XPRESS

Facilitating green public procurement in the energy sector

Deliverable 6.3

Plan and Recommendations for Ethical, Data and Risk Management

Partners

APRE | Eambiente | University of York | Element Energie | DIW Berlin | NTNU | Ovgroup | Linnaeus University | LOBA | INSME | CIRCE | European Green Cities | Alleanza per il Clima Italia | Climate Alliance | Slovensky zivnostensky zvaz | Eurada

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Deliverable 6.3

Plan and Recommendations for Ethical, Data and Risk Management

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XPRESS

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XPRESS

Risk Report

Risk identified by:

Risk author	

Identified risk:

Date of identification	
Respective WP	
WP Leader	
Description of the risk	
Likelihood Low – medium – high?	
Severity Low – medium – high?	
Proposed mitigation action	
Status Active – inactive?	
Comment	

Please fill out this table and send it to the XPRESS project coordinators:
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List of abbreviations and acronym

Abbreviation, Acronym	Description
APRE	Agenzia per la Promozione della Ricerca Europea (project coordinator)
CA	Consortium Agreement
CAE	Climate Alliance – Klima Buendnis –Alianza del Clima e V. (project partner)
CAI	Alleanza per il Clima Italia (project partner)
CIRCE	Fundación CIRCE centro de investigación de recursos y consumos energeticos (project partner)
DIW	Deutsches instiut fur wirtschaftsforschung DIW (project partner)
Dx.x	Deliverable x.x
eAMBIENTE	eAMBIENTE srl (project partner)
EC	European Commission
EGC	European Green Cities APS (project partner)
ELE	Element Energy Limited (project partner)
EURADA	Association Europeenne des Agences de Developpement (project partner)
GA	Grant Agreement
GC	General Committee
INSME	Rete Internazionale per le Piccole e Medie Imprese (project partner)
KPI	Key Performance Indicator
LNU	Linneuniversitetet (project partner)
LOBA	GLOBAZ S.A. (project partner)
MQP	Management and Quality Plan
NTNU	Norges Teknisk- Naturvitenskapelige universitet NTNU (project partner)
OV	Officinae Verdi Group s.p.a. (project partner)
PC	Project Coordinator
PM	Project meeting

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Abbreviation, Acronym	Description
PO	Project Officer
SAB	Specialist Advisory Board
SZZ	Slovensky Zivnostensky Zvaz (project partner)
TL	Task Leader
UoY	University of York
WP	Work package
WPL	Work Package Leader

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1. Introduction

This Plan provides recommendations for: Ethical, Data and Risk Management.

The purpose is to ensure that all legal requirements regarding ethics, personal data protection and data management are fulfilled and that the consortium is in line with the most recent EU legislation (with a specific focus on the General Data Protection Regulation – GDPR EU 2016/679) with regards to the collection, storage and management of data gathered and processed by the partners in the lifetime of the project.
This document serves as a guide for all partners to provide guidelines about how to manage data, ethical and risk issues. The Plan will be focused on the mechanisms, procedures and tools to be used, ensuring high quality and ethically sound nature of project deliverables and activities.
The report is divided into 3 chapters, each of them dedicated to an individual topic.

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2. Risk Management

XPRESS time frame is 36 months. This is considered the most adequate timing to carry out the work and activities described in the Work Plan and to meet the planned deliverables and milestones. The effort foreseen per Work Package (WP) is appropriate for the activities of each WP, taking into account the considerable expertise of the partners.
The purpose of risk management is the early identification of potential problems to ensure that adverse situations will be properly managed throughout the evolution of the project. The plan explained below documents the processes, tools and procedures that will be used to manage and control those events that could have a negative impact on the project implementation. In case the problems cannot be completely eliminated, a scenario of potential damage needs to be drafted.
Moreover, this plan will address the roles and responsibilities of the partnership, the risk identification, risk assessment and mitigation plans.
The risk management actions will be carried out throughout the project life cycle; the Project Coordinator (PC) will be primarily responsible for monitoring the potential risks and will have regular communication with the Work Package Leaders in order to provide an updated mapping, elaborate appropriate solutions and timely adjustments.
The PC must ensure that potential risks are properly assessed, evaluated and managed in terms of communication and contingency management. The WPL themselves are responsible for the communication of any problem faced during the implementation of the tasks assigned.

