

OpenGovIntelligence

Fostering Innovation and Creativity in Europe through Public Administration Modernization towards Supplying and Exploiting Linked Open Statistical Data

Deliverable 6.5

Ethics Policy

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Editor(s):	Owen Harney (NUIG), Michael Hogan (NUIG)
Contributor(s):	Evangelos Kalampokis (CERTH), Ricardo Matheus (TU Delft), Robert Krimmer (TUT) Maarja Toots (TUT), Paul Hermans (ProXML), Bill Roberts (Swirrl) Jamie Whyte (Trafford Council), Tom Van Gulck (VLO), Konstantinas Pečiulis (EL), Eleni Chaniotaki (MAREG)
Reviewer(s):	Efthimios Tambouris (CERTH)
Approved by:	All Partners

Abstract:	This document reports on how any potential ethical issues in OpenGovIntelligence will be addressed by the partners involved in field work activities, and in data collection and management. Potential ethical issues for OpenGovIntelligence, in the categories of “Human participants involved in research” and “Protection of Personal Data”, are addressed. With regard to these, a description of ethical clearance considerations and processes of each partner involved in research activities is provided.
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	<i>Role</i>	<i>Name</i>	<i>Short Name</i>	<i>Country</i>
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2.	R&D partner	Delft University of Technology	TU Delft	Netherlands
3.	R&D partner	National University of Ireland, Galway	NUIG	Ireland
4.	R&D partner	Tallinn University of Technology	TUT	Estonia
5.	R&D partner	ProXML bvba	ProXML	Belgium
6.	R&D partner	Swirrl IT Limited	SWIRRL	United Kingdom
7.	Pilot Partner	Trafford council	TRAF	United Kingdom
8.	Pilot Partner	Flemish Government	VLO	Belgium
9.	Pilot Partner	Ministry of Interior and Administrative Reconstruction	MAREG	Greece
10.	Pilot Partner	Ministry of Economic Affairs and Communication	MKM	Estonia
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List of Abbreviations

The following table presents the acronyms used in the deliverable in alphabetical order.

<i>Abbreviation</i>	<i>Description</i>
CI	Collective Intelligence
EU	European Union
GDPR	General Data Protection Regulation
HREC	Human Research Ethics Committee
LOSD	Linked Open Statistical Data
MOOC	Massive Open Online Course
PIA	Privacy Impact Assessment
REC	Research Ethics Committee
UN	United Nations
WP	Work Package

Executive Summary

The OpenGovIntelligence project aims to stimulate sustainable economic growth in Europe through fostering innovation in society and enterprises. Towards this end, OpenGovIntelligence suggests a holistic approach for the modernization of Public Administration by exploiting Linked Open Statistical Data (LOSD) technologies. The project will involve multiple phases of research, each of which must be designed and conducted in accordance with high standards of research ethics. This document reports on how the potential ethical issues in the OpenGovIntelligence project will be identified and addressed by the partners involved in field work activities, and in data collection and management. As such, the primary objectives of this deliverable are to: (a) review European, National, and Local, ethical principles and procedures; (b) identify and address ethical considerations associated with the OpenGovIntelligence project; (c) review the ethical clearance requirements and procedures in each research site, and; (d) review data protection principles across sites.

Objectives (a) and (b) were addressed by means of a review of EU directives on ethical principles (EU No 1291/20131: Article 19), protection of personal data (EU Data Protection Directive 95/46/EC), and the General Data Protection Regulation. All research activities in OpenGovIntelligence will be performed in compliance with EU ethical principles. As required by these directives, all research involving human participants will adhere to the principles of transparency; legitimate purpose; and proportionality; and at all stages will involve obtaining informed consent; ensuring comprehension, minimal risk and voluntariness; and maintaining privacy and confidentiality.

Objectives (c) and (d) were addressed by means of a review of research activities, ethical clearance requirements and data protection principles by each research partner. The results of this process revealed significant variations in ethical clearance requirements across sites. More specifically, while a formal ethics application to an REC has been submitted for research activities run by NUIG (stakeholder workshops), CERTH (stakeholder workshops, and questionnaires), and TUT (stakeholder workshops), this is not the case in the other sites. TUDelft are required to complete an ethical checklist, on the basis of which a formal application to an REC is determined. In the case of TUDelft activities on OpenGovIntelligence (Stakeholder Interviews, surveys, and workshops), a formal application is not required. In each of these cases, NUIG, CERTH, TUT, and TUDelft, the relevant application or checklist has been submitted, and approved.

While only NUIG, TUT, CERTH and TUDelft, are required to submit a formal application or checklist to a REC, ProXML and Swirrl IT Limited, are still required to adhere to strict guidelines in determining the ethical status of their research. ProXML follows research ethics guidelines from Belgian Universities (University of Antwerp and KULeuven). Research activities which involve consenting adults are anonymous, do not focus on sensitive topics, and do not collect information which could harm the participant's reputation, including requirements analysis interviews, do not require a formal research ethics application. However, ProXML, as part of the OpenGovIntelligence project, are required to adhere to EU principles of research ethics and data protection, as outlined in this document, including obtaining informed consent from participants, and ensuring privacy and confidentiality.

Finally, as regards ethical clearance, Swirrl IT Limited, based on a review of existing protocols from Trafford's Information Governance Team, as well as available support from the UK Centre for Excellence in Sharing, and UK Information Commissioner's Office, will conduct a Privacy Impact Assessment (PIA), but are not required to submit a formal ethics application to a REC. This PIA will require Swirrl to identify privacy-related risks, identify and evaluate privacy solutions, record the outcomes of the PIA, and integrate these outcomes into the project plan.

As per the M12 update of this deliverable, all partners who have applied for ethical clearance have been granted approval, and thus have proceeded with research activities. All partners, regardless of the need for formal ethical approval, remain cognisant of the ethical principles and policies outlined in this deliverable, and will adhere to them throughout the project.

Next steps, as regards ethical considerations, involve planning for future research activities during this project, which will require additional review and consideration of ethical principles, and may, in some cases, require additional formal applications to research ethics committees.

1 Introduction

1.1 Scope

This deliverable seeks to outline the approach taken to ethics management by the OpenGovIntelligence project. This project, which aims at stimulating sustainable economic growth in Europe through fostering innovation in society and enterprises, involves several research activities, all of which will be designed and conducted with strict adherence to principles of ethical research at the European, national, and local levels. As such, this deliverable outlines the key research activities which have been proposed across sites, the relevant ethical considerations and policies in place associated with these activities, and the steps which are being taken, and will be taken, to ensure that high ethical standards are maintained throughout this project.

1.2 Audience

The audience for this deliverable is as follows:

- European Commission
- Centre for Research & Technology - Hellas
- Delft University of Technology
- National University of Ireland, Galway
- Tallinn University of Technology
- ProXML
- Swirrl IT Limited
- Trafford Council
- Flemish Government
- Ministry of Interior and Administrative Reconstruction
- Ministry of Economic Affairs and Communication
- Marine Institute
- Public Institution Enterprise Lithuania

1.3 Structure

The main body of this deliverable is divided into four key sections.

Section 2 provides an overview of the primary ethical principles and considerations which will be dealt with throughout OpenGovIntelligence. This includes, adherence to EU Principles of research ethics, awareness of ethical consideration associated with open data, and awareness of ethical considerations associated OpenGovIntelligence research activities.

Section 3 provides a detailed account of the preparation taken by each research partner to maintain high ethical standards. A description of the ethical clearance processes and policies from each site is given, as well as a description of the relevant research activities. Section 3 also details the on-going process of monitoring ethical issues within the project.

Section 4 provides an overview of data protection principles, as provided by each research partner. As a result of this review process, each research partner is acutely aware of the key data protection principles which must be adhered to.

Section 5 concludes this deliverable by summarising the information provided in earlier section, and provides an overview of research activities and ethical clearance processes in tabular form. Finally, section 5 closes by noting the next steps involved in ethics management for OpenGovIntelligence.

Finally, the deliverable includes four appendices (A-D), which provide (A) links to relevant data protection documents at national and local levels, (B) ethical approval requests submitted by partners (C) a sample informed consent form to be used for research activities, and (D) letters of commitment to data protection principles.

2 OpenGovIntelligence Ethical Principles and Considerations

This section provides an overview of ethical principles which have been considered by OpenGovIntelligence, and will be addressed throughout the project. This includes: adherence to European Union principles, consideration of potential ethical issues raised by open data research, following ethical principles associated with research involving human participants, and careful protection of personal data.

2.1 European Union Principles

All research activities involving human subjects in OpenGovIntelligence have to be performed complying with ethical principles and also according to national, international and EU legislation (i.e., Charter of Fundamental Rights of the European Union¹ and the European Convention on Human Rights²). EU establishes the following regulation (EU) No 1291/20131: Article 19: “Ethical principles”:

“All the research and innovation activities carried out under Horizon 2020 shall comply with ethical principles and relevant national, Union and international legislation, including the Charter of Fundamental Rights of the European Union and the European Convention on Human Rights and its Supplementary Protocols.”

The protection of personal data, at European level, is ensured by the EU Data Protection Directive 95/46/EC (DPD)³. In accordance with this Directive, Member States shall protect the fundamental rights and freedom of natural persons and, in particular, their right to privacy, with respect to the processing of personal data.

Specifically, they have to provide:

Transparency: everyone has the right to be informed when his or her personal data are being processed and data may be handled (according to a regular procedure) only if the data subject has given his or her consent. Moreover, the data subject has the right to access all data processed about him or her and has the right to request the correction or deletion of data that is incomplete or inaccurate.

Legitimate purpose: personal data can only be processed for specific and explicit legitimate purposes.

Proportionality: the data must be accurate and should not be kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data were collected. A single law, the “General Data Protection Regulation” (GDPR)⁴, includes new guidelines

¹ «Charter of fundamental rights of the EU, http://www.europarl.europa.eu/charter/pdf/text_en.pdf».

² «Convention on Human Rights, http://www.echr.coe.int/Documents/Convention_ENG.pdf».

³ «Directive 95/46/EC of the European parliament and of the council of the 24 Oct. 1995, <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31995L0046&from=EN>».

⁴ «Proposal for a "DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL", <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52012PC0010&from=en>».

for data protection and privacy and it replaces the directive “EU Data Protection Directive (officially 95/46/EC) on the protection of individuals with regard to the processing of personal data and on the free movement of such data. This new law, which was adopted on the 27th of April 2016 and, after a two year transition period, will be applicable as of 2018. The current project will comply with the new law, following the principle of privacy by design. In terms of relevance to this project, among other changes, this new law places greater emphasis on consent, as a legal basis from data processing. For example, under the new law, mere acquiescence (e.g. failing to un-tick a pre-ticked box) does is not considered a valid means of obtaining (or giving) consent. As such, informed consent, and other aspects of the new law, is being followed by partners in the design of the research activities listed in this deliverable, and will continue to be followed through the current project.

