Ethics requirements

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WP8 Project Management

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CC, MK, TK, FM (NTUA), PB (AIJU)	ES, VS, CC (NTUA)

Disclaimer of warranties

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Executive Summary

This deliverable refers to Task 8.4 which deals with the 'ethics requirements' that the project must comply with:

- Humans
- Personal data
- Non-EU countries and Third Countries
- Environment, health and safety

The project involves human participants, namely potential users, children and parents, operators, suppliers and stakeholders will participate in interviews, sessions, workshops, questionnaires and trainings that will be performed during the project, as described in the Grant Agreement (GA). A description of the measures that will be implemented to safeguard personal data from stakeholders/experts, such as details on: i) informed consent form template and procedures, ii) data protection policy; and iii) security measures to prevent unauthorized access to personal data has been reported. Special consideration has been given to the activities involving the participation of children, and the collection and/or processing of personal data.

Furthermore, activities taking place in non-EU countries by PRecycling beneficiaries, within the project have been reported.

Moreover, possible health and safety issues raised in the demo-cases in WP5 have been considered. Different recycling, manufacturing and characterization processes are followed by PRecycling partners, and a variety of plastic (waste) materials and additives are being used. Partners involved in manufacturing processes and in material handling activities ensure that the appropriate health and safety procedures conform to relevant local/national guidelines/legislation for staff involved in this project. All partners provided information regarding the measures taken to mitigate potential risks, related to the work conducted within PRecycling project.

Finally, initially identified artificial intelligence that will be used in the research for improving plastic waste-sorting doesn't raise ethical concerns related to human rights and values and any additional ethics issues that may emerge during the project implementation.

The beneficiaries from consortium have ensured that all ethics issues related to activities in the project are addressed in compliance with ethical principles, the applicable international and national law, and the provisions set out in the Grant Agreement. This includes all above stated and any additional ethics issues that may emerge during the project implementation. Compliance with the ethics standards of Horizon Europe will be guaranteed at all times.

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LIST OF ABBREVIATIONS AND ACRONYMS

CA – Consortium Agreement
D – Deliverable
DoA – Description of Action
DPO – Data Protection Officer
DMP – Data Management Plan
EC – European Commission
EuPC – European Plastics Converters
FP – Framework Programme
GA – Grant Agreement
GDPR – General Data Protection Regulation
IPR – Intellectual Property Right
PC – Project Coordinator
PWS – Plastic waste streams
SME – Small and Medium Enterprise
WP – Work package

1. INTRODUCTION – ETHICS REQUIREMENTS

The ethics issues that have been raised by the European Commission (EC) as relevant to PRecycling project, regarding participation of humans, protection of personal data, third countries involvement and environmental protection and safety are addressed in present repot - D8.3 - within WP8, namely:

- Humans: the proposal envisages social engagement through active collaboration and the empowerment of people and communities to take part actively to the targets of PRecycling for circular plastic transition, including active collaboration with parents and children through the direct access to "toys spots" for recycling. The inclusive design methodology and recycle-play-recycle methods will be adopted. Living Labs will act as an interface for involving parents and children, interviews and non-formal education gamified workshop designed for children (and their families) and different type of actions (workshops, exhibitions, gamification activities) are planned, as well as a PRecycling engagement toolkit will be prepared (T7.4).
- Personal data: personal data will be collected and/or processed in relation to the social engagement activities, but also as regards the conferences, social medial, workshops and other dissemination activities.
- Third Countries: the Consortium comprises partners from Norway and Turkey.
- Environment, Health and Safety: During the demonstrations some potentially hazardous and/or toxic substances (e.g. halogenated and inorganic FRs) will be removed from the streams to prevent their entering into the circular plastics system. The Process Hazard Analysis (PHA) will be applied. Such removal might raise environmental and safety risks.

Artificial intelligence, identified at the beginning of the project, will be used in the research for improving plastic waste-sorting, thus this use doesn't raise ethical concerns related to human rights and values.

1.1 HUMANS

PRecycling has to comply with recruitment procedures and criteria, and to manage in a proper manner the informed consent procedures implemented for the recruitment of humans and their participation. For this purpose, information sheets and informed consent forms will be provided to all the participants (templates available in Annex), in addition to the consortium members, end-users and other relevant stakeholders such as attendees to events, workshops, trainees, speakers or contacts for clustering activities will collaborate also in the project, so their participation should be managed in a proper manner. To ensure that the data will be kept secure, in PRecycling project, a process will be implemented to protect personal data (Privacy by design), and verify GDPR on «confidentiality, integrity, availability» of the data. These measures will be reported in the deliverable D8.2 of the Data Management Plan, in a specific section dedicated to Human ethics requirements.

This document provides detailed information on consent procedures that will be implemented for participation of humans in the PRecycling project. More specifically, human participation is identified in Task 1.4 and Task 7.5 which deal with the networking activities, contacts and interview to obtain all information needed for the final definition of recyclate and more specially in Task 7.4 which deals with engagement of society (families and children). Dissemination events with stakeholders' participation will also take place under WP7.

1.1.1 Work with children at AIJU

Every study involving children that will be carried out by AIJU will comply with ethics principles and with applicable international, European and national law. The researcher will ensure the respect for

people and for human dignity, fair distribution of research benefits, and the protection of the values, rights and interests of the research participants. Research in the field of social sciences and humanities often involves working with human participants and particular methodological tools (e.g., surveys, questionnaires, interviews, standardised tests, direct observation, ethnography, recordings, experiments with volunteers and whether these include physical interventions).

It will be ensured that research methodologies do not result in discriminatory practices or unfair treatment. As a general principle, benefits will be maximised and harm/risks minimised.

Prior to starting research with humans, the researcher will need to obtain:

- The necessary ethics approvals (if required)
- Free and fully informed consent of the research participants

For each research conducted by AIJU, International Code on Market, Opinion and Social Research and Data Analytics (2016) will be followed. Its key points can be summarised as follows:

1. When research purposes involve the collection of personal data, researchers must be clear about what information they intend to store, the purpose of its collection, and to whom and how it will be communicated.

2. Researchers must protect the personal data used, ensuring that no one can access them without authorization and that they will not be disclosed without the consent of the data subject.

3. Researchers will follow ethics conduct and will not act in any way that could harm data subjects or affect the reputation of market, opinion, and social research.

Research will also abide by "Ethics for research, facilitating research excellence in FP7" document (EC, 2013)[1], with its twelve golden rules for ethical research:

1. Respects the integrity and dignity of persons (this intrinsic worth protects them from being used for greater perceived benefits).
2. Follows the "Do no harm" principle. Any risks must be clearly communicated to the subjects involved.
3. Recognizes the rights of individuals to privacy, personal data protection and freedom of movement.
4. Honors the requirement of informed consent and ongoing dialogue with research subjects.
5. Respects the principle of proportionality: not imposing more than is necessary on your subjects or going beyond stated objectives (mission creep).
6. Treats societal concerns seriously - a researcher's first obligation is to listen to the public and engage with them in constructive dialogue, transparently, honestly and with integrity.
7. Tries to prevent open availability of data for misuse or malign dual use by terrorists or military organisations
8. Recognises the wholeness of an individual and ensure that any modification (genetic or technological) does not interfere with this principle.
9. Respects biodiversity and does not impose irreversible change that threatens the environment or ecological balance.
10. Be based on the understanding that any benefit is for the good of society and that any widely shared expressions of concern about threats from your research must be considered (with the acceptance that perhaps certain research practices might have to be abandoned).

[1] European Commission. (2013). *Ethics for researchers. Facilitating Research Excellence in FP7*. Directorate-General for Research and Innovation. Available at http://ec.europa.eu/research/participants/data/ref/fp7/89888/ethics-for-researchers_en.pdf

In addition, it will be considered that research with children respects their recognized rights in international and national regulations, collected in the United Nations human rights document included in the United Nations Convention on the Rights of the Child. Next, a comparative table prepared by Enew & Plateau (2004) is showed detailing the basic aspects to be considered to ensure the rights of children in research, based on four articles of the United Nations Convention on the Rights of the Child with an ethical research strategy:

Table 1 Correspondence between United Convention on the Rights of the Child Articles and research principles

Main article of the UN Convention on the Rights of the Child	Connection with research
Article 3 3. States Parties shall ensure that the institutions, services and facilities responsible for the care or protection of children shall conform with the standards established by competent authorities, particularly in the areas of safety, health, in the number and suitability of their staff, as well as competent supervision.	▪ Research must conform to the highest possible scientific standards. ▪ Researchers must be carefully recruited and supervised.
Article 12 1. States Parties shall assure to the child who is capable of forming his or her own views the right to express those views freely in all matters affecting the child, the views of the child being given due weight in accordance with the age and maturity of the child.	▪ Children's perspectives and opinions must be integral to research.
Article 13 1. The child shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of the child's choice	▪ Methods need to be found, and used, to help children to express their perspectives and opinions freely in research.
Article 36 protects children against all…forms of exploitation prejudicial to any aspects of the child's welfare	▪ Children must not be harmed or exploited by taking part in the research.

Source: Ennew & Plateau (2004, p. 29).

1.2 PERSONAL DATA

1.2.1 Definition and ethical issues

For the sake of clarity, a definition of personal data derived from regulation GDPR/2016/679 is given here in relation to the aims of the project: according to GDPR/2016/679 "personal data" are defined as "any information which are related to an identified or identifiable natural person"[2]. However, personal data may include special categories. Special categories are:

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Processing of genetic data;
- Biometric data;
- Health data;
- Sex life or sexual orientation

Processing of data from the special categories is prohibited unless there is consent and other provisions identified in Art. 9.1 of GDPR[3]. The project does not anticipate the collection of data from

[2] GDPR/2016/67: https://gdpr-info.eu/art-4-gdpr/

[3] Processing of special categories of personal data: https://gdpr-info.eu/art-9-gdpr/

the special categories. Researchers will only collect data after explicit and written consent has been given by the participants. The process of informed consent is laid out in this document in the subsequent chapters.

The ethical issues under this requirement are relevant to the collection of personal data and processing, identified in activities under Tasks 7.1 and 7.4 such as social engagement activities, conferences, social media, workshops and other dissemination activities.

1.2.2 Personal data – work with children

Every study involving children that will be carried out by AIJU will comply with ethics principles and with applicable international, European and national law. The researcher will ensure the respect for people and for human dignity, fair distribution of research benefits, and the protection of the values, rights and interests of the research participants.

