naming you in the acknowledgements section, but will only do this if you give us permission to do so (see consent statements).
- In addition, SSH CENTRE is committed to Open Science including transparent sharing of data and results. This means notes from this interview (but not recordings) will be uploaded to **SSH CENTRE's open data platform** - subject to your explicit consent, and appropriately anonymised (which may mean removing portions).
- You are free to decide before or during the interview not to take part, or to **withdraw your data within 2 weeks of taking part**.
- SSH CENTRE activities have received ethical approval from **Anglia Ruskin University, UK** (the technical coordinators of the project).
- In relation to SSH CENTRE, **Interviewer's organisation** is responsible for the personal data you give to us in this interview as a Joint Controller with Anglia Ruskin University.
- Our general privacy notice explaining our use of your personal data for research purposes is available here: <https://sshcentre.eu/data-protection-policy/>

#### Any questions?

Contact: [rosie.robison@aru.ac.uk](mailto:rosie.robison@aru.ac.uk) (ethics lead)

Complaints: [complaints@aru.ac.uk](mailto:complaints@aru.ac.uk)

#### Consent statements

**At the start of the interview you will be asked to confirm the following 10 statements; the interviewer will video record your confirmation:**

1. I am over 18 years old.

2. I have been provided with a copy of this information sheet and consent form. I have read this information sheet and agree to be interviewed.
3. I understand what my role will be and what will happen to the data collected from me.
4. All my questions have been answered to my satisfaction and I understand I can ask further questions at any time.
5. I understand the interview will be recorded and that quotes from me may be used in SSH CENTRE materials and reports. **Please confirm to your interviewer if you are happy to be acknowledged in the associated SSH CENTRE literature brief by name and/or by project/organisation.**
6. I understand that notes made based upon my interview will be uploaded to an open access online repository.
7. I understand that I can withdraw my data during the interview, and within 2 weeks of the interview, without giving a reason, by contacting the interviewer.
8. I understand that in the unlikely event of the interview revealing incidental findings that are not harmless (e.g. related to criminal activity or abuse) these will be reported to appropriate authorities, e.g. the police.
9. **Data Protection 1:** I agree to Anglia Ruskin University processing personal data which I have supplied. I understand personal data and recordings will be held for a maximum of **3 years after the interview**, after which time it will be destroyed.
10. **Data Protection 2:** I understand the recording or text of my interview may be shared with SSH CENTRE partners, all of whom are contractually bound to abide by EU data protection law.



This project has received funding from the European Union's Horizon Europe research and innovation programme under grant agreement No 101069529 and from UK Research and Innovation (UKRI) under the UK government's Horizon Europe funding guarantee [grant No 10038991].

## Appendix 5 - Tailored Information and consent form template for SSH CENTRE HEU Policy Stakeholder Interviews (T1.2.2)

*Text in red is for tailoring to specific activities.*

### SSH CENTRE Policy Stakeholder interviews

Thank you for agreeing to participate in this **interview** as part of the SSH CENTRE research project. The [SSH CENTRE](#) (*Social Sciences & Humanities for Climate, Energy aNd Transport Research Excellence*) project aims to generate best practices for incorporating Social Sciences & Humanities (SSH) and transdisciplinary research into the European Union's (EU's) climate transition policy.

#### Interview details

- We are undertaking **15 informal interviews** across the end of 2022/early 2023 with **Policy Stakeholders**, including individuals involved in SET-Plan, HEU Missions, Pillar II Partnerships and Pillar III Partnerships.
- The interview will last up to **30 minutes** (online or in-person) and will be **video or audio-recorded, with research notes made based upon this recording**.
- Discussion will cover **how policy stakeholders use research evidence, the roles of citizens and how the SSH CENTRE could work with policy communities in later project tasks**.
- You may be asked for the following personal data: Name/ Contact details, Experiences, Opinions

