



Ethics Management Plan
*WP6 - Management, Coordination and
Dissemination*

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1. Executive Summary

The UPTAKE **Ethics Management Plan** is the critical document that outlines all ethical **considerations and procedures** that will be followed throughout the project lifespan. It is strictly connected to the Data Management Plan (DMP – Deliverable 6.3) concerning data collection, storage, and usage from an ethical perspective.

The document will detail all aspects regarding the **recruitment of Human Participants, Informed Consent, and Data Protection** with particular attention to compliance with ethical principles and relevant legislation.

2. Introduction

2.1 Project Overview

Given the project's ambitious goal to advance the understanding of the potential role of CDR in achieving European and global climate policy goals, one of the critical aspects in the entire workflow of the research that will be conducted in the project is the **engagement and continuous dialogue with stakeholders**.

This aspect (mainly addressed in WP1) is one of the fundamental aspects of the project about the Ethical elements and concerns of the UPTAKE project, together with the **surveys** that will be conducted to measure public attitudes and expectations.

2.2 Objectives of the Ethics Management Plan

The main objective of the Ethics Management Plan is to:

- Define Ethical compliance with all relevant regulations and guidelines in implementing the actions.
- Outline the procedures for obtaining informed consent from participants involved in the research, ensuring transparency and voluntary participation.
- Describe the measures in place to protect the privacy and confidentiality of data, especially when dealing with sensitive information collected during the surveys.
- Describe how stakeholders will be engaged in project activities.
- Identify and describe potential ethical issues during the project implementation and the mitigation measures to apply (if any).





3. Ethical Compliance

3.1 Relevant Regulations and Guidelines

As a vital part of all types of research projects, Ethics requirements are stipulated in Annex V of the Grant Agreement (GA) *Ethics – Article 14*, which can be considered the primary reference in addressing ethical concerns about the project. In addition, the Consortium Agreement (CA), *Section 4: Responsibilities of Parties*, extends the provision stated in Article 14 of GA to the Associated Partners, who undertake to be compliant with Ethics during the actions carried out in the project lifespan.

The projects processing personal information about identifiable human research subjects are subject to the Regulation (EU) 2016/679 - *General Data Protection Regulation (GDPR)*, GDPR), and the entire project implementation will be carried out in compliance with the following:

- (a) **ethical principles** (including the highest standards of research integrity – as set out, for instance, in the *European Code of Conduct for Research Integrity* – which includes avoiding fabrication and falsification, plagiarism or other research misconduct);
- (b) and applicable **international, EU and national law**.

Furthermore, the project adheres to the *Ethics and data protection*¹ guidelines outlined in the Horizon Europe framework.

3.2 Ethical dimension

The research proposed in UPTAKE involves collecting data through the **participation of adult and healthy volunteers**. In particular, the project will collect data during the **stakeholder engagement** and vision development process; it will conduct **surveys** on public attitudes towards CDR and **interviews with CDR stakeholders**. The activities foreseen do not involve children, minors or persons with disabilities. During the Kick-Off, a task force was set up, with representatives from the WP leaders.

Survey participants will be recruited by a sub-contractor following standard survey procedures and regulations. Aarhus Univer will be the data controller, and the GDPR-compliant survey provider will maintain the role of data processor.

¹ Full text available: https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/ethics-and-data-protection_he_en.pdf





Relying on external, certified survey providers ensures that ethical and data protection issues are dealt with in full respect of national and European legal procedures. Professional survey providers have a well-established privacy policy, a statement of principles and guidelines to safeguard the interests of individuals who agree to share their data. We will ensure that companies follow 'Privacy by Design', such that privacy and data protection are embedded throughout the entire life cycle of research activities, from the early design stage to data storage, analysis and, if applicable, ultimate disposal. Data collected by surveys will include sensitive personal data (political and philosophical opinions) and be identifiable (through the contact key maintained by the survey company) until the point of anonymisation so that all data will be stored in a secure, password-encrypted server maintained by Aarhus University IT. Data that will be transmitted to AU will remain pseudonymised up until three months after collection. At no point will AU hold in possession contact information maintained by the survey company. This limits the risk of malicious use of participant data by cross referencing data. At that point, the survey company will delete any identifiable information used to contact the participants, and thus the data will become fully anonymized. Pseudonymised data will only be shared with Consortium members listed on the informed consent through a network-protected source maintained by Aarhus University. This prevents unauthorised access and limits risk to participants. After data becomes fully anonymized, data can be fully shared within the Consortium without any risk to participants.