2.1. Risk management strategy

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2.1.1. Strategy

Risk management is an integral part of the XPRESS project. In order to secure the XPRESS objectives and deliverables, the project uses a risk management process that identifies risks and mitigation

actions. The diverse quality control structures will ensure that risks are identified in advance, assessed and responses integrated into the work plan.

The General Risk Management Strategy of the Project is to:

- Identify potential risks at the earliest possible stage through constant monitoring;
- Estimate the potential probability of the identified risk;
- Assess the potential impact of the risk on the project implementation;
- Identify a set of actions that may be necessary to offset the risk;
- In case the risk cannot be completely countered, define strategy and actions to minimize its impact.

The PC is in charge of making sure that risks are well identified and controlled. Each WPL is responsible for the identification and control of the risks within its WP.

All the details described below.

2.1.2. Identified risk

Some of the most perceived risks related to the project Work Plan are listed in the table below, including a classification of their probability and a description of contingency measures envisaged by the Consortium.

RISK NUMBER	DESCRIPTION OF RISK	WP NUMBER	PROPOSED RISK-MITIGATION MEASURES
1	Lack of funds to perform all the project activities described in the WPs in the later stage of the project. The demand for resources available could exceed the budget available, given the nature of the data collection.	1-4	The XPRESS group will seek to address this issue by seeking additional funding as appropriate to augment funding available from XPRESS.
2	Components of the work plan prove suboptimal.	All	Evaluation of all project components, with formal reviews at M12 and 36. The SAB will also review progress at the end of each periodic reporting period. Finally, the WPL in consultation with the General Committee will take the appropriate remedial actions.

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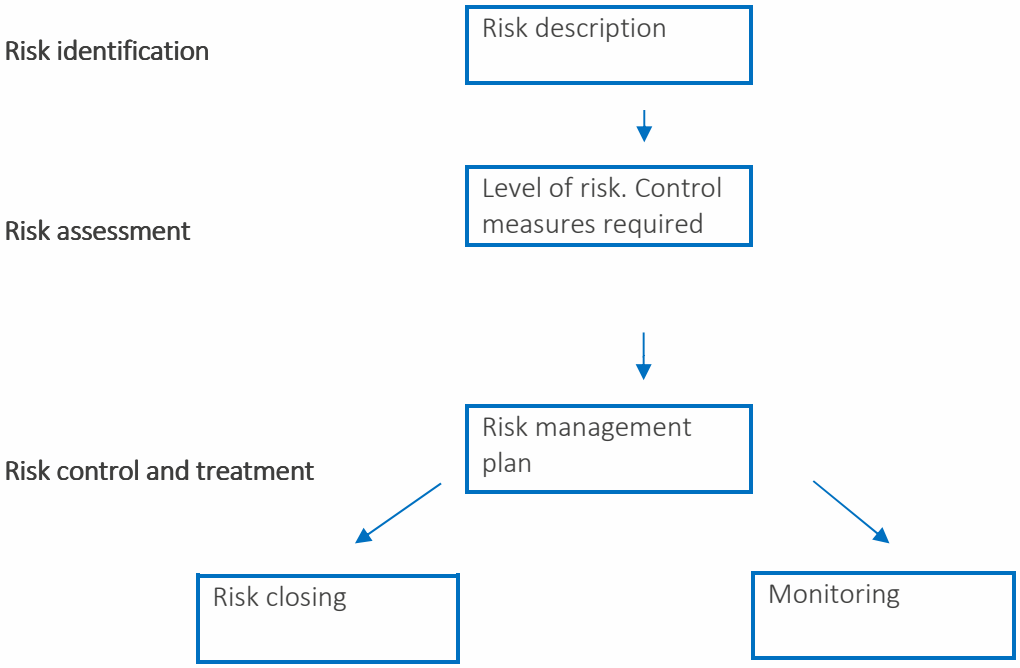
2.1.3. Plan for the identification and treatment of risks

The PC, together with the General Committee and according to the feedbacks of all the partners, will periodically analyse the status of all identified risks during the meetings. For the risk management to be effective, risks need to be:

- **Identified**. This includes risks being considered that could affect the achievement of the project's objectives, and then described to ensure that there is a common understanding of these risks.
- **Assessed**. This includes ensuring that each risk can be ranked in terms of estimated likelihood, impact and immediacy, and understanding the overall level of risk associated with the project.
- **Controlled**. This includes identifying appropriate responses to risks and then executing, monitoring and controlling these responses.