It should be mentioned that research involving children will only be carried out if it is the only way, or the most appropriate way, to obtain the information needed for the project, and also only if:

- Studies with adults would not be effective
- There is only minimal risk to the participants
- The results of the research will benefit the individual or the group represented by the participants

1.3 NON-EU COUNTRIES

The ethical issues under this requirement are related to the participation of non-EU countries in PRecycling project and the potential exchange of materials between the partners from EU and non-EU countries. As relevant partners to these activities ARCELIK from Turkey and NTNU from Norway have been identified. The potential exchange of goods between ARCELIK, NTNU and other partners from EU countries as well as the practices that will be followed for each case are reported in this deliverable.

1.4 ENVIRONMENT, HEALTH AND SAFETY

The ethics issues have been raised by the European Commission (EC) regarding environmental protection and safety: during the demonstrations some potentially hazardous and/or toxic substances (e.g. halogenated and inorganic FRs) will be removed from the streams to prevent their entering into the circular plastic systems (Task 2.3, Task 2.4). The Process Hazard analysis (PHA) will be applied.

In particular, PRecycling material handling, processing and manufacturing will be performed by a number of partners (WP2, WP3, WP5). The partners have to demonstrate that appropriate health and safety procedures conforming to relevant local/national guidelines/legislation are followed for staff involved in this project. Respective template documents are included Annex XI and XII.

Among other activities, in order to promote safe by design and occupational risk assessment, partner IRES will perform safety-related sessions to the partners involved in R&D activities, according to each case characteristics. A dedicated questionnaire to issues relevant to environmental protection and safety with focus to the handling of PWS, additives and finally recyclates will be compiled and distributed to all partners in order to identify if appropriate health and safety procedures conform to relevant local/national guidelines/legislation are followed.

The abovementioned requirements are addressed below in Section 3 and methodology for their assessment in Section 2.

2. METHODOLOGY

This section describes the methodological process carried out to obtain the necessary information covering the objectives and details the procedures and criteria used in PRecycling regarding humans, data protection and privacy/personal information, as well as regarding potential exchange of materials between EU and Non-EU countries and Environment, health and safety issues.

2.1. HUMANS AND PERSONAL DATA PROTECTION

2.1.1. Desk research

The Desk Research methodology is part of market research and involves the collection and analysis of data from secondary sources, i.e. information previously published by others. It is based on documentary sources, both internal and external, web pages, books, magazines, media, blogs, articles, studies and reports published by various organisations. Its purpose is to obtain a better knowledge of the subject of the project. The sources consulted in this Desk Research are shown in Table 2.

Table 2 Sources consulted for the procedures elaboration and criteria used to identify and recruit research participants

	Source
Directives and regulations	- REGULATION (EU) 2016/679 of the European Parliament and of the Council of 27 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)
Standards	- ESOMAR. (2009). *World research codes and guidelines. Passive data collection, observation and recording*. - ESOMAR. (1999). *World research Codes & Guidelines. Interviewing children and young people*. Latest reprint: 2009. - ICC/ESOMAR. (2016). *ICC/ESOMAR International Code on Market, Opinion and Social Research and Data Analytics*. - ESOMAR. (2018). *Guideline on Research and Data Analytics with Children, Young People, and Other Vulnerable Individuals*. - Ley 26/2015, de 28 de julio, de modificación del sistema de protección a la infancia y a la adolescencia. *Boletín Oficial del Estado*, 29-07-2015, 180, 64544- 64613. https://www.boe.es/boe/dias/2015/07/29/pdfs/BOE-A-2015-8470.pdf - Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales. *Boletín Oficial del Estado*, 6-12-2018, 294, 119788-119857. https://www.boe.es/eli/es/lo/2018/12/05/3/dof/spa/pdf - DIN 66399. Regulation regarding the seven safety levels of paper shredders.

	Source
Publications	- Castro, A., Ezquerra, P., & Argos, J. (2011). Dando voz y protagonismo a la infancia en los procesos de investigación e innovación educativos. *Fuentes*, (11), 107-123. - Ennew, J., & Plateau, D.P. (2004). *How to research the physical and emotional punishment of children*. International Save the Children Southeast, East Asia and Pacific Region Alliance. - European Comission. (2021). *EU Grants: How to complete your ethics self-assessment*. - European Commission. (2013). *Ethics for researchers. Facilitating Research Excellence in FP7*. Directorate-General for Research and Innovation. - Graham, A., Powell, M., Taylor, N., Anderson, D., & Fitzgerald, R. (2013). *Ethical Research Involving Children*. UNICEF Office of Research Innocenti. - Keeping Children Safe. (2020). *Keeping Children Safe. Setting tough international child safeguarding standards*. - UNICEF. (2016). *The United Nations Convention on the Rights of the Child*. https://www.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf

2.1.2. Expert Analysis

The aim of an expert panel is to achieve a balanced utilisation of information and expertise from several disciplines in decision-making including probabilistic safety assessment as one decision criterion. In this project, after reviewing all the documentation and needs of research with children, the group of experts has agreed on the different aspects to consider in order to take into account all the pertinent ethical aspects and forms of action, which are summarized in this document.

2.1.3. Informed consent. No coercion on participants. Understanding of the implications of participation.

The informed consent is meant to guarantee the voluntary participation in research and is probably the most important procedure to address privacy issues in research. Informed consent consists of four components: adequate information, voluntariness, competence, and comprehension. Informed consent is required when:

- The research involves the participation of human beings.
- The research uses human genetic material or biological samples.
- The research involves personal data collection.

When requesting permission to carry out an interview, sufficient information must be given to the person responsible for the child so that they are able to make a considered decision about giving such permission. Where it is not practicable for that person to see or hear the actual questions to be asked, the subject and general nature of the interview must be explained, together with an explanation of any potentially sensitive or embarrassing questions, etc. The identity of the person giving the permission for the interview should be noted.

The participation of the persons involved in the research with humans must be entirely voluntary and their informed consent will be obtained in advance (and clearly documented). All the information that appears must be in the language and in terms that are completely understandable to them. Ensuring that the participant has fully understood the information and does not feel pressured or obligated to give their consent. In this way, it is ensured that the participation of all the people involved in the research will be completely voluntary.

Participants must be provided with an “informed consent form” and detailed “information sheets”. The main points that the informed consent of AIJU will cover are:

- Explanation of the purpose of the research.
- Expected duration of the interview.
- A statement that participation is voluntary.
- Information about who is organising and funding the research.

- A description of any reasonably foreseeable risk, discomfort or disadvantage.
- A description of any benefits to the subject or to others which may reasonably be expected from the research avoiding inappropriate expectations.
- A description of the procedures adopted for ensuring data protection, confidentiality, and privacy.
- A reference of whom to contact for answers to pertinent questions about the research.
- The opportunity to ask questions and to withdraw at any time from the research, without consequences.
- Information about what will happen to the results of the research.

2.1.4. Details on child assent procedures and parental consent. Approval from guardians/ legal representative

If any research carried out by AIJU involves children, the researcher will clearly inform the parents or legal guardians about the benefits, risks and tasks related to the child's participation in the study. They will be asked for their consent, and they will also be allowed to monitor the research. It should be noted that the definition of legal representative must be in accordance with the legislation of the host country.

Whenever a child is able to provide assent, this assent is required. The non-conformity of both the legal representative and the participating child is respected. Researchers should avoid exerting any pressure on the child or his/her parents that would lead the child to participate in the research.

In addition, when the minor child can demonstrate his/her capacity to express an opinion and give his/her consent, the researcher must also obtain that consent in writing, taking due account of his/her opinion. In the specific case of Spain, according to *Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales*, the processing of data of a minor may only be accepted when they are over fourteen years. Except for those cases, the law requires the assistance of the holders of parental authority or guardianship for the celebration of the legal act or business.

Finally, when data collection occurs within a protected area or environment, such as a school or early childhood education center, (where some person in authority has overall responsibility) researchers must obtain the consent of the owners and/or managers overseeing that location before it is used for undertaking research with children. Thereafter consent must be obtained from specific individuals who have responsibility for children (the 'responsible adult') within a protected environment before any children are approached.

When seeking consent, researchers must provide sufficient information about the nature of the research project to enable responsible adults to make an informed decision about the child's participation. As ESOMAR Guideline on Research and Data Analytics with Children, Young People, and Other Vulnerable Individuals (2018) points out, the information provided will need to include:

- the name and contact details of the researcher/organisation conducting the research;
- the nature of the data to be collected from the data subject, including reference to any data that might be considered sensitive or not age appropriate;
- an explanation of how the data will be protected and used;
- an explanation of the reasons the child has been asked to participate and the likely benefits or potential impacts;
- an outline of kinds of activities that might be undertaken (e.g., product testing);
- a description of any incentive being offered;
- a description of the procedure for giving and verifying consent;
- a request for a responsible adult's contact address or phone number for verification of consent.

It is essential to have flexible means of providing information and consent for children, which are best adapted to their context and social and cultural circumstances. Likewise, the information sheets must be in accordance with the age of the children:

- Information for children aged five years and under should be predominantly pictorial.
- For pre-adolescents (aged up to 16) information sheets should explain briefly and in simple terms the background and aim of the study, so the child can make a considered assent. It also should contain an explanation that their parents will be asked for consent.
- If an adolescent aged 16 to 18 is no longer a minor as defined in national law, or is an "emancipated minor", then written informed consent is required from these individuals.

Finally, according to ESOMAR (2018), prior consent from the responsible adult is not required to:

- collect, the email address of a responsible adult solely to solicit consent; or
- collect a data subject's age for screening and exclusion purposes. If this screening leads to the decision that a data subject qualifies for the research, the consent of the responsible adult must be obtained before continuing.

2.1.5. Details on the age range

The age range of who is considered as a child has been established following ISO/IEC Guide 50:2014 Guidelines for child safety in standards and other specifications. The range of age is from 0 to 14 years old. In addition, ESOMAR (1999), also considered children as people "under the age of 14" and a "young person" as someone aged 14-17 years old.

2.1.6. Minor welfare

It is essential that all parties involved in the research process (researchers, clients, parents, legal guardians, and/or other responsible adults) trust that research involving children, youth, and other vulnerable people is conducted with the highest ethical standards, which take into account the safety, rights and interests of the people involved.

For this purpose, the researcher will check the following points (established by ESOMAR, 2018):

- The welfare of individual data subjects is the overriding consideration. They must not be disturbed or harmed as a direct result of participating in research, or having their data processed and analysed for a research purpose.
- Researchers must obtain the consent of the responsible adult, as well as the data subject, before collecting personal data from any child.
- The adult responsible for a data subject's well-being must be confident that the latter's safety, rights, and interests are safeguarded. Consent from a responsible adult also is required when photographing or recording children.
- Special care must be taken to ensure that neither the research topic nor questions asked are unlikely to upset the child or the responsible adult.
- The method of participation in the research must be designed to accommodate the age and cognitive abilities of data subjects. It is worth mentioning that AIJU researchers are specialized in research with boys and girls and have extensive experience in this area.
- Researchers must filter out any data likely to have originated from a child or a vulnerable adult, mask responses to ensure that data subjects cannot be identified or obtain consent from responsible adults and the data subject i.e. the child or vulnerable adult to collect and use potentially identifiable data.
- Researchers must take special care to ensure that:

- Products are safe to consume (e.g. foods, confectionery) or to handle (e.g. toys). The researcher must confirm the product's safety in writing with the supplier even when the latter may be legally liable for any adverse effects caused by the product.
- Children are unlikely to suffer from any relevant allergy (e.g. products containing nuts).
- Children and young people are not asked about or directed to do anything illegal (e.g. the under-age consumption of alcoholic products).
- Any requests from a responsible adult to avoid specific products or classes of products are complied with.