Moreover, all partners agreed to **process personal data in compliance with the applicable EU, international and national law on data protection** (in particular, Regulation 2016/67916 - GDPR), and apply gender-sensitive approaches, setting a **standard framing about gender and ethical** issues as defined in the following sections.

As project coordinator, CMCC will oversee monitoring and dealing with ethical issues during the whole implementation of the project.





4. Informed Consent

4.1 Informed Consent Procedures

A Consent Form will be presented to individuals. By filling out the Consent Form, the individuals can express their acceptance to **participate in the data collection activities** (events participation, registration form, etc). The document will strictly abide by the provisions of GDPR as mentioned above. All individuals will be aware of the aims, objectives, and methods of the study, including the nature of questions, the time and tasks required and contact details of both the researchers and the appropriate ethics committee. Individuals will be assured that their **involvement in the study will be voluntary**, and their nonparticipation will incur no disadvantage. No deceptive methods will be used.

Participants will be provided with **written and/or verbal information** about the scope and purpose of the interviews and questionnaires, the types of questions that are likely to be asked, the use of results, the **method of anonymization**, and the extent to which participants' utterances will be used in reports. Participants will be given time to consider their participation and will then be asked **to sign an agreement on informed consent**. The agreement will stipulate that participation in the project is voluntary, that their identity will be protected, and that they can withdraw (their participation and data) from the project whenever they wish.

4.2 Documentation of Informed Consent

Informed consent **minimum requirements** will be related to the provision of GDPR. In particular, the consent form will be developed based on the following criteria:

- Simple language.
- Concise information, with the possibility to find more information.
- Written in cooperation with participants.
- In consideration of ethnic and other differences.
- In consideration of the fact that it is hard to establish whether someone is truly informed.

The essence of the informed consent will be explaining **what personal data** (names, email addresses, etc.) will be used and for **what purposes**. Furthermore, it will always contain indications about the **reference contact person** for any further information about **data storage and processing**, and when appropriate, debriefing information will be provided.





Furthermore, the informed consent must give the **option to disallow the use of their data** to subjects. Section 8 of this document provides the informed consent template ([8. Annexes: forms and template](#)).

5. Data Privacy and Security

5.1 Data Protection Measures

The Consortium and the project coordinator have long-standing experience in managing and working in the context of the EU Research and Innovation Framework Programs and other EU projects engaging different stakeholders and communities.

Protection of Personal Data

Adequate measures to ensure **personal data protection** and **confidentiality** will be taken according to the GDPR and the national/local regulations. The following principles will be applied when processing personal data:

lawfulness, fairness, and transparency; purpose limitation; data minimization (necessary and proportionate for the project's objective); accuracy; storage limitation and integrity and confidentiality.

All beneficiaries must **clarify whether new data are collected** and whether sensitive data will be processed. The Consortium will comply with the GDPR and any updates it might incur during implementation of the project. Each Beneficiary Data Protection Officer (DPO) will ensure full compliance with the provisions of European and national legislation on this matter. The Data Management Plan of the UPTAKE project (DMP) is the reference document for **processing data**, and it will be reviewed from time to time over the project life to ensure consistency with the activities performed and compliance with the legal procedures in place, namely the GDPR at the time of performance of the activities.

Confidentiality

The data will be **collected anonymously**, and **confidentiality is guaranteed**. All data will be **stored in a secure, locked location**. Anonymous data will be **shared between project partners**. Data will be entered onto project computers protected by passwords. **The participants will be informed about the confidentiality procedures** by signing Informed Consent before participating in any project research or dissemination activities.