Consequently, the risk management procedure contains the following **five steps**:

- **Identification** (see 2.1.4)
- **Assessment** (see 2.1.5)
- **Planning** (see 2.1.6)
- **Implementation** (see 2.1.7)
- **Communication** (see 2.1.8)

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2.1.4. Risk identification

Risk identification is the first step of the risk assessment process. Risks cannot be managed until they are identified and described in an understandable way. Each WPL is in charge of identifying new risks throughout the course of the project supported by all contributors. In this way, mitigation actions will be established in advance, ensuring the correct evolution and coordination of all the activities. When a new risk is identified, the WPL submits a risk report to the PC. In this report, the WPL provides detailed information about the identified risk, proposes counter-measures and reports on the implementation of those measures. The "risk reporting template" (see **Errore. L'origine riferimento non è stata trovata.**) is available on the XPRESS Google Drive.

Risk exposure will be continuously evaluated and modified accordingly. If any new risk is identified by a partner, it will be analysed alongside those on the original risk list and then added.

2.1.5. Assessment

Once possible risks are identified, a preliminary quantification provides some prioritisation for further evaluation. The partner who identified the risk also determines the level of risk, taking into account the following facts: the "likelihood of occurrence of the event", the "severity of consequence if the event should occur", which requires the identification of consequences and the degree of impact.

2.1.6. Planning

After the risk identification and assessment, the first choice will always be to eliminate the risk, but this action will rarely be achievable - if a risk cannot be eliminated, then it will have to be handled properly. Therefore, the objective of this planning step is to prepare specific management responses to reduce the risk and to maximise opportunities: (1) Mitigation actions need to be foreseen if the risks materialise, and (2) resources/responsibilities must be foreseen for this handling process.

The WPL are primarily responsible for developing an appropriate response for risks associated with their WP. If a mitigation action cannot be effectively carried out or does not solve the problem, the partner must contact the PC in order to find the right measure to mitigate the risk.

The PC is responsible for developing an appropriate management for risks associated with the whole project. The current status of risks is a permanent agenda item on each project meeting, on which the risks and the management responses are discussed and agreed upon.

An item can be considered closed when the following criteria are brought together: the risk-mitigation measures have been implemented and a new exposure risk is estimated as low using the risk Matrix (table 1 in section 2.1.3.).

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2.1.7. Implementation

The objective is to ensure that the planned risk responses are auctioned, their effectiveness monitored and corrective actions are taken, if the responses are found ineffective. The partner who identified the risk is also responsible for the implementation of the mitigation measures.

2.1.8. Communication

Communication is carried out continually to ensure that all information related to risks and opportunities is available to all parties concerned. Therefore, every meeting will include a section to discuss on the current status of risks.

3. Ethical and Gender issues

3.1. Introduction

Ethical issues are of great importance to research, innovation, science and technology. Many developments in these fields give rise to pressing ethical questions and consequently stimulate the introduction of high ethics standards for research and innovation (R&I). These standards reflect the adherence of the project to fundamental values and rights, such as human dignity, freedom, democracy, pluralism, solidarity, integrity and non-discrimination, on which the EU is founded (in fact, the Lisbon treaty makes explicit reference to the European Charter of Fundamental Rights).

High ethics standards also add to the quality of research and increase its social impact, promoting its better alignment with social needs and expectations, which is crucial to tackle the many challenges that the European society confronts every day. Ethics assessment of innovation enables the characterisation of the ethical dimensions of new technologies and applications, which, in turn, allows us to make informed decisions about which technologies to promote, which to discourage and how to develop and distribute them in just and ecologically sensitive ways.

The term “ethics” may be defined as “norms for conduct that distinguish between acceptable and unacceptable behaviour. Ethics is closely connected with the partnership’s duties and responsibilities towards other individuals and the society as a whole, and refer to the respect of their dignity and rights, ensuring their well-being and avoiding harm. Moral values and principles that are often referred to in ethics include justice, freedom, autonomy, privacy, dignity, well-being and responsibility.

