PROCEDURES ON ETHICS REQUIREMENT AND DATA MANAGEMENT PLAN

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Horizon 2020

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Intermin project partners

	INSTITUTO GEOLÓGICO Y MINERO DE ESPAÑA	IGME	ES
	EUROGEOSURVEYS	EGS	BE
	BUREAU DE RECHERCHES GEOLOGIQUES ET MINIERES	BRGM	FR
	ASOCIACIÓN DE SERVICIOS DE GEOLOGÍA Y MINERÍA IBEROAMERICANOS	ASGMI	ES
	LA PALMA RESEARCH CENTRE FOR FUTURE STUDIES SL	LPRC	ES
	UNIVERSIDAD POLITECNICA DE MADRID	UPM	ES
	FEDERATION EUROPEENNE DES GEOLOGUES	EFG	FR
	MONTANUNIVERSITAT LEOBEN	MUL	AT
	COORDINATING COMMITTEE FOR GEOSCIENCE PROGRAMMES IN EAST AND SOUTHEAST ASIA	CCOP	TH
	AMERICAN GEOLOGICAL INSTITUTE	AGI	US
	THE UNIVERSITY OF QUEENSLAND	UQ	AU
	YOUNG EARTH SCIENTISTS NETWORK	YES	BE
	SVERIGES GEOLOGISKA UNDERSOKNING	SGU	SE

SUMMARY

1. INTRODUCTION: INTERMIN

The H2020-Project INTERMIN will commence in February 2018 lasting a total of 36 months. Its goal is to create a feasible, long-lasting international network of technical and vocational training centres for mineral raw materials' professionals. Specific objectives of the project are to develop common metrics and reference points for quality assurance and recognition of training and to create a comprehensive competency model for employment across the primary and secondary raw materials sector. INTERMIN activities include:

a) To develop an international qualification framework for technical and vocational training programs on mineral raw materials' topics, based on present and future requirements by employers.

b) To foster joint international training programs by a merger of competences and scope of existing training programmes.

c) To optimise future interaction and collaboration in Europe and internationally.

The project activities require contact with people as well the collection, analysis, treatment and storage of primary data (data collected by the Consortium involved in INTERMIN) and secondary data (data collected by others and published or publically available). INTERMIN also includes the development of a repository, which consists of a database of documents used and generated by the project.

2. CONTENT AND SCOPE

This deliverable adresses the procedures for gender issues and ethics

The DMP (Data Management Plan) will outline how data are to be handled.

In order to meet EU requirements, this proposed deliverable will address the following:

- Details on the procedures and criteria that will be used to identify/recruit research participants.

- Detailed information will be provided on the informed consent procedures that will be implemented for the participation of humans.

- In case of data not publicly available, relevant authorisations will be provided, in particular, with regards to the US Government restricted data on college graduates.

- Detailed information on the informed consent procedures that will be implemented in regard to the collection, storage and protection of personal data.

- Detailed information must be provided on the procedures that will be implemented for data collection, storage, protection, retention and destruction and confirmation that they comply with national and EU legislation.

- Detailed information must be provided on the procedures that will be implemented for data collection, storage, protection, retention and destruction and confirmation that they comply with national and EU legislation.

Intermin is construed in accordance with and governed by the laws of Belgium excluding its conflict of law provisions.

3. IDENTIFICATION AND RECRUITMENT CRITERIA

7.1 H-REQUIREMENT No. 1-Part 1: *Details on the procedures and criteria that will be used to identify/recruit research participants*

