



Project Title: OptimaSteel – Optimum working conditions for ageing workers in Steel Industry

Deliverable 5.2 Ethics Procedures

Lead Beneficiary	PSA
Delivery Date	29/02/2020
Dissemination Level	PU
Version	1.0



This project is funded by the European Commission's Coal and Steel Research Fund (RFCS - 2018) on agreement number [839990]. The content of this document reflects only the authors' view. The European Commission is not responsible for any use that may be made of the information it contains.

Document Information

Authors	Rui Oliveira & Ana Fonseca, PSA
Deliverable name	Ethics Procedures
Deliverable No.	D5.2
Dissemination Level ¹	PU
Work Package	5
Task	5.2
Contributing beneficiary(ies)	PSA; INOVA+; JR and EWF
Due date of deliverable	29/02/2020
Actual submission date	29/02/2020
Lead beneficiary	PSA

Document history

Version	Date	Beneficiary	Author
0.1	17/02/2020	PSA	Rui Oliveira, Ana Fonseca
0.2	17/02/2020	INOVA+	Cláudia Antunes, Carolina Carli
0.3	20/02/2020	JR	Sandra Murg
0.4	23/02/2020	EWF	Ana Sofia Lopez
0.5	26/02/2020	PSA	Ana Fonseca
1	26/02/2020	INOVA+	Cláudia Antunes, Ana Solange Leal

This document describes the Ethics Procedures included in the Project Management work package. This deliverable is designed to assure that all the partners in the project follow the national and EU requirements in terms of Ethics.



This is a formal deliverable under WP5 of the OptimaSteel project financed by the Research Fund for Coal and Steel of the European Commission under Grant Agreement No [839990]

¹ PU = PUBLIC

PP = Restricted to other programme participants (including the Commission Services)

RE = Restricted to a group specified by the consortium (including the Commission Services)

CO = Confidential, only for members of the consortium (including the Commission Services)



Table of Contents

1	Introduction	3
2	Ethics Assurance Procedures	4
2.1	Ethics Project Committee.....	4
2.2	PSA Code of Ethics.....	5
2.3	Portuguese Ethics	5
2.4	European Ethics	5
3	Conclusions	8
4	References	9
	Annex I - Informed Consent (English version)	10
	Annex II - Informed Consent (Portuguese version)	15

Abbreviations and acronyms

ALLLEA	All European Academies
EC	European Commission
ESF	European Science Foundation
EWf	European Welding Federation
EU	Europe Union
GDPR	General Data Protection Regulation
JR	Joanneum Research
PSA	Peugeot Citroen Automóveis Portugal, S.A.
RFCS	Research Fund for Coal and Steel

1 Introduction

As expressed in the grant agreement, article 34-Ethics, the OptimaSteel project complies with the ethical principles, based on the European Code of Conduct for Research Integrity.

However, considering the nature of the project that includes test and implementation phases of solutions to improve the quality of life at work for the elder employees in the steel industry, we need to be careful and take certain measures to assure that the research complies with the recommended ethical principles. Therefore, the consortium designated a project Ethics Committee to supervise the integrity of the OptimaSteel project, as presented below.

In this document, we will address the ethical concerns of the project, such as research with humans and data protection, PSA directives/good practices, Portuguese and EU legislation.



2 Ethics Assurance Procedures

The conduction of a research project has an overriding obligation of protection of participants' welfare and safety ensuring that any research conducted respects the physical, social and psychological well-being of research' participants.

PSA is the Ethics Manager of the project and is responsible for the OptimaSteel Ethics Committee, as the research will be performed mainly at the PSA factory, and consequently, PSA must assure the integrity requirements for its employees.

The most important ethics issue of the OptimaSteel project is the conduction of research involving people within the pilot study. Participants – employees from PSA, were informed accordingly, and any doubts clarified before and while answering the first questionnaire. The same procedure will be applied when additional questionnaires are implemented during the trial phases. Importantly, we should note that given the project's nature which is closely related to the workers' lifestyle and health data, personal information has been collected and stored in an anonymized way.