Likewise, with the purpose of ensuring the well-being of children, and in accordance with *Ley 26/2015, de 28 de julio, de modificación del sistema de protección a la infancia y a la adolescencia (BOE del 29), que modifica la Ley Orgánica 1/1996, de 15 de enero, de Protección del Menor, de modificación parcial del Código Civil y de la Ley de Enjuiciamiento Civil*, Investigators who are in contact with minors will be required to provide a negative certification from the Central Registry of Sex Offenders. As stated in article 13 of this law:

> «It will be a requirement for access and exercise to professions, trades and activities that involve regular contact with minors, not having been convicted by a final sentence for any crime against sexual freedom and indemnity, which includes sexual assault and abuse, sexual harassment, exhibitionism and sexual provocation, prostitution and sexual exploitation and corruption of minors, as well as trafficking in human beings. To this end, whoever seeks access to such professions, trades or activities must prove this circumstance by providing a negative certification from the Central Registry of sexual offenders. »

2.1.7. Justification of children's involvement

The right to participate of children and adolescents is recognized by the United Nations Convention on the Rights of the Child (UNICEF, 2016) which, in addition to enumerating a series of protection and provision rights, also recognizes the condition of children/ as well as holders of participation and decision-making rights. Specifically, it establishes several articles (12, 13, 14 and 15) that recognize the right of participation of children, and that are summarized in:

- Art. 12: The child shall be provided the opportunity to be heard in any proceedings affecting him/her.
- Art. 13: Every child has the right to seek, receive and impart information and ideas of all kinds, provided that this does not undermine the rights of others.
- Art. 14: The child has the right to freedom of thought, conscience and religion under the direction of his father and mother, and in accordance with the limitations prescribed by law.
- Art. 15: Every child has the right to freedom of association and to hold meetings, as long as this does not go against the rights of others.

When designing and planning research involving children, it must be possible to justify why children or a specific group of children are included or excluded from the research. The international project "Ethical Research involving Children" (2013), which focuses on helping researchers to carry out ethical research with children and young people, establishes that their participation should be determined based on joint reflection on various questions such as:

- whether the research will extend knowledge, and potentially influence policy and practice;
- if it is necessary to include children or if the knowledge can be obtained through other means;
- if there are sound and informed reasons for excluding children;
- if the researchers have the competence, expertise, resources and capacity needed to undertake the research involving children;

- if the research will be of benefit to the individual child participants or children as a wider social group.

The Lundy model of child participation[4]

This model was developed by academic Laura Lundy, Professor of international Children's Rights at the School of Education at the Queen's University of Belfast. Her model provides a way of conceptualizing a child's right to participation, as laid down in Article 12 of the UN Convention on the Rights of the Child (UNICEF, 2016). It is intended to focus decision-makers on the distinct, albeit interrelated, elements of the provision. The four elements have a rational chronological order: space, voice, audience, influence. More information on the model can be found in Laura Lundy's 2007 publication on child participation.

The Lundy Model (Figure 1) of Participation was prominently featured and endorsed by the Irish Department of Children and Youth Affairs in their recent National Strategy on Children and Young People's Participation in Decision-Making (2015– 2020).

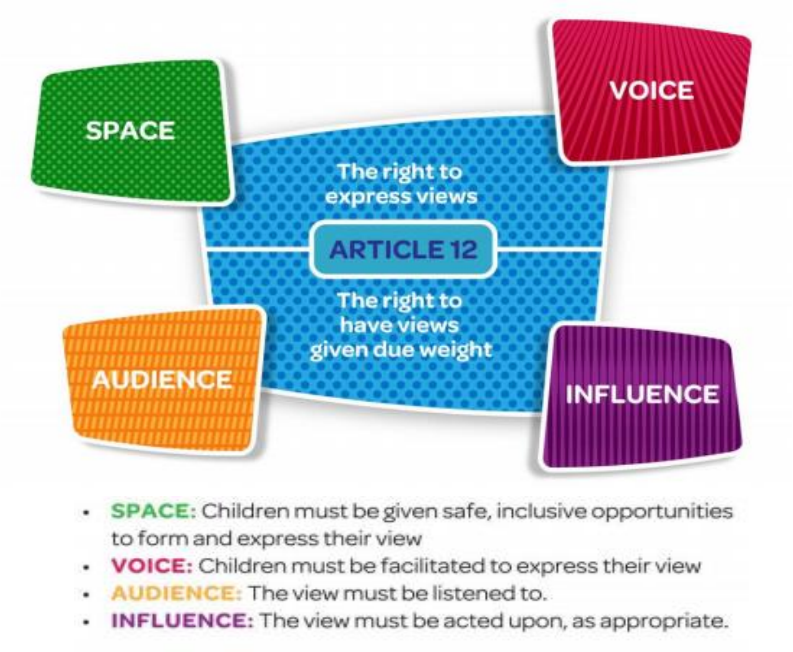


Figure 1. Lundy's Model of Participation as included in Ireland's National Strategy on Children and Young People's Participation in Decision-Making 2015-2020.

This model provides a way of conceptualizing Article 12 of UNCRC which is intended to focus educational decision-makers on the distinct, albeit interrelated, elements of the provision. The Strategy details that "this checklist aims to help organisations, working with and for children and young people, to comply with Article 12 of the UNCRC and ensure that children have the space to express their views; their voice is enabled; they have an audience for their views; and their views will have influence" (Figure 2).

[4] European Comission. (2015). *The Lundy model of child participation*. Available at: https://ec.europa.eu/info/sites/default/files/lundy_model_of_participation.pdf

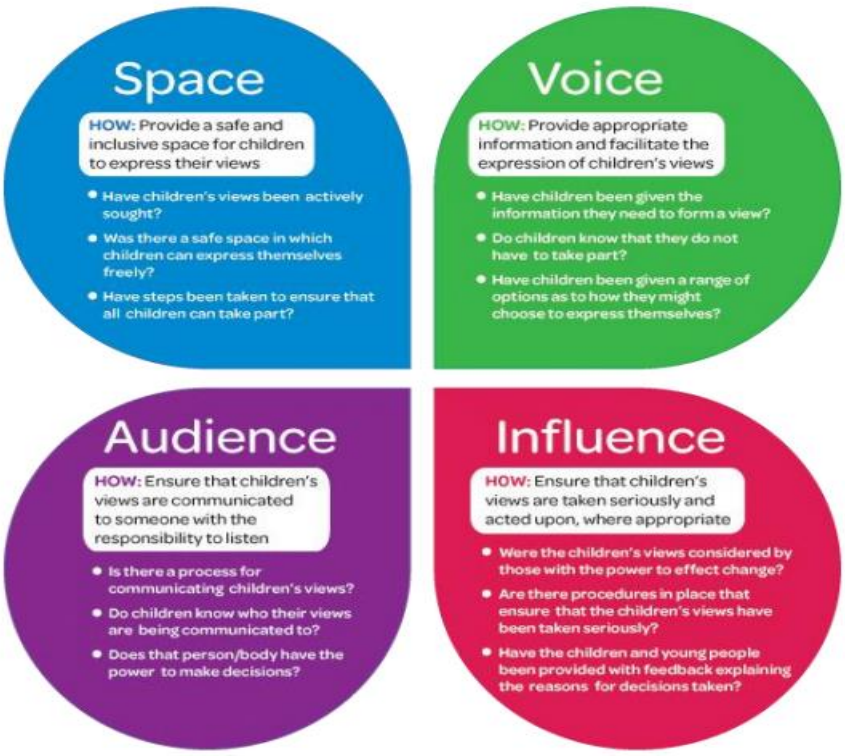


Figure 2. Lundy's voice model checklist for participation as included in Ireland's national strategy on children and young people's participation in decision-making 2015-2020

2.2. DATA PROTECTION AND PRIVACY

The responsible for the data collected in the investigation have a duty to care for them. To this end, the ICC/ESOMAR International Code (2016) states that:

- Researchers must ensure that data subjects are not harmed due to the use of their personal data for research purposes.
- Researchers must take special care when the nature of the research is sensitive or when the circumstances under which the data are collected may cause the data subjects inconvenience.
- Researchers must take into consideration that the research is based on public trust, on the integrity of the research and on the confidential treatment of the data provided. Therefore, they must exercise due diligence in distinguishing between an investigation and other non-investigative activities.
- If the researchers carry out activities unrelated to the research, for example, promotional or commercial activities directed individually at the owners of the data, these activities must be clearly separated from the research.

In line with this, below is a summary of the most important aspects of the Regulation (EU) 2016/679[5] that affects studies with children carried out by AIJU:

- The protection of natural persons in relation to the processing of personal data is a fundamental right.

[5] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

- The principles of, and rules on the protection of natural persons with regard to the processing of their personal data should, whatever their nationality or residence, respect their fundamental rights and freedoms, in particular their right to the protection of personal data.
- Consistent and homogenous application of the rules for the protection of the fundamental rights and freedoms of natural persons with regard to the processing of personal data should be ensured throughout the Union.
- The protection afforded by this Regulation should apply to natural persons, whatever their nationality or place of residence, in relation to the processing of their personal data.
- Any processing of personal data in the context of the activities of an establishment of a controller or a processor in the Union should be carried out in accordance with this Regulation, regardless of whether the processing itself takes place within the Union. Establishment implies the effective and real exercise of activity through stable arrangements. The legal form of such arrangements, whether through a branch or a subsidiary with a legal personality, is not the determining factor in that respect.
- Consent should be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the data subject's agreement to the processing of personal data relating to him or her, such as by a written statement, including by electronic means, or an oral statement.
- Children merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data. Such specific protection should, in particular, apply to the use of personal data of children for the purposes of marketing or creating personality or user profiles and the collection of personal data with regard to children when using services offered directly to a child. The consent of the holder of parental responsibility should not be necessary in the context of preventive or counselling services offered directly to a child.
- Any processing of personal data should be lawful and fair. It should be transparent to natural persons that personal data concerning them are collected, used, consulted or otherwise processed and to what extent the personal data are or will be processed. The principle of transparency requires that any information and communication relating to the processing of those personal data be easily accessible and easy to understand, and that clear and plain language be used.
- Where processing is based on the data subject's consent, the controller should be able to demonstrate that the data subject has given consent to the processing operation. In particular in the context of a written declaration on another matter, safeguards should ensure that the data subject is aware of the fact that and the extent to which consent is given. In accordance with Council Directive 93/13/EEC (10) a declaration of consent pre-formulated by the controller should be provided in an intelligible and easily accessible form, using clear and plain language and it should not contain unfair terms. For consent to be informed, the data subject should be aware at least of the identity of the controller and the purposes of the processing for which the personal data are intended. Consent should not be regarded as freely given if the data subject has no genuine or free choice or is unable to refuse or withdraw consent without detriment.
- The information in relation to the processing of personal data relating to the data subject should be given to him or her at the time of collection from the data subject, or, where the personal data are obtained from another source, within a reasonable period, depending on the circumstances of the case.

