



DIVERFARMING

Crop diversification and low-input farming across Europe: from practitioners' engagement and ecosystems services to increased revenues and value chain organisation



Protection of Personal Data Ethics Requirement No. 1

Deliverable D11.2

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Author: Raúl Zornoza





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Author	Raúl Zornoza
E-mail of principal author	raul.zornoza@upct.es
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List of Diverfarming participants

No	Name	ACRONYM	COUNTRY
1	Universidad Politécnica de Cartagena (Coordinator)	UPCT	Spain
2	Consiglio per la Ricerca in Agricoltura e l'Analisi dell'Economia Agraria	CREA	Italy
3	Agencia Estatal Consejo Superior de Investigaciones Científicas	CSIC	Spain
4	Universita degli Studi della Tuscia	UTu	Italy
5	Asociación Regional de Empresas Agrícolas y Ganaderas de la Comunidad Autónoma de Murcia	ASAJ	Spain
6	Consorzio Casalasco del Pomodoro Società Agricola cooperativa	CCP	Italy
7	Arento Grupo Cooperativo Agroalimentario de Aragón	GA	Spain
8	Barilla G.E.R. Fratelli SPA	Bar	Italy
9	Disfrimur Logistica SL	DML	Spain
10	Universidad de Córdoba	UCO	Spain
11	Wageningen University	WU	Netherlands
12	Firma Nieuw Bromo van Tilburg	NBT	Netherlands
13	Industrias David S.L.U.	InDa	Spain
14	University of Portsmouth Higher Education Corporation	UPO	United Kingdom
15	Universität Trier	UT	Germany
16	Eidgenössische Technische Hochschule Zürich	ETH	Switzerland
17	Weingut Dr. Frey	WDF	Germany
18	University of Exeter	Exeter	United Kingdom
19	Pecsi Tudományegyetem - University of Pecs	UP	Hungary
20	AKA Kft	AKA	Hungary
21	Nedel-Market Kft	NMT	Hungary
22	Luonnonvarakeskus	Luke	Finland
23	Paavolan kotijuustola	PK	Finland
24	Polven juustola	PJ	Finland



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Executive summary

This document provides detailed information on the procedures that will be implemented by the project coordinator and the participants for collection, storage, protection, retention and destruction of personal data according to Spanish and EU legislation.

This document also provides the template of the informed consent forms and information.



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1. Procedures for data collection, storage, protection, retention and destruction

Universidad Politécnica de Cartagena-UPCT (as project coordinator) and Diverfarming partners share the responsibility for data collection, storage, protection, retention and destruction according to the European Union and national legislations.

Spanish Constitutional Law 15/1999 of the 13th of December 1999 on the protection of personal data imposes a series of legal obligations upon those natural or legal persons who possess files containing personal data, based on Directive 95/46/EC of the European Parliament and the Council of the 24th of October 1995 on the protection of individuals with regard to the processing of personal data (Data Protection Directive). Additionally, since the 19th of April 2008, there is a national Spanish Regulation for the Development of the Constitutional Law 15/1999 (Royal Decree 1720/2007 on protection of personal data). This Law and its Regulation imposes the obligation upon organisations, both public and private, to ensure the protection of data by applying various measures in their computer systems, file storage media, personnel records, operational procedures, etc. In this regulatory context, the UPCT and Diverfarming partners maintain the required protection on personal data based on this Spanish and European Union regulations.

On the 8th of April 2016, the European Council adopted the Regulation 2016/679, also known as the General Data Protection Regulation (GDPR). This European Regulation will replace the Directive 95/46/EC that is currently valid. It went into force on the 24th of May 2016, but it will apply from the 25th May 2018 [DPRreform], when the current Directive will be repealed. Being a Regulation, the GDPR is legally binding for all Member States, without the need to be ratified by Member State parliaments. It is a key document used as a basis for the discussions and recommendations in this deliverable.

Each Diverfarming partner is bound by their institutional, professional, and national code for research ethics. We will incorporate information about the institutional ethics codes on the project website, including provisions as to how to lodge complaints. Each researcher will be bound by their institutional ethics oversight structures, such as own organisation-based ethics committees. In addition, we will encourage Diverfarming partners to pursue further training in research ethics. In general, the research across the work packages is designed to ensure integrity, quality and transparency. Each work package is required to identify risks to participants and researchers. Researchers and participants will be informed about the purpose, methods and intended purpose of the research, how their participation contributes to the overall research objectives, and how potential risks arising from their participation have been mitigated so as to eliminate all risk of harm arising to researchers and research participants.