Audio /Video recording

In case of audio and video recorded meetings and/or live broadcasts through web streaming, **explicit consent will be required** on the collection and processing of personal data and the publication of the audio and video recordings and/or web streaming (form as the examples provided in the following section 8. Annexes: forms and template). Depending on the meeting type, the recordings' publication might be on the project website. If participants do not agree with the image or voice being recorded and published, they will be granted the possibility to opt out.

All personal **data collected** for the sake of event organization will be **fairly and lawfully processed**; processed for **limited purposes**; adequate, relevant, and not excessive; accurate; not kept longer than necessary; processed in accordance with the data subject's rights; secure; not transferred to countries without adequate protection.

Limited personal data (name, email) will be collected for the purpose of meeting/workshop/event registration.

5.2 Data Sharing and Access Controls

Data collected through surveys:

Survey data will be collected and maintained by the GDPR compliant survey provider which AU has an agreement with through the *AU Technology Transfer Office*, and potentially will contain data such as name, contact information, gender, racial and ethnic origin, and political and philosophical opinions, which are defined as identifiable sensitive personal data by GDPR. Thus, the data will be transmitted and stored in a way that **protects it from unauthorised access**. Data from survey providers will be transmitted in **pseudonymized form and stored on password-encrypted servers** as part of the Aarhus University network. Pseudonymized data will only be shared amongst Consortium partners that appear on the informed consent letter. Once the survey has been completed and all data has been collected, the survey provider will delete any remaining identifiable information within three months, making the data fully anonymized. At that time, the data can be shared amongst the entire Consortium.

- All participants will be 18 and over, fully participate by their own will, and be able to withdraw from participation until anonymization. Participants will give consent to





participate via the informed consent form approved by Aarhus University (to be completed)

- No data not listed in the informed consent will be shared amongst Consortium members until it is fully anonymized. Data will be stored on AU secure servers and only accessible by password.
- Pseudonymized data can be shared with certain members through an accessible platform, such as TEAMS, managed by AU to control who has access to the data. Data access can be revoked at any time if a security issue does arise.
- Aarhus University is the data controller, and the survey company will be the data processor since AU determines the data's purpose and means.
- The survey provider will enter into a legal agreement which makes all data transfer legal within GDPR and within set conditions as stated by AU.
- The only data that will be collected will have a clearly stated purpose to justify the collection.
- Identifiable information from the survey company will be deleted after three months. All data will be deleted from Aarhus University servers in 2032.
- Data cannot be used in publication until fully anonymized.





6. Stakeholder Engagement

6.1 Communication Strategy

The online platform **UPTAKE CDR Stakeholder Forum** is the primary communication tool for the project stakeholder community. It aims to ensure consistent and efficient involvement of stakeholders in the activities implemented within (and beyond) the project, including their **participation in the co-design and co-creation** of the activities and outputs throughout the project, as well as strengthening mutual knowledge exchange among the different stakeholder groups and the project team.

The UPTAKE CDR Stakeholder Forum will be used to:

- ensure consistent and efficient **involvement of stakeholders** in the activities implemented within (and beyond) the project.
- **disseminate the interim results** and **collect feedback** to improve the project outcomes;
- stimulate constructive, evidence-based **dialogue among different stakeholder groups**.

The Forum, managed by REFORM, will provide impulses for the exchanges involving stakeholders and the project team throughout the project. REFORM and CMCC cooperate closely to set up the CDR Stakeholder Forum platform. A first test phase is foreseen before the full sharing. The finalization of the platform is ongoing, and a fully open-access platform will be soon available, as expected in Milestone 3.

6.2 Stakeholder Engagement Strategy

A **two-step engagement strategy** has been foreseen to abide by all relevant ethical issues regarding personal data protection and to help set up the UPTAKE stakeholder database:

First step: Through the consultation of the Consortium, the first draft of a list of potential stakeholders will be made, but only through the institutional contacts. At this stage, no personal data will be considered.

Second step: Stakeholders will decide whether they want to join the UPTAKE project (on a volunteer basis). An invitation to join the UPTAKE CDR stakeholder forum will follow.

The UPTAKE CDR Stakeholder Forum will be the primary tool for stakeholders' communication and engagement.