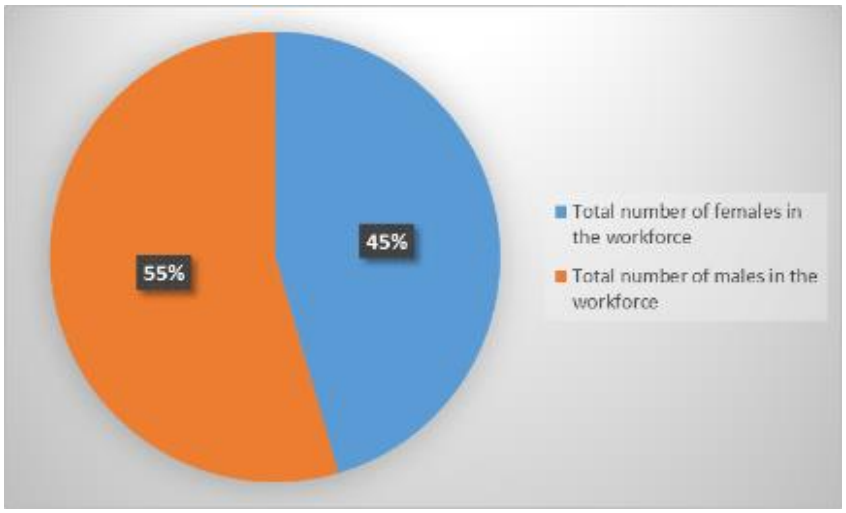
The INTERMIN network should map skills and knowledge in the EU and the third countries, identify key knowledge gaps and emerging needs, develop roadmap for improving skills and knowledge, as well as establish common training programmes in the raw materials sectors.

Building on existing EGS and NGSOs European and global cooperation in mineral raw materials, INTEMIN's overall objective will be to promote and mobilize European institutions and other international partners in creating future network to address relevant training. In addition, worldwide institutions and partners will also be identified and initial contact made with them alerting them to the upcoming plan to develop an international network of raw materials training centres.

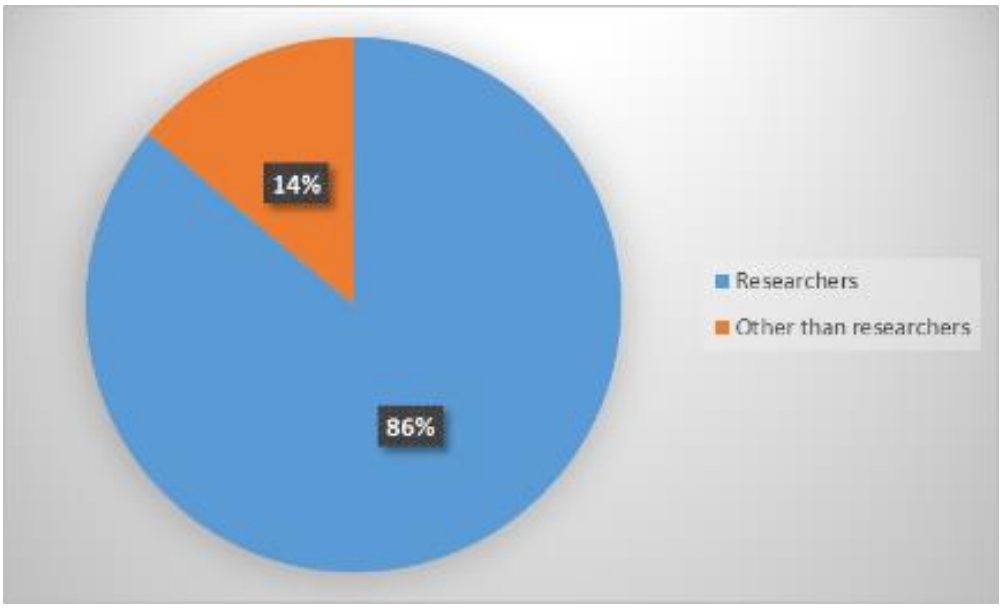
For each investigation activity details on the procedures and criteria that will be used to identify/ recruit participants shall be provided. It is at the participant's discretion as to whether s/he wishes to participate in the investigation activity or not. Contact details will be provided, for participants to contact the Project Consortium for information and decide whether they wish to join in.

At the moment of the present deliverable (april 2018) the research structure of intermin comprises:

1. Females/males:



2. Researchers/non-researchers:



3.1 Identification/recruitment procedures

Each partner is able to use the conventional recruitment procedures implemented in their institution (taking into account a gender balance), provided that they are not in conflict with the good practice criteria of the EC.