2.2 Ethical Issues of Open Data

Open availability of data is a key instrument for Public Administration, but free access to data raises significant issues in terms of privacy concerns. Typical anonymization techniques may prove themselves ineffective, since they do not always disallow probabilistic “jigsaw identification”. This refers to cases whereby different pieces of information from several sources may be combined to provide a (probabilistic) identification. In this sense, a redefinition of the feature of data identifiability in the continuum is needed, using a scaled approach where data can be (probabilistically) identifiable only at great cost, paired with legally enforceable organizational commitments not to pursue such re-identification activities, nor to share downstream the data in de-identified form. The existence, quality and implementation of data protection legislation, protecting individual rights to control data about them, varies across nations, as shown by our reports in the next sections. Nevertheless, while each partner will be adopting and following national and European legislation in dealing with personal data, particular care will be placed within the project by adopting the “Privacy by Design” principle, which makes privacy an ordinary but integral part of the design and implementation.

2.3 Ethical Issues of OpenGovIntelligence Research Activities

2.3.1 Human Participants involved in research

First of all, it must be emphasized that the activities of OpenGovIntelligence do not plan any physical interventions on the study participants or using any kind of invasive techniques.

User workshops, interviews, and surveys to identify challenges and gather requirements and needs are going to be organized and participants will be given material (e.g., consent forms, questionnaires etc.) as needed to achieve research objectives outlined in each pilot site.

Appendix B includes the request letters for Ethical Approvals for the collection of data that have been, or will be, submitted for review to the competent entities (University Data Protection Officer, Local Ethics Committee, etc.). Also, attached to this document, are letters of commitment to data protection in accordance with EU Directives, National Guidelines and National legislation relating to the ethical conduct of research (appendix D).

2.3.1.1 Relevant activities

A variety of user workshops, survey, and interviews are planned by each of the following partners: National University of Ireland, Galway (Ireland), ProXML (Belgium), Tallinn University of Technology (Estonia), Centre for Research and Technology – Hellas (Greece), Delft University of Technology (The Netherlands), and Swirrl (United Kingdom).

2.3.1.2 Ethical principles

Ethics should be applied at all stages of research, such as planning, conducting, and evaluating the results of a research project. Research involving human subjects will be conducted adhering to ethical principles in order to protect the dignity, rights and welfare of participants. Specifically, in OpenGovIntelligence the following principles will be adhered to:

Minimal risk

Studies should not expose participant to risks (i.e., psychological or sociological risks) and should not use deception on people participating.

Informed consent

Information has to be provided to participants before starting with the study. Specifically, the following will be provided: (1) the procedures that will be followed, (2) the purpose of the research (3) the benefit for participants (4) any risks to the participant, (5) the opportunity to ask questions, (6) the opportunity to avoid to complete some tasks, (7) the opportunity to withdraw at any time, (8) mechanisms for protection of and limitations to privacy and confidentiality, (9) voluntariness of participation, (10) possibility of future uses (secondary uses) of data collected, (11) storage and destruction of data collected. Written consent must be obtained for all humans studies. Evidence of consent shall be contained either in a signed consent form or in documentation by the researcher of another appropriate means of consent, acting in accordance with International Good Practice Guidelines, EU Directives, National Guidelines and National legislation pertaining to the ethical conduct of research.

Comprehension

Facilitators and/or researchers need to ensure that each participant understands what is involved in the research.

Voluntariness

The participation must be voluntary. Some roles influence participant involvement. An authority position over the participant could imply pressure. Coercion and undue influence should be absent when individuals take part in research.

Privacy and confidentiality

Everyone has the right to protection of the personal data concerning him or her. Any law and regulation shall ensure that personal data are processed by respecting data subjects' rights, fundamental freedoms and dignity, particularly with regard to confidentiality, personal identity and the right to personal data protection. An important aspect of privacy is the right to control

information about oneself, strictly related with the concept of consent. Therefore, privacy is respected if an individual has an opportunity to exercise control over personal information by consenting to, or withholding consent for, the collection, use and/or disclosure of information.

2.3.2 Protection of Personal Data

During user workshops (/interviews/surveys), data will be collected and processed. Data processing will be realized in order to protect individuals' privacy. To this aim, anonymity and confidentiality of the data have to be ensured. Specifically, logged data, transcripts (i.e. audio recording), and all collected personal and sensitive information (if any) will not include identifying information. For data storage purposes, participants will be assigned a participant number, and all data records will be stored in an encrypted protected database for 5 years and then destroyed. The participants to the research will be informed of the kind of processing their data will be subject to, and that no disclosure of information will occur to secondary entities. Data will be processed by OpenGovIntelligence entities only, and for scientific purposes only.

3 OpenGovIntelligence and the issue of Human Participants involved in research

This section describes the research methods involving human participants, which will be employed in each site. Methods described here include: workshops, surveys, questionnaires, focus groups, and interviews. In each case, partners have reviewed the ethical clearance process in their location, provided information about the ethical considerations associated with their chosen research activities, and detailed how the process of ethical clearance is being addressed. Based on this information, and the specific ethical procedures in place in each site, a preliminary judgment on whether or not formal ethical approval is needed has been made.

3.1 National University of Ireland, Galway (Pilot: The Marine Institute)

3.1.1 Ethical clearance process

The objective of the NUI Galway Research Ethics Committee is to safeguard the health, welfare and rights of human and researchers in research studies. For any research proposal to gain ethical approval it must be necessary and of a design that minimises predictable risk to both the research participant and the researcher. The NUI Galway Research Ethics Committee Standard Operating Procedures (SOPs) are focused on assisting in the ethical review of any area of research within NUI Galway that involves humans or their tissues, biological materials or hazardous substances.

The SOPs apply to research carried out by NUI Galway research personnel, whether permanent staff members or on fixed-term research contracts of any duration, and either alone or in collaboration with colleagues within the university or in other research institutes (where ethical approval has not been sought in those other institutes). The aim is to provide complementary support to the Declaration of Helsinki and to international Good Practice guidelines currently in use in Europe, taking into account any EU Directives or National legislation pertaining to the ethical conduct of research.

3.1.2 Details of the research

The stakeholder workshop was held at the National University of Ireland, Galway. Before the workshop began, participants were provided with written information describing the nature and purpose of the workshop. Participants were informed that the workshops were to be recorded and that both written and recorded information which they provide will be used as part on an on-going research project. Participants were given details of data anonymisation and storage procedures, where relevant. All participants who agreed with these procedures were asked to sign informed consent forms.

A collective intelligence (CI) design session (Warfield, 2006) with key stakeholders (open data providers, open data researchers and innovators, service users, n = 20) was conducted to (a) identify the challenges and needs regarding opening-up and exploiting LOSD and (b) identify objectives regarding user requirements, best practices, models and challenges. Based on Warfield's (1994) science of generic design, the CI process is a facilitated problem solving methodology that helps

groups to develop outcomes that integrate contributions from individuals with diverse views, backgrounds, and perspectives. Established as a formal system of facilitation in 1980 after a developmental phase that started in 1974, CI was designed to assist groups in dealing with complex issues (Ackoff, 1981).

The CI approach carefully delineates content and process roles, assigning to participants responsibility for contributing ideas and to the facilitator responsibility for choosing and implementing selected methodologies for generating, clarifying, structuring, interpreting, and amending ideas. Emphasis is given to balancing behavioral and technical demands of group work (Broome & Chen, 1992) while honoring design laws concerning variety, parsimony, and saliency (Ashby, 1958). CI has been applied in a variety of situations to accomplish many different goals, including assisting city councils in making budget cuts (Coke & Moore, 1981), developing instructional unit (Sato, 1979), designing a national agenda for pediatric nursing (Feeg, 1988), creating computer-based information systems for organizations (Keever, 1989), improving the U.S. Department of Defence's acquisition process (Alberts, 1992), promoting world peace (Christakis, 1987), improving Tribal governance process in Native American communities (Broome 1995), and training facilitators (Broome & Fulbright, 1995).

Participants were presented with a stimulus question (e.g. "what are challenges associated with political, legal, institutional, social and technical issues in opening-up and exploiting LOSD for the co-production of innovative data-driven services?"), followed by idea generation. Then each participant presented their challenges, which were recorded and displayed on the walls surrounding the group. The group then worked to categorise or group related challenges on the wall. Next, each participant chooses their five most important challenges from across the categories. Participants then generated options to overcome challenges in each category: "What are options for overcoming the challenges in the category [category title]?"

Finally, from the perspective of different user groups, participants worked in groups to generate simple user stories that highlight key needs and requirements of users:

"As a <type of user>, I want <some goal> so that <some reason>."

These user stories were then reviewed by the group, before the session closed with some broad discussion.

3.1.3 Current Status

Ethical approval for the research activities described above was granted by the NUIG Research Ethics committee (see Appendix B 8.1.1)

3.2 ProXML (Pilot: Flemish Government)

3.2.1 Ethical clearance process

The Flemish government does not traditionally use ethics committees in the delivery of public services – neither operationally nor strategically. Instead, they rely on Information Governance functions within the organization to ensure projects involving data are conducted appropriately.

Consistent with work from other entities within the Flemish government, the current project will follow normal Governance procedures.

As such, ethics is dealt with in the first instance by the board of directors supported by their security advisor.

Furthermore, ProXML follow the ethical clearance guidelines used by the University of Antwerp and KULeuven, which lead to the conclusion that for the requirements gathering activities (see 3.2.2) planned, no clearing process was needed.

In the case of the University of Antwerp, reference may be made to the following document: https://www.uantwerpen.be/images/uantwerpen/container2123/files/141204_Guidelines%20to%20determine%20the%20need%20for%20ethics%20review.pdf . For example, in relation to general survey research and interviews; cases in which an ethical advice might be required include:

- The participants belong to one of the following groups:
 - minors (-18)
 - prisoners
 - people with learning disabilities
 - Patients
 - foreigners
 - people involved in illegal activities
 - people in care institutions
 - or other vulnerable groups
- The study is about sensitive topics (e.g. illegal activities, religion, ethnicity)
- The data are not anonymous, but merely encrypted
- Audio-visual data of the participants is collected (even if permission was obtained)

Cases in which ethical clearance might not be required:

- The participants are consenting adults
- The data are fully anonymous
- The study does not focus on sensitive topics
- No information is obtained that could harm the public or personal reputation of the participants involved.
- The participants are public figures

The guidelines from the KULeuven are to be found here:

<https://www.kuleuven.be/english/research/integrity/schemes/schemeone>

3.2.2 Details of the research

ProXML engaged in traditional (ICT) business requirements gathering within the clearly defined scope of publishing emission data as linked open statistical data. The requirements gathering process is based on the Volere methodology: <http://www.volere.co.uk/>.

Within this scope, the key stakeholders (employees of the Environment, Nature and Energy Department of the Flemish Government), were identified. A sample size of 5 key stakeholders were be used.

ProXML investigated their requirements by (joint) interviews, elaborating use cases and building prototypes.

Next they analyzed the gathered requirements: analyzing feasibility and impact, resolving potential conflicts, and prioritizing.

This resulted in a written requirements analysis document, to be approved by the stakeholders.

Consistent with Flemish regulations (<http://www.vlaamsetoezichtcommissie.be/> see section 3.2.1), Informed consent was obtained from all research participants and data privacy was ensured.