Stakeholders can join it by **completing registration**, and upon entering, members will receive a **welcome package** containing information on how to navigate the Forum, forum rules, and





guidelines to ensure a productive and respectful environment. The registration form is under process, along with the implementation of the stakeholder platform, which is in a test phase. An updated information about this procedure will follow during the project's lifespan. Project partners will use the forum to gather stakeholders' opinions on developing the UPTAKE project deliverables shared in the Forum in a dedicated category and topic. Stakeholders' opinions will be considered at the project partners' discretion. Project partners can contact stakeholders to discuss their views in detail. Stakeholders' input will be acknowledged in specific deliverables in the introduction and, where relevant, in footnotes unless a given stakeholder objects to reveal his/her/their input.

7. Ethical Issues and Mitigation Strategies

7.1 Identification of Ethical Issues

All participants in the UPTAKE projects will participate voluntarily and neither vulnerable groups nor children will be involved in the action. The research conducted in the UPTAKE project does not assess any Ethical issues.

7.2 Mitigation Strategies

At this time of the project, no mitigation strategies have been implemented since no relevant ethical issues have been identified.

At any time during the lifespan of the UPTAKE projects, any participant can ask questions before, during, or after their participation. Either about the research activities and/or their rights and obligations under the project. The primary contact is:

As Project Coordinator:

Soheil Shayegh

soheil.shayegh@cmcc.it

RFF-CMCC European Institute on Economics and the Environment (EIEE)

Via Bergognone 34

20144 Milano





8. Annexes: forms and template

Forms and templates will be customized based on the specific occasion (e.g., registration form for event participation, webinar participation, stakeholder engagement, etc.). Each partner will provide its forms and templates according to their institutional requirements and in compliance with the minimum requirements as stated above.

Find below the latest CMCC forms used as an example:

8.1 Consent form to participate in project EVENT



Information pursuant to Article 13 of Regulation 2016/679.

This information notice is addressed to those who are interested in taking part in the UPTAKE project activities, funded by the European Union g.a. 101081521. The list of the UPTAKE Project's partners is available at the following [link](#).

UPTAKE partners (hereinafter "We" or the "Partners") ensure that processing activities will take place in compliance with Regulation 2016/679 (so-called GDPR). Therefore, the processing of data will be based on the principles of fairness, lawfulness, transparency, restriction of processing and protection of confidentiality, using methods suitable to guarantee the security of your data.

This information notice refers to the "_____ ("Event"), organized by the [insert the relevant partner](#), and it's addressed to all its participants ("Data Subjects").

Purposes

The personal data provided by the Data Subject are processed to allow registration and participation in the Event organized by CMCC Foundation, as a partner of the UPTAKE project.

Furthermore, during the events, we may record, stream, and capture images that will later be shared on relevant social channels for the purpose of disseminating scientific knowledge and documenting the event itself.

We may also process the email addresses of the Data Subjects for sending newsletters and other informational communications regarding its scientific and educational initiatives and activities. Each Partner may also send its scientific uptakes on similar topics.

Data Categories and Legal Basis

Personal data processed through the survey include: (i) identifying and contact data (first name, last name, e-mail address) and (ii) other common data (academic and/or work background).

The processing of personal data provided by individuals for the Event is carried out in accordance with Article 6(1)(b) of the GDPR. The processing of email addresses of individuals for sending non-commercial newsletters and other informational communications is based on the legitimate interest pursued by the Partners in disseminating scientific research, in line with the objectives of the UPTAKE Project, in accordance with Article 6(1)(f) of the GDPR.

The provision of personal data for the aforementioned purposes is optional. However, failure to provide the requested data may result in the inability to provide the requested services to the data subject.

Recipients and data transfer

This data may only be shared with the Project's partners.

Retention Period

i. Event Registration

Personal data of individuals provided through the completion of registration forms for events will be retained by the Joint Controllers for a period not exceeding that necessary to achieve the aforementioned purposes and in any case no longer than 12 months from their collection, unless otherwise required by law or for judicial or administrative purposes.

ii. Provision of non-commercial newsletter service

Regarding the purpose of providing the non-commercial newsletter service, personal data of individuals will be retained as long as the service itself is active. Therefore, the data will be retained until the individual requests cancellation from the service.