#### Outputs

- This interview will primarily feed into our planning for collaborations later in the project but may also be briefly reported in **publicly available and/or confidential reports**. We would like to note your contribution by naming you in the acknowledgements section, but will only do this if you give us permission to do so (see consent statements).
- In addition, SSH CENTRE is committed to Open Science including transparent sharing of data and results. This means notes from this interview (but not recordings) will be uploaded to **SSH CENTRE's open data platform** - subject to your explicit consent, and appropriately anonymised (which may mean removing portions).
- You are free to decide before or during the interview not to take part, or to **withdraw your data within 2 weeks of taking part**.
- SSH CENTRE activities have received ethical approval from **Anglia Ruskin University, UK** (the technical coordinators of the project).
- In relation to SSH CENTRE, **Interviewer's organisation** is responsible for the personal data you give to us in this interview as a Joint Controller with Anglia Ruskin University.
- Our general privacy notice explaining our use of your personal data for research purposes is available here: <https://sshcentre.eu/data-protection-policy/>

#### Any questions?

Contact: [rosie.robison@aru.ac.uk](mailto:rosie.robison@aru.ac.uk) (ethics lead)

Complaints: [complaints@aru.ac.uk](mailto:complaints@aru.ac.uk)

#### Consent statements

**At the start of the interview you will be asked to confirm the following 10 statements; the interviewer will video record your confirmation:**

1. I am over 18 years old.
2. I have been provided with a copy of this information sheet and consent form. I have read this information sheet and agree to be interviewed.
3. I understand what my role will be and what will happen to the data collected from me.
4. All my questions have been answered to my satisfaction and I understand I can ask further questions at any time.
5. I understand the interview will be recorded and that anonymised quotes from me may be used in SSH CENTRE materials and reports. **Please confirm to your interviewer if you are happy to be acknowledged in SSH CENTRE materials and reports by name and/or by project/organisation.**
6. I understand that notes made based upon my interview will be uploaded to an open access online repository.
7. I understand that I can withdraw my data during the interview, and within 2 weeks of the interview, without giving a reason, by contacting the interviewer.
8. I understand that in the unlikely event of the interview revealing incidental findings that are not harmless (e.g. related to criminal activity or abuse) these will be reported to appropriate authorities, e.g. the police.
9. **Data Protection 1:** I agree to Anglia Ruskin University processing personal data which I have supplied. I understand personal data and recordings will be held for a maximum of **3 years after the interview**, after which time it will be destroyed.
10. **Data Protection 2:** I understand the recording or text of my interview may be shared with SSH CENTRE partners, all of whom are contractually bound to abide by EU data protection law.

This project has received funding from the European Union's Horizon Europe research and



innovation programme under grant agreement No 101069529 and from UK Research and Innovation (UKRI) under the UK government's Horizon Europe funding guarantee [grant No 10038991].

## Appendix 6 - Tailored Information and consent survey front matter (T1.3)

### What is the SSH CENTRE project?

The SSH CENTRE (Social Sciences & Humanities for Climate, Energy and Transport Research Excellence) project aims to **generate best practices** for **incorporating Social Sciences & Humanities** (SSH) research into policies to address climate change.

One objective of the SSH CENTRE project is to enable a **better representation of SSH** research from different European regions. In particular, disparities remain in terms of participation in research collaborations between the Western/Northern parts of Europe and Southern, Central and Eastern European countries.

### What is this Call for Evidence for?

SSH CENTRE is currently running this Call for Evidence survey to gather the views of **researchers** who have worked in **Southern and Central Eastern Europe** (now or in the past) with experience **working in or with SSH disciplines** related to **climate, energy and mobility** topics.

Insights from this Call for Evidence will be discussed at two workshops with climate-energy-mobility SSH researchers in early 2023 to create a Position Statement which will be submitted to the European Commission (Directorate-General for Research & Innovation) on how SSH in Southern and Central Eastern Europe can be better supported.

### How long will it take and what will you ask me?

The Call is intentionally designed to be **quick and easy to complete** (only 3 sections) taking approximately 10-20 minutes.

Within the survey, you will be asked for the following personal data: Age, Gender, Countries where you have lived/worked/studied, Experiences, Opinions, Employment experience. Our general privacy notice explaining our use of your personal data for research purposes is available here: <https://sshcentre.eu/data-protection-policy>. Responses will be anonymised unless you indicate you would be interested in being contacted about the workshops taking place in March 2023. Should you have any questions about this Call for Evidence, or the SSH CENTRE project more broadly, please contact Viktor Varjú (varju.viktor@krtk.hu, survey supervisor).