The research methods employed by the various work packages vary. They rely on primary data (newly generated) and secondary data. In those research activities that involve human participants (through interviews, questionnaires, surveys), research will be only conducted on the basis of 'informed consent', i.e. participation will be free from any coercion, and can be revoked at any time. This applies in particular to those individuals involved in the surveys and questionnaires defined for WP2, WP6 and WP8. Individuals will be provided with information about the nature of the research, the conditions under which they are being asked to provide information, and about the way in which the findings will be presented. Interviewees will be invited to check transcripts of the interviews and to comment on matters of fact in draft



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papers. Data controllers (Project Coordinator and WP leader responsible for the activities where personal data is collected) will ensure that data subjects can rectify, remove or block incorrect data about themselves. The research does not involve 'vulnerable individuals' in the sense of the young or elderly, or impaired individuals.

The co-ordinator will ensure that data will be stored securely during the period of the project, and provisions will be made to ensure that the data will be secured safely beyond the lifetime of this project. Confidential information such as personal data on individuals recorded in interviews, questionnaires or surveys (name and contact data) will be never become public, findable or accessible, and will be securely stored to prevent breaches of confidentiality on private personal hard drives and the private institutional Diverfarming Microsoft Office 365 OneDrive.

The nature of the research conducted in the overall project does not engage in research areas where 'incidental findings' have caused primary concern, namely medical ethics. Data will be anonymised where appropriate, and when personal data is recorded, it will always be confidential.

1.1. Data storage and retention

The project objectives require the collection and analysis of public data that come from very different sources. Sometimes data are publicly available, but others data is inexistent or insufficiently detailed for the implementation of Diverfarming tasks. As a consequence, the Diverfarming project involves primary data collection such as interviews, questionnaires, surveys and data sources from the different project partners.

Several file formats will be used for inputted and stored data:

- Microsoft Word (.doc/.docx) and Portable Document Format (.pdf) for text/word documents.
- Microsoft Excel for databases (.xls/.xlsx; and comma-delimited .csv).
- MP3, MP4 and WAV for digital audio recording.
- Quicktime Movie and Windows Media Video for video files.

All these formats have been chosen because they are accepted standards and widespread used.

Project data will need to be backed up regularly. Different levels of back-up procedure will be applied depending on whether they have been obtained from an external source or created as an output by the project team. Data obtained from externalsources will be stored on i) the project coordinator hard drive, ii) hard drive of the WP coordinator responsible for those data; and iii) on the Diverfarming Microsoft Office 365 OneDrive.

Data created by the project team will be stored on the computer hard drives used in the course of the project AND on the Diverfarming Microsoft Office 365 OneDrive. The use of Microsoft Office 365 OneDrive will ensure that all data files are kept for Diverfarming consortium use despite problems in personal computers. Microsoft protects the Microsoft Office 365 OneDrive from viruses and data piracy. This will help to ensure the security of the data held on computers used in the project. In fact, some activities will be directly performed online on files stored on Microsoft Office 365 OneDrive to ensure that the last version of the document is the one saved on the system and shared by all partners that may need it.