Rights of the Data Subjects

In accordance with current legislation, every data subject has the rights granted by articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

In order to exercise these rights, please refer to the [insert the relevant partner's website or an email contact](#)

The data subjects have a right to file a complaint with the relevant Supervisory Authority if the data subject considers that the processing of personal data breaches the data subject's rights pursuant to applicable law.



This project has received funding from the European Union's Horizon Europe research and innovation programme under grant agreement No 101081521- UPTAKE - Bridging current knowledge gaps to enable the UPTAKE of carbon dioxide



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Declaration of Informed Consent for the survey (WP1 Task 1.3), written in conjunction with Aarhus University's Technology Transfer Office will be completed after the design of the survey. The Ethics Management Plan will be updated at that time.





8.2 Privacy policy for event participants – Online registration Form

The form must include a clear indication on how personal data will be collected, stored, and used, ensuring privacy protection.

Data Protection Law Information

By sending this form, the undersigned consents to the processing of personal and sensitive data pursuant to art. 13 GDPR 679/16. The information will only be used for the purposes of reporting key participant statistics to the European Commission. In registering for this event, the user expresses her/his consent to the use of her/his personal details for receiving information about the UPTAKE project, to be included in the participant list and for the collection, processing and distribution of images/video taken during their attendance of the event. The data will be stored securely until the end of the UPTAKE project (31/08/2027). You may withdraw your consent to the use of the data at any time by emailing fabiana.gerardi@cmcc.it

If you have any objections, please contact Fabiana Gerardi.

If you have general questions regarding data protection @CMCC, you can contact our privacy contact person at privacy@cmcc.it at any time. Please read the [CMCC Privacy Policy](#)² carefully.

² Full text of the Information on the Processing of Personal Data for Registration and Participation in Webinars by the CMCC Foundation is available:

https://files.cmcc.it/Footer_sitoCMCC/Privacy%26Cookies/ENG_Privacy_Data%20Processing_Webinar.pdf





8.3 Stakeholder Google Form


The logo for 'uptake' is displayed at the top of the form, identical to the one above.


Uptake CDR Forum

We are very glad that you decided to join the Uptake CDR Stakeholder Forum. The Forum aims to bring together stakeholders from different groups and with different focuses of interest in the field of carbon dioxide removal (CDR) technologies. We would like to form a CDR community which would share findings, insights and updates with other members of the Forum. We hope that you will also help us make the deliverables of our project as highly informed as possible.

As we want to tailor the Forum to the needs of different stakeholders, we would like to know your affiliation and CDR-related interests. To that end, we developed a few questions below and we kindly request to answer them. Once you fill in the form, we will send you the link allowing you to sign up and log in the Forum upon our approval.

We also want to inform you in advance that based on information provided in this form we will invite you for particular events and surveys held within the UPTAKE project.

[Switch account](#) 

 Not shared

* Indicates required question





First name: *

Your answer _____

Last name: *

Your answer _____

E-mail address: *

Your answer _____

Title / position *

Your answer _____

Institution / Company name: *

Your answer _____





Which group do you represent: *

- Research
- Business
- Civil society
- Policy
- Other: _____

In which CDR method are you interested: *

- General interest (no specific method)
- Land-based and coastal (Afforestation, Soil conservation service, BECCS, Biochar)
- Geological, weathering and mineralization (Ocean Alkalinization, Enhanced Weathering)
- Technological-based (DACCS)
- Other: _____

*Dear User, according to Article 13 of the GDPR, we would like to inform you that the * data provided through this form will be processed by the UPTAKE's Project Partners, specifically by CMCC Foundation, to execute your request to join the "Uptake CDR Stakeholder Forum".*

Furthermore, we would like to inform you that your email address will be collected and used to send you newsletters and other informative communications regarding the UPTAKE Project and the CDR Stakeholder Forum. You can unsubscribe from this service at any time by emailing fabiana.gerardi@cmcc.it or changing your email settings from your account.

For further information regarding the processing of your data and to learn about your rights and how to exercise them, we invite you to read the complete privacy policy, available [here](#) and eventually get in touch with privacy@cmcc.it."

Accept

Submit

Clear form