- A data subject should have the right of access to personal data which have been collected concerning him or her, and to exercise that right easily and at reasonable intervals, in order to be aware of, and verify, the lawfulness of the processing.

Laid down as principles in the Charter of Fundamental Rights and the Treaty on the Functioning of the European Union, privacy and data protection are fundamental rights which need to be protected at all times. Privacy can mean many different things in different contexts. Not all people have the same notion of the right to privacy, but most people want to maintain control over personal information and personal communications. If personal information is disclosed, it is expected this information to be treated confidentially.

Data protection is meant to guarantee the right to privacy. Data protection refers to the technical framework and security measures designed to guarantee that all personal data are safe from unforeseen, unintended or malevolent use. Data protection therefore includes both measure with regard to access to data and the conservation of data. Also measures to assure the accuracy of the data can be included in a data protection strategy. In the context of research, privacy issues arise whenever data relating to persons are collected and stored, in digital form or otherwise.

The Data Protection Directive (EU) 2016/679 contains a number of key principles for the handling of personal data. This directive provides the framework for the regulation of data protection and privacy issues in the Member States. When the collection and processing of data is part of the planned research, applicants need to identify the applicable local or national legal requirements and the competent authorities to provide the necessary authorisations. A good overview of the implementation of Data Protection Directive by the member states can be found on the website of DG Justice under 'Data Protection.' Please note that recently, the European Commission made an official proposal to amend the current Data Protection Directive, so changes in the regulatory framework are to be expected in the near future.

Furthermore, PRecycling will comply with data protection acts, directives, and opinions, at together National and European level. These include:

- The Charter of Fundamental Rights of the EU, specifically the article concerning the protection of personal data.
- Directive 95/46/EC of the European Parliament and the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement within the EU/ EEA of such data to be replaced in May 2018 by Regulation 679/2016 (the General Data Protection Regulation). The said Directive was incorporated into Greek Legislation with Law 4624/2019.
- Directive 2002/58/EC of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications) [2002] OJ L201/37, as modified by the Citizens' Rights Directive. The Directive was incorporated into Greek Legislation with Law 3471/2006.
- EU Directive 2006/24/EC of 15 March 2006 on the retention of data generated or processed in connection with the provision of publicly available electronic communications services or of public communications networks, which amended the abovementioned Directive 2002/58/EC and was incorporated into Greek Legislation with Law 3917/2011.

NTUA as the host institution and coordinator of PRecycling, holds the Ethics Committee of Research, which constitutes and operates in accordance with Law 4521/2018. Objective of Ethics Committee of Research is to examine whether a research program is conducted with respect to the value of human beings, the autonomy of the participants, their private life and personal data, as well as the natural and cultural environment. The Ethics Committee of Research is composed of five (5) regular members and their substitutes. Members of Ethics Committee of Research are scientists, specialized in subjects of research, ethics/bioethics and deontology of research. For the data protection issues, there is a

dedicated person devoted to this role, the Data Protection Officer (DPO). The designated DPO will ensure that all personal data collection and processing will be carried out according to EU and national legislations. The contact details of the DPO are available to all data subjects involved in the research:

N.T.U.A. ETHICS RESEARCH COMMITTEE
HEROON POLYTEHNEIOU 9, POLITEHNEIOUPOLI
15780 ZOGRAFOS, ATTIKA, GREECE
Tel. 210 7721348, Fax: 210 7724181
elke_dpo@mail.ntua.gr

2.3. PERSONAL INFORMATION

All research conducted by AIJU and PRecycling partners will be performed in compliance with:

- Ethical principles
- Applicable international EU and national law (in particular, Regulation (EU) 2016/679).

Personal data must be processed according to certain principles and conditions that aim to limit the impact on the persons concerned and ensure data quality and confidentiality. Certain categories of data are more 'sensitive' than others (e.g., health, sexual lifestyle, ethnicity, political opinion, religious or philosophical conviction) and these may only be processed according to specific rules. Specifically, ICC/ESOMAR (2016) determines various aspects to take into account for data protection and privacy:

- If researchers plan to collect personal data for research that may also be used for a non-research purpose, this must be made clear to data subjects prior to data collection and their consent for the non-research use obtained.
- Researchers must not share a data subject's personal data with a client unless the data subject has given consent to do so and has agreed to the specific purpose for which it will be used.
- Researchers must have a privacy notice that is readily accessible by data subjects and is easily understood.
- Researchers must ensure that personal data cannot be traced nor an individual's identity inferred via deductive disclosure (for example, through cross-analysis, small samples or combination with other data such as a client's records or secondary data in the public domain).
- Researchers must take all reasonable precautions to ensure that personal data is held securely. It must be protected against risks such as loss, unauthorized access, destruction, misuse, manipulation or disclosure.
- Personal data is to be held no longer than is necessary for the purpose for which it was collected or used.
- If personal data is to be transferred to subcontractors or other service providers, researchers must ensure that the recipients employ at least an equivalent level of security measures.
- Researchers must take particular care to maintain the data protection rights of data subjects whose personal data is transferred from one jurisdiction to another. Such transfers must not be made without the consent of the data subject or other legally permissible grounds. In addition, researchers must take all reasonable steps to ensure that adequate security measures are observed and that the data protection principles of this Code are complied with.
- In the event of a data breach containing personal data researchers have a duty of care for the data subjects involved and must follow all applicable data breach notification laws.

Therefore, AIJU researchers will anticipate the use and collection of sensitive data. And the collection of secondary personal data (for example, on religion, race, ethnicity, etc.) will only take place if it is extremely necessary for the correct development of the investigation.

Likewise, during the conduct of surveys, interviews or focus groups where personal information will be collected and stored, the person responsible for the research will guarantee that the data is stored securely and that publication (including publication on the Internet) will not lead (directly or indirectly) to a breach of agreed confidentiality and anonymity.

In accordance with Regulation (EU) 2016/679 "an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person". There are various potential identifiers, including full name, pseudonyms, occupation, address or any combination of these. Individuals are not considered 'identifiable', if identifying them requires excessive effort. Completely anonymised data does not fall under the data privacy rules (as of the moment it is has been completely anonymised).

'Processing of personal data' means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as:

- Collection (digital audio recording, digital video caption, etc.)
- Recording
- Organisation and storage (cloud, LAN or WAN servers)
- Adaptation or alteration (merging sets, amplification, etc.)
- Retrieval and consultation
- Use
- Disclosure by transmission, dissemination or otherwise making available (share, exchange, transfer)
- Alignment or combination
- Blocking, deleting or destruction

Processing typically covers any action that uses data for research purposes (including interviewees, volunteers, patients, etc.). A personal data file is any structured set of personal data accessible according to specific criteria, whether centralized, decentralized or distributed functionally or geographically.

2.4. NON-EU COUNTRIES

This requirement is addressed by identifying the tasks in which the Non-EU countries Turkey and Norway are involved and where potential exchange of materials is expected for the fulfilment of PRecycling objectives. Information from local authorities related to requirements needed for the exchange of these materials has been taken under consideration.

2.5. ENVIRONMENT, HEALTH AND SAFETY

In order to address this requirement, two different ethics environmental, health and safety requirement templates have been prepared by the coordinator and signed by all PRecycling partners. One template concerns all partners involved in experimental activities and ensures that the appropriate health and safety procedures conform to relevant local/national guidelines/legislation for staff involved in this project. The second template prepared covers the dissemination /exploitation /management activities within PRecycling project and is signed by partners that are not involved in any other experimental activity.

3. RESULTS

3.1 HUMANS

For all the activities planned and described in the introduction session which will be performed with the participation of the consortium members, end-users and other relevant stakeholders such as trainees, attendees to events, speakers, other individuals including children or contacts for clustering activities will collaborate also in the project, detailed Informed Consent forms are created (included in the Annex) and will be shared with the participants, so their participation should be managed in a proper manner. The above-mentioned Informed Consent forms fully and clearly outline the scope of these events and their purposes. Terms and conditions are included in the forms and, if the individuals agree to participate in the training sessions or interviews or dissemination events, they will fill the consent form, which will be kept on file by the partner that organises the training/interview /workshop/webinar. In order to protect the privacy rights, no data will be collected without the explicit informed consent of the participants. This involves being open with participants about what they are involving themselves in and ensuring that they have agreed fully by giving their explicit consent.

For this purpose, informed consent forms will be sent via email by the coordinator to the project participants. In case of workshops or other dissemination events organized in the frame of PRecycling, the organizer will be responsible to ensure accessibility to this form.

3.1.1 Informed consent forms

The GDPR consent form template was created and will be filled in by each partner's personnel working in the project. The same form will be also signed for all relevant stakeholders participating in workshops and other events arranged in the frame of the project. In Annex of this deliverable several consent form templates have been included to cover all activities that will take place within the project.

3.1.2 Informed consent procedures

The consortium confirms that detailed information on the informed consent procedures in regard to data processing will be kept on file and the informed consents and information sheets will be elaborated in language and terms intelligible to the participants.

The above mentioned Informed Consent forms will fully and clearly outline the scope of the project events and their purposes. Terms and conditions will be included in the forms and if the individuals agree to participate in the events they can download and fill the consent form and submit it to the platform. In order to protect their privacy rights, no data will be collected without the explicit informed consent of the participants. This involves being open with participants about what they are involving themselves in and ensuring that they have agreed fully by giving their explicit consent.

2.5.1.1. Profiling

The Data Management Plan that will be aligned with the General Data Protection Regulation 2016/679 (GDPR) and will be initially produced by M6 (D8.2), will clearly explain the strategy that will be followed for the profiling, in order to address the information of the data subjects on the existence of the profiling and how their fundamental rights will be safeguarded.