3.2.3 Current status

As outlined above, the review of ethical guidelines indicates that none of the research activities involve any of the conditions that require ethical clearance and the proposal fulfils all the conditions where clearance is not needed.

3.3 Tallinn University of Technology (Pilot: The Estonian Ministry of Economics)

3.3.1 Ethical clearance process

The Tallinn University of Technology is committed to conducting research in a manner that respects human dignity and the provisions for personal data protection stipulated in the national and EU law. While the university's internal regulations, in particular the Code of Academic Ethics and Rules on the Processing and Protection of Personal Data, offer guidelines for an ethical conduct of research and data protection, the procedures of ethical validation of research have not been formalized within the university structures. Therefore, a formal ethical approval for research conducted in the framework of OpenGovIntelligence was sought from the Research Ethics Committee of the University of Tartu.

The Ethics Committee assesses the ethical aspects of human research in the field of medicine and natural science (incl. human gene research and clinical trials of medicinal products) and other human research, if there is a risk of danger to the physical or mental health of human(s) involved in the research. The objective of the Committee is to ensure the compliance of planned research with internationally recognized ethical principles, incl. the protection of health, human dignity, identity, security and other fundamental rights and freedoms of persons participating in the research as human subjects of investigation, and the safety and welfare of the human subjects of investigation. In its assessment, the Committee follows the European Council's Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine: Convention on Human Rights and Biomedicine, Additional Protocol to the Convention Concerning Biomedical Research, the Declaration of Helsinki of the World Medical Association, other generally recognized ethical rules and international conventions, the Medicinal Products Act, the

Human Genes Research Act, the Personal Data Protection Act, and other relevant legislation as well as the good practice of conducting clinical trials.

As an independent body operating under the University of Tartu, the Committee provides assessment to all projects submitted to the Committee for an opinion, including research projects undertaken by other universities and research institutions, private companies, etc. The structure, membership, application and decision procedures of the Committee are described in its statute: http://www.ut.ee/sites/default/files/ut_files/Tartu%20%C3%9Clikooli%20inimuuringute%20eetika%20komitee%20statuut_eng_Dima_puhas.pdf.

3.3.2 Details of the research

The stakeholder workshop took place at the Ministry of Economic Affairs and Communications, Tallinn. The organization of the workshop was coordinated by the Tallinn University of Technology. Before the start of the workshop, participants were provided with written information describing the nature and purposes of the workshop. Participants were informed that the workshops will be recorded and that both written and recorded information which they provide will be used as part on an on-going research project. Participants were given details of data anonymization and storage procedures. All participants who agreed with these procedures, were asked to sign informed consent forms..

The workshop with key stakeholders (open data providers, open data researchers and innovators, service users, n = 5-10) was conducted to (a) identify the challenges and needs regarding opening-up and exploiting LOSD and (b) identify objectives regarding user requirements, best practices, models and challenges. The workshop followed the Collective Intelligence (CI) approach developed by Warfield (2006) (see Section 2.1.1 for a more detailed description of the method).

Participants were presented with a stimulus question (e.g. “what are challenges associated with political, legal, institutional, social and technical issues in opening-up and exploiting LOSD for the co-production of innovative data-driven services?”), followed by idea generation. Then each participant presented their challenges and these were recorded and displayed on the walls surrounding the group. The group then worked to categorise or group related challenges on the wall. Next, each participant selected their five most important challenges from across the categories. Participants then generated options to overcome challenges in each category: “What are options for overcoming the challenges in the category [category title]?”.

Finally, from the perspective of different user groups, participants worked in groups to generate simple user stories that highlight key needs and requirements of users:

“As a <type of user>, I want <some goal> so that <some reason>.”

These user stories were then reviewed by the group.

3.3.3 Current status

Ethical approval for the research activities described above has been granted by the Research Ethics Committee of the University of Tartu (see Appendix B, 8.3.1).

3.4 Centre for Research and Technology – Hellas (Pilot: Ministry of Interior and Administrative Reconstruction)

3.4.1 Ethical clearance process

CERTH has an Ethics Committee in place in order to ensure that all research activities involving humans or their biological materials comply with the national and European regulations and laws. The Ethics Committee of CERTH consists of as many members as CERTH's Institutes. The Committee's members are appointed by the Board of Directors of CERTH for a 5-year term of office. All of CERTH's Institutes research areas are "represented" in the Ethics Committee.

The mission of the committee can be described as follows:

1. Check that CERTH's submitted research proposals abide by national and EU legislation and rules in terms of best Research Practices and Ethics.
2. Inform the staff members of the regulations on Ethics.
3. Provide consultation and formal opinion on Ethics when requested.
4. Examine statements of objections, resolve conflicts on Ethics among researchers-staff members, in order to promote equality and overall quality of the work environment.

Proposals that may require the Ethics Committee's formal opinion include research during which the following issues may arise:

- Medical and genetic data protection
- Medicine clinical trials
- Protection of laboratory animals
- Biological diversity, i.e. biotechnology applications to produce genetically modified organisms

Research proposals or activities that require authorization must be submitted to the Ethics Committee and they are assigned to a rapporteur-committee member with relevant knowledge, who makes a proposition to the committee. To avoid conflict of interest, any members that are actively involved in the proposal in question of the Ethics Committee, must abstain from the procedure.

An information sheet for the research proposals should be submitted to the Ethics Committee in order the latter to decide whether or not there is a need for getting an approval. This first decision can be obtained in a couple of days because it does not involve the general assembly of the Committee. If there is a need for approval, then the submission is forwarded to the general assembly of the Ethics Committee where that final decision is made. In this case the final decision might take one month.

Although there is no standard document for the information sheet, it should include the following information:

- Principal investigator

- Description and objective of the research proposal
- Study design
- Phases of the research
- Data analysis methods
- Who can access the collected data
- Where the data will be stored and who will have control of the data

The information sheet should be submitted in both Greek and English.

3.4.2 Details of the research

CERTH organized the following research activities that involve humans in the first six months:

- Identification of challenges regarding the combination of multiple linked statistical datasets from diverse publishers. Towards this end, a focus group was conducted with the responsible persons for each Linked Statistical Data portal.
- Identification of challenges and needs regarding the exploitation of open statistical datasets in the development of applications. Towards this end, questionnaires were disseminated to software developers outside the OpenGovIntelligence consortium.
- Identification of scenarios and challenges regarding the exploitation of integrated statistical datasets published by Open Government Data portals at multiple administrative levels and across countries. Towards this end, interviews were conducted with employees from the OpenGovIntelligence pilot partners.

All these tasks include professionals working in the area of Open Government Data and Linked Data and required their professional opinion on technical issues.

3.4.3 Current status

Ethical approval for the research activities described above has been granted by the CERTH Research Ethics (see Appendix B, 8.4)

3.5 Delft University of Technology

3.5.1 Ethical clearance process

TU Delft has a Code of Ethics⁵ and the system is trust-based, unlike more rule-based approaches in countries like United States and the United Kingdom. It is expected that researchers are aware of ethical considerations, and knowledgeable of all relevant legislations, decrees and norms. In the case of any doubt, the professionals involved on the research should go to the Ethical Committee.

In accordance with the TU Delft Code of Ethics, there is a checklist to be completed and delivered to the Human Research Ethics Committee (HREC) at HREC@tudelft.nl. If all of the answers to the checklist questions are “no”, there is no need to receive approval from the Committee for Ethical Dilemmas. The HREC can make three types of decision:

- Approve the application

⁵

http://www.tudelft.nl/fileadmin/UD/MenC/Support/Internet/TU_Website/TU_Delft_portal/Over_TU_Delft/Strategie/Integriteit/TU_Delft_Code_of_Ethics_EN_.pdf

- Approve under a number of conditions and/or recommendations
- In rare cases - disapprove the application. In this case, the HREC will have further discussions with the applicant.

3.5.2 Details of the research

3.5.2.1 Details of the Interviews and Surveys

TU Delft have planned activities that will have human interactions in WP 4. This will include planning and evaluation tasks using interviews and surveys, at two different phases, with each pilot. This contact is described in Figure 1.

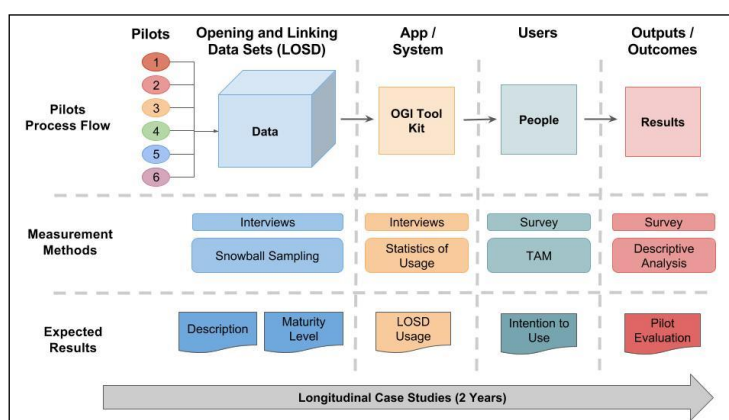


Figure 1. TUDelft Human Contact at WP 4- Pilots planning and evaluation.

The interviews in the phase "Pilots" and the "Users" shown in Figure 1 will be conducted with public managers from all the pilots, who are in charge of the pilot's public policy and service delivery (PP&SD). Interviews will also be conducted with users of the PP&SD to check if the information (issues) given by public managers are the same given by the users. All of this information collected will be anonymized; as such, there is no need to identify people, but rather to clarify what they want to change in PP&SD. The information can be exchanged between the researchers in OpenGovIntelligence due to its "hashing process" which means that names and personal data will be hidden, releasing only the interview content to the researchers. There will be two phases conducted because this enables the benchmarking between the old process and the new process of PP&SD presented in figure 1 at the phases "Opening-up data" and "App", that is, upon delivering the new application and service.

3.5.2.2 Details of the workshop leaflets distribution, MOOCs, OpenGovIntelligence Project website and Social media

In WP5 - Dissemination and exploitation - another five types of contact with people are planned: Workshops, leaflet distribution, MOOCs, the OpenGovIntelligence Project website, and OpenGovIntelligence social media accounts. Two involve physical means of communication: workshops and leaflets distribution. Three are electronic based communication: MOOC, or Massive Online Open Course, is also known as "distance learning" or "YouTube videos for learning courses"; The OpenGovIntelligence Project website, which is the electronic page that will centre all the

information, news and official communication for the project to the audience; and the social media accounts, which will include LinkedIn, Twitter and possibly other social media accounts, will be used to communicate and inform the project audience about news from the OpenGovIntelligence Project.

The workshop and leaflets approaches will mainly be used at conferences, aimed at participants including statisticians, engineers, software developers, public policy managers. The leaflets are a summarised way to: invite people to watch OpenGovIntelligence workshops; access the OpenGovIntelligence project website; engage with the MOOCs; and engage with the social media.

All of these ways of communication, physical or electronic based, will be run in compliance with the rules of TUDelft Code of Conduct, Dutch Constitution and European directives.

3.5.3 Current status

The ethics checklist (referred to in 3.5.1) was submitted by TUDelft researchers to the HREC (see Appendix B, 8.5). It was judged by the HREC that formal ethical approval is not necessary, and that TUDelft may proceed with the research activities outlined above.