2.1 Ethics Project Committee

The Ethics Committee, coordinated by PSA, assures and regulates the fulfilment of all ethics procedures and their alignment with the ISO 9001² requirements throughout the OptimaSteel project. The Ethics Committee is formed by:

- **PSA:** Anabela Guerra (Human Resources Data Protection); Ana Fonseca (Human Resources Security and Health) and Rui Oliveira (OptimaSteel project manager);
- **INOVA+:** Pedro Castro (Data Protection Officer); Eurico Neves (Ethical Compliance) Cláudia Antunes (OptimaSteel project manager);
- **JR:** Erich Riegler (Data Protection Officer of institute DIGITAL), Silvia Russegger (OptimaSteel project manager);
- **EFW:** Ana Beatriz Lopez (European relations).

The Ethics Committee will enforce the following principles throughout the project approach:

- **Compliance with Legislation:** Any real data collected for research and demonstration purposes will be handled in accordance with the Data Protection legislation in the concerned countries and each company handling the data will be registered to handle this type of information with their data protection authority.
- **Use Limitation:** All information leading to person identities will be encrypted and protected according to EU best practices, for example, using reference numbers instead of actual names.

² ISO - International Organization for Standardization, 2015. ISO 9001:2015.



- **Security Safeguards:** Personal data will be kept secure from potential abuse, during all required processing before storing, until personal identities are eliminated.
- **Openness:** All collection processes will be transparent on how data is collected, used, and shared.
- **Accountability:** The project consortium will be accountable to comply with all above principles.

2.2 PSA Code of Ethics

The PSA has its own Code of Ethics³ that all the employees of the organisation must follow. This code expresses the guidelines in terms of respect for the law, people, environment, customers and the company. Overall, the OptimaSteel project responds to all the PSA Ethics criteria, nevertheless, this code does not include directives for research programs.

2.3 Portuguese Ethics

The Portuguese ethics for research programs⁴ promotes the principles of integrity in research as specified in the European Code of Conduct for Research Integrity⁵ of the European Science Foundation (ESF) and All European Academies (ALLEA), as well as in this project since it is financed by the Research Fund for Coal and Steel. This code gives the guidelines for projects' practices in the contexts of Research Environment, Training, Supervision and Mentoring, Research Procedures, Safeguards, Data Practices and Management, Collaborative Working, Publication and Dissemination, Reviewing, Evaluating and Editing documentation.

The consortium and in particular PSA and EWF will ensure that all the Portuguese requirements will be met during for OptimaSteel.

2.4 European Ethics

The basic ethical principles have their origin in clinical research and have been evolved to protect human participants from harm applicable to all fields of research in which humans participate by contributing time, effort, insights and personal data for researchers' use. In this context, research participants' rights and consequent fundamental human rights are fundamental ethical principles that should govern all scientific researches funded by the European Commission.

³ PSA GROUPE: Code of Ethics. November, 2019.

⁴ FCT – Fundação para a Ciência e a Tecnologia: Code of Conduct. August, 2015.

⁵ ALLEA - All European Academies: The European Code of Conduct for Research Integrity. Berlin, 2017.

The OptimaSteel project, as expressed in article 34 of the grant agreement, must comply with the European Code of Conduct for Research Integrity and at the same time apply the Portuguese, EU and international laws.

So, based in The European Code of Conduct for Research Integrity, and always having into consideration the PSA Code of Ethics and the Portuguese Ethics, three specific domains are considered and the respective methodology explained:

I. Research Environment

This research involves human participants, in particular the employees of the PSA Mangualde factory. In this context, it was essential for PSA to assure the protection of the identity of these individuals when the research findings are published. Before enrolling in the pilot, each employee was informed about the project, the aim and the processes established to protect his/her privacy. The Ethical Committee developed an informed consent already for the first questionnaire. This consent will be kept updated and employees will sign a specific document for each step of the pilot ensuring that they are truly informed about the goal of the data collection and the respective treatment.

The consortium has already started this research by acquiring data about their current status in the following areas: digital literacy, wellbeing at work, health & wellbeing, ergonomic assessment and clinical survey (D1.1).

All the employees that accepted to participate in the questionnaire decided to do it on a voluntary-base and signed the respective informed consent, available in the annex I. In this consent, a brief presentation of the project was given, as well as the terms for data collection and treatment. The consent was provided in Portuguese to ensure a complete understanding by all the participating workers. Besides that, the Ethics Manager of PSA was available to clarify any doubts and the Data Protection Officer of INOVA+ was also available to assist with questions.