2.5.1.2. Data storage

The project team will use state-of-the-art technologies for secure storage, delivery, and access of personal information, as well as managing the rights of the users. In this way, there is complete guarantee that the accessed, delivered, stored, and transmitted content will be managed by the assigned persons, with well-defined rights, at the right time. State-of-the-art firewalls, network security, encryption and authentication will be used to protect collected data. Only authorized persons within authorised organizations will have access to all the users' identities. Only anonymous data will be made available to out-of-the-project researchers. If any identifiable data is required, access to it

will be granted only after explicit user permission. Access to any private generated project database will be granted with an authentication server that will restrict access depending on the user identity. Access to those databases will be also filtered on a user-based policy. A periodic change of password and minimum password quality policy will be enforced to grant the security of the system.

2.5.1.3. Anonymisation process

Within the Data Management Plan the anonymisation process will be analysed in detail. In this early stage of the project, the approach adopted for this research follows widely recommended procedures[6]. The following steps are recommended for an effective anonymisation process:

- Find and highlight direct identifiers
- Assess indirect identifiers
- Assess the wider picture
- Remove (or pseudonymise) direct identifiers
- Aggregate or blur (in)direct identifiers
- Redact indirect identifiers
- Re-assess any remaining disclosure risk

An abstract draft of the anonymisation process has been designed based on the aforementioned steps that will be adapted according to the research needs during data collection.

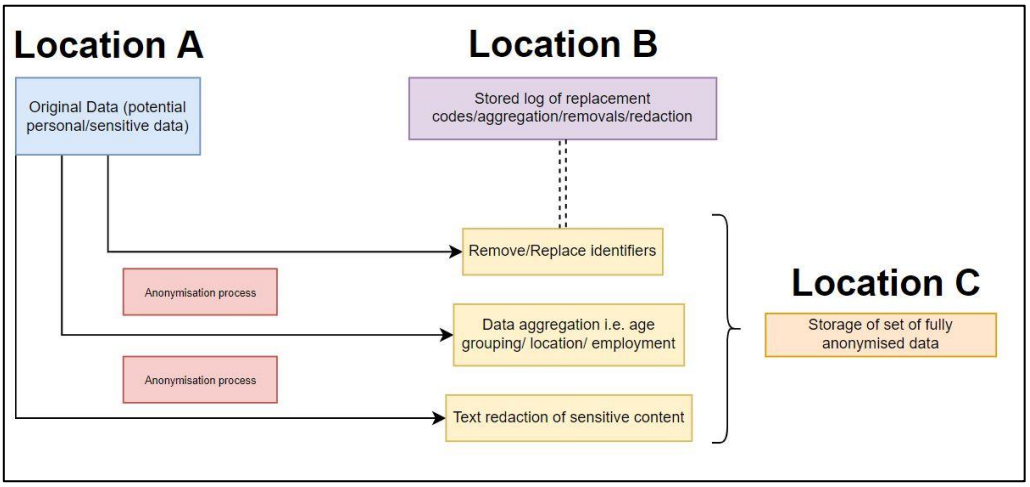


Figure 3. Abstract anonymisation process.

Original data, when gathered, will be stored in Location A according to the data security/storage provisions of the project. At the earliest possible stage, anonymisation takes places, through the various techniques that will be selected according to the anonymisation needs of the data. A log of actions will be kept in a separate storage place. Location C is where the final anonymised data set will be kept in accordance with best practices. That fully anonymised set can be then used in dissemination activities of the project. Splitting the location ensures to the extent that is possible that the anonymised data set cannot be used to identify person(s).

[6] UK Data Service anonymisation guidance: https://ukdataservice.ac.uk/learning-hub/research-data-management/anonymisation/anonymisation-step-by-step/

3.1.3 AIJU ethics protocols in research with humans & database management

2.5.1.4. Requirements for workers in social research with children

AIJU workers have extensive professional experience in carrying out social research with children, and in the application of research techniques such as focus groups, workshops with children, interviews or surveys. Aspects that allow them, as pointed out by Castro et al. (2011), better understand children and the world of children, show greater empathy and listening skills towards them, and/or understand the different developmental stages in which the participants find themselves.

In addition, according to the international document prepared by Graham et al. (2013) and edited by UNICEF, which establishes the ethical aspects that must be taken into account in research with children, other requirements that must also be taken into account as childhood researchers are indicated to:

- Possess specialized skills and training in the literature on the ethics of the research process itself with children.
- Have skills to communicate adequately with children, but also with parents, members of the community (educational centers or nursery schools) and, in general, with all interested parties.
- Be able to establish a good relationship with the children, give them confidence, respond to the needs that may arise during the research process and understand verbal and non-verbal language.
- Show sensitivity towards the cultural and social context of children, accepting and respecting behaviors or behaviors that may arise due to their origins and customs.
- Establish proximity with children for meaningful information exchange and balance the unequal power relationship between researchers and participants.
- Have specialized training in specific areas, depending on the type of research to be carried out. Some of the areas in AIJU can be, for example, the identification and management of security issues.
- Being able to critically reflect on their practice and review their ethical decision-making on an ongoing basis.

On the other hand, to guarantee the wellbeing of the participating children and create a common understanding among AIJU workers who are going to participate in social research with children, a code of conduct has been drawn up. That is in line with the international child protection standards (ICS Standards) prepared by Keeping Children Safe (2020), it must be carried out so that all workers understand their professional limits when interacting with children and differentiate what is acceptable behavior.
In the same way, AIJU workers will be asked to provide a certificate of sexual crimes in accordance with current regulations (*Ley 26/2015, de 28 de julio, de modificación del sistema de protección a la infancia y a la adolescencia*). With the aim of accrediting the non-existence of crimes of a sexual nature of all AIJU professionals who are going to be in direct contact and interact with children.

2.5.1.5. AIJU's database definition

AIJU's database is a collection of data on people interested in participating in studies that AIJU carries out for companies and for regional, national or international projects. There are two different types of collaborator profiles: families and professionals.

AIJU's database is made up of heterogeneous profiles, such as: children from 0 to 16 years old, parents and future parents, educators and teachers, playcentre caregivers, disability experts, paediatricians, psychologists, sociologists, children's development experts, play lovers, etc. Likewise, the database includes various institutions such as ONCE (Organización Nacional de Ciegos Españoles), CEAPAT (Centro de Referencia Estatal de Autonomía Personal y Ayudas Técnicas) or ASINDOWN (Asociación y Fundación Síndrome de Down de Valencia), among others.

The type of studies that AIJU usually carries out with AIJU database are:

- Evaluation of prototypes, concepts, products, etc., for children
- Analysis of the usability of the prototypes and products
- Analysis of the use of new technologies
- Analysis of preferences related with design and social trends
- Analysis of the play behaviour of children, adults and the elderly
- Analysis of leisure-time patterns

2.5.1.6. Database respondent recruitment

The recruitment of the respondents in Spain will be made through AIJU's database. The participating families are recruited via:

Primary schools and playcentres. AIJU directly contacts schools and playcentres to carry out some studies. In these cases, AIJU gives the director or the person responsible for the school a consent letter form and the information letter of the study that should be signed. Then the centre sends consent forms and information letters to the parents or legal guardians of the children that will participate in the study. When AIJU is carrying out the study at the school, only children that have the consent letter signed are permitted to participate in the study.

AIJU's Toys Guide. A guide with more than 30 years of experience, where AIJU's usability and safety experts analyse more than 100 toys every year. The AIJU Toy Guide is available both in printed and online form. Each year, 200,000 copies are printed and it is mainly distributed among schools and playcentres, but also nursery schools, toy shops, Christmas events for children, city councils, gynaecologists, paediatricians, hospitals and fairs specialised in families and children. Equally, the guide is available on its own website to consult online or download.

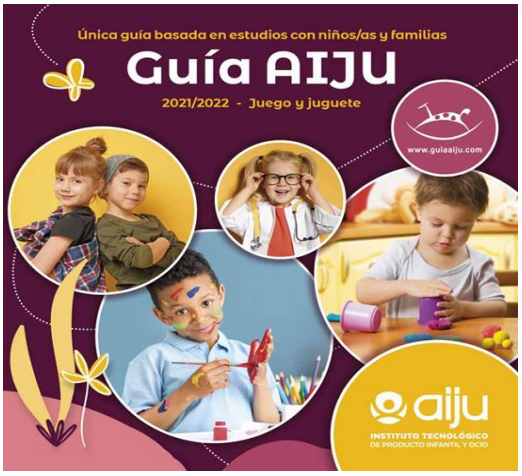


Figure 4. AIJU's Toy Guide 3.0 2021/2022 cover.

On one page of the printed guide, families are asked to collaborate with AIJU in future studies. They are informed about types of possible collaborations – e.g. focus groups, interviews, surveys, etc. – profiles that form AIJU'S database and contact information. In order to register, a questionnaire to fill in is attached. Information about personal data, number of children, dates of birth and use of technology is requested, among others.

Figure 5. Registration form sheet for collaboration on AIJU'S Toy Guide

Furthermore, AIJU's Toy Guide website has a banner asking for people to collaborate and form part of the AIJU database. To register on the database, an online questionnaire is provided.

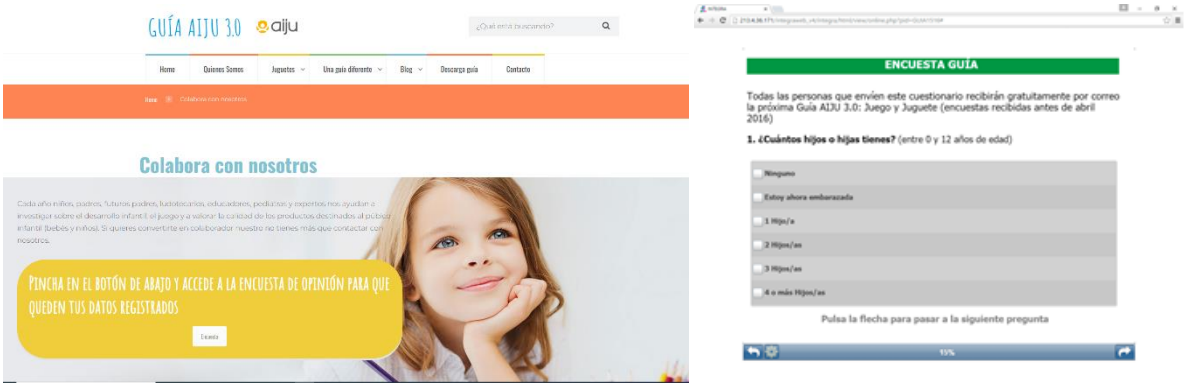


Figure 6. Banner asking the collaboration on AIJU's Toy Guide website (left) and questionnaire for registration in AIJU's database (right)

People directly contact. People can contact AIJU directly in order to register as a professional or family collaborator. Apart from the previous ways, there are others such as email, phone and social networks through which AIJU provides the information and registration form:

- Social networks
  - Facebook: Guía AIJU 3.0 (private communication)
- Email
  - AIJU's User Research Area: consumidorinfantil@aiju.es
  - AIJU's general information: informacion@aiju.es
- Telephone
  - AIJU's User Research Area: 0034 963 391 376
  - AIJU's General information: 0034 965 554 475

2.5.1.7. AIJU´S database: Communications to third parties

AIJU does not share the information gathered in the database. All data collected will remain anonymous and will only be linked with a family code, in order to ensure the safety and confidentiality of the respondents and their families.