Overall, ethical principles tend to fall into one of four categories:

- Principles concerning individual rights and freedoms deserving respect, such as freedom of movement, of assembly, of speech and expression, autonomy, human dignity, bodily integrity, privacy and property.
- Principles related to benefits and harms, such, amongst others, as beneficence, non-maleficence, the no harm principle, and the principle of utility. Harms include health and

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bodily harms, property damage, immaterial harms, environmental harms, harms to society, and others, while benefits cover principles of welfare (happiness, friendship, trust) and the common good (vital social institutions, cultural richness, etc.).

- Fairness principles, such as justice, equality, inclusion and non-discrimination.
- Virtues. These are principles concerning good human character features that people should strive for like honesty, tolerance, integrity, diligence, and respectfulness.

In relation to research, **ethical research conduct** implies the application of fundamental ethical principles to scientific research. Ethical issues are indispensable and integral elements for the European Union (EU) research as the research excellence may be only achieved by ensuring ethical research conduct. Although research ethics is most developed within the context of medical research, ethics is of crucial importance for all scientific domains and projects. The following is a rough and general summary of some research ethics principles that various research ethics codes address: honesty, objectivity, integrity, carefulness, openness, respect for intellectual property and personal data, non-discrimination, competence, legality and social responsibility. It is possible to distinguish several reasons to adhere to ethical norms in research. Firstly, ethical norms and values promote the aims of research, such as avoidance of error, knowledge, truth, and they also help to build public support for research. In addition, many of the ethical values promote a variety of other important moral and social values, such as human rights, social responsibility, animal welfare, public health and safety and compliance with the law. Last but not least, since research often involves cooperation and coordination among many different people and experts in different fields, ethical standards help to promote the values that are essential to collaborative work, such as trust, accountability, mutual respect, and fairness. Collaborative projects, such as XPRESS, often require public participation and stakeholder engagement, which may involve ethics considerations related to, among others, personal data protection.

The XPRESS project will not raise many ethical issues, apart from some minor issues arising from the data collection. In the unlikely event that personal data collection is needed during the duration of the XPRESS project, the concept of personal data protection is explained in more detail in section 3.3 of this deliverable.

3.2. The legal basis for ethical research conduct in Horizon 2020

Ethics is given high priority in EU funded research and all the activities implemented in the Horizon 2020 framework must comply with ethical principles and relevant national, EU and international legislation. The former is based on the direct European commitment to the latter. The **Lisbon Treaty**[1] makes explicit reference to the **Charter of Fundamental Rights of the European Union**[2] which refers to the right of the integrity of a person, protection of personal data and family life, as well as rights in the field of bio-ethics and academic freedom and freedom of scientific research:

[1] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A12007L%2FTXT
[2] http://www.europarl.europa.eu/charter/pdf/text_en.pdf

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Art 3: Right to the integrity of the person

1. Everyone has the right to respect for his or her physical and mental integrity.
2. In the fields of medicine and biology, the following must be respected in particular.
a. The free and informed consent of the person concerned, according to the persons.
b. The prohibition of eugenic practices, in particular those aiming at the selection of persons.
c. The prohibition on making the human body and its parts as such a source of financial gain.
d. The prohibition of the reproductive cloning of human beings.

Article 7 Respect for private and family life

Everyone has the right to respect for his or her private and family life, home and communications

Art. 8: Protection of personal data

1. Everyone has the right to the protection of personal data concerning him or her.
2. Such data must be processed fairly for specified purposes and on the basis of law. Everyone has the right of access to data which has been collected concerning him or her, and the right to have it rectified.
3. Compliance with these rules shall be subject to control by an independent authority.

Art. 13: Freedom of the arts and sciences.

The arts and scientific research shall be free of constraint. Academic freedom shall be respected.

Furthermore Article 16 of the **Treaty on the Functioning of the European Union**[3] provides for the right to the protection of personal data and allows the European Parliament and the Council to pass legislative acts in this respect (like for example the General Data Protection Regulation).