II. Training, Supervision, Mentoring and Research Procedures

The people involved in the project (particularly the PSA workers) received and will receive proper training in terms of ethics from the human resources that already know the PSA Ethics code and good practices. The data from the research will be collected, anonymized, interpreted and published always respecting the confidentiality of the involved people in compliance with the General Data Protection Regulation (GDPR). The agreement with GDPR for data accessible is ensured by the Data Protection Officer, Pedro Castro.

III. Safeguards, Data Practices and Management

This project works with a large amount of data, not only the collected through the questionnaires, but also data collected in the subsequent work (e.g. data obtained from technological applications). This data will be interpreted, and only aggregated results will be public.

Within the collected data, done via questionnaires, the only information that could identify the persons involved is the employee number, which is asked. With this number, only the human resources services of PSA can access to the system and identify the person. For all the consortium members, and those accessing the research findings, the data will be completely anonymous and will not be possible to trace the responses to specific individuals.

This process of data collection needs to conserve an ID (alphanumeric ID) per each participant because we need to compare the data to be collected at the end phase of the research with the data collected in the questionnaire (start of the research). This information is important because we need to measure the research impact, namely, if the technologies and methods tested are deemed as positive or negative.

In PSA only the consortium members will access the data collected, which will be stored in their own computers, and the PSA has strict regulations in this area. Additionally, the informed consents are in a physical file at the human resources services, where only authorized employees from this service can have access.

Concerning the availability of the data in the tool portal, it should be stated that JR will host the tool portal as well as the data stored within its own servers. The data in the tool portal will be only anonymized data using the participant ID as agreed within the consortium. This ID can only be used to identify a specific person by the HR department of PSA, as explained before. The database which stores the tool portal data (sensor data, questionnaire results, fact sheets about relevant solutions, etc.) will be managed under the data protection and security criteria of JR. The Data Protection Officer will be available for assistance with any questions and issues. Tried and tested procedures implemented at JR for data protection will be used for this project's data also.

3 Conclusions

All the consortium partners are aware of the importance of the ethical procedures and committed to ensure their application. The Ethics Committee will follow all the consortium activities ensuring compliance with all the agreed ethical procedures.

4 References

EUROPEAN COMMISSION: Ethics in Social Science and Humanities. October 2018.

PSA GROUPE: Code of Ethics. November 2019.

ALLEA - All European Academies: The European Code of Conduct for Research Integrity. Berlin, 2017.

ISO - International Organization for Standardization, 2015. ISO 9001:2015.

FCT – Fundação para a Ciência e a Tecnologia: Code of Conduct. August 2015.

Annex I - Informed Consent (English version)



OptimaSteel is funded by the Research Fund for Coal and Steel (RFCS-2018) for the European Commission under Grant Agreement No [839990].

Title of the research conducted: ***OptimaSteel Baseline Survey in the PSA context***

Project partner and contact details conducting the research: **INOVA+**
R. Dr. Afonso Cordeiro 567, 4450-309 Matosinhos
+351 962 642 322

This Informed Consent Form is composed of two parts:

- 1. Information Sheet**
- 2. Consent Form**

You will be given a copy of the full Informed Consent Form.

Part 1: Information Sheet

About OptimaSteel

We approach you on behalf of the project OptimaSteel funded by the Research Fund for Coal and Steel.

The mission of OptimaSteel is to create a safer work environment in the steel industry. Considering that, the partners involved in the European funded project aim at understand your needs during your daily work and address them to offer you a better work quality of life.

Your needs are most certainly the needs of other employees in the steel industry. If you accept to participate in this project, your role will be crucial to implement the actions required to retain workers in good shape (physical and psychologic) for longer in the industry, and will have an impact in all Europe.

We invite you to read this Consent Form, and to decide whether or not you wish to participate in this project. In case you wish to not participate in this study no action will be taken further.

During the project, you will be asked questions regarding your work daily routine and how that affects your personal life. Moreover, you will be ask to test the technologies and innovations discovered during the project.

At any time of the project you may withdraw your consent without giving reasons. In case of withdrawal, please inform us immediately.



If there is anything that you do not understand in this Information Sheet, please feel free to ask any question at any time.

Participant Selection

You are invited to contribute to this research due to your years of experience.