3.6 Swirrl IT Limited (Pilot: Trafford Council)

3.6.1 Ethical clearance process

Neither Trafford Council nor Swirrl has any defined formal ethical clearance process for research activities. Local Government in the UK does not in general use ethics committees in the delivery of public services – neither operationally nor strategically. Instead, it relies on Information Governance functions within the organization to ensure projects involving data are conducted appropriately.

As such, ethics are dealt with in the first instance by Trafford's Innovation and Intelligence Lab, with immediate support from Trafford's Information Governance Team. The Lab will have additional support from the UK Centre for Excellence in Information Sharing, as well as the UK Information Commissioner's Office (ICO), the national body responsible for monitoring and advising on compliance with the Data Protection Act.

To ensure that potential issues relating to personal data are thoroughly considered, a Privacy Impact Assessment (PIA) is being carried out for the project. This is a process defined by the UK Information Commissioners Office. For details, see this Code of Practice: <https://ico.org.uk/media/for-organisations/documents/1595/pia-code-of-practice.pdf>. The key points of the PIA are as follows:

- identify the need for a PIA
- describe the information flows
- identify the privacy and related risks
- identify and evaluate the privacy solutions
- sign off and record the PIA outcomes
- integrate the outcomes into the project plan
- consult with internal and external stakeholders as needed throughout the process.

3.6.2 Details of the research

This section covers research to be carried out by Trafford Council and by Swirrl IT Limited on the UK Pilot and on requirements gathering for OpenGovIntelligence.

Trafford Council, supported by Swirrl, will organize a series of interviews and workshops, to develop an understanding of the challenges and needs facing public sector organizations, and Trafford Council in particular, in the better application of statistical data to improvement of public services. This process will pay special attention to the area of worklessness, which is the focus of the Trafford-led pilot.

This research involves talking to professional staff of government organizations, particularly Trafford Council, to gather their views. In some cases, it is possible that documenting and reporting on the interviews will involve attributing comments to identifiable individuals and this may fall within the scope of 'personal data'.

In all interactions with people who are not direct participants of the OpenGovIntelligence project, the principles of informed consent will be followed, ensuring that research participants understand how the information they contribute will be used, and in the cases where this leads to personal data being retained, their explicit consent will be obtained.

Following the self-assessment process defined by the EU (see

http://ec.europa.eu/research/participants/portal/doc/call/h2020/h2020-msca-itn-2015/1620147-h2020_-_guidance_ethics_self_assess_en.pdf), the only section relevant to this research is that on the management of Personal Data.

Personal Data may be gathered during the research processes described above. Should this be the case, this will be managed in line with the procedures laid out in section 4.6.1 of this document.

3.6.3 Current Status

As outlined above, an application to a research ethics committee is not necessary in this case. However, a Privacy Impact Assessment will be carried out.

3.7 On-going monitoring of ethical issues

In line with the requirements of this deliverable, ethical issues are being routinely monitored throughout the lifecycle of this project. This monitoring process involves the distribution of a survey, to all partners engaged in research, every six months. This survey allows partners to report on ethical issues which have been encountered, or which may be foreseen in upcoming research activities. The questions which comprise the survey are as follows:

1. Has ethical approval been granted for your current research activities?
2. Have you submitted an ethical approval letter for inclusion in D6.5 appendices?
3. Can you provide any other relevant materials for inclusion?
4. Have any ethical issues arisen during research activities to-date? If "yes", please describe in detail
5. Have these issues been resolved? If so, how were they addressed? Please elaborate

6. Do you foresee any ethical issues in current or future research activities? Please elaborate
7. Do you need to seek ethical approval for upcoming research activities?
8. If you answered "yes" to question 7. Please describe (a) the research activity (b) the ethical considerations (c) the procedure for seeking ethical approval for this research activity
9. If you answered "no" to question 7. Please (a) clarify why ethical approval is not needed, and (b) describe any other relevant procedures/bodies which are in place to ensure high standards of ethics in your research
10. Do you have any other concerns in relation to ethical issues or procedures? Please elaborate

The current version of this deliverable has been informed by the most recent responses to this survey, received on January 20th, 2017. No additional applications for ethical approval are necessary at this time.

4 Local rules, National Legislation and European Directives

4.1 National University of Ireland Galway (Pilot: Marine Institute)

4.1.1 Data protection principles

The National University of Ireland Galway (NUI Galway) is committed to a policy of protecting the rights and privacy of individuals (including students, staff, graduates, researchers and others) in accordance with the Data Protection Act 1988 and the Data Protection (Amendment) Act 2003.

The NUI University's Data Protection Policy will be treated strictly in accordance with following internal policies:

- "Data Protection Policy"

This policy recommends the rights of staff about the Personal Data as set out in law, in accordance with the Data Protection Acts 1988 and 2003.

- "Data Handling Policy"

The policy protects sensitive personal data held in the University.

4.2 ProXML (Pilot: Flemish Government)

4.2.1 Data protection principles

All regulations on Flemish level to be found at: <http://www.vlaamsetoezichtcommissie.be/>

Guiding principles are:

- informed consent
- access rights to the data
- improvement right of the data
- right to oppose
- refusal right (Direct Marketing)
- removal right

If necessary, a Privacy Impact Assessment (PIA) will be conducted for the project – once the detailed requirements of the project are known.

In Belgium there are two government bodies ("privacy commissie" and the "Vlaamse toezichtcommissie") that evaluate the quality of the PIA and will give a go/no go if one doesn't comply with the privacy rules. Depending on the data an approval from both or just one of them is needed. This procedure will be supported legally and administratively by the Flemish Department for Environment, Nature, and Energy's security advisor (it is a legal obligation to have a security advisor in this case).

Information required within a Privacy Impact assessment includes the nature of the project, the data that it will use, and the types of people that it relates to.

Depending on the type of data approval lead time will vary between 1 hour (security advisor decides no PIA is needed) to several months if both levels of government bodies need to be involved.

However, since no personal data will be collected, persisted nor published, the 1 hour process is expected.

4.3 Tallinn University of Technology (Pilot: The Estonian Ministry of Economics)

4.3.1 Data protection principles

The Tallinn University of Technology is committed to protecting the rights and privacy of individuals in accordance with the Personal Data Protection Act (2007) (<https://www.riigiteataja.ee/en/eli/512112013011/consolide>). The Personal Data Protection Act obliges anyone involved in processing personal data to respect the general principles of legality, purposefulness, minimalism, restricted use, data quality, security, and individual participation. It also foresees specific provisions for data processing for the needs of scientific research, including the coding of data that would allow a person to be identified, etc.

In addition to national legislation, the internal data protection policy at the Tallinn University of Technology follows the university Rules on the Processing and Protection of Personal Data.

4.4 Centre for Research and Technology – Hellas (Pilot: Ministry of Interior and Administrative Reconstruction)

4.4.1 Data protection principles

In Greece the Hellenic Data Protection Authority⁶ (HDPa) is an independent authority aiming at protecting the personal data and the privacy of individuals. Law 2472/1997⁷ and 3471/2006⁸ structure the legal framework upon which the authority operates.

The primary goal of the HDPa is the protection of citizens from the unlawful processing of their personal data and their assistance in case it is established that their rights have been violated in any sector (financial, health, insurance, education, public administration, transport, mass media, etc).

Furthermore, another goal of the HDPa is to offer support and guidance to controllers in their effort to comply with their obligations vis-a-vis the Law, while taking into account the needs of the services in the Greek society, as well as the growing use of modern digital communications and networks. As a result of the above, the HDPa focuses, among others, on the identification and solution of problems which arise from the advancements of new technologies and their applications.

⁶ <http://www.dpa.gr>

⁷ Protection of Individuals with regard to the Processing of Personal Data

⁸ Protection of personal data and privacy in the electronic telecommunications sector and amendment of law 2472/1997

Greece as a member state of the European Union should also comply with Directive 95/46/EC & Directive 2002/58/EC of the European parliament regarding issues with privacy and protection of personal data and the free movement of such data.

4.5 Delft University of Technology

4.5.1 Data protection principles

The Delft University of Technology, based on the Code of Conduct⁹ signed by all the Dutch universities, has an internal committee that evaluates all the ethical dilemmas. The TUDelft code of ethics takes in consideration the national Dutch legislation about rules for the protection of personal data, Personal Data protection Act 25892¹⁰. This legislation was based on the need of implementation the Directive 95/46/EC¹¹ of the European Parliament and of the Council of the European Union of 23 November 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of that data.

The act 25892 also reflects the article 10, sub-article 2 and sub-article 3 of the Dutch Constitution¹². The article 10 gave to the government, such as sub-article 2 pointed, a duty to protect the privacy posed by a possible abuse of databases against a threat. The sub-article 3 regulated the right of own personal information and corrects it on the databases to improve possible mistakes on the content.

The Dutch privacy regulation highlight that personal data has a strict jurisdiction based on the theory of safe harbor¹³. Researchers that store personal data must do on an encrypted system and internal storage. After the Snowden case of massive surveillance the European Commission created guidelines to avoid the usage of external computers, named as "Cloud computing"¹⁴. If anything suspect happened or is happening the researchers must report to the government immediately and are responsible for the acts happened.

4.6 Swirrl IT Limited (Pilot: Trafford Council)

4.6.1 Data protection principles

Both Trafford Council (registration number Z703652X) and Swirrl (registration number Z2482164) are registered with the Information Commissioners Office as data controllers and the respective registrations define how each organization deals with personal data. These are publicly available through the website of the Information Commissioner's Office – see <https://ico.org.uk/esdwebpages/search>.

Trafford Council and Swirrl will follow the guidance provided by ICO for organisations on how to comply with the UK Data Protection Act (<http://www.legislation.gov.uk/ukpga/1998/29/contents>).

⁹ http://www.vsnul.nl/en_GB/codes-of-conduct.html

¹⁰ http://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=65780&p_country=NLD&p_count=2273

¹¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31995L0046:en:HTML>

¹² <https://www.government.nl/documents/regulations/2012/10/18/the-constitution-of-the-kingdom-of-the-netherlands-2008>

¹³ http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/files/eu-us_data_flows_communication_final.pdf

¹⁴ http://ec.europa.eu/justice/contract/files/expert_groups/expert_group_subcontracting_discussion_paper_en.pdf

For details, see <https://ico.org.uk/for-organisations/guide-to-data-protection/>. The principles of the UK Data Protection Act are as follows:

1. *Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless –
 - (a) at least one of the conditions in Schedule 2 is met, and
 - (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.*
2. *Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.*
3. *Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.*
4. *Personal data shall be accurate and, where necessary, kept up to date.*
5. *Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.*
6. *Personal data shall be processed in accordance with the rights of data subjects under this Act.*
7. *Appropriate technical and organizational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.*
8. *Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.*

5 Conclusion

This deliverable has outlined the careful approach to research ethics being taken by the OpenGovIntelligence project, with due consideration being given to potential ethical issues across all areas of research and design. Research activities across sites including: interviews, surveys, questionnaires, focus groups, and workshops have been, and will continue to be, designed and conducted in accordance with EU principles of research ethics and data protection, as well as relevant national and local policies and protocols. Each research and development partner, in cooperation with pilot partners, has reviewed these local and national policies, including assessing the requirements for ethical clearance and where necessary, formal applications have been made to RECs. Table 1 provides a summary of the relevant research activities, and their current ethical approval status.