With regards to the legislation regulating Horizon 2020, Art. 19 of the **Regulation establishing Horizon 2020**[4] requires the activities carried under Horizon 2020 to comply with ethical principles and laws. In this context, "*particular attention shall be paid to the principle of proportionality, the right to privacy, the right to the protection of personal data, the right to the physical and mental integrity of a person, the right to non-discrimination and the need to ensure high levels of human health protection.*"

Recital 9 of the **Regulation laying down the rules for participation and dissemination in Horizon 2020**[5] requires that all Horizon 2020 actions to "respect fundamental rights and observe the principles acknowledged in particular by the Charter of Fundamental Rights of the European Union? And that those actions "should be in conformity with any legal obligation including international law and with any relevant Commission decisions such as the Commission notice of 28 June 2013, as well as with ethical principles, which include avoiding any breach of research integrity". Art. 14 of the said Regulation provides for ethics

[3] https://eur-lex.europa.eu/resource.html?uri=cellar:41f89a28-1fc6-4c92-b1c8-03327d1b1ecc.0007.02/DOC_1&format=PDF
[4] http://ec.europa.eu/research/participants/data/ref/h2020/legal_basis/fp/h2020-eu-establact_en.pdf#page=11
[5] http://ec.europa.eu/research/participants/data/ref/h2020/legal_basis/rules_participation/h2020-rules-participation_en.pdf#page=10

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review of Horizon 2020 proposals, Art. 22(9) states that *"participants shall comply with national legislation, regulations and ethical rules in the countries where the action will be carried out"* while Art. 186) of the Regulation requires the Grant Agreement to contain "*provisions ensuring the respect of ethical principles, including the establishment of an independent ethics board and the right of the Commission to carry out an ethics audit by independent experts*".

Indeed, Art. 34 of the **Model Grant Agreement**[6] provides for the obligation to comply with ethical and research integrity principles while Art. 39(2) requires the Beneficiaries to "*process personal data under the Agreement in compliance with applicable EU and national law on data protection (including authorisations or notification requirements)*".

In addition to the applicable legislation, there exist also several **guidance documents** related to ethics in EU research that should be followed by Horizon 2020 consortia and Beneficiaries, such as the" European Code of Conduct for Research Integrity"[7], the "Ethics for researchers - Facilitating Research Excellence in FP7"[8] or the "European Textbook on research in Europe"[9].

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3.3. Ethical issues in XPRESS

Ethical issues concern all the activities funded under the EU Programme for Research and Innovation Horizon 2020, meaning that all procedures related to the ethics regulation, personal data protection and rules for participation must be respected.

The XPRESS project, being a Coordination and Support Action, does not raise many ethical issues, apart from a few minor ones related to the data collection. However, the data processing foreseen by XPRESS does not involve the collection of any sensitive personal data, genetic information, tracking and observation of participants.

In order to assure the effective protection of data collected for the XPRESS activities, the project partners must comply with the EU Data Protection and Privacy legal framework and in specific with the General Data Protection Regulation (GDPR). All partners are also required to apply the ethical standards and guidelines of Horizon 2020.

More specifically, for the organisation of co-creation workshops and stakeholders' cafés enterprises and local authorities should subscribe giving some business information: name, email, country and they will also be invited to register to the XPRESS platform.

As data collection is necessary, the project will guarantee that all partners will follow EU and national regulations regarding data protection and will obtain approval from

[6] http://ec.europa.eu/research/participants/data/ref/h2020/mga/gga/h2020-mga-gga-multi_en.pdf#page=72
[7] http://ec.europa.eu/research/participants/data/ref/h2020/other/hi/h2020-ethics_code-of-conduct_en.pdf
[8] http://ec.europa.eu/research/participants/data/ref/fp7/89888/ethics-for-researchers_en.pdf
[9] https://ec.europa.eu/research/science-society/document_library/pdf_06/textbook-on-ethics-report_en.pdf

local/national authority in charge of data protection if applicable. The work of the project will be subject to the ethical-related directives and regulations.

An information sheet and an informed consent will be required to be signed by the stakeholders taking part at the events. The information sheet will give the following information:

- A statement that the study involves research subjects and an explanation of the purposes of the research.
- The expected duration of the subject's participation.
- A description of the procedures to be followed.
- A statement that participation is voluntary.
- Information about who is organising and funding the events.
- A description of any reasonably foreseeable risk, discomfort or disadvantages.
- A description of any benefits to the subject or to others which may reasonably be expected from the research avoiding inappropriate expectations.
- A statement describing the procedures adopted for ensuring data protection/confidentiality/privacy including duration of storage of data.
- A reference to whom to contact for answers to pertinent questions about the research and research subjects" rights.
- A statement offering the subject the opportunity to ask questions and to withdraw at any time from the research without consequences.
- An explanation of what will happen with the data at the end of the research period and if the data are retained or sent/sold to a third party for further research.
- Information about what will happen to the results of the research.