2.5.1.8. Data protection

AIJU's database will be used for the recruitment of the families that will participate in AIJU's research. This recruitment will be performed guaranteeing the anonymity of the respondents.

Each family in AIJU's database has an individual code in order to ensure their anonymity. In addition, this database has a security manager, system administrator and restricted permitted users.

The database is locked with a password which is known by the database responsible. It is changed every month.

2.5.1.9. Data storage

AIJU's database is registered on the "Agencia de Protección de Datos"[7]. This institution is responsible for ensuring compliance with legislation on data protection and monitoring its implementation, especially in regard to the rights of data information, access, rectification, opposition and cancellation.

The database is an Access file located on AIJU's local computer network. Each family is classified by the following data:

- Family code
- Date last updated
- Family name
- Telephone
- Address
- Email
- Mother's and father's name and surname
- Mother's and father's date of birth
- Number of children
- Civil status
- Family studies and employment situation
- Social class
- Recruitment method
- Last studies involved in

2.5.1.10. Data destruction

For the redaction of data destruction procedures DIN 66399 procedure was consulted. This standard establishes three classification levels (to determine the security level which is chosen for the destruction), seven security levels and six material categories.

- Three classification levels

The security level which is chosen for the destruction of the data carriers is determined by the sensitivity of the data.

- Classification level 1: Normal sensitivity for internal data: the most common classification of information, intended for large groups of people. Unauthorised disclosure or transfer would have limited negative effects on the company. Protection of personal data shall be guaranteed. Otherwise, there is a risk that persons affected may suffer damage to their reputation and economic circumstances
- Classification level 2: Higher sensitivity for confidential data: the information is restricted to a small group of people. Unauthorised disclosure would have serious effects on the company and may lead to violation of laws or contractual obligations. The protection of personal data shall meet stringent requirements. Otherwise, there is a risk that persons affected may suffer serious damage to their social standing or economic circumstances
- Classification level 3: Very high sensitivity for confidential and secret data: the information is restricted to a very small group of persons, known by name, who are authorised to access it.

[7] http://www.agpd.es/

Unauthorised disclosure would have serious, existence-threatening effects on the company and/or would lead to violation of trade secrets, contracts, and laws. The protection of personal data shall be absolutely guaranteed. Otherwise, the life and safety of persons affected may be at risk, or their personal freedom may be jeopardised

- Seven security levels

P1. Recommended, for instance, for data carriers with general data, which have to be made illegible. Particle size ≤ 2000 mm2 or strip width ≤ 12 mm. Unlimited strip length.

P2. Recommended, for example, for data carriers with internal data, which have to be made illegible. Particle size ≤ 800 mm2 or strip width ≤ 6 mm Unlimited strip length.

P3. Recommended, for example, for data carriers with sensitive and confidential data. Particle size ≤ 320 mm2 (for example particles 6 x 50 mm) or strip width ≤ 2 mm Unlimited strip length.

P4. Recommended, for example, for data carriers with particularly sensitive and confidential data. Particle size ≤ 160 mm2 and for regular particles: strip width ≤ 6 mm (for example particles 4 x 40 mm)

P5. Recommended, for example, for data carriers with secret data. Particle size ≤ 30 mm2 and for regular particles: strip width ≤ 2 mm (for example particles 2 x 15 mm)

P6. Recommended, for example, for data carriers with secret data where unusually high security standards shall be maintained. Particle size ≤ 10 mm2 and for regular particles: strip width ≤ 1 mm (for example particles 0.8 x 12 mm)

P7. Recommended, for example, for data carriers with top secret data where the strictest security standards shall be maintained. Particle size ≤ 5 mm2 and for regular particles: strip width ≤ 1 mm (for example particles 0.8 x 5 mm)

- Six material categories

- Information in original size, for example paper, films, printing plates. Security levels P-1 to P-7.
- Information in miniaturised form, for example microfilms. Security levels F-1 to F-7.
- Information on optical data carriers, for example CDs/DVDs. Security levels O-1 to O-7.
- Information on magnetic data carriers, for example ID-cards, diskettes. Security levels T-1 to T-7.
- Information on hard drives with magnetic data carriers. Security levels H-1 to H-7.
- Information on electronic data carriers, for example chip cards, memory sticks. Security levels E-1 to E-7.

- Security level selection

If there are data carriers with different security levels at the collection point, they should be sorted there by security level for economical and environmental reasons. If this is not possible, all the data carriers shall always be destroyed according to the higher security level. This is to minimize the risk of

incorrect assignment leading to inadequate destruction of data carriers containing sensitive data. Assignment of classification levels and security levels see table below:

Table 3. Security level classification

	Security level 1	Security level 2	Security level 3	Security level 4	Security level 5	Security level 6	Security level 7
Classification level 1	●[1]	●[1]	●	○[2]	○[2]	○[2]	○[2]
Classification level 2			●	●	●	○[2]	○[2]
Classification level 3				●	●	●	●

[1] This combination can not be used for personal data
[2] A higher security level covers the protection class in a better way

- Modification and cancelation of data

Every family has the right to consult, modify or cancel the information gathered on AIJU's database. In order to carry out one of these options, a postal address (to send the information or visit the office), email and telephone number are provided.

3.1.1.1. Participation in studies

Families in AIJU's database could participate in studies either face-to-face or remotely.

Face-to-face participation can be conducted at AIJU's facilities:

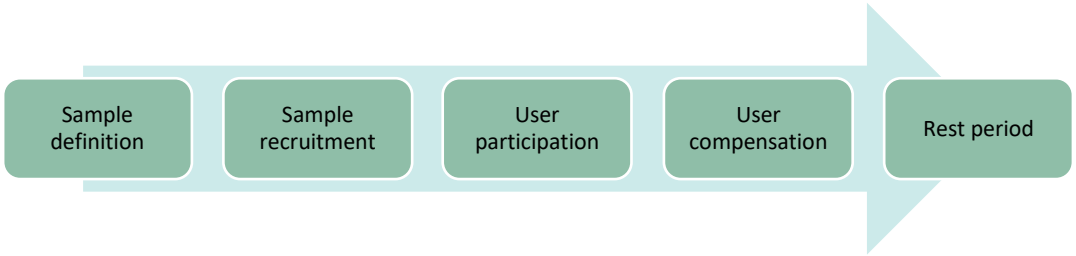
- Childlab: a hidden viewing room for watching play or usability sessions with users. It is equipped with a two-way mirror and closed-circuit television with Gesell cameras
- Toylab: a 300 m2 children's playcentre with a two-way mirror for researching and studying children's behaviour in contact with toys or other children's products.

In addition, research can be conducted in collaborating schools and children's playcentres.

Remote participation can be conducted via telephone (e.g., survey), video conference (e.g., focus group) or by internet (e.g., online questionnaire).

- Face-to-face studies at AIJU's facilities

The protocol followed to carry out face-to-face studies at AIJU's facilities is described below.



1. Definition of the sample. The sample is selected from AIJU's database depending on the objective of the study. The most common criteria to take into account to define the different profiles are age, sex, educational level, family structure, possession of products, socioeconomic level, …

2. Sample recruitment

- Communication of the study objectives. Once we have defined who we want to participate in our study, we will contact them by email and/or telephone to inform them of the objectives, methodology, duration, date and place of the study, data collection and processing (including images and video recording).
  In the event that we need to know extra information about the person's profile, we will include a question that allows us to decide if this person fits within the defined sample or not.
- Acceptation of participation. The people contacted will confirm their participation or non-participation through the same channel used for communication of the study.
  It is advisable to contact more people than necessary for the study (normally one or two more) to ensure the number of samples necessary to carry out the study. In the event that there are no absences, all the people recruited will be counted, as long as it does not affect the methodology.
- Reminder notification. Once the sample is selected, the people will be contacted, by the means provided by them (email, WhatsApp, call, ...) one day before the study to remember and confirm the appointment, and in the event that there is any cancellation, try to get another user.

3. User participation

- Welcome and acceptance of the participation in the study.
  - Child participation: During the welcome and before starting the study, the mother, father or person responsible for the child is informed about the study and in the event that the study is recorded, authorization will be requested. to allow recording, explaining how the images will be captured, what will be done with them and who will have access to them. Once the authorization is signed, the study can begin. Depending on the age of the child, the consent of the minor will also be requested.

  - Adults participation: Once the adult is in the room where the study will take place, in the event that it is recorded, the moderator will inform that the session is being recorded and will request the consent of the attendees. If someone does not agree, they will be informed that they can freely withdraw from the study. However, it is advisable to offer a written consent. Once the participants have given their consent, the study begins.

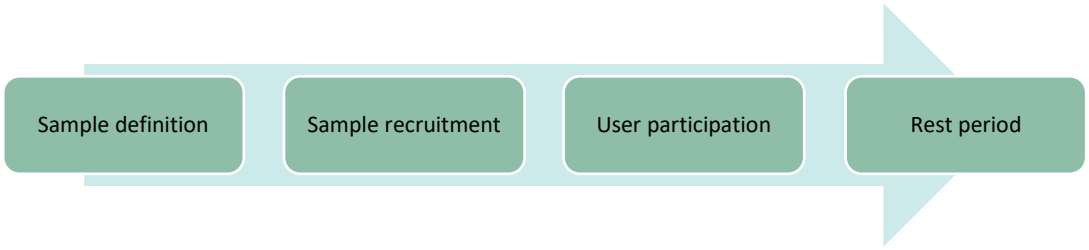
4. Compensation policy. As a form of reward and to encourage participation in the study, participants will be offered a reward, either financial (the most recommended is a check to purchase products at certain centers) or a gift. This will depend on the profile of the sample, its availability and the budget of the study.

5. Rest period. When a user has participated in a study, the date on which this study was carried out must be recorded, and check that these people comply with a rest period between one study and another, in order, on the one hand, to prevent the same people from participating in our studies, thus reducing the possible distortion of the results, and avoiding the fatigue of carrying out several similar studies.

For face-to-face studies, such as focus groups, the rest period is usually around 2 months.

- Face-to-face studies outside AIJU's facilities

The protocol followed to carry out face-to-face studies outside AIJU's facilities (schools and children's playcentres) is described below.



