



 Project 101120713 LIFE22-CET-LIFE ReHABITA

Data Management Plan

DMP

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1. Introduction

This **Data Management Plan** outlines the strategies and protocols for the responsible collection, storage, and use of sensitive data in the context of addressing energy poverty among citizens. This document has been created based on the Horizon 2020 FAIR Data Management Plan (DMP) template, which is also applicable to LIFE Clean Energy Transition projects.

The LIFE ReHABITA project outputs complies with the FAIR data management concept, which requires that the project data should be 'FAIR', meaning: Findable, Accessible, Interoperable, and Re-usable. These principles precede implementation choices and do not necessarily suggest any specific technology, standard, or implementation-solution. The DMP is not intended as a strict technical implementation of the FAIR principles; it is inspired by FAIR as a general concept.

The LIFE ReHABITA project aims to gather information to address energy poverty at local level, and even at household level, including personal details such as names, ages, professions, education levels, income, energy bill expenses, and addresses, from individuals facing energy poverty. The collection and handling of such data demand meticulous attention to privacy, security, and ethical considerations to ensure compliance with relevant regulations and safeguard the rights of participants.

The overarching goal of this DMP is to establish robust procedures that facilitate the ethical and efficient management of sensitive data. These protocols will not only encompass data collection but will also address storage, access, sharing, and eventual disposal, prioritizing transparency and confidentiality throughout the project's lifecycle. This plan serves as a guideline for project personnel, emphasizing the importance of respecting individual privacy rights while striving to derive valuable insights to combat energy poverty effectively.

2. Data Summary

The LIFE ReHABITA project has a two-fold objective: firstly, to gain an in-depth understanding of the complex factors that contribute to energy poverty among citizens and, secondly, to align this understanding with the project's overall objectives focused on alleviating energy poverty through the energy renovation of dwellings.

Regarding **data collection**, the project will gather diverse data types, including demographic information (such as names, ages, professions, education levels), financial details (income, expenses on energy bills), and residential data (addresses).

In this context, the European General Data Protection Regulation (Directive 95/46/EC) mentions that the most sensitive data to be considered is:

- personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs,
- trade union membership,
- genetic data, biometric data processed solely for the purpose of identifying a human being,
- data concerning health,
- data concerning a person's sex life or sexual orientation.

Therefore, the LIFE ReHABITA project will this type of data, as they are not considered decisive for the type of assessment to be carried out.

The project data will primarily be collected in digital formats through surveys, interviews, and potentially through utility providers' records. Data will be mainly processed in XLSX, CSV, PDF or Word DOCX formats in order to ensure compatibility with as many software as possible.

Although the project mainly focuses on the collection of new data, additional information related to the fuel poverty or general poverty situation in their municipalities may be available to municipalities. This **reuse of data** can also serve as a reference to extend the baseline of the project in strict compliance with the ethical and privacy guidelines of this DMP.

The collected data will be very useful for multiple stakeholders beyond the project scope, including policymakers, energy regulatory bodies, non-governmental organizations and community support groups. To this end, the data will be aggregated so that anonymity is ensured. The knowledge derived will help to create local roadmaps, make informed decisions, formulate policies and allocate targeted resources to effectively combat energy poverty.

As for the **data generation**, the project will produce data which will be published on the project webpages, the project deliverables and communication and dissemination materials.

Data collection directly involves citizen participation in surveys or interviews, with an expected data size of approximately 15 Gigabytes.

Finally, the ethical handling and careful analysis of this data will be imperative, ensuring that it contributes to understand and alleviate the challenges faced by people struggling with energy poverty.

In this regard, we have identified two main categories of dataset that will be produced during the implementation of the LIFE ReHABITA project.

2.1. Vulnerable citizens information

Within Work Package 2 (Local Energy Poverty Assessment), each municipality, with the support of its social services, will carry out a local analysis of the incidence of energy poverty (EP). For this purpose, the local social services will survey the vulnerable citizens of the project neighbourhoods, where at least the following information will

be collected: vulnerability of the residents, characteristics and condition of the building, existence and/or efficiency of air-conditioning and heating systems, tenancy status of the dwelling, willingness of owners to implement energy renovations and energy saving potential of the building. Citizens will also be asked about information on their economic situation, including income, amounts of energy bills, education levels, employment status, etc.