Voluntary Participation

Your participation in this research is entirely voluntary. You can choose either to participate or to decline the invitation. If you decide to participate, you can change your decision and withdraw your consent at any time, without this affecting your relationship with your employer.

Procedures

During OptimaSteel project, you will be asked to fill in a survey, asking questions related to your work routine and how it affects your personal life. This survey will be anonymised, meaning that your name will not be asked, as well as any information that may identify you. During OptimaSteel project, your health status will be assessed by a physician from PSA. Only him/her, and the human resources team will be able to relate your clinical data with your name.

During OptimaSteel project, you will be asked to perform activities or change your work routine in order to test the innovations aimed at improve your work life and environment, your opinions and feedback will be collected and used within the aims of the project, anonymously.

Risks and discomforts resulting from your participation in the study

The OptimaSteel project might potentially include activities that may cause you any discomfort. In case this happens you will be followed by professionals and advised to stop the activities as soon as any risk or discomfort is foreseen or felt by you.

In case you are asked any question that might make you feel uncomfortable, you are not obliged to answer.

Benefits and reimbursement

You may benefit from the results of the OptimaSteel project in the sense that its outcomes will help your health and wellbeing. There will be no reimbursement for your contribution.

Confidentiality

All data collected will remain confidential, within the consortium. The data provided by you will be stored and used for the purposes of the OptimaSteel project. Data collected for the study will be identified by an alpha numeric code, so that it does not include information that can identify you, and only the PSA' doctor/employer will be able to link such data to you and your clinical records. Your identity will therefore not be disclosed to any person,



except in the event of a medical emergency or as required by law. Processing, disclosure and transfer of personal data from all participants will comply with the provisions of General Data Protection Regulation (GDPR).

Data storage

The anonymised data collected during the project will be stored for five years, counting from the end of the project. These data can be made available to other scientific practitioners at request.

In case data is stored on paper, these documents will be stored in a safe cabinet where people outside of the project cannot see it.

In case data is stored electronically, it will be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- For data shared and stored in emails, it should be protected by strong passwords that are changed regularly and never shared between employees.
- For data shared and stored on Microsoft OneDrive®, access is limited to consortium partners, and the OneDrive is protected by approved security software and a firewall.
- Data should not be saved directly to laptops or other mobile devices like tablets or smart phones.

Data Security

As security measurements we will use authentication tools, encryption, and digital certificates to help protect and maintain the security, integrity, and availability of your personal information.

Sharing the results

The project findings are expected to be published within public reports. The final results, will be, for example, used in reports, conferences and workshops and as communication material.

Whom to contact

If you have any questions about this research, please feel free to get in contact with the INOVA+ general contact: +351 962 642 322

The Data Protection Officer: Pedro Castro, dpo@inova.business, phone: +351 229 397 130 / +351 936 494 726



OptimaSteel Project Managers: Mariana Santos, mariana.santos@inova.business and Carolina Carli, carolina.carli@inova.business, phone: +351 229 397 130

Part 2: Consent Form



OptimaSteel is funded by the Research Fund for Coal and Steel (RFCS-2018) for the European Commission under Grant Agreement No [839990].

Confirmation

I, the undersigned, confirm that (please tick the box as appropriate):	Yes	No
I have read and understood the information about the OptimaSteel project, as provided in the Information Sheet.		
I have been given the opportunity to ask questions about the project and my participation.		
I voluntarily agree to participate in the project.		
I understand I can withdraw at any time without giving reasons and that I will not be penalised for withdrawing nor will I be questioned on why I have withdrawn. In case of withdrawal I can inform the contacts above: OptimaSteel Project Manager and DPO.		
I understand that I can request any data held about me to be destroyed at any time without my giving any reason.		
The procedures regarding confidentiality have been clearly explained to me.		
The use of the data in sharing, archiving, dissemination and publications has been explained to me.		
I consent to the data gathered being used for this research.		

Participant

Name:		
I confirm that I am 18 years of age or older	Yes	No
Any additional remarks concerning my privacy in the framework of this research:		
Date:		
Signature:		

Researcher

Name:



Date:
Signature:



Annex II - Informed Consent (Portuguese version)

Consentimento Informado



OptimaSteel is funded by the Research Fund for Coal and Steel (RFCS-2018) for the European Commission under Grant Agreement No [839990].