A basic requirement is language skills. Being recommended a background knowledge in raw materials.

3.2 Summary of the characteristics of research participants

The criteria for research participants (partners and thirth parties) are the same as the respondent (language skills, raw materials knowledge).

The use-cases will involve only voluntary participants aged 18 or older and capable to give consent, who will be informed on the nature of their involvement and on the data collection/retention procedures through an informed consent form before the commencement of their participations. Terms and conditions will be transparently communicated to the end-users by means of an information sheet including descriptions of: purpose of the research, adopted procedures, data protection and privacy policies. Please note that all the research participant will have the capacity to provide informed consent: i.e., individuals who lack capacity to decide whether or not to participate in research will be appropriately excluded from

research. Finally, INTERMIN pilots may involve certain vulnerable groups, e.g., elderly people and immigrants.

4. INFORMED CONSENT

7.1 H-REQUIREMENT No. 1-Part 2: *Detailed information must be provided on the informed consent procedures that will be implemented for the participation of humans*

Participation of individuals in INTERMIN activities will be on voluntary basis only. Participants in interviews, surveys, workshops, conferences or any other INTERMIN activities or events will be invited and adequately informed of the aims and methods of the research. The documentation given to potential participants should be comprehensible and there should be an opportunity for them to raise any issues of concern. The documentation must include contact details of the beneficiary performing the research, allowing participants to get in touch even after data-gathering has been concluded. The documentation must also inform the participants on the procedure for making complaints. Appendix 1 includes a template for a participant information sheet.

A request for consent form will be given to potential participants, before the start of the research activities. Participants must be informed that they are free to withdraw consent to participation and leave the event at any time, without giving any explanation. Participants must fill in and sign the request for consent form before the start of research activities. Consent is in writing and records of consent will be maintained. Appendix 2 includes a template for a consent form.

5. AUTHORISATION FOR NOT AVAILABLE DATA

7.2 POPD – REQUIREMENT No. 2-Part 1: *In case of data not publicly available, relevant authorisations must be provided, in particular, with regards to the US Government restricted data on college graduates.*

According to this requirement Intermin will pay special attention to the authorisations needed for any data restricted or not publicly available.

6. PROTECTION OF PERSONAL DATA

7.2 POPD – REQUIREMENT No. 2-Part 2: *Detailed information on the informed consent procedures that will be implemented in regard to the collection, storage and protection of personal data data on college graduates.*

INTERMIN will collect data (opinions, information and insight) from individuals who volunteer to participate in the project research. Protecting the rights and freedom of opinion and expression of these individuals is an ethical obligation of the Consortium.

Prior to the commencement of activities that involve the collection of personal data (e.g. interviews and surveys), regardless of the country in which the activities will be carried out, the beneficiary responsible for that activity must submit to the coordinator information on data collection procedures and accompanying evidence (e.g. copies of the scripts and questionnaires that will be used, consent forms, local sign off, participant information sheets). The coordinator will forward those documents to the Ethics Committee[1], asking for verification and confirmation that the activities that are proposed will conform with the ethical guidelines of INTERMIN and Horizon2020. The Ethics Committee verifies compliance of the activities with INTERMIN and the H2020 ethical guidelines and issues an ethical approval for the described activities.

Individuals wishing to voluntarily supply a new document to INTERMIN's repository need to request access to the system manager. This is an online procedure and, together with the password to log in into the repository upload entry page, prospective contributors will receive information on INTERMIN's aims and will be asked to read and confirm a request for consent online form. Data voluntarily uploaded by contributors into INTERMIN's repository website will be checked for copyright holder's consent and suitability by the INTERMIN repository Administrators before inclusion in the public database.