2. Principles of Personal Data processing

- Individuals whose Personal Data is being Processed shall be treated fairly and in an open and transparent manner.
- Personal Data of individuals (hereinafter “Personal Data”) shall be processed only for those administrative, operational, accounting, research and monitoring purposes that are necessary for the safe and reliable implementation of Diverfarming, without prejudice to the individual rights under the relevant laws.
- Processing of Personal Data shall be adequate, relevant and not excessive in relation to the purposes for which they are processed.
- Personal Data shall be accurate and, where necessary, kept up to date. Where Personal Data are found to be inaccurate or incomplete, having regard to the purposes for which they are processed, they shall be rectified or purged.
- Personal Data processed shall be always anonymised and confidential, unless the individual would give explicit and signed consent to publish personal data (free from any coercion, and can be revoked at any time).
- Appropriate technical and organisational measures shall be taken against accidental loss or destruction of, or damage to, Personal Data. For this purpose, personal data will be stored on the computer hard drives used in the course of the project and on the Diverfarming Microsoft Office 365 OneDrive. The use of Microsoft Office 365 OneDrive will ensure that all data files are kept for Diverfarming consortium use despite problems in personal computers.
- Personal Data (name and contact details) shall be retained until data derived from surveys, questionnaires or interviews are published, and shall be destroyed after a period of 18 months from that publication. By default, Personal Data shall be destroyed after a period of 36 months after the finalisation of the Diverfarming project. Destruction means elimination of any file, on own hard drive or Diverfarming Microsoft Office 365 OneDrive, so that no information on those Personal Data is available, accessible and findable. Destruction of research data must follow applicable EU regulations, UPCT policies on record retention and data disposal, and any other applicable guidelines.
- Diverfarming partners shall not disclose Personal Data unless in accordance with these Principles of Personal Data Processing.
- Individuals can report suspected breaches of this principles to Diverfarming Project Coordinator or to an independent UPCT staff of the research team (see section 4.1).
- Any Diverfarming partner shall respond to suspected breaches of Personal Data Protection established under these principles promptly and effectively and take the appropriate action where a breach is found to have occurred. The Project Manager will manage this issue following the Consortium Agreement.
- The individuals whose personal data is being collected and processed have the right to: .i) obtain a copy of their Personal Data being stored by the Diverfarming partner without undue delay; ii) request that any Personal Data relating to them which is shown to be incomplete or inaccurate be rectified; iii) request that on compelling legitimate grounds processing of their Personal Data should cease; and iv) know the contact details of the Project Coordinator to which the individual should direct requests in relation to their rights above.
- All Diverfarming partners dealing with personnel data derived from interviews, questionnaires or surveys shall record the following elements, which will be always confidential:
 - Name and contact details of the Participant.



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- Description of Personal Data being Processed.
- Purpose or purposes of Processing of Personal Data.
- Personal Data shall never be transferred to individuals or organisations outside Diverfarming consortium unless there is an appropriately enforced legal request.

3. Diverfarming Ethics Statement

- All research is designed, undertaken and reviewed as part of the consortium to ensure integrity, quality and transparency. The Diverfarming Management Board will take lead responsibility to ensure that the ongoing research is conducted at the highest level of integrity, quality and transparency. Each work package is embedded within institutional research ethics frameworks and committees. Where these bodies do not exist, the research ethics framework that applies to the coordinator, Universidad Politécnica de Cartagena, will apply. All partners are expected to conduct their research in keeping with the principles of Directive 95/46/EC and Regulation 2016/679.
- The coordinator will ensure that Diverfarming-related research follows ethical guidelines.
- Concerns regarding the ethical conduct of research conducted under the Diverfarming project should be raised, in the first instance, with the Diverfarming Project Manager.
- The annual general assembly meetings will devote time for the consideration of emerging research ethics issues that may not have been foreseen at the outset of the research.
- Unethical research behaviour will not be tolerated and will be raised as part of consortium meetings. Depending on severity, failure to comply may lead to the exclusion from the consortium, following the internal principles defined in the Consortium Agreement. The process of such investigation will be guided by the principles of integrity, fairness, uniformity, confidentiality and no detriment. All members of the Diverfarming consortium are committed to cooperate and support such investigations. They are also committed to consent to the conclusions of such processes and to take appropriate actions (subject to appropriate appeal processes).
- Research staff will seek opportunities to train in research ethics as part of their activities in the Diverfarming consortium. Such opportunities will be encouraged as part of career development opportunities.
- All individuals participating in surveys, questionnaires and interviews will be fully informed about the purpose, method and intended usage of the research, what their contribution to the research is and what risks, if any, may arise from participation.
- Confidentiality of information supplied by research participants and the anonymity of respondents shall be always ensured. The dignity and autonomy of individuals will be respected at all times.
- Individuals will participate voluntarily, without any form of coercion.
- All primary research will be conducted under the principle of informed consent; individual participants will not contribute without their knowledge and consent. Individual participants will have the right to withdraw at any time.
- Personal Data processing shall not generally involve vulnerable individuals who are not in a position to give informed consent.
- Diverfarming research will be conducted under the principle of 'informed consent' and under conditions of non-attributability of information so as to protect the anonymity of the participant. The conditions will be explicitly set out in the information sheet and letter requesting the meeting with a research participant and the conditions will be reiterated at the outset of the conversation (section



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4.1). The letter will also illustrate why the individual's participation is being sought. Participants will be granted the opportunity to comment on transcripts and draft papers in order to correct factual information. The right to comment does not affect researchers' rights to interpret and analyse.

- No financial inducements will be offered for individuals on research participation.
- To ensure ethical rigour and that the ethical requirements of each country is met respective work-package leaders will be responsible for obtaining the appropriate institutional ethics approval for any collection of personal data.