*This project has received funding from the European Union's Horizon Europe research and innovation programme under grant agreement No 101069529 and from UK Research and Innovation (UKRI) under the UK government's Horizon Europe funding guarantee [grant No 10038991].*

## Eligibility and consent statements for the survey

1. I am a researcher (self-defined) with experience of studying or working in or with Social Sciences and Humanities disciplines (for the purposes of this survey this includes Business, Communication Studies, Development, Economics, Education, Environmental Social Science, Gender, History, Human Geography, Law, Philosophy, Planning, Politics, Psychology, Science & Tech. Studies, Social Anthropology, Social Policy, Sociology, Theology and Ethics).
2. I have spent some time studying at postgraduate level or working as a researcher in a country in Central Eastern or Southern Europe (for the purposes of this survey this includes Albania, Belarus, Bosnia and Herzegovina, Bulgaria, Czechia, Croatia, Greece, Hungary, Italy, Malta, Montenegro, North Macedonia, Poland, Portugal, Republic of Moldova, Romania, Serbia, Slovakia, Slovenia, Spain, Turkey, Israel, Ukraine).
3. I have experience of studying or working in climate, energy and/or mobility.
4. I am over 18 years old.
5. I am happy for information submitted in this form to be quoted anonymously in publicly available online reports. Details about organisations or locations may also be included, but every effort will be made to ensure that individuals cannot be identified.
6. Data protection 1: I agree to CERS processing personal data which I have supplied. Personal data will be held for a maximum of 3 years after the end of the project (i.e. up until the end of February 2029), after which time it will be destroyed.
7. Data protection 2: I understand that data may be shared with SSH CENTRE project partners, some of whom are based outside of the EU, but all of whom are contractually bound to abide by EU data protection law.

## Appendix 7 - Information and consent form template for SSH CENTRE in-person events

Text in red is for tailoring to specific activities. Yellow highlighting indicates statements which can be included or deleted as appropriate.



**TEMPLATE FOR IN PERSON ACTIVITIES AND EVENTS WHERE  
PHOTOS/VIDEOS/NOTES ARE TAKEN**  
[Add in any additional logos, e.g. organiser, host institution]

### Use of Photos, Videos and Notes



This project has received funding from the European Union's Horizon Europe research and innovation programme under grant agreement No 101069529 and from UK Research and Innovation (UKRI) under the UK government's Horizon Europe funding guarantee [grant No 10038991].

- SSH CENTRE is a 3.5 year research project working to generate and share best practice for how Social Sciences & Humanities (SSH) and transdisciplinary research can accelerate the EU's journey to a sustainable future.
- **Photos/videos and notes** from this activity may be used in public or confidential outputs.
- If you would prefer photos/videos of you **not** to be used, just let **organiser name** know.
- Questions? Contact: **organiser name, role (email)** and/or Prof Rosie Robison, SSH CENTRE ethics lead ([rosie.robison@aru.ac.uk](mailto:rosie.robison@aru.ac.uk)).
- For Project privacy policy see: <https://sshcentre.eu/data-protection-policy/>

Name	Signature	I consent to photos and videos of me at this event being used	I am happy to be acknowledged by name and organisation in the event report
[To be filled in by event organiser]		Yes / No	Yes / No





## Appendix 8 – Information slide template on the use of data for SSH CENTRE online events

*Text in red is for tailoring to specific activities. Yellow highlighting indicates statements which can be included or deleted as appropriate.*

# Use of photos, videos and notes from today's event

- SSH CENTRE is a 3.5 year project working to generate and share best practice for how Social Sciences & Humanities (SSH) and transdisciplinary research can accelerate the EU's journey to a **sustainable future**.
- **Photos/videos and notes** from today's event may be used in public or confidential outputs.
- If you would prefer photos/videos of you **not** to be used, please turn your camera off when recording is taking place.
- No participant names will be included in dissemination materials without explicit consent.
- Questions? Contact: **organiser name, role (email)** and/or Prof Rosie Robison, SSH CENTRE ethics lead (rosie.robison@aru.ac.uk).
- For Project privacy policy see: <https://sshcentre.eu/data-protection-policy/>