Detailed information will 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.

In order to guarantee the adequate and proper administration and processing of this kind of data, the project and the consortium members comply with the Data Protection and Privacy legal framework, including in particular the General Data Protection Regulation. The data processing foreseen by XPRESS does not involve sensitive personal data, genetic information neither tracking nor observation of participants.

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3.4. Gender issues

All XPRESS partners emphasise the importance of taking an inclusive and participatory approach to address gender inequalities. The general approach foresees specific campaigns addressed to female stakeholders in order to guarantee an equal participation of gender at workshops and events.

The findings of the project are not foreseen to affect women and men differently and all the outputs are expected to be non-gendered. Nevertheless, the Consortium will incorporate sex and gender analysis into its research and innovation content (particularly where these might have adverse effects) and Management activities to ensure that the sex and gender dimensions are properly taken into account thereby removing potential barriers to adoption and take-up.

For example, the Dissemination and Exploitation Management will ensure that system user interfaces or published documents (i.e., scientific papers, white papers, etc.) do not contain any assumptions or biases with regard to sex and/or gender. In the context of the project activities and management, the Partners of the XPRESS consortium are all equal opportunity employers, actively working towards a better balance between male and female members of staff, flexibility of the workforce and benefits for all working parents.

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4. Data Management

4.1. Introduction

General business data (from participating enterprises and local government authorities) will be gathered during the co-creation workshops, stakeholders' cafés XPRESS platform and through its communication and engagement activities.

The Data Management ensures that collected data through the engagement activities and the online Platform will strictly comply with Council of Europe – Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, of January 28th 1981 and will verify possible contributions to the open research data, open EC database and possible contributions to open knowledge repositories.

The online XPRESS Platform and the website will also comply with the General Data Protection Regulation (EU) 2016/679).

4.2. Personal data protection in EU

As of 25 May 2018, the General Data Protection Regulation (GDPR/Regulation) replaced Directive 95/46 on data protection and currently is the main EU legal act regulating the protection of personal data in all Member States of the European Union. The Regulation applies to all entities established in the EU (or branches established in the EU) that process personal data as part of their activities, regardless of where the data is processed; and entities established outside the EU, offering

goods/services to individuals in the EU or monitoring the behaviour in the EU of these individuals. XPRESS does not involve the processing of personal data. It is rather focused on the collection and analysis of business data (from participating enterprises and local government authorities). Should any personal data be needed during the duration of the project, the GDPR Regulation shall be complied with and respected by the consortium as a whole as well as by all project Beneficiaries that are involved in personal data processing.

According to Art.4 (1) of GDPR, personal data "means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person". Examples of personal data protection typically cover: names and surname, home and email address, an identification card number, location data and IP address or a cookie ID.

Processing of personal data is defined in Art. 4(2) of the Regulation and means "any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction".

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4.2.1. Workable definitions

According to art. 4 of General Data Protection Regulation (GDPR) (EU) 2016/679:

- "Personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- "Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- "Consent" of the data subject means any freely given, specific, informed and unambiguous indication of the data subject"s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- "Legitimate Interest": (art 6. (f)) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.
- "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member

State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

- "Processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

4.2.2. Approach and procedures

By signing informed consent documents or by reading the privacy notice informative properly shared, engaged participants agree to a controlled breach of their privacy for a specific purpose and a specific period of time. In case an individual does not agree with such a temporary breach, he/she retains the right to exercise his/hers own rights such as to withdraw his/her consent and request the destruction of his/her personal data.

Individuals need to be aware of:

- Methods used for handling personal data;
- Justification for requesting/obtaining their data;
- Duration of data use and storage;
- Guarantees concerning the rightful use of data;

Therefore, any research action that might impede privacy requires informed consent.

The main aspects of Informed consent are the following:

- The potential participant must be given adequate information in order to be able to make a choice about whether or not to share its information that is based on an understanding of the risks and alternatives in an environment which is free from any coercion;
- The decision of the potential participant on the consent issue must be evidenced. The participant needs to agree and/or being informed that her/his data will be used for a specific project scope and is aware of the meaning of such use.