In addition, during Work Package 3, the engagement of citizens in the renovation works will be implemented. To this end, local social services will seek the active involvement of vulnerable families in the project by offering them the services of the ReHABITA Offices. Social services or technical personnel at the ReHABITA Offices will gather details such as names, addresses, income, energy consumption, employment status, and other pertinent information required to apply for available funding for energy-efficient renovations.

Thus, the main data outputs of this set will be:

- Online and face-to-face questionnaires
- Interview recordings and notes
- Workshop recordings, minutes and pictures

If surveys are conducted anonymously, without reference to personal data, the General Data Protection Regulation (GDPR) does not apply.

However, it may be useful for the social services of the municipalities to know the personal information of the respondents in order to identify any episode of energy poverty. In this case, prior the collection of any information, citizens will be informed about their rights and about the obligations of those who will process their personal data so that they can give their informed consent. If they agree with these terms, they can continue with the survey. If they do not consent, they can easily be sent to the end of the questionnaire where they will be thanked for their time. This information must be kept confidential by the social services of the municipalities and under no circumstances may it be shared with any other member of the LIFE ReHABITA consortium.

The data - including interview recordings, notes, questionnaire responses and comments from workshops - will be stored in accordance with national data protection requirements and we will ensure that no identifiable data will be stored longer than required.

After the completion of the LIFE ReHABITA project, all this data will be destroyed.

2.2. Stakeholders engagement

Work Package 2 envisages the co-creation of a collaborative roadmap to address energy poverty at local level. To this end, the main local stakeholders, which are representatives of the civil society, the construction and renovation sector, the

economic and financial sector and professional and civic associations will be invited to participate in workshops to design the roadmaps.

In addition, the Work Package 5 will also engage local stakeholders for the updating of SECAPs with the new 2030 and 2050 objectives through different co-creation workshops. This Work Package will also involve key stakeholders in the definition of policy recommendations at local, regional or even national level to address energy poverty at different levels.

During these workshops, personnel information of the stakeholders will be collected, such as name, phone number or email, as well as their contributions during the workshops. Thus, the main data outputs of the stakeholders engagement will be:

- Workshop recordings, minutes and pictures
- Registration and attendance lists.

The personal information of stakeholders will not be shared under any circumstance and will only be kept for organisational purpose. This information won't be shared with any member of the LIFE ReHABITA consortium.

Again, prior the beginning of the workshops, stakeholders will be informed about their rights and about the obligations of those who will process their personal data so that they give their informed consent.

All the data will be stored in accordance with national data protection requirements and we will ensure that no identifiable data will be stored longer than required. After the completion of the research the data will be destroyed.

3. FAIR data

3.1. Making data findable, including provisions for metadata

The data produced and utilized within the project will be structured to ensure discoverability and traceability through standardized identification mechanisms.

The documents naming will be as follows:

[YYYYMMDD]_LIFEReHABITA_[Doc Name]_[Responsible Partner]_v[n° version].[document format]

For example, the name of the first version of the DMP is:

20231219_LIFEReHABITA_D11_EV_v1.pdf

Document filenames are kept short to avoid unnecessarily long paths, always include the last partner to edit the document, and a version indicator.

All project documentation is stored in a dedicated Google Drive that will enable full control over editing permissions of project participators. No metadata is expected to be generated.

3.2. Making data openly accessible

The information collected by the municipality's social services on people experiencing energy poverty will be shared mostly openly and anonymously for the project consortium. However, some data may have legal restrictions due to privacy regulations or voluntary restrictions, such as ethical considerations or contractual agreements with specific beneficiaries.

The final data, deliverables, and project documentation to support published outcomes are deposited in a dedicated repository that EV, the data management responsible, has established.

In situations where there are restrictions on the use of the data, access will be granted under conditions set out in specific licences of use. Identification verification protocols will be implemented for those accessing the data, using secure authentication methods. This strategy seeks to balance open access with necessary restrictions, ensuring secure and facilitated access to valuable data and complying with legal, ethical and contractual obligations.

3.3. Making data interoperable

The data produced in this project will be structured to ensure high levels of interoperability, allowing exchange and re-use across project partners. We prioritize adherence to established standards for data formats and compatibility with available open-source software applications to maximize accessibility and reusability.

During the project, all partners will collect and generate data for a successful implementation. Nevertheless, no large volumes of data and metadata are expected. The generated and collected data is included in the project deliverables and reports. In order to ensure good interoperability, XLSX, CSV, PDF or Word DOCX formats will be used. The public deliverables and other relevant project results will be accessible on the project's official website.