To guarantee protection of personal data the following ethical guidelines are in place:

[1] The Ethics Committee is composed by the Management Committee and the Advisory Board

1. No vulnerable or high risk-groups (e.g. children, adults unable to consent, people in dependency relationships, vulnerable persons) will be addressed by INTERMIN or during the development of INTERMIN;
2. Participation of individuals in INTERMIN activities will be on a voluntary basis only;
3. Persons are only approached in their professional capacity;
4. Participants in interviews, surveys, workshops, conferences or any other INTERMIN activities or events will be invited and informed that they are free to leave the event at any time, without giving any explanation;
5. It is made clear to all participants that they may request that contact ceases and that their contact information is removed from the INTERMIN databases;
6. A description of INTERMIN aims and specific purposes will be provided in advance to potential participants invited to participate in INTERMIN's activities, together with a request for consent;
7. The minimum possible amount of personal contact data will be collected;
8. The purpose for collecting contact data is to obtain professional opinions and information only and no research will be performed on the contact data;
9. Personal contact data will be considered confidential, will be held securely and will not be disclosed to entities or individuals that do not participate in the INTERMIN Consortium;
10. To safeguard confidentiality of the opinions of participants in INTERMIN activities the disclosure of individual opinions will never be made.

In case of conflicts of interests researchers will inform the INTERMIN Ethics Committee, ensuring respect to the conduct of the research from inception to publication.

All Ethics Approval, Informed Consent, and Data Protection documentation will be centrally held by the Project Coordinator and hence available for audit.

1. A project description sheet will be provided to potential participants together with an invitation explaining also our ethics procedures. In case of an interview, the project description will be sent in advance. The project description will provide information about the general aims of the INTERMIN project and the specific purposes of the workshop/conference/event/survey or interview the person is partaking into.

2. Request for consent will be sent out with the invitation to potential participants. Potential participants are informed that their participation is entirely voluntary and that a refusal to participate will not have any consequences for them. A refusal to participate by the invitee will be accepted under any circumstance. Similarly, request for consent will be sent out with the invitation to potential interviewees and asked again during the interview. A consent request will be included in any surveys undertaken.
3. Informed consent is collected in any case of participation, given exclusively for the specified purpose and it is revocable.
4. Only the name and affiliation of participants will be recorded. Recorded names and affiliations will only be distributed (if required) across delegates of the same event.
5. During electronic communication email addressed will be encrypted to avoid sending personal information to groups of people.
6. All email communication will be archived during the life of the project and the quality assessment time period after finishing the project. This email archive will only be for the purposes of the INTERMIN project.
7. Retention of personal data is limited to “no longer than necessary to achieve the purpose specified”. After this period the personal data will be destroyed. Data destruction includes the destruction of all personal data in printed or virtual form.
8. Stakeholders/delegates will be given the option to not provide their personal information if they wish to do so.

7. DATA MANAGEMENT

7.2 POPD – REQUIREMENT No. 2-Part 3: *Detailed information must be provided on the procedures that will be implemented for data collection, storage, protection, retention and destruction and confirmation that they comply with national and EU legislation*

7.1 Prodedures for data collection

Primary data collection will be made through surveys, meetings with experts and interviews. Secondary data collection will be made by desk research of published or publically available data.

INTERMIN also considers the possibility of receiving data and information from individuals who voluntarily take the initiative of submitting documents through INTERMIN's repository website.

Personal contact data will be collected to facilitate screening of professional opinions and information. No research will be performed on the contact data and the minimum possible amount of contact data will be collected. Contact data will be considered confidential and will not be disclosed. Prospective participants will be given the option to not provide their personal information if they do not wish to do so.

Primary data collection will be planned in advance. A project description sheet will be provided to potential participants together with an invitation to participate and an explicit request made for written consent (issue of a consent form). The request for consent form will include a short description of INTERMIN ethics procedures and the information that participation is entirely voluntary and that a refusal to participate will not have any consequences for the prospective participant. A refusal to participate (or to cease participation without giving reasons) will be accepted by the invitee under any circumstances.

Individuals wishing to voluntarily supply a new document to INTERMIN's repository need to request access to the system manager. This is an online procedure and, together with the password to login into the repository upload entry page, prospective contributors will receive information on INTERMIN's aims and will be asked to read and confirm a request for consent *via* an online form. Data voluntarily uploaded by contributors into INTERMIN's repository

website will be checked for copyright holder's consent and suitability by the INTERMIN repository Administrators before inclusion in the public database.