## Appendix 9 – SSH CENTRE Data Protection Policy

### **SSH CENTRE Data Protection Policy**

#### **Who are we?**

*We are the SSH CENTRE project consortium, which is led by Acentoline Comunicación (administrative coordinator) and the Global Sustainability Institute within Anglia Ruskin University (ARU) Higher Education Corporation (technical coordinator and ethics lead), working with a number of partners.*

#### **What does this Data Protection Policy cover?**

*This policy is in two sections. Section 1 is about Data Protection related to the activities of the SSH CENTRE project, section 2 is about Data Protection related to the website <https://sshcentre.eu>.*

*We will revise or update this policy if our practices change. Please refer to this page for the latest information and the effective date of any changes.*

#### **Section 1: Data Protection for activity participants**

*This section is written for those who have chosen to or have been invited to participate in any of the SSH CENTRE project activities.*

#### **Why may we ask for your Personal data?**

*The SSH CENTRE project aims to facilitate interdisciplinary collaboration and generate best practices for incorporating Social Sciences & Humanities (SSH) and transdisciplinary research into the European Union's (EU's) climate transition policy. To support the achievement of this aim, various research activities are being undertaken.*

*What Personal Data do we need from you?*

*SSH CENTRE collects personal data via its activities (covered in this section) and via its website (covered in section 2).*

*Depending on the activity, we may ask for your:*

- *Name/ Contact details*
- *Experiences*
- *Opinions*

*We will not ask you for any Special Category Data.*

#### **What do we use your personal data for?**

*SSH CENTRE uses the personal information given by data subjects related to project activities to run those activities and to produce project outputs.*

*Informed consent regarding use of privately contributed data (e.g. as part of surveys, interviews, and focus groups) is mandatory across the participatory activities of SSH CENTRE.*

Publicly available personal data may be processed where the processing is necessary for SSH CENTRE to perform a task in the public interest or for official functions, and the task or function has a clear basis in law.

We do not use automated processing (such as algorithms or profiling) for decision-making.

All personal data used for research purposes will be anonymised before publishing in our outputs, except in cases where clear and explicit consent has been given to the use of this data (e.g. where someone has agreed to be quoted as a named source).

### **Who else will process or see your data?**

SSH CENTRE is a project involving 13 partners (see: <https://sshcentre.eu/about/>), each of whom are responsible for ensuring their compliance with relevant national and international data protection law, including GDPR.

Processing of personal data in relation to SSH CENTRE activities will be carried out by the SSH CENTRE partner(s) responsible for those activities. More information, including on key contacts for each activity, can be found via the website, or by contacting: Prof Chris Foulds ([chris.foulds@aru.ac.uk](mailto:chris.foulds@aru.ac.uk)) and Prof Rosie Robison ([rosie.robison@aru.ac.uk](mailto:rosie.robison@aru.ac.uk))

SSH CENTRE will not share your personal data with third parties, except in the case of explicit consent (e.g. naming contributors to activities in published reports).

### **What are your rights over our use of your data?**

Our use of your data for this purpose will allow you to exercise the following rights: (Click links for further details)

- The right to be Informed
- The right of Access
- The right to Rectification
- The right to Erasure
- The right to Restrict Processing
- The right to Object

You can exercise your rights by contacting:

- Any partner you have liaised with regarding specific activities.
- Prof Chris Foulds ([chris.foulds@aru.ac.uk](mailto:chris.foulds@aru.ac.uk)) and Prof Rosie Robison ([rosie.robison@aru.ac.uk](mailto:rosie.robison@aru.ac.uk)) for any activities.

The Data Protection Officer for the Technical Coordinator and Ethics Lead for the project, Anglia Ruskin University, is:

- David Humphreys – [dpo@anglia.ac.uk](mailto:dpo@anglia.ac.uk)

Will we send your data to partners based in a country outside the European Economic Area?

Your data may be shared with an organisation based in a country outside the European Economic Area. The security of your data and your rights over it are protected because the following legal arrangement is in place:

- An 'Appropriate Safeguard' is in place, which is a legal agreement between Public Bodies.