1. Definition of the sample. The sample is selected from AIJU's database depending on the objective of the study. The target is focused on schools and children's playcentres with children up to 14 years of age that live in Spain. A briefing describing the sample characteristics is sent to the person allowed to use the database. She or he applies filters in order to select the best sample (i.e. schools and playcentres) that fits with the established requirements.

2. Sample recruitment

- Communication of the study objectives. The contact with the sample defined is performed by the person allowed to use the database through a combination of email and landline telephone. The information sent to the school or playcentre contact is about the aim of the study, type of methodology planned, the way to record the information generated (e.g., video recording, photos), the duration, the target needed (mother, father, child of specific age, etc.) and a proposal of a date to carry out the study. In addition, AIJU describes the requirements for the study such as type of space, furniture, necessity of Wi-Fi, etc. If it is necessary to acquire extra knowledge about the consumption or preferences of the children or parents in order to select the sample, some questions to gather this information are included in the communication.
- Acceptation of participation. Attached to the previous information, two authorisation letters are sent to the school or playcentre contacted:
  - A non-disclosure agreement for the director, in order to accept carrying out studies with children in the centre.
  - An authorisation to parents in order to accept the participation of the children in the study and the recording. This authorisation is given to parents and, if they agree, it is returned signed.
- Reminder Notification. Once the date is set, a reminder is made two days before the study by sending an email, a message via WhatsApp, or making a call. If there is a cancellation, the person in charge of the recruitment consults AIJU's database in order to convene another user.

3. Users participation.

- Acceptance of participation in the study.
  - Child participation: If the parental authorisations have not already been gathered, this is done before starting the study. Once the authorisation has been signed, the children can participate
  - Adult participation: In the case that the study is intended for parents, before starting, the moderator explains the aim of the study and the way which the information is going to be collected (e.g., video, photos). The moderator asks for the consent of the participants. If the participant does not agree, she or he is free to withdraw from the study. When the participant has given their consent, and this has been recorded, the study starts

- Participation. In the case of child participation, the study starts after signing the authorisation, whereas with adults, the study starts after they have consented to the recording.

4. Compensation Policy. To avoid the professionalization of the AIJU family database, the compensation, as a sign of gratitude for participation, is a symbolic gift given by AIJU. For this reason, AIJU's policy is not to reward participants with money and to offer gift cards as a last resort.

Once the study is finished, there are two possibilities of reward according to the policy of the center:

- Centre receives the compensation. The centre receives the compensation (e.g., toys, school material, electronic devices, etc.) which is used in the centre by all the children
- Participant receives the compensation. The participants are offered a selection of toys to choose from several options, or a gift card to spend in a toy shop or department store is offered. This situation is less common.

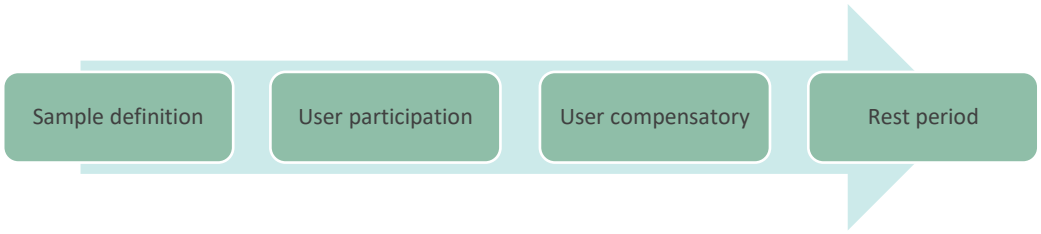
5. Rest period. When a centre has participated in a study, the date of participation is recorded in the database to calculate the next date when participation is possible. This measure is performed for several reasons:

- Permitir que participen tantas personas de la base de datos de familia AIJU como sea posible.
- To avoid the professionalisation of AIJU's family database:
    - People who are more interested in the gift than in altruistic participation.
    - People who know the methodology and technique well enough that may distort the opinions given.
- To ensure that the sample does not participate in a study with the same brand twice. This restriction is omitted if repeating with the sample is a company requirement

For face-to-face studies, such as focus groups, the rest period given is two months.

- Remote studies

The protocol followed to carry out remote studies (online questionnaires) is described below.



1. Definition of the sample. Depending on the objective of the study, the necessary profile of the people to be interviewed will be defined. The most common criteria to take into account to define the different profiles are age, sex, educational level, family structure, possession of products, socioeconomic level, …

In some cases, we will need to make quotas (need to distribute the different profiles in a predetermined way), in that case, questions will be asked at the beginning of the questionnaire, so that, if the profile of this person is already complete, it will not allow participation in the study, informing you that your profile is complete and thanking you for your participation.

2. Users participation (fieldwork).

- Communication of participation. Users will be contacted in writing via email or social networks (Whatsapp, Facebook, …) with the following content:
    - Objective of the study.
    - Link to the questionnaire (if contacted via email).
    - Link to copy in the browser in case the previous one does not work.
    - Link to communicate that the participant does not want to answer the questionnaire.
    - Link to unsubscribe in case you do not want to receive further notifications to participate in the surveys.

- Acceptation of participation. The people contacted will confirm their participation or non-participation in the study by accepting or not the terms and conditions, shown at the beginning of the questionnaire:
  - Consent letter: includes the name and aim of the project, participant request, estimated duration of the questionnaire, how the information will be transferred to third parties and information that the questionnaire is voluntary, among others. (Annex 1)
  - Information letter: includes the same information as the consent letter and potential benefits, possible risks, security, privacy and confidentiality issues and a contact with an AIJU technician (Annex 1), this link is accessible to the respondents throughout the whole study.

After having shown all this information, a button to accept the terms and conditions previously stated is included.

- Reminder Notification. Periodically, notifications will be sent to complete the questionnaire, in case they have not yet accessed it. Depending on the time available, notifications can be sent in periods of 5 days.
- Finalisation of the fieldwork. Once we have achieved the predefined sample or the predestined time for this phase has elapsed, the questionnaire will be closed to proceed with the data analysis.

3. Compensation. As a form of reward and to encourage participation in the study, participants will be offered a reward, either financial (the most recommended is a check to purchase products at certain centers) or a gift. This will depend on the profile of the sample, its availability, and the budget of the study. Being a remote study, the rewards will be sent once the fieldwork has been completed by mail or email, depending on the type of reward.

4. Rest period. When a user has participated in a study, the date on which this study was carried out must be recorded, and check that these people comply with a rest period between one study and another, in order, on the one hand, to prevent the same people from participating in our studies, thus reducing the possible distortion of the results, and avoiding the fatigue of carrying out several similar studies. For this kind of study, the rest period is usually around 1 month.

3.1.1.2. Images and Video recording

Recorded information (audio and/or visual) will need special consideration by the data controller (person responsible for the task), to ensure that privacy and personal identities are protected. Respondents shall be informed before observation techniques or recording equipment are used for research purposes, except where these are openly used in a public place and no personal data are collected. If respondents so wish, the recording, or relevant section thereof, shall be destroyed or deleted. In the absence of explicit consent the personal identity of respondents shall be protected.

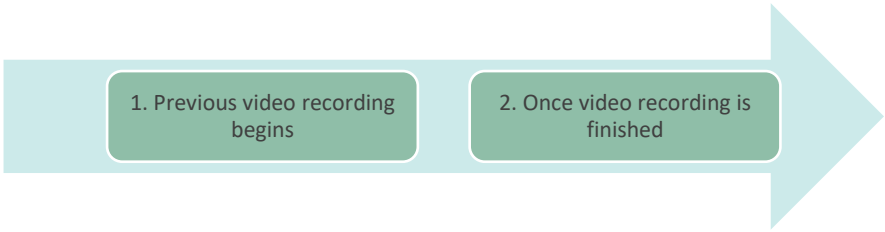
Families in AIJU's database could participate in video recording studies at AIJU's facilities or away from AIJU's facilities

Video recording conducted at AIJU's facilities is performed in:

- Childlab: a hidden viewing room for watching play or usability sessions with users. It is equipped with a two-way mirror and closed circuit television with Gesell cameras.
- Toyylab: a 300 m2 children's playcentre with a two-way mirror for researching and studying children's behaviour in contact with toys or other children's products.

In each project, all research that is collected through video recording will be brought to the attention of the responsible adult and, if it comes from the participating child, following the ethical procedures established by ICC/ESOMAR (2016).

The protocol followed to perform video recording studies depends on the type of study performed. For this reason, all the protocols established for the corresponding methodology will be followed. Regardless of this, the recording process is divided into two main phases:



1. Prior to starting video recording: Prior to conducting research, researchers enter into a documented agreement with participants that clarifies the nature of the research and the responsibilities of each party. Informed consent: Before personally identifiable data can be processed, the data subject needs to give informed consent. The respondent must know about the nature of the data being collected, the reasons for processing it and what will be done with it. Data subjects should not be misled, lied to or tricked. Participation is voluntary and they can withdraw at any time. When obtaining this informed consent, researchers use language that is reasonably understandable to the participants. In addition, the following aspects shall be accomplished:

- Respondents' agreement to the use of recording: Respondents must be told at the beginning of the interview, group discussion or usability test that tape or video recording techniques are to be used unless this knowledge might bias the respondent's subsequent behaviour. Respondents must be told about the recording at the end of the interview and be given the opportunity to see or hear the relevant section of the recording and, if they so wish, to have this destroyed or to have their image pixelated so that they cannot be identified. Closed circuit television or video streaming should not be carried out without prior permission from respondents.
- Researchers tell participants that they can withdraw from the research at any time as well as explain the foreseeable consequences of declining to participate or withdrawing.
- For persons who are legally incapable of giving informed consent, researchers nevertheless provide an appropriate explanation, obtain the person's consent, and obtain appropriate permission from a legally authorised person, if such substitute consent is permitted by law.
- Researchers inform participants of their anticipated sharing or further use of personally identifiable research data and of the possibility of unanticipated future uses.
- Researchers provide a prompt opportunity for participants to obtain appropriate information about the nature, results, and conclusions of the research, and they attempt to correct any misconceptions that participants may have.
- Researchers explain significant factors that may be expected to influence the person's willingness to participate (such as risks, discomfort, adverse effects, or limitations to confidentiality) and other aspects about which the person may enquire.

2. Once video recording is finished:

- Proper use of the data: The use of personal data is restricted to those aspects that the data subject has agreed to. If data is collected for research purposes, it may not be used for other purposes.
- In particularly sensitive cases, the possibility (where technically feasible) of blurring or obscuring the identifying characteristics of respondents should be considered when a video recording is to

be released outside the research organisation. In certain cases, it may be sufficient to release the soundtrack only.