7.2 Procedures for data storage, protection and retention

All non confidential documents collected and produced in the course of the INTERMIN project will be stored and publicly available in INTERMIN's website repository. These documents cover the whole scope of the project. Some are held in digital form (most as PDF files) within the database itself and available for download. Others are available online in digital form elsewhere and links are provided to these. Yet others are not available online but may exist as digital files or on paper within the INTERMIN Observatory or in institutions or companies elsewhere.

The main storage medium of the INTERMIN Repository is a relational database table which gives access to all referenced documents. Those documents which are held online by the INTERMIN Observatory are maintained in a folder within the website for instant download.

The Repository database provides a set of document discovery tools, allowing search and browse options. Documents are indexed by metadata elements (field of interest, geographical and commodity) and by keywords, and searchable abstracts are provided - often as abstracts or executive summaries taken directly from the individual documents.

There are three classes of user: "Guest", "Contributor", and "Administrator". Anybody may visit the Repository as a "Guest" without any need to login (or provide personal data), and public access is provided to all documents stored within the Repository. Users are reminded that they must respect copyright and other intellectual property rights which attach to these documents, many (indeed most) of which are from third-party sources. Where documents are available for download from third-party sites, the terms and conditions of those sites must be respected. "Contributors" are members of the INTERMIN consortium and others who are accredited as providers of documents to the database. They have password-controlled access allowing them to add documents to the database. Such updates must be accompanied by the appropriate metadata, including keywords, and an abstract for each document. Contributors may add items ("write access") to the database but cannot modify or delete existing entries. "Administrators" are a small number of INTERMIN participants having full administrative access allowing them to modify the database contents and structure, to make backup copies,

and other similar procedures. Administrators will also take any action resulting from a complaint made concerning the accuracy of any existing entry or copyright queries.

The repository will not store any information in "cookies" or other data elements on users' own computers, other than the database session cookies which are deleted automatically at the end of each online session, and will not access any data from any user's computer.

Although the repository website does not include personal data or any data that are financially sensitive, nonetheless security is a consideration in terms of the costs of building and maintaining a database which will be of increasing importance. It is known that using standardised website development aids such as Wordpress or Joomla can carry security risks which have been exploited. They also involve unnecessary overheads in terms of redundant capabilities which incur space and time penalties.

The repository database website has therefore been developed using hand-coded HTML with only as much ASP and javascript scripting as required to provide the necessary functionality. It uses an SQL database (Microsoft Access). There are known risks in SQL, if queries are carelessly coded, allowing unauthorised access which could compromise the integrity of a database, even to the extent of deletion of whole tables. INTERMIN uses three ways to mitigate these risks: (1) allowing write access ONLY to a restricted list of accredited users who must log in using randomised passwords; (2) coding the SQL queries in such a way that any attempt to use SQL query exploits will be foiled. The principal ways in which this is achieved are by using selection lists, by limiting query length, and by filtering queries to block malware. These checks are carried out, as appropriate, using server-side ASP scripting before access to the database, and by using ASP-scripted tests that explicitly check the queries against retrieved data instead of applying the queries directly to the database. There is an efficiency penalty in this second option, but it is not anticipated that the INTERMIN database will grow to such an extent that this will be a serious constraint; (3) taking regular backup copies of the entire database. This will limit the extent of any damage in the event that the security is breached or that the server itself becomes corrupted or otherwise unavailable. INTERMIN uses a regular backup procedure, with additional special backups after each major update cycle.

INTERMIN’s confidential documents (e.g. personal data collected in project activities) will be stored in secure computers, with access only by the immediate research team, and never in shared servers or cloud storage systems.

All documents publically available in INTERMIN's website repository will be retained during the life time of the project and handed over to the European Union's International Observatory for Raw Materials, who will manage the Repository in the future. The business planning for the permanent Observatory will build in the same set of data security safeguards as are being implemented during the INTERMIN project.