Título do questionário conduzido: *OptimaSteel questionário de base para entender o contexto da PSA*

Coordenador do projeto e informação para contacto: *INOVA+*

*R. Dr. Afonso Cordeiro 567, 4450-309 Matosinhos
+351 962 642 322*

Este consentimento informado é constituído por duas partes:

- 1. Secção Informativa**
- 2. Secção do Consentimento Informado**

Receberá uma cópia de ambas as partes que constituem o documento.

Parte 1: Secção Informativa

O que é o projeto OptimaSteel:

Estamos a abordá-lo(a) por parte do projeto OptimaSteel financiado pelo Fundo de Investigação do carvão e do aço.

A missão do OptimaSteel é criar um ambiente de trabalho seguro na indústria do aço. Tendo essa premissa em consideração, os parceiros envolvidos neste projeto europeu têm como objetivo entender as suas necessidades diárias de modo a proporcionar-lhe melhores condições de trabalho.

As suas necessidades são de certeza semelhantes às de tantos outros trabalhadores na indústria do aço. Caso aceite participar neste projeto, o seu papel será crucial para implementar ações que visam manter os trabalhadores de boa saúde física e psicológica e ativos por mais tempo. Estas melhorias serão disseminadas pela Europa.

Nós convidamo-lo(a) a ler este Consentimento Informado, e a decidir se está ou não interessado(a) a participar neste projeto. Caso não deseje participar neste estudo, nenhuma ação será tomada contra si.



Durante este projeto, ser-lhe-ão feitas perguntas sobre a sua rotina de trabalho e como isso lhe afeta a sua vida pessoal. Para além, ser-lhe-á pedido que teste tecnologias e inovações durante o projeto.

Durante o decorrer do projeto poderá retirar o seu consentimento em qualquer altura, sem necessitar de justificar os seus motivos. Caso decida desistir da sua participação, por favor informe-nos imediatamente pelos números disponibilizados no final da secção.

Caso haja alguma informação menos clara nesta secção informativa, por favor não hesite em questionar.

Seleção dos Participantes

Está a ser convidado(a) a contribuir neste projeto dado os seus anos de experiência.

Participação Voluntária

A sua participação neste projeto é inteiramente voluntária. Está à vontade para decidir se quer participar ou recusar o convite. Caso decida participar, pode alterar a sua decisão e retirar o seu consentimento a qualquer momento, sem que isso afete a sua relação com o empregador.

Procedimentos

Durante o projeto OptimaSteel, ser-lhe-á pedido que preencha um questionário. As questões incluídas visam entender a sua rotina laboral e como isso afeta a sua vida pessoal. O questionário será anonimizado, o que significa que o seu nome não lhe será pedido, assim como qualquer informação que o identifique.

Durante o projeto OptimaSteel, o seu estado de saúde será avaliado pelo médico da PSA. Somente ele/ela, e a equipa de recursos humanos, terão a informação necessária para relacionar o seu nome com os seus dados clínicos.

Durante o projeto OptimaSteel, ser-lhe-á pedido que colabore em atividades ou que altere a sua rotina laboral de modo a testar as inovações que visam melhorar a sua vida laboral, as suas opiniões e avaliações serão recolhidas e usadas no âmbito do projeto, de forma anónima.

Riscos e desconforto que pode advir da sua participação no projeto

O projeto OptimaSteel pode potencialmente incluir atividades que lhe possam causar algum desconforto. Caso isso ocorra, será seguido por profissionais especializados e aconselhado a parar as atividades assim que riscos ou desconfortos são previstos de acontecer ou sentidos por si.

Caso lhe sejam feitas questões que o façam sentir incomodado, não é obrigado a responder.

Benefícios e reembolso



Os benefícios que o projeto OptimaSteel lhe podem proporcionar serão de bem-estar e de melhorias da sua saúde. A sua contribuição não será financeiramente reembolsada.

Confidencialidade

Todos os dados recolhidos serão mantidos confidenciais pelo consórcio. A informação que nos fornecer será guardada e usada para os propósitos do projeto OptimaSteel. Os dados recolhidos no estudo serão identificados por um código alfanumérico, pelo que não contém informação que o identifique diretamente, somente a equipa médica e de recursos humanos da PSA terão a informação necessária para relacionar os seus dados de saúde à sua pessoa.