Table 1. Summary of research activities

Partner	Relevant Activities	Number of Participants	Ethical Approval Status
National University of Ireland, Galway (Pilot: Marine Institute)	Stakeholder workshop	20	Ethical approval has been granted by REC
ProXML (Pilot: Flemish Government)	Requirements analysis interviews	5	In accordance with guidelines used by University of Antwerp and KULeuven, formal application is not required here
Tallinn University of Technology (Pilot: The Estonian Ministry of Environment)	Stakeholder workshop	5-10	Ethical approval has been granted by REC
Centre for Research and Technology – Hellas (Pilot: Ministry of Interior and Administrative Reconstruction)	Stakeholder focus group; questionnaires; interviews	10; 100; 10	Ethical approval has been granted by REC
Delft University of Technology	Evaluation interviews; evaluation surveys (across 6 pilots – pre and post)	108; 600; (incl. pre and post across 6 pilots)	Ethical checklist has been sent to the REC in TUDelft. No further approval is required.
Swirl IT Limited (Pilot: Trafford Council)	Interviews, workshops	10; 10	Not required. Privacy Impact Assessment is being conducted.

At this stage, all partners who were required to apply for ethical approval from an REC, have been granted approval for current research activities. All partners, regardless of the need for formal ethical approval, must remain cognisant of the ethical principles and policies outlined in this deliverable, and will adhere to them throughout the project. Next steps involve planning for future research activities during this project, which will require additional review and consideration of ethical principles, and may, in some cases, require additional formal applications to research ethics committees.

6 References

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7 Appendix A – Data Protection National Legislation and Internal Procedures

7.1 National University of Ireland, Galway

- National university of Ireland, Galway Data Protection Policy, http://www.nuigalway.ie/data_protection/documents/nui_galway_data_protection.pdf
- Data Handling, http://www.nuigalway.ie/quality/downloads/qa401_data_handling.pdf
- Data protection (Amendment) Act 2003
- Irish Statute Book, <http://www.irishstatutebook.ie/pdf/2003/en.act.2003.0006.pdf>

7.2 ProXML

- Belgian Privacy Act: <https://www.privacycommission.be/en/privacy-act>
- Flemish level overview of regulations <http://www.vlaamsetoezichtcommissie.be/>

7.3 Tallinn University of Technology

- Personal Data Protection Act (2007)
<https://www.riigiteataja.ee/en/eli/512112013011/consolide>

7.4 Centre for Research and Technology - Hellas

- Law 2472/1997
http://www.dpa.gr/pls/portal/docs/PAGE/APDPX/ENGLISH_INDEX/LEGAL%20FRAMEWORK/LAW%202472-97-APRIL010-EN%20_2_.PDF
- Law 3471/2006
http://www.dpa.gr/pls/portal/docs/PAGE/APDPX/ENGLISH_INDEX/LEGAL%20FRAMEWORK/LAW%203471-2006-EN.PDF
- Directive 95/46/EC <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=URISERV%3A14012>
- Directive 2002/58/EC <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=URISERV%3A124120>

7.5 Delft University of Technology

- TUDelft Code of Ethics
 - <http://www.tudelft.nl/en/about-tu-delft/strategy/integrity-policy/code-of-ethics/>
- Code of Ethics and a number of other specific codes of conduct laid down by the Association of Universities in the Netherlands (VSNU)
 - http://www.vsnu.nl/en_GB/codes-of-conduct.html
- Research Ethics Committee and Checklist of minimal risk identification

- <http://www.tudelft.nl/en/about-tu-delft/strategy/integrity-policy/scientific-integrity-committee/research-ethics/>
- Checklist file of minimal risk identification
 - http://www.tudelft.nl/fileadmin/Files/tudelft/over/strategie/Integriteitsbeleid/hrec/Checklist_Version_10.3.2016.docx
- Personal Data Protection Act (25 892).
 - http://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=65780&p_country=NLD&p_count=2273
- Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data
 - <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31995L0046:en:HTML>
- Dutch National Constitution (Article 10, sub-article 2 and 3 about data privacy)
 - <https://www.government.nl/documents/regulations/2012/10/18/the-constitution-of-the-kingdom-of-the-netherlands-2008>


7.6 Swirrl IT Limited

- UK Data Protection Act <https://ico.org.uk/for-organisations/guide-to-data-protection/>

8 Appendix B – Ethical Approval Requests

8.1 National University of Ireland, Galway

Application Form *Version 6.0 July 2015* *NUI Galway Research Ethics Committee*



OÉ Gaillimh
NUI Galway

RESEARCH ETHICS COMMITTEE APPLICATION FORM

For Applicant to complete:

Applicants' Name:

Title of Project:

For Ethics Committee use only:

Reference Number:

Date received:

Review Date:

Outcome:
☐ Approval
☐ Provisional Approval
☐ Deferral
☐ Approval Declined

Applicant informed (Date):

Please complete form and select YES/NO options as appropriate. An electronic version of this form is also available on the NUI Galway website (http://www.nuigalway.ie/research/vp_research/ethics.htm).

An application will only be accepted for review by the NUI Galway Research Ethics Committee (REC) if it is completed fully and the relevant enclosures are received. Refer to the accompanying Guidance Notes when completing the form and complete the checklist on the next page before submitting the form. Where you have received permission to do this, or similar research in another institution, please provide evidence of permission with this application.

Please submit your completed application: application form; participant consent form(s); participant information sheet(s); Questionnaire(s); as one single PDF document.

Address to send application: NUI Galway Research Ethics Committee
 Research Support Services
 Unit 8, Business Innovation Centre
 NUI Galway

Email address: (pdf) deirdre.whelan@nuigalway.ie

Page 1 of 43

Application Form	Version 6.0 July 2015	NUI Galway Research Ethics Committee
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SECTION 1

Applicant(s) Details

1. Title of project:

Fostering Innovation and Creativity in Europe through Public Administration
 Modernization towards Supplying and Exploiting Linked Open Statistical Data

2. Principal Applicant: *(All correspondence will be sent to this address unless indicated otherwise.)*

Family Name: Hogan	Forename: Michael	Title: Dr.
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Contact address *(for correspondence regarding application):*
 School of Psychology,
 NUI, Galway

Tel: 091 593455	Fax:	Email: 091 593455
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Mobile Number / Other Contact Number: 087 9419832

Present appointment of PA: Senior Lecturer

Qualifications of PA: B.A., PhD.

3. Other Investigator(s):

Family Name: Ojo	Forename: Adegboyega	Title: Dr.
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Department: INSIGHT

Institution: NUI, Galway

Tel: +353-91-495335	Fax:	Email: adegboyega.ojo@deri.org
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Present appointment: Senior Research Fellow

Qualifications: BSc., PhD

Family Name:	Forename:	Title:
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Department:

Institution:

Tel:	Fax:	Email:
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Present appointment:

Qualifications:

7. Signature of relevant personnel:

Principal Applicant declaration
The information in this application form is accurate to the best of my knowledge and belief and I take full responsibility for it.
I understand that it is my responsibility to obtain institutional approval where appropriate before the project takes place.
I agree to supply interim and final reports to the Research Ethics Committee from which approval was granted for this project.
I agree to advise the Research Ethics Committee from which approval was granted for this project and any local researchers taking part in the proposal of any material changes to the proposal or any adverse or unexpected events that may occur during this project.
I agree to advise the Research Ethics Committee in the event of premature termination, suspension or deferral of this project and to provide a report outlining the circumstances for such termination, suspension or deferral.

Signature of Principal Applicant: Michael Hogan Date: 04/03/2015

Co-Signed by Supervisor where the P.A. is a Student: _____ Date: _____

Head of Department/Supervisor
I am fully aware of the details of this project and agree for it to continue as outlined here. I can confirm that the necessary facilities and resources are available to the researcher.

Name: _____ Department: _____

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8.1.1 Ethics approval confirmation

Sent on behalf of Dr Allyn Fives, REC Chair

26 May 2016

Dear Michael,

Re: Ethics 16/MAY/07 – ‘Fostering Innovation and Creativity in Europe through Public Administration Modernization towards Supplying and Exploiting Linked Open Statistical Data’

I write to you regarding the above proposal which was submitted for Ethical review. Having reviewed your response to my letter, I am pleased to inform you that your proposal has been granted **APPROVAL**.

All NUI Galway Research Ethic Committee approval is given subject to the Principal Investigator submitting annual and final statements of compliance. The first statement is due on or before 26 May 2017. Please see section 7 of the REC's Standard Operating Procedures for further details which also includes other instances where you are required to report to the REC. Statement of compliance forms are also attached.

If you require this letter of approval in hard copy, please email ethics@nuigalway.ie, quoting the reference number of your application.

Yours Sincerely

Allyn Fives

REC Admin

8.2 ProXML

As elaborated in 2.2.2., an application to an ethics committee is not necessary in this case. The initial review indicates that none of the research activities involve any of the conditions that require ethical clearance and this project fulfils all the conditions where clearance is not needed.

8.3 Tallinn University of Technology

UURIMISTÖÖ AVALDUS KOOSKÕLASTUSE SAAMISEKS TARTU ÜLIKOOLI
INIMUURINGUTE EETIKA KOMITEELT

1. UURIMISTÖÖ ANDMED

Uurimistöö täielik nimetus: *eesti keeles (vajadusel inglise keeles):*

Fostering Innovation and Creativity in Europe through Public Administration Modernization towards Supplying and Exploiting Linked Open Statistical Data

Uurimistöö toimumiskoht: Tallinn, Estonia

2. UURIMISTÖÖ TEOSTAJAD JA UURINGUKESKUSED

2.1. Vastutav uurija

ees- ja perekonnanimi: Robert Krimmer

teaduslik kraad: PhD

amet: Professor
töökoht: Tallinn University of Technology
töökoha aadress: Akadeemia tee 3, 12618 Tallinn
telefoninumber: +372 620 2662
e-post: robert.krimmer@ttu.ee
allkiri:

2.2. Kaastöötajad

ees- ja perekonnanimi: Tarmo Kalvet
teaduslik kraad: PhD
amet: Senior researcher
töökoht: Ragnar Nurkse School of Innovation and Governance, Tallinn University of Technology
töökoha aadress: Akadeemia tee 3, 12618 Tallinn
telefoninumber: +372 620 2660
e-post: tarmo.kalvet@ttu.ee
allkiri:

ees- ja perekonnanimi: Maarja Toots
teaduslik kraad: MA
amet: Junior researcher
töökoht: Ragnar Nurkse School of Innovation and Governance, Tallinn University of Technology
töökoha aadress: Akadeemia tee 3, 12618 Tallinn
telefoninumber: +372 620 2671
e-post: maarja.toots@ttu.ee
allkiri:

2.3. Vastutava uurija asutuse juhataja või tema kohusetäitja

on uurimistöö korraldamisega nõus:
ees- ja perekonnanimi: Veiko Lember
amet: Director
töökoht: Ragnar Nurkse School of Innovation and Governance, Tallinn University of Technology
töökoha aadress: Akadeemia tee 3, 12618 Tallinn
kuupäev:
allkiri:

2.4. Uurimistöösse kaasatud muu asutuse kooskõlastus:

volitatud isiku ees- ja perekonnanimi: Mikk Lellsaar
amet: Head Specialist
töökoht: Ministry of Economic Affairs and Communications
töökoha aadress: Harju 11, Tallinn 15072
kuupäev:
allkiri:

3. UURIMISTÖÖ FINANTSEERIMINE

Allikas: (*grandi puhul täpsustada kas taotlemisel või saadud*) European Commission (funding secured)

Uurimistöõ üldmaksumus, sh töötasude jaotus uuringu teostajatele (kellele ja millises ulatuses): 227 500,00 EUR

Uuritavatele kompensatsiooni maksmine: no

4. LÜHIÜLEVAADE SIINI SAMAL TEEMAL LÄBIVIIDUD UURIMISTÖÖDEST

To the knowledge of the researchers, no similar studies have been conducted on the topic of open data in Estonia to this day.

5. KAVANDATAVA UURIMISTÖÖ EESMÄRK, KOKKUVÕTE JA PÕHJENDUS

The current study seeking approval is Phase 1 of a larger innovation project which aims at stimulating sustainable economic growth in Europe through fostering innovation in society and enterprises. Towards this end, OpenGovIntelligence suggests a holistic approach for the modernization of Public Administration (PA) by exploiting Linked Open Statistical Data (LOSD) technologies.

A collective intelligence design session (Warfield, 2006) with key stakeholders will be conducted to (a) identify the challenges and needs regarding opening-up and exploiting LOSD and (b) identify objectives regarding user requirements, best practices, models and challenges. Based on Warfield's (1994) science of generic design, the CI process is a facilitated problem solving methodology that helps groups to develop outcomes that integrate contributions from individuals with diverse views, backgrounds, and perspectives.

6. UURIMISTÖÖ TEOSTAMISE AEG

04/2016-07/2016

7. UURITAVATE JA NENDE VÄRBAMISVIISI TÄPNE KIRJELDUS

The participants to the study are key stakeholders in the field of open data in Estonia, including open data providers, policy-makers, open data researchers, innovators, technology developers and open data users, mostly but not exclusively affiliated with the Estonian Ministry of Economic Affairs and Communications. Altogether 5-10 persons will be invited to participate in the study using e-mail and telephone communication.

The participants will be identified in consultation with the contact person for the project at the Estonian Ministry of Economic Affairs and Communications based on the relevance of their position/expertise/experience to the objectives of the study. The identified members of the target group will be approached and recruited individually. As an additional strategy in case a sufficient

number of participants (minimum 5) cannot be secured, snowball sampling will be used to identify and recruit additional participants.

8. UURIMISMETOODIKA TÄPNE KIRJELDUS

A collective intelligence design session (Warfield, 2006) with key stakeholders (open data providers, open data researchers and innovators, service users affiliated with the Estonian Ministry of Economic Affairs and Communications, n ~ 5-10) will be conducted to (a) identify the challenges and needs regarding opening-up and exploiting LOSD and (b) identify objectives regarding user requirements, best practices, models and challenges.

Participants will be presented with a stimulus question (e.g. “what are challenges associated with political, legal, institutional, social and technical issues in opening-up and exploiting LOSD for the co-production of innovative data-driven services?”), followed by idea generation. Then each participant presents their challenges and these are recorded and displayed on the walls surrounding the group. The group then works to categorise or group related challenges on the wall. Next, each participant chooses their five most important challenges from across the categories. Participants then generate options to overcome challenges in each category: “What are options for overcoming the challenges in the category [category title]?”.

Finally, from the perspective of different user groups, participants work in groups to generate simple user stories that highlight key needs and requirements of users:

“As a <type of user>, I want <some goal> so that <some reason>.” These user stories are then reviewed by the group.

9. UURIMISTÖÖ EETILISTE ASPEKTIDE KIRJELDUS

There are minimal risks associated with the procedure outlined. Some participants may find discussions around transparency barriers, options, and stories uncomfortable. Participants might become fatigued by the CI process, or find collaboration with peers stressful. Participants will be informed prior to participation that transparency will be discussed, so they can choose not to participate if they would find that distressing. Participants will also be informed that they can withdraw at any stage without penalty.

Also, participants may experience embarrassment from the prospect of being audio recorded. Audio recording of the session is required for transcription purposes only. This will be outlined in the participant information sheet and participants will be asked to provide informed consent to be recorded prior to the session. Anonymity and confidentiality of the data will be ensured. Transcripts will include no identifying information. For data storage purposes, participants will be assigned a participant number, and all data records will be stored on secure equipment in a secure location.

10. TEAVE SAMA PROJEKTI VARASEMATEST VÕI SAMAAEGSETEST HINDAMISTEST VÕI HEAKSKIITMISTEST MUJAL.

The same project has been submitted for ethical review by NUI Galway (Ireland), The Greek Ministry of Interior, Enterprise Lithuania, Trafford Council (the UK) and The Flemish Government (Belgium).

11. LISAD:

11.1 Uuringu läbiviija(te) CV(d)

CV Robert Krimmer

CV Tarmo Kalvet

CV Maarja Toos

11.2 Uuritava või tema seadusliku esindaja informeerimise ja teadliku nõusoleku vorm

PARTICIPANT INFORMATION SHEET

Fostering Innovation and Creativity in Europe through Public Administration

Modernization towards Supplying and Exploiting Linked Open Statistical Data

You are being invited to take part in a research study. Before you decide it is important for you to understand why the research is being done and what it will involve. Please take time to read the following information carefully.

What is the purpose of the study?

We are interested in stimulating sustainable economic growth in Europe through fostering innovation in society and enterprises. Towards this end, OpenGovIntelligence suggests a holistic approach for the modernization of Public Administration (PA) by exploiting Linked Open Statistical Data (LOSD) technologies. To do this we want to utilise a collective intelligence methodology to gather ideas in relation to needs and requirements of stakeholders, specifically, in the context of small groups of up to 10 stakeholders who will come together to identify the challenges and needs regarding opening-up and exploiting LOSD and (b) identify objectives regarding user requirements, best practices, models and challenges.

Who is conducting and financing the study?

This research is being carried out by Prof. Dr. Robert Krimmer, Dr. Tarmo Kalvet and Maarja Toos from the Tallinn University of Technology.

The study is financed by the European Union through the Horizon 2020 Programme for Research and Innovation.

What would my participation involve?

If you choose to participate, this will involve you, as part of a small group, discussing the challenges and needs regarding opening-up and exploiting LOSD and (b) identifying objectives regarding user requirements, best practices, models and challenges. The group session will be recorded (audio only), so that we have a record of what was said.

What will you do with the information?

With your permission, we will record these group discussions and then write it up into what is called a transcript. These transcripts will only be accessible to members of the research team, and will be kept securely, in strict accordance with the data protection act. An analysis of these discussions will be included in an EU report, as a key deliverable in an innovation project called the OpenGovIntelligence project. No one will be named or identifiable in any way in the reports of the study.

Are there any risks involved in taking part?

We foresee no risks to participants as a result of taking part. Many people use open data to learn more about the world around them and we value your ideas in relation to how to open up and exploit Linked Open Statistical Data. Discussions in relation to open data can sometimes cause some distress, but we will have a facilitation and support team available to support your involvement in this study.

What if I wish to withdraw?

Your participation is entirely voluntary and you can withdraw at any time you wish, without giving a reason and without penalty.

When and where will this happen?

These sessions will take place on campus at the School of Psychology, NUI Galway.

How long will it take?

The session is expected to take up to 6 hours. There will be two 20 minute breaks for refreshments in the morning and afternoon, and an hour break for lunch.

Who can I contact for further questions?

If you have any questions about the study, you are welcome to contact any of the researchers at any time:

Robert Krimmer: robert.krimmer@ttu.ee, +372 620 2662

Tarmo Kalvet: tarmo.kalvet@ttu.ee, +372 620 2660

Maarja Toots: maarja.toots@ttu.ee, +372 620 2671

If you have questions about your rights, you can consult the Research Ethics Committee of the University of Tartu: etitikakomitee@ut.ee,

PARTICIPANT CONSENT FORM

Mind,

on informeeritud ülalmainitud uuringust ja ma olen teadlik läbiviidava uurimistöö eesmärgist ja uuringu meetodikast, riskidest ja võimalikust tervisekahjust. Kinnitan oma nõusolekut selles osalemiseks allkirjaga. Juhul kui uuringust tulenevaid riske või tervisekahju pole ette näha, siis tuleb võetavat nõusolekut vastavalt kohandada. Tean, et uuringu käigus tekkivate küsimuste kohta annab mulle täiendavat informatsiooni

Uuritava allkiri:

Kuupäev, kuu, aasta

Uuritavale informatsiooni andnud isiku nimi

Uuritavale informatsiooni andnud isiku allkiri

Kuupäev, kuu, aasta

11.3 Teised uuritavale või uuritava eeskostjale esitatavad dokumendid

N/A

8.3.1 Ethics approval confirmation



UNIVERSITY OF TARTU

Robert Krimmer

Tallinn University of Technology

Faculty of Social Sciences

Ragnar Nurkse School of Innovation and Governance

robert.krimmer@ttu.ee

April 2016 No 3-17.3/TA/

Authorization of the project

„OpenGovIntelligence - Fostering Innovation and Creativity in Europe through Public Administration Modernization towards Supplying and Exploiting Linked Open Statistical Data“

by the Research Ethics Committee of the University of Tartu

To whom it may concern,

The Research Ethics Committee of the University of Tartu has reviewed the application of the project on 18 April 2016 and hereby confirm:

The project „OpenGovIntelligence - Fostering Innovation and Creativity in Europe through Public Administration Modernization towards Supplying and Exploiting Linked Open Statistical Data“ does not require approval of Ethics Committee based on Estonian legislation. The researchers fulfil Data Protection Act of the Republic of Estonia.

If any ethical issue is emerging please do not hesitate to contact by e-mail: etikakomitee@ut.ee or phone +3725642117.