All confidential data collected in the course of INTERMIN will be deleted unless subject to specific EU regulatory requirements. In that case it will be handed over to the European Union's International Observatory for Raw Materials with a receipt that must be signed by responsible parties of both entities, transferring to the European Union's International Observatory for Raw Materials the responsibility for retaining in safe storage and managing the confidential data.

All Ethics Approval, Informed Consent, and Data Protection documentation will be centrally held by the Project Coordinator and hence available for audit.

7.3 Procedures for data destruction

When confidential data is no longer needed (or, at latest, at the conclusion of the project term, unless subject to specific EU regulatory requirements.) it should be disposed of in a secure and responsible manner. If data is on paper records, these must be destroyed using a cross-cut shredder. If data is on floppy disks, hard drives, memory sticks, CDs, DVDs or mobile devices it should be erased and media must be overwritten with random data. If this is not possible media must be physically destroyed through pulverising or crushing.

8. IMPORTED/EXPORTED PERSONAL DATA

7.3 NEC – REQUIREMENT No. 4: *The applicant must provide details on the personal data which will be imported to/exported from EU and provide evidence that authorisations have been applied for*

When personal data is transferred outside the European Economic Area, special safeguards are foreseen to ensure that the protection travels with the data (adequacy decisions, standard contractual rules, binding corporate rules, certification mechanism, codes of conduct, so-called "derogations" etc).

Directive 95/46/EC, Article 25:

1. The Member States shall provide that the transfer to a third country of personal data which are undergoing processing or are intended for processing after transfer may take place only if, without prejudice to compliance with the national provisions adopted pursuant to the other provisions of this Directive, the third country in question ensures an adequate level of protection.

2. The adequacy of the level of protection afforded by a third country shall be assessed in the light of all the circumstances surrounding a data transfer operation or set of data transfer operations; particular consideration shall be given to the nature of the data, the purpose and duration of the proposed processing operation or operations, the country of origin and country of final destination, the rules of law, both general and sectoral, in force in the third country in question and the professional rules and security measures which are complied with in that country.

3. The Member States and the Commission shall inform each other of cases where they consider that a third country does not ensure an adequate level of protection within the meaning of paragraph 2.

4. Where the Commission finds, under the procedure provided for in Article 31 (2), that a third country doesnot ensure an adequate level of protection within the meaning of paragraph 2 of thisArticle, Member States shall take the measures necessary to prevent any transfer of data of the same type to the third country in question.

5. At the appropriate time, the Commission shall enter into negotiations with a view to remedying the situation resulting from the finding made pursuant to paragraph 4.

6. The Commission may find, in accordance with the procedure referred to in Article 31 (2), that a third country ensures an adequate level of protection within the meaning of paragraph 2 of thisArticle, by reason of its domestic law or of the international commitments it hasentered into, particularly upon conclusion of the negotiations referred to in paragraph 5, for the protection of the private livesand basic freedoms and rights of individuals. Member States shall take the measures necessary to comply with the Commission's decision.

9. ETHICAL APPROVALS FOR THE COLLECTION OF PERSONAL DATA

9.1 Approval process

Prior to the commencement of activities that involve the collection of personal data (e.g. interviews and surveys), regardless of the country in which the activities will be carried out, the beneficiary responsible for that activity must submit to the coordinator information on data collection procedures and accompanying evidence (e.g. copies of the scripts and questionnaires that will be used, consent forms, local sign off, participant information sheets). The coordinator will forward those documents to the Ethics Committee, asking for verification and confirmation that the activities that are proposed will conform with the ethical guidelines of INTERMIN and Horizon2020.

The Ethics Committee will verify compliance of the activities with INTERMIN and the H2020 ethical guidelines. If the Ethics Committee considers compliance is assured it will issue, as soon as practicable, an ethical approval for the aforementioned activities. In case the Ethics Committee considers compliance is not assured it will inform the Coordinator as soon as possible, describing which activities/tasks are not in line with INTERMIN and the H2020 ethical guidelines and proposing corrective measures.