3.4. Increase data re-use (through clarifying licences)

During the project implementation, the data quality assurance process is organised by EV, the partner responsible for data management) who searches for inconsistencies and other anomalies in the data and the project Google Drive folder.

After project implementation, EuroVértice (EV) will ensure that the relevant public data is available for 5 years. In the repository which will contain this information, licenses and access conditions will be established.

4. Allocation of resources

The costs of the project Google Drive will be free until the expected 15 GB. In case of a need of more space, an upgraded Google Drive plan will be contracted. This will have a cost of around 24€ per year which will be assumed by the Data Management responsible (EV).

The project coordinator is responsible for data. Everyday workflow tasks are delegated, but the PC ensures that consistent data management is performed along with project execution. In addition, the PC conducts six monthly reviews on the use of controlled vocabulary, file naming and versioning conventions and that the organizational logic of the Google Drive site is adequate.

Furthermore, the PC is also the responsible for data management during and after the project ends for at least 5 years. Public deliverables and other key reports (in case they exist) will be public. In case any document, scientific article, prototype, or any other outcome are not fully public, the General Assembly will decide which parts should be public.

5. Data security

5.1 Data usage by project partners and stakeholders

Technical Partners:

The LIFE ReHABITA technical partners may need access to specific datasets essential for collaborative actions. This access will always be framed on the project's requirements, ensuring that pertinent data is available for mutual benefit. Any sensitive information shared with technical partners will be handled under strict confidentiality protocols.

Stakeholders:

Stakeholders will primarily interact with aggregated datasets to obtain project information or assess its results. It is imperative to note that stakeholders will not have access to sensitive or individualized information. The dissemination of data to stakeholders will be organised to present aggregated findings that maintain anonymity and confidentiality of sensitive information.

5.2 Data Security Policies in LIFE ReHABITA Project

Access to project documentation and data is only available to those who have access to the project's Google Drive. This access is determined by the Project Coordinator and implemented by EV staff.

All LIFE ReHABITA data is collected, stored, protected, and shared, upholding security measures and in full compliance with relevant EU legislation. This data is not disclosed to anyone outside the research team until the data has been finalised for publication and approved for release by the project consortium.

As stated, EV will store all the project relevant data for at least 5 years after the end of the project. This will ensure that funder, institutional or publisher retention compliance is satisfied, as is the authenticity of the original data for open data requirements or post research review if necessary.

5.3 LIFE ReHABITA vulnerable citizens' Personal Data

Only data strictly necessary for running the project activities is collected and processed.

Personal data will be collected and stored by the project municipalities following the General Data Protection Regulation, and will always be anonymized and/or aggregated before sharing it with the project consortium.

This information will be irrevocably erased after the project completion.

Nevertheless, only if an individual participant has provided their free informed consent, name, age, professional occupation, and professional views this data is included in project outputs. If such a consent is not provided by the individual participant, only information that may be processed in a way that inhibits tracing their opinions back to him/her (anonymised information) is part of the activities.

5.4 Data Anonymization

The aim of data anonymization is that personal data could not be identified or attributed to a natural person without the use of additional information. In the case of the project activities, data anonymization takes part when it is requested by the participant, and when it is necessary for the results of the activities to be reliable.

6. Ethical aspects

Ethical and legal considerations play a pivotal role in data sharing, especially concerning the sensitive nature of personal data related to individuals in energy poverty. The impact of these considerations on data sharing revolves around ensuring compliance with privacy regulations and ethical standards.

Any personal data gathering within the project conformed to informed consent expectations that are expected with regard to current Data Protection legislation, and the EU General Data Protection Regulation (GDPR) that started to implement on 25th May 2018.

In the questionnaires dealing with personal data, explicit provisions for informed consent regarding data sharing and long-term preservation have been included. Participants are informed about the project's data sharing policies, including the anonymization and aggregation processes for protecting their identities. This informed consent ensures that participants are fully aware of how their data will be shared and preserved, granting them the opportunity to provide or withhold consent for these purposes.

By incorporating informed consent mechanisms into the questionnaires and addressing ethical and legal concerns within the project's framework, we aim to ensure that data sharing practices adhere to rigorous ethical standards while facilitating valuable insights for combating energy poverty.

If during participatory activities personal data or photos are taken, consent forms are produced for participants. The consent forms are adapted to the specific activities and national context.

When written informed consent was not proportionated to the participants, verbal consent was solicited, and anonymization of the data was carried out when requested.

All the ethics issues are treated in the Steering Committee meetings, including data management ones.