Sincerely

Aime Keis

Chairman

University of Tartu | Ülikooli 18, 50090 Tartu ESTONIA | tel +372 737 5100 | fax +372 5440
www.ut.ee/en | e-mail info@ut.ee | reg code 74001073

8.4 Centre for Research and Technology – Hellas

Submitted to: Ethical Committee of CERTH	Ref. No: ETH.COM- Date Submitted: Review Completed: Researcher(s) Notified:
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**Application for Ethical Approval from
CERTH Research Ethics Panel**

Name of researcher: *Konstantinos Tarabanis* Email: *kat@uom.gr*

Project Title: *“OpenGovIntelligence: Fostering Innovation and Creativity in Europe through Public Administration Modernization towards Supplying and Exploiting Linked Open Statistical Data”*

In order to understand the challenges and needs regarding opening-up and exploiting linked open statistical data the project will use the following activities:

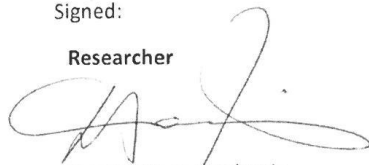
1. Identify the best practises on publishing Linked Open Statistical Data in order to overcome the challenges regarding the combination of multiple datasets from diverse publishers. A group of around 10 experts (Linked Data portal curators, dataset publisher etc.) will be contacted to give their professional opinion on technical issues. The Delphi method will be used collect the professional opinion of experts on technical issues.
2. Identify the challenges and needs related to the development of data-driven products using open statistical data. Participants of hackathons using their expertise in the development of data-driven products will be contacted to give their professional opinion on this matter. Structured questionnaire will be disseminated to the participants of hackathons in order to collect their professional opinion on the difficulties they faced using open statistical data.
3. Identify the challenges and needs of users that aim to exploit statistical open data published by providers across countries and in different administrative levels. A group of experts that are fully aware of the structure and content of published open datasets will be contacted to give their professional opinion regarding the challenges they face. Interview forms will be given to the group of experts in order to collect their professional opinion about the exploitation of open statistical data.

I have read the institutes policies regarding the use of human participants and agree to abide by them. I am also familiar with the ethical principles with regard to human participants and the data protection Act. I further agree to submit any significant changes in procedures or measurement instruments for additional review.


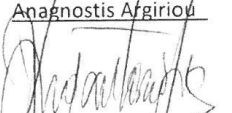

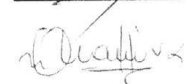
1

Signed:

Researcher


Konstantinos Tarabanis

Ethical Committee Members


Athanasios Konstandopoulos
Anagnostis Argiriou
Georgia Aifantopoulou
Ioannis Kompatsiaris
Olga Kammona

8.5 Delft University of Technology

Delft University of Technology ETHICS REVIEW CHECKLIST FOR HUMAN RESEARCH

This checklist should be completed for every research study that involves human participants and should be submitted before potential participants are approached to take part in your research study.

In this checklist we will ask for additional information if need be. Please attach this as an Annex to the application.

Please upload the documents (go to [this page](#) for instructions).

Thank you and please check our [website](#) for guidelines, forms, best practices, meeting dates of the HREC, etc.

I. Basic Data

Project title:	OpenGovIntelligence (OGI) Fostering Innovation and Creativity in Europe through Public Administration Modernization towards Supplying and Exploiting Linked Open Statistical Data
Name(s) of researcher(s):	Marijn Janssen and Ricardo Matheus
Research period (planning)	February 2016 - February 2019
E-mail contact person	M.F.W.H.A.Janssen@tudelft.nl r.matheus@tudelft.nl
Faculty/Dept.	Technology Policy and Management ICT Section
Position researcher(s):¹	Prof. Dr. Ir. Marijn Janssen PhD Candidate Ricardo Matheus
Name of supervisor (if applicable):	Prof. Dr. Ir. Marijn Janssen
Role of supervisor (if applicable):	Leader of Project OGI

II. Summary Research

The OpenGovIntelligence project aims at stimulating sustainable economic growth in Europe through fostering innovation in society and enterprises. The OpenGovIntelligence pilots in six countries to validate and prove the usability and effectiveness of the LOSD Innovation Ecosystem. The pilots will develop services at both national and local level to tackle societal and Public administration challenges in various problem areas such as internal decision-making, enhancing e-services and improving policy-making. The expected number of people interviewed and surveyed on each pilot is around 100, giving a total of 600 habitants from 6 different countries: Belgium, England, Estonia, Greece, Ireland, Lithuania.

¹ For example: student, PhD, post-doc

² **Important note concerning questions 1 and 2.** Some intended studies involve research subjects who are particularly vulnerable or unable to give informed consent. Research involving participants who are in a

III. Checklist

	Yes	No
1. Does the study involve participants who are particularly vulnerable or unable to give informed consent? (e.g., children, people with learning difficulties, patients, people receiving counselling, people living in care or nursing homes, people recruited through self-help groups).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Are the participants, outside the context of the research, in a dependent or subordinate position to the investigator (such as own children or own students)? ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Will it be necessary for participants to take part in the study without their knowledge and consent at the time? (e.g., covert observation of people in non-public places).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Will the study involve actively deceiving the participants? (e.g., will participants be deliberately falsely informed, will information be withheld from them or will they be misled in such a way that they are likely to object or show unease when debriefed about the study).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Will the study involve discussion or collection of information on sensitive topics? (e.g., sexual activity, drug use, mental health).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Will drugs, placebos, or other substances (e.g., drinks, foods, food or drink constituents, dietary supplements) be administered to the study participants?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Will blood or tissue samples be obtained from participants?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Is pain or more than mild discomfort likely to result from the study?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Does the study risk causing psychological stress or anxiety or other harm or negative consequences beyond that normally encountered by the participants in their life outside research?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Will financial inducement (other than reasonable expenses and compensation for time) be offered to participants?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Important:
if you answered 'yes' to any of the questions mentioned above, please submit
the full application form to HREC
(see: HREC website for forms or examples).

² **Important note concerning questions 1 and 2.** Some intended studies involve research subjects who are particularly vulnerable or unable to give informed consent. Research involving participants who are in a dependent or unequal relationship with the researcher or research supervisor (e.g., the researcher's or research supervisor's students or staff) may also be regarded as a vulnerable group. If your study involves such participants, it is essential that you safeguard against possible adverse consequences of this situation (e.g., allowing a student's failure to complete their participation to your satisfaction to affect your evaluation of their coursework). This can be achieved by ensuring that participants remain anonymous to the individuals concerned (e.g., you do not seek names of students taking part in your study). If such safeguards are in place, or the research does not involve other potentially vulnerable groups or individuals unable to give informed consent, it is appropriate to check the NO box for questions 1 and 2. Please describe corresponding safeguards in the summary field.

10. Will the experiment collect and store videos, pictures, or other identifiable data of human subjects?³

	Yes	No
11. Will the experiment collect and store videos, pictures, or other identifiable data of human subjects? ³	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If "yes", are you sure you follow all requirements of the applicable data protection legislation?
(Please provide proof by sending us a copy of the informed consent form).

<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	-------------------------------------

12. Will the experiment involve the use of devices that are not 'CE' certified?

<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	-------------------------------------

Only if 'yes': continue with the following questions:

- Was the device built in-house? ☐ ☒
- Was it inspected by a safety expert at TU Delft?
(Please provide device report, see: HREC website) ☐ ☒
- If it was not built in house and not CE-certified, was it inspected by some other, qualified authority in safety and approved?
(Please provide records of the inspection). ☐ ☒

13. Has or will this research be submitted to a research ethics committee other than this one? (if so, please provide details and a scan of the approval or submission if available).

<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	-------------------------------------

IV. Enclosures (tick if applicable)


- ☐ Full proposal (if 'yes' to any of the questions 1 until 10)
- ☐ Informed consent form (if 'yes' to question 11)
- ☐ Device report (if 'yes' to question 12)
- ☐ Approval other HREC-committee (if 'yes' to question 13)
- ☐ Any other information which might be relevant for decision making by HREC

V. Signatures

Signature(s) of researcher(s)

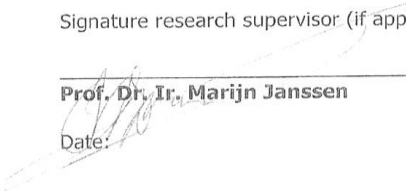

Prof. Dr. Ir. Marijn Janssen

Date:


Ricardo Matheus

Date: 26/03/2016

Signature research supervisor (if applicable)


Prof. Dr. Ir. Marijn Janssen

Date:

³ Note: you have to ensure that collected data is safeguarded physically and will not be accessible to anyone outside the study. Furthermore, the data has to be de-identified if possible and has to be destroyed after a scientifically appropriate period of time.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65

Appendix1: Privacy and data protection

Please fill this in if you have answered 'yes' to question 11 in the checklist

- a. Are the research data made anonymous? If no, please explain.
- b. Will directly identifiable data (such as name, address, telephone number, and so on) be kept longer than 6 months? If yes, will the participants give written permission to store their information for longer than 6 months?
- c. Who will have access to the data which will be collected?
- d. Will the participants have access to their own data? If no, please explain.
- e. Will covert methods be used? (*e.g. participants are filmed without them knowing*)
- f. Will any human tissue and/or biological samples be collected? (*e.g. urine*)



8.6 Swirrl IT Limited

As elaborated in 2.6.2, an application to an ethics committee is not necessary in this case. Ethics will be dealt with in the first instance by Trafford's Innovation and Intelligence Lab, with immediate support from Trafford's Information Governance Team.

9 Appendix C - Sample informed consent form

PARTICIPANT CONSENT FORM

Project Title: Fostering Innovation and Creativity in Europe through Public Administration
Modernization towards Supplying and Exploiting Linked Open Statistical Data

Researchers: _____

The purpose and nature of the study has been explained to me in writing ☐

I understand that my participation is voluntary and I can withdraw from the study,
without repercussions, at any time, whether before it starts or while I am participating. ☐

I give permission to be audio recorded. ☐

I understand that anonymity will be ensured in the write-up by disguising my identity. ☐

I understand that anonymous extracts from group sessions may be quoted in the EU report and any
subsequent publications if I give permission below ☐

I agree to take part in the above study ☐

By signing below you are agreeing that you have read and understood the participant
information sheet and that you agree to take part in this research study.

Participant's signature Date

Printed name of researcher Signature of researcher Date

10 Appendix D – Commitment Letters for Data Protection

10.1 National University of Ireland, Galway



24 March 2015

Dear Sir,

RE: Commitment to follow institutional Data Protection and Handling Policy in the implementation of the OpenGovIntelligence Project

As the team leader for the National University of Ireland, Galway (NUIG) on the OpenGovIntelligence project, I confirm that any data that comes into the possession of NUIG will be treated in accordance with our Data Protection and Data Handling Policy.

In respect to the OpenGovIntelligence project, all data received by NUIG, through stakeholder engagement and the technology and tools which will be developed, will be anonymized. In the unlikely event that personal data are collected, such data will be treated in accordance with the Irish Data Protection Law (<https://www.dataprotection.ie/docs/Law-On-Data-Protection/m/795.htm>), our Data Protection and Data Handling Policy, and at the same procedures will be in place to ensure that appropriate consent is sought from individuals involved.

Kind regards,

A handwritten signature in blue ink, consisting of a stylized 'A' and 'O'.

Dr. Adegboyega Ojo
Senior Research Fellow and Unit Leader
Insight Centre for Data Analytics
DERI Building
IDA Business Park, Lower Dangan
Co. Galway
Republic of Ireland

10.2 ProXML

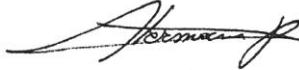
Dear Sir/Madam,

RE: Commitment to follow institutional Data Protection and Handling Policy in the implementation of the OpenGovIntelligence Project.

As the team leader for ProXML on the OpenGovIntelligence project, I confirm that any data that comes into the possession of ProXML will be treated in accordance to our data handling rules.