After receiving feedback from the Ethics Committee the Coordinator will inform the beneficiary responsible for the activity, which can start the task (if the ethical approval has been issued) or make the necessary corrective measures and resubmit to the coordinator the revised procedures. In this case the coordinator will convey the information to the Ethics Committee who will repeat the compliance verification process. The figure below illustrates the submission and approval process for INTERMIN ethically relevant activities.

All Ethics Approvals and associated documentation will be centrally and securely held by the project coordinator and hence available for audit.

9.2 Ethics comitee

The Ethics Committee comprises a representative of each Work Package leader and the members of the Advisory Board.

In case any of the members of the Ethics Committee has an impediment he/her shall inform the Chair and the project coordinator, who will appoint a substitute. Given the nature of the activity

of the Ethics Committee there are no established routine meetings and the intervention of the Ethics Committee will take place whenever requested by the project coordinator. The communications within the Ethics Committee will be managed by the Chair. The Chair's decision will prevail in case of a tied vote between the representatives of the INTERMIN Management Committee.

10. ETHICS REQUIREMENTS FOR NON-EU COUNTRIES

The INTERMIN project involves the participation of technical experts and professionals who participate in professional workshops to provide their technical assessments and consultation and technical expertise. Other than contact information, no personal information will be collected from individuals who participate in the project. No human research subjects will be used. Data storage, protection, retention and destruction will obey specific rules. INTERMIN will comply with the Horizon 2020 ethical standards and guidelines and the EU directive on data protection (*Directive 95/46/EC on the protection of individuals with regard to the processing of personal data and on the free movement of such data*) and with any updates it might receive during the life time of the project.

INTERMIN includes the following beneficiaries from non-EU countries:

1. Coordinating Committee for Geoscience Programmes in East and Southwest Asia;
2. American Geological Institute;
3. The University of Queensland.

The ethical standards and guidelines of Horizon2020 for social or human sciences research will be rigorously applied by the beneficiaries and linked third parties of the INTERMIN project, regardless of the country in which the research is carried out.

11. APPENDIX 1: PARTICIPANT INFORMATION SHEET

INTERMIN PARTICIPANT INFORMATION SHEET

This document must be adapted to specific aspects of the research activities to be developed. Technical and academic terms should be avoided and the language should be plain. The information may be provided in bullet points or in the question-answer format, and the items below should be mentioned.

1. Title of Work Package;
2. Name of the activity;
3. Short description of INTERMIN and the overall aim of the activity;
4. Criteria for the selection of participants;
5. Short description of the methodology that will be used;
6. The place (if applicable), and the expected duration of the activity;
7. How research findings will be used (reports, publications, presentations);
8. Name and contact of the responsible for the activity;
9. Statement of confidentiality and details of coding system to protect the identity of participants;
10. Information that participation is totally voluntary and the participants are free to withdraw;
11. Procedure to contact with any concerns or complaints.

12. APPENDIX 2: INTERMIN PARTICIPANT CONSENT FORM

INTERMIN PARTICIPANT CONSENT FORM

Title of Work Package _____

Name of the activity _____

	YES	NO
1. I have read the Information Sheet for this activity and have had details of the research explained to me.	☐	☐
2. My questions about the INTERMIN and the research activity have been answered to my satisfaction and I understand that I may ask further questions at any point.	☐	☐
3. I understand that I am free to withdraw from this activity at any time without giving a reason for my withdrawal or to decline to answer any particular questions without any consequences to my future treatment by the researchers.	☐	☐
4. I wish to participate in this INTERMIN activity under the conditions set out in the Information Sheet.	☐	☐
5. I agree to provide information to the researchers under the conditions of confidentiality set out in the Information Sheet.	☐	☐

Name _____

Signature _____

Date _____

Contact details (email; phone) _____

Researcher's name _____

Researcher's signature _____

Researcher's contact details (email; phone) _____

Please keep your copy of the consent form and the information sheet together.