A sua identidade não será divulgada a nenhuma pessoa exterior à PSA, excetuando num evento de emergência médica, como salvaguardado por lei.

O processamento, divulgação e transferência dos dados pessoais de todos os participantes cumprirão com o previsto na Regulação Geral para a Proteção de Dados (RGPD).

Armazenamento de Dados

Os dados recolhidos no âmbito do projeto OptimaSteel serão anonimizados e armazenados por 5 anos, a contar a partir do final do projeto. Estes dados podem ser disponibilizados para fins exclusivamente científicos.

No caso da recolha de dados acontecer em formato de papel, esses documentos serão guardados num armário seguro, fora do alcance de pessoas externas ao projeto.

No caso da recolha de dado acontecer em formato eletrónico, serão protegidos para evitar o seu acesso por pessoas externas ao projeto.

- Dados partilhados e armazenados em *emails*, devem ser protegidos como palavras passe fortes, que serão alteradas regularmente e nunca partilhadas.
- Dados partilhados e armazenados na Microsoft OneDrive®, o acesso é limitado aos parceiros do consórcio OptimaSteel, e a Microsoft OneDrive®, é protegida por *software* e *firewall* aprovados.
- Dados não devem ser mantidos em *laptops*, dispositivos móveis nem *tablets*.

Segurança dos Dados

Como medidas de segurança nós iremos usar ferramentas de autenticação, encriptação, e digitais aprovadas e certificadas de modo a proteger a segurança, integridade e disponibilidade de toda a informação recolhida no âmbito do projeto OptimaSteel.

Partilha dos resultados



É expetável que os resultados do projeto OptimaSteel sejam publicados em revistas e relatórios científicos.

Os resultados finais do projeto serão incluídos em relatórios para a Comissão Europeia, conferências e *workshops*, e usados em materiais de comunicação.

Quem contatar

Caso tenha alguma questão em relação ao projeto OptimaSteel, ou à informação disponibilizada neste documento, não hesite em contatar a INOVA+: +351 962 642 322

O responsável pela proteção dos dados: Pedro Castro, dpo@inova.business, phone: +351 229 397 130 / +351 936 494 726

E os gestores do projeto OptimaSteel: Mariana Santos, mariana.santos@inova.business e Carolina Carli, carolina.carli@inova.business, telefone: +351 229 397 130

Parte 2: Secção do Consentimento informado



OptimaSteel is funded by the Research Fund for Coal and Steel (RFCS-2018) for the European Commission under Grant Agreement No [839990].

Confirmação

Eu, que abaixo-assino, confirmo que (<i>por favor, selecione Sim / Não</i>):	Sim	Não
Eu li e entendi a informação do projeto OptimaSteel, fornecida na Secção Informativa.		
Foi-me dada a oportunidade de colocar questões sobre o projeto e sobre a minha participação.		
Voluntariamente aceito participar neste projeto.		
Eu entendo que posso desistir de participar neste projeto a qualquer momento sem providenciar qualquer justificação para o fazer, e que não serei de maneira alguma penalizado por o fazer, nem serei questionado quanto aos meus motivos. Caso desista de participar no projeto, eu informarei de imediato os contactos mencionados acima do Pedro Castro e das gestoras do projeto.		
Eu entendo que tenho o direito de pedir toda e qualquer informação recolhida sobre mim, ou fornecida por mim, a qualquer momento e destruí-la sem providenciar qualquer justificação.		
Os procedimentos acerca da confidencialidade dos meus dados foram-me explicados convenientemente.		
A partilha dos meus dados, sua disseminação, e uso em publicações científicas, foi-me explicado.		
Eu dou consentimento para o uso dos meus dados e informação recolhidos no projeto OptimaSteel.		



Participante

Nome:		
Eu confirmo ter mais de 18 anos de idade	Sim	Não
	<input type="checkbox"/>	<input type="checkbox"/>
Por favor tenha a liberdade de comentar e providenciar quais notas ou preocupações que tenha acerca da sua privacidade e direitos ao participar neste projeto OptimaSteel:		
Data:		
Assinatura:		

Responsável por parte do projeto OptimaSteel

Nome:
Data:
Assinatura: