

TANGENT

ETHICS MONITORING. FIRST RELEASE.

D9.4



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Authors	Leire Serrano (Deusto)
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Executive summary

Ensuring compliance with ethical aspects and rules in TANGENT is key for a successful implementation of the project. This deliverable updates on the procedures defined for carrying out the research in accordance with the ethical requirements at the EU level. Such as the informed consent templates that must be completed by the individuals participating in the different project activities, such as workshops, TANGENT Forum and traveller's behaviour modelling. This deliverable also covers the measures for the correct data management along the project, including personal data.

The report details different mechanisms for guaranteeing effective data management and protection, such as the approach for data anonymisation/pseudonymisation, technical and organisational measures implemented to safeguard the rights and freedoms of the data subjects and research participants, the role of Data Protection Officers (DPO) and Data Managers.

Additionally, the deliverable covers the safe and health measures identified and applied to all the individuals taking part in TANGENT.

Key words

GDPR, ethical aspects, informed consent form, data management, data processing, personal data.

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List of abbreviations and acronyms

Acronym	Meaning
DPO	Data Protection Officer
EU	European Union
UK	United Kingdom
WP	Work Package
GDPR	General Data Protection Regulation

1 Introduction

This deliverable aims to present the different ethics measures considered in TANGENT project in order to safeguard the rights of the participants in TANGENT research project and comply with the EU legislation in force.

So far, TANGENT has produced 3 deliverables in month 6 (February 2022), presenting the ethical procedures that will be followed for executing the different research& development activities planned in TANGENT. These deliverables are: a) "D10.1. H - Requirement No. 1"; b) "D10.2. POPD - Requirement No. 2" and c) "D10.3. EPQ - Requirement No. 3".

This deliverable will provide an update on the ethical measures implemented:

- Informed consent procedures for the participants in the TANGENT Forum activities (involving meetings and workshops), participation in surveys and participation in travel behaviour modelling providing tracking information.
- The management of data in the project research activities, including personal data.
- Ensuring that appropriate health and safety procedures are implemented for the participants in the project, complying with the national and EU regulation.

2 Informed consent procedures

Within the project it will be necessary to involve participants in some of the activities that will be carried out in the project, namely, (i) TANGENT Forum activities including meetings and workshops, (ii) participation in surveys and (iii) participation in travel behaviour modelling (providing tracking information).

Volunteers participating in these actions will need to sign or digitally accept an informed consent form. Participants will be informed in detail, in language and terms intelligible to them, via an information sheet about the objectives and methods of the research and that they participate on a voluntary basis. It is the participants' right to change their mind and to withdraw themselves and their data from the research, also after having given informed consent, at any time of the research process, without bearing any consequences whatsoever.

The project will only record information that is necessary to address the central purpose of its research. No personal data will be processed without users' authorization and specific requirements under GDPR will be fulfilled. Collecting data from or about individuals implies taking into consideration two main elements: informed consent and data protection.

The informed consent forms cover the following:

- all the participants have to be adults (over 18 years old) according to the EU regulation;
- the project does not target any vulnerable individuals such as children, patients, discriminated people, minorities, persons unable to give consent, people of dissenting opinion, immigrant or minority communities, sex workers, etc.
- they will have the right to be fully informed about the research in which they are involved.
- documents are in a language and in terms fully understandable to them.
- clearly describe the aims, methods and implications of the research, the nature of the participation and any benefits, risks or discomfort that might be involved.
- explicitly state that participation is voluntary and that anyone has the right to refuse to participate and to withdraw their participation, samples or data at any time without any consequences.
- describe how the personal information will be handled in order to assure its privacy. The information will be processed securely and will not be disclosed to third parties and neither to third countries.
- indicate what procedures will be implemented in the event of unexpected or incidental findings (in particular, if the participants have the right to know, or not to know, of any such findings).

Before taking part in any research on a voluntary basis, individuals are entitled to be informed and therefore receive answers to their questions before deciding about participation or sharing of data.

Three different informed consents have been defined for addressing the particularities of the different actions, being:

- stakeholders' participating in the TANGENT Forum activities
- volunteers participating in the TANGENT Survey
- volunteers participating in providing their tracking information

The templates are available in deliverable "D10.1. H - Requirement No. 1".

During the first year of execution of the project various activities have been carried out, such as the setting of TANGENT Forum and workshops with stakeholders in the scope of WP1 for the different Case Studies (Greater Manchester, Rennes and Lisbon). All the participants have completed the Informed Consent Procedure.

Additionally, in Autumn 2022 a survey related to traveler's behaviour will be launched and also travelers' tracking information will be gathered by means of Google timeline, in the scope of WP3 activities. The volunteers in these actions will need to complete the inform consent forms procedure.