4. Informed consent procedure

Each individual participant involved in surveys, questionnaires and interviews shall be requested to sign an informed consent form. With this regards:

- The consent document will be used as a guide for verbal explanation of the study.
- The consent document will be the basis for a meaningful exchange between the researcher and the participant.
- The participant's signature will provide documentation of agreement to participate in a study, but it is only one part of the consent process.
- The consent document will not serve as a substitute for discussion.



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4.1. Consent template

ABOUT DIVERFARMING PROJECT: The aim of Diverfarming is to increase the long-term resilience, sustainability and economic revenues of agriculture across the EU by assessing the real benefits and minimising the limitations, barriers and drawbacks of diversified cropping systems under low-input practices, and by adapting and optimising the downstream value chains organization. We will tailor diversified cropping systems focusing on the adverse impacts of current agro-ecosystems and ensuring end-user acceptance by reducing technical, socioeconomic, cultural and value chain barriers, through a decision-making process with involvement of all stakeholders, from farmers to consumers. The selected diversified cropping systems will be validated in field case studies studying the land productivity, the rational use of external inputs, the delivery of ecosystem services, the proper organization of downstream value chains and the economic impact through the entire value chain.

PURPOSE OF YOUR PARTICIPATION: You are invited to participate in our research study on _____ under the Diverfarming project. You will be requested to participate in events organised by the Diverfarming consortium, surveys, questionnaires and interviews, or record videos/audios about your experience as end-user or stakeholder. These materials will become part of studies that may be presented at scientific or professional meetings or published in scientific or professional journals for communication and dissemination purposes.

TIME INVOLVEMENT: This research study may take up to approximately five years after your participation.

RISKS AND BENEFITS: The risks associated with this study are none. We cannot and do not guarantee or promise that you will receive any benefits from this study. Your decision whether or not to participate in this study will not affect your participation in other Diverfarming events and activities.

PAYMENT: You will not receive any reimbursement as payment for your participation.

RIGHTS: If you have read this form and have decided to participate in this research project, please understand that your participation is voluntary and you have the right to withdraw your consent or discontinue participation at any time without penalty or loss of benefits to which you are otherwise entitled. The alternative is not to participate. You have the right to refuse to answer particular questions. The results of this research study may be presented at scientific or professional meetings or published in scientific journals. Your name and contact data will be always retained confidential, and will never be public, findable or accessible.

CONTACT INFORMATION: If you have any questions, concerns or complaints about this research, its procedures, risks and benefits, contact the Project Coordinator (Dr. Raúl Zornoza; raul.zornoza@upct.es; +34 868 07 1130).

INDEPENDENT CONTACT: If you are not satisfied with how this study is being conducted, or if you have any concerns, complaints, or general questions about the research or your rights as a participant, please contact Mrs María Jesús Legaz, Universidad Politécnica de Cartagena, OTRI, Plaza del Cronista Isidoro Valverde s/n. 30201, Cartagena (chus.legaz@rec.upct.es; +34 968 33 8991) to speak to someone independent of the research team.



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Indicate Yes or No:

- I give consent to be audiotaped during this study: ____Yes ____No
- I give consent to be videotaped during this study: ____Yes ____No
- I give consent for registration of data resulting from this study to be used at scientific or professional meetings or published in scientific or professional journals for communication and dissemination purposes: ____Yes____No
- I give consent for audios and/or videos resulting from this study to be used at scientific or professional meetings or published in scientific or professional journals for communication and dissemination purposes: ____Yes____No
- On default, your identity (name and contact data) will be retained anonymous and confidential, unless you give explicit consent to reveal your identity: ____Yes

Signed, on duplicate, so that one copy of this signed and dated consent form is for you to keep.

NAME: _____

ORGANIZATION: _____

DATE: _____

SIGNATURE _____



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5. Regulations and references

[DPReform] http://ec.europa.eu/justice/data-protection/reform/index_en.htm

[EC-DC-Oblig] http://ec.europa.eu/justice/data-protection/datacollection/obligations/index_en.htm

Directive 95/46/EC of the European Parliament and of the Council of 24th October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data

Gans-Combe, C., 2009. Data protection and privacy ethical guidelines, document produced by the Experts Working Group on data protection and privacy, EC.

Regulation 2016/679, of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

Spanish Constitutional Law 15/1999 of 13th December 1999 on the protection of personal data

Spanish Royal Decree 1720/2007 on protection of personal data