Informed consent for the project will be required, even if personal data has been collected in the frame of previous research projects. Whereas applicable, the Legitimate Interest will be also used as a lawful basis for the tretmaent of data previously collected.

4.2.3. Storage, usage and destruction of collected data

Data structures such as databases will be specified according to privacy by design and by default (art. 25 GDPR), it should also be specified how the unforeseen data added during the research such as incidental findings will be treated.

Conservation methods require a non-WAN connected computer server or HARD disk should be preferred. Data should not be stored on a memory stick or other easily lost/accessed media.

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Usage times will be specified according to recital 39 and art. 13 GDPR. On a general point of view, data must be specifically stored solely for as long as the project lasts, or in accordance with the Partners" data protection policy in relation to the specific treatment and data. Normally data will be destroyed at the end of the project, but if one or more partners will continue the motivation and treatment for which the data were obtained, they can extend the usage time until the treatment is over.

The usage time of collected data will be related for the entire project duration.

4.3. Purpose of the business data collection

The purpose of the collection of business data (from participating enterprises and local government authorities) is to organise data for and from the activities of the co-creation workshops and the stakeholders' cafés, facilitating the building of a common understanding and the participation in the scientific discussion on voluntary basis. Collecting business data is necessary for building the community that will discuss and share knowledge connected with RES technologies issues, as well as for the newsletter, dissemination and communication of project activities and results.

According to the general aims of XPRESS, project data and information are collected to:

- Engage SMEs and public authorities in a highly participatory debate to stimulate new interactions and synergies, animating open dialogue, discuss existing multilevel governance strategies, polices and planning tools and operational, financial and organisational measures for energy, transport, mobility and land-use planning at community and city level;
- Establishing a web-platform that supports the interaction between public procurers, innovative SMEs and end users of green innovations;
- Deliver guidelines and good practices and promote them to foster their adoption;
- Provide recommendations and policy options related to perceived barriers and challenges related to the use of GPPs;
- Communicate and disseminate broadly in Europe early in the project to enable the XPRESS activities to take place and create awareness of innovative SMEs about RES technologies via GPPs.

4.4. Data management plan

The Data Management Plan provides the complete research data life cycle and describes the types of research data that will be generated or collected during the project, the standards that will be used, how the research data will be preserved and what parts of the datasets will be shared for verification or reuse.

The XPRESS platform will collect business data of the stakeholders involved (name, email, telephone, business area). All collected data will strictly comply with the GDPR and in particular with the Article 15-22. Each partner will comply also with his national GDPR application.

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All the involved and interested stakeholders will be required to sign a specific informed consent (online or provided by the partners during the events and other project activities). When enterprises and local government authorities give consensus for their participation at any workshop and/or register on the events, business data is collected on-line and participants are also asked to be registered in the platform. Sharing all the described data will be possible only with the necessary consent from each business and authority directly involved.

The project uses the most common standard formats for the different kinds of data and documents collected. The data will be shared/made accessible only to the partners.

The sheet will give the following information:

- A statement with the explanation of the purposes of the activity/research;
- The expected duration of the subject's participation;
- A description of the procedures to be followed;
- A statement that participation is voluntary;
- Information about who is organising and funding the research;
- A description of any reasonably foreseeable risk, discomfort or disadvantage;
- A description of any benefits to the subject or to others which may reasonably be expected from the research avoiding inappropriate expectations;
- A statement describing the procedures adopted for ensuring data protection/confidentiality/privacy including duration of storage of business data;
- A reference to whom to contact for answers to pertinent questions about the research and research subjects' rights;
- A statement offering the subject the opportunity to ask questions and to withdraw at any time from the research without consequences;
- An explanation of what will happen with the data at the end of the research period and if the data is retained or sent/sold to a third party for further research.
- Information about what will happen to the results of the research.

The data relating to registered members is collected and stored on the LOBA server, dedicated to the XPRESS project, in the LOBA's server farm. The server farm is protected by a firewall managed by the server farm staff, the platform will be on secure connection (https) on 443 port and all the other server ports will be closed to external accesses for protecting data. The server hosting the platform will be further protected by a proxy server. The platform collects mainly public data and business data (name, surname, telephone number, address, and other data required by the project), but visible only to other registered members for facilitating the networking among the stakeholders. The passwords will be encrypted and members who don't remember the password will have to specify a new password opening a session from their email account after receiving an email from the platform. In the registration phase, the members can view and accept explicitly the data treatment rules of the platform.