3 Data management in TANGENT

TANGENT aims to develop new complementary tools for optimising traffic operations from a multimodal perspective, both for passenger and freight transport. The project allows the precise knowledge and management of the mobility flows among the transport modes and enables the implementation and integration of innovative mobility solutions, services, and business models. For delivering this information services, TANGENT system will collect and process data from various sources.

Some of the data processed in TANGENT will contain personal data, therefore, TANGENT is subject to EU Regulation 2016/679, of 27 April 2016 (GDPR). and the UK's Data Protection Act 2018, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. Additionally, each partner is subject to the applicable national regulation on the processing of personal data, regardless of whether the processing takes place in a specific country or not.

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

The following type of personal data collected and processed by TANGENT meet this definition:

- personal data related to natural persons (names, e-mail addresses, etc.) who will be involved in the TANGENT forum, in workshops, surveys or in other dissemination activities.
- historical tracking information from Google timelines of a targeted group of travelers at each Case Study.

TANGENT project will manage data relevant and limited to the purposes of the research, and complying with the following:

- **Data minimisation principle:** In accordance with the "Data minimisation" principle, it will be explained how all the data intended to be processed in TANGENT project is relevant and limited to the purposes of the project. Justification for the processing of sensitive personal data will be included.
- **Data anonymisation/pseudo anonymisation:** Description of the anonymisation/pseudonymisation techniques that will be implemented. In case the data will not be anonymised/pseudo-anonymised, it should be explained why.
- **Rights and freedoms of the data subjects/research participants:** A description of the technical and organisational measures implemented to safeguard the rights and freedoms of the data subjects and research participants must be provided.

Besides, the project implements the following measures:

- **Data Protection Officer:** All the TANGENT partners working with personal data have appointed a Data Protection Officer.

- **Data Processing Principles:** TANGENT has established specific principles – which include the data minimization principle – that must apply to the processing of any personal data in the project framework, building on the six basic processing principles defined by GDPR.
- **Rights and freedoms of Data Subjects and Research Participants:** TANGENT has implemented a set of technical and organisational measures to safeguard the rights and freedoms of the data subjects and research participants.
- **Data pseudonymisation and anonymization:** Only applies in case some of the TANGENT partners will have access to pseudonymised data from external sources in the context of data sharing agreements. In that case the pseudonymised datasets will be processed by these partners to generate aggregated (and therefore fully anonymised) information to be used in the project. The pseudonymisation process applied to the original datasets by the data providers, as well as the subsequent security and privacy protection measures implemented during the processing of the pseudonymised datasets to generate the aggregated anonymised information, are explained in this document.
- **Informed consents:** as mentioned in section 2 “Informed Consent procedures”, it will be necessary to involve participants in some of the activities that will be carried out in the project, namely, (i) TANGENT Forum activities including meetings and workshops, (ii) participation in surveys and (iii) participation in travel behaviour modelling (providing tracking information). Volunteers participating in these actions will need to sign or digitally accept an informed consent form.

Detailed information on this is provided in deliverables “D10.2 POPD – Requirement No. 2” and “D10.1 H - Requirement No. 1”, which have been submitted in M6.

4 Safety and health measures

Additionally, TANGENT ensures that all the activities in the project are aligned with the appropriate health and safety procedures conforming to relevant local/national guidelines/legislation are followed for staff and participating citizens involved in the project, including the COVID-19 measures. This will apply to employees of the companies participating in the project as partners and third parties, as well as participants in the different activities of TANGENT, such as workshops and testing activities.

The following regulation has been identified and will be followed in TANGENT:

In the European Union:

- At EU level: The European Framework Directive on Safety and Health at Work (Directive 89/391 EEC).
- Additionally, the national regulation of Spain, Greece, Belgium, Italy, Germany, France, Portugal and Netherlands has been identified.

In the UK:

- The Health and Safety at Work etc. Act 1974

Further information on the regulation and measures identified is detailed in “D10.3. EPQ – Requirement No. 3”.

5 Conclusions

This deliverable gives an update on the implementation of different measures for complying with ethical aspects during the first year of the project. Especially focusing on the procedures to be followed for the participation of the individuals in the project activities, where the conditions are covered under the informed consent forms. Also, an overview of how TANGENT will proceed in order to ensure data minimization principle and personal data protection and the measures implemented is described. The report also covers the safety and health measures identified and applied to all the individuals taking part in TANGENT.

Deliverable “D 9.10 Ethics monitoring. Second release”, due in month 36, will update on the ethical aspects covered in year 2 and 3 of the project.

6 References

TANGENT Grant Agreement (Description of the Action)

Deliverable D10.1. H - Requirement No. 1

Deliverable D10.2. POPD - Requirement No. 2

Deliverable D10.3. EPQ – Requirement No. 3