### **How long will we keep your data?**

*For more information about our approach to retaining information please click [here](#).*

*We will delete or destroy the personal data you give us a maximum of 3 years after the project has been formally closed (i.e. March 2029).*

*Use of your data is addressed in the following Corporate Privacy Notice:*

- *Research Participants*

*And is referenced under the title “What is the legal basis for using your personal data?” under section A1-2.*

### **What allows us to use your data in this way?**

*The Data Protection Act (2018) allows us to use your personal data when consent has been obtained from you*

### **Concerns or Complaints**

*The SSH CENTRE project is coordinated by Acentoline Comunicación in Spain and Anglia Ruskin University in the UK, however individual partners and subcontractors (located in different countries) have responsibility for both controlling and processing personal information related to specific activities. If you have concerns over our handling of your personal data please inform us via and also contact [dpo@aru.ac.uk](mailto:dpo@aru.ac.uk) with details.*

*The Data Protection Act (2018) gives you the right to make a complaint to a regulator about our use of your personal data. The regulator is the Information Commissioner’s Office (ICO) and they can be contacted at:*

- *Online: <https://ico.org.uk/make-a-complaint/>*
- *Phone: +44 (0)303 123 1113*

## **Section 2: Data Protection for Website Users**

### **Data Collection**

*SSH CENTRE uses the personal information given by data subjects via the website in two cases, when people want to (1) be included in our mailing list in order to receive updates and information via our newsletter, or (2) to sign up to events and/or opportunities to participate in the research project.*

*Processing of personal data submitted via the website will be carried out by Acento Comunicación who is the database administrator and by Mailchimp on behalf of SSH CENTRE for the Newsletter subscription. Mailchimp and they will receive the data only to use it for the purpose of sending you our emails in accordance with their Privacy Policy and Terms. You can unsubscribe and delete your data at any time by contacting us at Prof Chris Foulds ([chris.foulds@aru.ac.uk](mailto:chris.foulds@aru.ac.uk)) and Prof Rosie Robison ([rosie.robison@aru.ac.uk](mailto:rosie.robison@aru.ac.uk)) or clicking unsubscribe in the emails we send.*

*Subscription to the SSH CENTRE e-newsletter requires an email address (this is the mandatory field to sign-up). Additional information, including first name, last name, type of*

*organisation/sector/country are not mandatory, but the details provided here support understanding of who is engaging with the project and help improve activities.*

*If you receive a news alert about an event that you register for, details about data protection will be included on the registration form.*

*Personal information will only be kept for as long as it is needed, or until we are requested to stop using it by the data subject.*

*SSH CENTRE will not share your personal data with third parties, except in the case of explicit consent (e.g. naming contributors to activities in published reports).*

*Our use of your data will allow you to exercise the following rights: (Click links for further details)*

- *The right to be Informed*
- *The right of Access*
- *The right to Rectification*
- *The right to Erasure*
- *The right to Restrict Processing*
- *The right to Object*

*You can exercise your rights by contacting:*

- *Prof Chris Foulds (chris.foulds@aru.ac.uk) and Prof Rosie Robison (rosie.robison@aru.ac.uk) for the newsletter or any other activities.*

## **Website Cookies**

*When using our website, a small amount of data related to your use of the website is collected by placing cookies on your device.*

*Enabling cookies is not strictly necessary to be able to browse the website; cookies can be deleted or blocked, but doing so may mean that some features of this site may not work as intended.*

*A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.*

*Cookies are used in a number of ways on the SSH CENTRE website. We use cookies to remember:*

- *Your display preferences (e.g. contrast colour settings, font size)*
- *If you have already replied to a survey pop-up asking about your experience of the website (by remembering this it means you won't be asked again)*
- *If you have agreed (or not) to us using cookies on this site*

*Some videos embedded in our pages use a cookie to anonymously gather statistics on how you got there and what videos you visited.*

*Cookies are also stored by Google Analytics, the corporate service which measures the effectiveness and efficiency of the European Commission's websites on EUROPA.*

*The cookie-related information is not used to identify you personally and the pattern data is fully under our control. These cookies are not used for any purpose other than those described here.*

*Some of our pages or subsites may use additional or different cookies to the ones described above. If so, the details of these will be provided in their specific cookies notice page. You may be asked for your agreement to store these cookies.*