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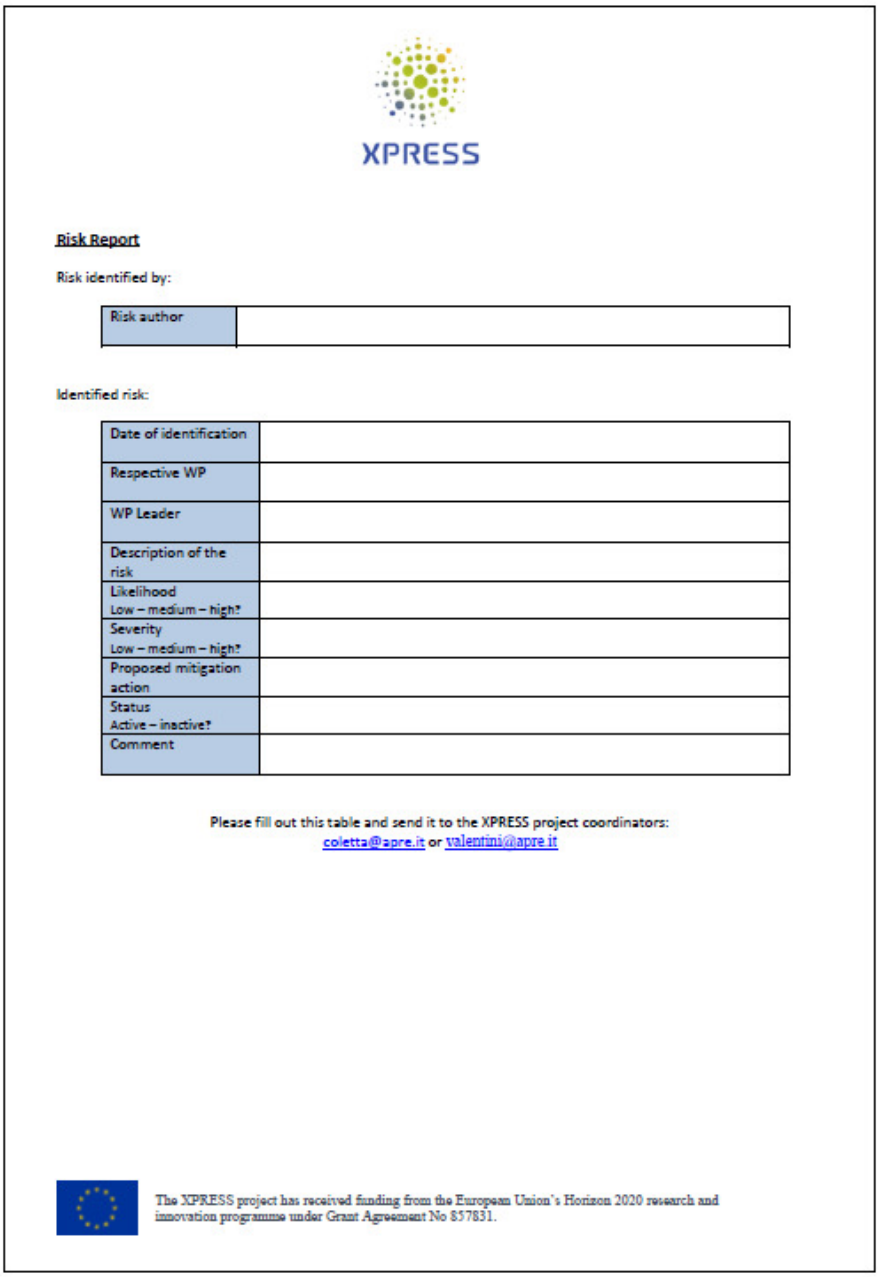
5. Annex

5.1. Risk reporting template



XPRESS

Risk Report

Risk identified by:

Risk author	

Identified risk:

Date of identification	
Respective WP	
WP Leader	
Description of the risk	
Likelihood Low – medium – high?	
Severity Low – medium – high?	
Proposed mitigation action	
Status Active – inactive?	
Comment	

Please fill out this table and send it to the XPRESS project coordinators:
coletta@apre.it or valentini@apre.it

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