In respect to the OpenGovIntelligence project, all data received by ProXML, through stakeholder engagement and the technology and tools which will be developed, will be anonymized. In the unlikely event that personal data are collected, such data will be treated in accordance with the Flemish and Belgian data protection legislation, our data handling rules, and at the same, procedures will be in place to ensure that appropriate consent is sought from individuals involved.

Kind regards,
Paul Hermans



Zaakvoerder

ProXML

10.3 Tallinn University of Technology



TALLINN UNIVERSITY OF
TECHNOLOGY

Ragnar Nurkse School
for Innovation and Governance
Akadeemia tee 3
12618 Tallinn, Estonia

To whom it may concern

Tallinn, 16. March 2016

**Commitment to follow institutional Data Protection and Handling Policy in the
implementation of the OpenGovIntelligence Project**

Dear Sir / Madam,

As the team leader for the Tallinn University of Technology (TUT) within the H2020 OpenGovIntelligence project, I confirm that any data that comes into the possession of TUT will be treated in accordance with the university Rules on the Processing and Protection of Personal Data and the Estonian Personal Data Protection Act (<https://www.riigiteataja.ee/en/eli/512112013011/consolide>).

In respect to the OpenGovIntelligence project, all data received by TUT through stakeholder engagement and the technology and tools which will be developed, will be anonymized. In the unlikely event that personal data are collected, such data will be treated in accordance with the Estonian Personal Data Protection Act and the university Rules on the Processing and Protection of Personal Data, and at the same procedures will be in place to ensure that appropriate consent is sought from individuals involved.

Kind regards,

A handwritten signature in black ink, appearing to be 'R. Krimmer', written over a horizontal line.

Prof. Dr. Robert Krimmer

10.4 Centre for Research and Technology – Hellas



CENTRE FOR RESEARCH AND TECHNOLOGY – HELLAS (C.E.R.T.H.)
INFORMATION TECHNOLOGIES INSTITUTE (I.T.I.)

6th km. Charilaou-Thessaloniki Rd • P.O. Box 60361 • 570 01 Thessaloniki, Greece • Tel: (+302311) 257 701-3 • Fax: (+302310) 474 128
Web: <http://www.itig.gr> • E-mail: info@iti.gr

Commitment to follow institutional Data Protection and Handling Policy in the implementation of the OpenGovIntelligence Project.

As the team leader for the Centre for Research and Technology, Hellas (CERTH) on the OpenGovIntelligence project, I confirm that any data that comes into the possession of CERTH, regarding the above-mentioned project, will be treated in accordance with our Data Protection and Data Handling Policy.

In respect to the OpenGovIntelligence project, all data received by CERTH, through stakeholder engagement and the technology and tools which will be developed, will be anonymized. In the unlikely event that personal data are collected, such data will be treated in accordance with the Greek legislation (i.e. 2472/1997 and 3471/2006) and that the same procedures will be in place to ensure that appropriate consent is sought from individuals involved.

Kind regards,

Prof. Konstantinos Tarabanis

Project Coordinator

10.5 Delft University of Technology

Date 17 March 2016
Contact person Prof.dr.ir. M.F.W.H.A. Janssen
Telephone +31 (0)15-278 81140
E-mail m.f.w.h.a.janssen@tudelft.nl
Subject OpenGovIntelligence Project



Technology, Policy and Management
Information and Communication
Technology

Visiting address
Jaffalaan 5
2628 BX Delft
Postal address
P.O. Box 5015
2600 GA Delft
The Netherlands

Dear Sir,

RE: Commitment to follow institutional Personal Data Protection Act (25 892 - Rules for the protection of personal data) in the implementation of the OpenGovIntelligence Project.

As the team leader for the Technology University of Delft (TUDelft) on the OpenGovIntelligence project, I confirm that any data that comes into the possession of TUDelft will be treated in accordance with our Personal Data Protection Act, copies of both are attached in Appendix 1.

In respect to the OpenGovIntelligence project, all data received by TUDelft, through stakeholder engagement and the technology and tools which will be developed, will be anonymized. In the unlikely event that personal data are collected, such data will be treated in accordance with the https://www.coe.int/t/dghl/standardsetting/dataprotection/national%20laws/NL_DP_LAW.pdf of our Personal Data Protection Act (25 892 - Rules for the protection of personal data), and at the same procedures will be in place to ensure that appropriate consent is sought from individuals involved.

Kind regards,

Prof.dr.ir. M.F.W.H.A. Janssen

10.6 Swirrl IT Limited

Dear Sir/Madam,

RE: Commitment to follow institutional Data Protection and Handling Policy in the implementation of the OpenGovIntelligence Project.

As the team leader for Swirrl IT Limited (SWIRRL) on the OpenGovIntelligence project, I confirm that any data that comes into the possession of SWIRRL will be treated in accordance with our Data Protection and Data Handling Policy.

In respect to the OpenGovIntelligence project, all data received by SWIRRL will be treated in accordance with the UK Data Protection Act and in accordance with the UK ethics management plan for OpenGovIntelligence. Procedures will be in place to ensure that appropriate consent is sought from individuals involved.

Kind regards,



Date: 21/03/2016

WILLIAM ROBERTS
Director, Swirrl IT Limited

10.7 Trafford Council

Dear Sir/Madam,

RE: Commitment to follow institutional Data Protection and Handling Policy in the implementation of the OpenGovIntelligence Project.

As the lead for the Trafford Council on the OpenGovIntelligence project, I can confirm that any data that is used by Trafford in the scope of the project will be treated in accordance with our Data Protection Policy. Data will also be dealt with in accordance with the UK ethics management plan for OpenGovIntelligence, and procedures will be in place to ensure that appropriate consent is sought from individuals providing data.

Yours Faithfully



Jamie Whyte

Head of Trafford Innovation and Intelligence Lab

Trafford Council

Sale Point

126 – 130 Washway Road

Sale

M33 6AG

10.8 Marine Institute

Foras na Mara,
Rinn Mhaicil,
Uarán Mór,
Co. na Gaillimhe,
Éire

Marine Institute
Rinville
Oranmore,
Co. Galway
Ireland
☎ +353 91 387 200
☎ +353 91 387 201
✉ institute.mail@marine.ie
🌐 www.marine.ie

24 March 2016



Dear Sir,

RE: Commitment to follow institutional Data Protection and Handling Policy in the implementation of the OpenGovIntelligence Project.

As the team leader for the Marine Institute (MI) on the OpenGovIntelligence project, I confirm that any data for the project which comes into the possession of MI will be treated in accordance with our own Data Policy.

In respect to the OpenGovIntelligence project, in the unlikely event that any personal or sensitive data received by MI, through stakeholder engagement will be anonymized. If personal data are collected, such data will be treated in accordance with the Irish Data Protection Law (<https://www.dataprotection.ie/docs/Law-On-Data-Protection/m/795.htm>), our Data Policy, and procedures will be in place to ensure that appropriate consent is sought from individuals involved.

Kind regards,

Dr. Adam Leadbetter
Marine Institute
Rinville
Oranmore
Co. Galway
Republic of Ireland

Foras na Mara
Teach Páirc Wilton
Plás Wilton
Baile Átha Cliath 2
Éire

Marine Institute
Wilton Park House
Wilton Place
Dublin 2
Ireland
☎ +353 1 7753900
☎ +353 91 387201

Foras na Mara,
Baile Uí Fhiacháin,
Co. Mhaigh Eo,
Éire

Marine Institute
Fumace,
Newport,
Co. Mayo,
Ireland
☎ +353 98 42300
☎ +353 98 42340



Is gníomhaireacht náisiúnta na hÉireann é Foras na Mara atá freagrach as taighde, teicneolaíocht, forbairt agus nuálaíocht mara.
The Marine Institute is Ireland's national state agency for marine research, technology, development and innovation.

10.9 Enterprise Lithuania



Prof. Dr. Konstantinos Tarabanis

24th March 2016 No. VL2016-108

Dear Sir,

RE: Commitment to follow institutional Data Protection and Handling Policy in the implementation of the OpenGovIntelligence Project.

As the team leader for Enterprise Lithuania on the OpenGovIntelligence project, I confirm that any data that comes into the possession of Enterprise Lithuania will be treated in accordance with our Data Protection and Data Handling Policy.

In respect to the OpenGovIntelligence project, all data received by Enterprise Lithuania, through stakeholder engagement and the technology and tools which will be developed, will be anonymized. In the unlikely event that personal data are collected, such data will be treated in accordance with the Lithuanian Law on Legal Protection of Personal Data (http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=435305), our Data Protection and Data Handling Policy, and at the same procedures will be in place to ensure that appropriate consent is sought from individuals involved.

Kind regards,

Ruta Pentikinaite
Acting Director General

A handwritten signature in black ink, appearing to read "Ruta", written over a faint, stylized map of Lithuania.

K. Pečiulis, mob. +370 683 95727, e-mail: k.peciulis@enterpriselithuania.com

Enterprise Lithuania, A. Gostauto str. 40A, LT-01112 Vilnius, Lithuania
Phone: +370 5 249 9083, fax: +370 5 204 5908; e-mail: info@enterpriselithuania.com
Company code: 302454111, VAT code: LT100005125012, www.enterpriselithuania.com

10.10 Ministry of Interior and Administrative Reconstruction

Dear Prof. Prof. Dr. Konstantinos Tarabanis,

RE: Commitment to follow institutional Data Protection and Handling Policy in the implementation of the OpenGovIntelligence Project.

As the team leader for the Ministry of Interior and Administrative Reconstruction (ex. Ministry of Administrative Reform and E-Government -MAREG) on the OpenGovIntelligence project, I confirm that any data that comes into the possession of MAREG will be treated in accordance with our Data Protection and Data Handling Policy.

In respect to the OpenGovIntelligence project, all data received by MAREG, through stakeholder engagement and the technology and tools which will be developed, will be anonymized. In the unlikely event that personal data are collected, such data will be treated in accordance with the Greek Data Protection Law (http://www.dpa.gr/portal/page?_pageid=33,19052&_dad=portal&_schema=PORTAL), our Data Protection and Data Handling Policy, and at the same procedures will be in place to ensure that appropriate consent is sought from individuals involved.

Kind regards,



Antonios Stasis

ANTONIOS STASIS
Στασής
Αντώνιος

10.11 Flemish Government

Dear Sir/Madam,

RE: Commitment to follow institutional Data Protection and Handling Policy in the implementation of the OpenGovIntelligence Project.

As the team leader for the Flemish Community on the OpenGovIntelligence project, I confirm that any data that comes into the possession of the Flemish Community will be treated in accordance with our Data Protection and Data Handling Policy.

In respect to the OpenGovIntelligence project, all data received by Flemish Community, through stakeholder engagement and the technology and tools which will be developed, will be anonymized. In the unlikely event that personal data are collected, such data will be treated in accordance with the Belgian and Flemish privacy regulations, our Data Protection and Data Handling Policy, and the same procedures will be in place to ensure that appropriate consent is sought from individuals involved.

Kind regards,

Tom Van Gulck

Tom Van
Gulck
(Authentic
ation)

Digitally signed
by Tom Van
Gulck
(Authentication)
Date: 2016.04.08
15:51:44 +02'00'