- The recording may not be used, under any circumstances, for non-research purposes, such as promotional or sales activities.
- Safeguards on the release of recordings: Recordings must not be allowed out of the hands of the researcher or research organisation carrying out the study unless explicit permission has previously been obtained from all the respondents included in the recording. Where such permission is to be obtained the researcher must ensure that respondents are given as much relevant information as possible about the future use of the recording, in particular: to whom the recording is to be given, to whom it is likely to be shown, for what research purposes it is likely to be used.
- Disclosure to third parties: Personally identifiable data can be passed on to a third party only with the permission of the data subject and to achieve the purpose for which the data was collected. Data collected for research purposes cannot be used for non-research purposes. Data which has been anonymised, and so is no longer personal data can be passed on to third parties and processed for other purposes.
- Client rights to copies of the original data: It is generally accepted research practice that the client is entitled to be supplied, at cost, with duplicate copies of the original survey information obtained from respondents, provided that this has been anonymised. Where this information is held in the form of audio or video recordings, rather than on questionnaires, there is usually no problem if it is supplied to the client in the form of anonymised transcripts or anonymous audio recordings (although in both cases care may be needed to remove identifying comments or other clues from the material). In the case of video recordings, the danger of respondent identification is much greater; and in this and other cases where the anonymity rule might be at risk the following recommendations must be followed:
    - In order to meet the Code of good business practice requirements, it is important for there to be contracts or written agreements between the researcher and the client and any other parties (e.g., self-employed interviewers or subcontractors) setting out their respective responsibilities. Where elements of a research project are subcontracted it is essential that the researcher ensures in the contract with the subcontractor that they and, in particular, interviewers, understand and fully conform to the requirements of the Code. It is essential for the research agency to explain the relevant data protection issues to the third-party coder, and they must sign a declaration that they will comply with the requirements of the ICC/ESOMAR Code and data protection legislation.

3.1.1.3. Communication to third parties

In the event that the company needs images or videos of a child, the child's mother, father or tutor is informed and asked to sign a consent form before starting the study.

The visual information gathered is processed by AIJU and sent to the company along with a confidentiality letter. This letter asks the company to solely view and analyse the information and not to share it with third parties, nor make it public. In the event that the company wants to this information in future studies, they should once again ask the parents or legal guardian to provide a consent form.

3.1.1.4. Compensation policy

In order to avoid the professionalisation of AIJU's family database, the compensatory item is a symbolic gift that AIJU gives as a sign of gratitude for participation. For this reason, AIJU's policy is to not reward participants with money and offer gift cards as a last option.

1. Online studies: These are studies carried out on the internet (e.g., online questionnaires). The respondent receives a link to answer some questions. The most usual time to answer this type of study is around 15 minutes. The respondent collects points every time she or he finishes a study. Twice a year, AIJU calculates the points for each family, and sends rewards to the families that have been involved in ten or more online studies without having received a reward. Rewarded families are allowed to select a gift from a catalogue given. They communicate their choice and the sending address via an electronic survey
2. Panel studies: These are a specific number of studies for the same company and are performed in a concrete period of time, with the participation of the same respondents. In this case, respondents are informed during the recruitment about the gift that they are going to obtain in exchange for their participation. (As an example, the numbers of online surveys are usually between 8 and 12 and the value of the gift is from €50 – €90, including shipping costs).
3. Personal interviews and Focus Groups: The most usual time respondents invest in participating in this type of study is about 1.5 – 2 hours. Once the Focus Group has finished, the interviewees and/or their parents or legal guardian (for children's studies) are rewarded with a gift. Normally this reward is a toy or a gift card. The value of the gift card is normally between €20 – €30.
4. Usability tests: The user follows the instructions given from the interviewer to use the product. Once the usability test has finished, frequently, the gift is the product being tested.
5. Centres compensation for participation: Recruitment, sending the consent forms to children's parents or legal guardians and preparing the area where the test will be performed are frequent tasks carried out by schools and playcentres in their collaboration with AIJU for studies with people (children or adults). For each study, the centre is awarded with educational material or toys of an estimated value of €50 per session.

3.1.1.5. Data protection policy

PRecycling will comply with data protection acts, directives, and opinions, at European level. These include:

- The Charter of Fundamental Rights of the EU, specifically the article concerning the protection of personal data.
- Directive 95/46/EC of the European Parliament and the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement within the EU/ EEA of such data to be replaced in May 2018 by Regulation 679/2016 (the General Data Protection Regulation).
- Directive 2002/58/EC of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications) [2002] OJ L201/37, as modified by the Citizens' Rights Directive.
- EU Directive 2006/24/EC of 15 March 2006 on the retention of data generated or processed in connection with the provision of publicly available electronic communications services or of public communications networks.

3.1.1.6. Technical and organisational measures

A Data Management Plan that will be aligned with the General Data Protection Regulation 2016/679 (GDPR) will be produced by M6 (D8.2) and will be updated over the course of the project whenever significant changes arise, such as (but not limited to) new data, changes in consortium policies, changes in consortium composition and external factors. Regarding the collection, storage and protection of personal data of the participants, the following issues will be taken into account:

- All data associated with a recognizable person will be held private;
- Any data or information about a person will be held private, regardless of how this data was acquired;

- Under no circumstances will the acquired data be used for commercial purposes;
- All participants will be informed and given the opportunity to provide their consent;
- No minors will be involved in these events and no sensitive personal data will be collected.

3.2. NON-EU COUNTRIES

This section describes the activities of the partners Arcelik from Turkey and NTNU from Norway, as non-EU countries, that will be performed within PRecycling and clarifies which materials will be potentially transferred between them and other partners from EU countries. Adequate authorisations that may be needed for specific items from local authorities are also described.

3.2.1. Main activities – potential exchange of items related to ARCELIK

ARCELIK from Turkey participates in all WPs. They will provide plastic waste streams materials from company's two licensed WEEE recycling facilities and contribute to compounding activities, analysis of recyclates, manufacturing and testing of prototypes in terms of performance.

Table 4 presents the tasks under which ARCELIK can potentially exchange materials with other partners from EU countries, as well as the materials to be exchanged.

Table 4. Potential exchange of materials between ARCELIK and other partners within PRecycling.

Tasks	Materials exchange	Exchange with EU partners
T2.1	Plastic waste (PP, HIPS, PA)	x
T2.4	Plastic waste (PP, HIPS, PA)	x
T5.2	Recycled polymers	x

3.2.2. Main activities – potential exchange of items related to NTNU

NTNU from Norway is involved in different tasks under WP 3, 4, 5 and 6. NTNU is one of the core partners to work on the degradation degree, aging testing and prediction of degradation and lifetime of new polymeric products. The tasks in which NTNU participates and under which potential exchange of materials can be conducted between NTNU and other PRecycling partners from EU countries as well as the materials that can be possibly exchanged within each task are described in Table 5.

Table 5. Potential exchange of materials between NTNU and other partners within PRecycling.

Tasks	Materials exchange	Exchange with EU partners
T3.4	thermoplastic samples	x
T3.5	thermoplastic samples	x

3.2.3. Authorization

The local authorities for the imports and exports have been contacted in both Norway and Turkey from NTNU and ARCELIK, respectively. Regarding the exchange of samples between NTNU and EU partners, there is no particular requirement. For the exchange of samples between ARCELIK and EU project partners the regulations that need to be applied in case of import recycled raw materials from EU partners are listed Table 6. Also, proforma invoice have to be prepared when the materials will be sent.

Table 6. Regulations applied for import of recycled materials in Turkey.

Date	Official Journal No	Regulation
11.08.1983	18132	Environmental Law
02.04.2015	29314	Regulation on Waste Management
31.12.2021	31706	Notification on the Import of Wastes Under Control for Environmental Protection

3.3. ENVIRONMENT, HEALTH AND SAFETY ENVIRONMENT, HEALTH AND SAFETY

Partners ensure that the appropriate health and safety procedures conforming to relevant local/national guidelines/legislation, are followed by the staff involved in the PRecycling project. All European health and safety conformities will be strictly adhered. Local laws and standards will be applied as part of the grant. All staff members are aware of local and European standards in all areas of engineering practice, health and safety conformance and in personal health and safety aspects.

The official documents that have been signed from each partner (specific to their work and procedures), have been saved in PRecycling Intranet repository.

All partners are taking all necessary precautions to reduce hazards in order to mitigate any possibility that project materials and processes would affect the environment. All products are handled in accordance with their appropriate MSDS, and all testing are carried out in specially constructed facilities that follow stringent health and safety policies. Each partner has provided documentation that contain more information about the unique procedures that each partner follows.

Furthermore, all processes applied, and materials used within this project will be evaluated in Task 6.1, which will include the risk and exposure assessment of potentially hazardous and/or toxic substances. All tests and assessments will be based on OECD guidelines aiming to set Safe-by-Design principles, for the identification of potential new hazards introduced by the waste streams and novel processes applied, as well as methods to address and mitigate the occupational risk.

4. CONCLUSIONS

A description of the measures that will be implemented to safeguard personal data from all human participants including stakeholders, and experts, such as details on informed consent form template and procedures, data protection policy and security measures to prevent unauthorized access to personal data have been described. Special consideration is be given to the activities involving the participation of children, the collection and/or processing of personal data and possible health and safety issues raised in the demo-cases in WP5. The data collection and handling procedure has been prepared in accordance with GDPR Compliance and the template participant consent forms are included in Annex of this document. The data collection and handling procedure will be additionally developed and updated to reflect further needs of organisation of workshops and possible changes in compliance requirements, including:

- User Experience Research (behavioural mapping) through interviews and sessions with relevant potential users, operators and stakeholders;
- Activities concerning ad hoc questionnaires with stakeholders/participants at events;
- Activities regarding the use of the project's website and social media.

Appropriate health and safety procedures conforming to relevant local/national guidelines/legislation are followed for staff involved in this project. Detailed information is provided, describing the health and safety procedures that will be implemented for protection, and confirmation that they comply with national and EU legislation. Copies of relevant available documentation are included in the Annex and filled forms received from partners kept on file. Finally, all facilities used for the project work that have been planned at this point of the project, do not require special authorization and are controlled or available to the respective partners. The existing safety systems will be updated with project-specific insights; several activities related to occupational safety will be performed up until M18, in the context of Task 6.1. All the findings will be reported in D6.1.

Regarding the participation of non-EU countries, the potential transfer of any materials between EU and Turkey or Norway, by specifying relevant tasks and activities have been covered in this deliverable.

The beneficiaries from consortium ensure that all ethics issues related to activities in the project are addressed in compliance with ethics principles, the applicable international and national law, and the provisions set out in the Grant Agreement. This includes the ethics issues Humans, Personal data, Non-EU countries and Environment, health and safety and any additional ethics issues that may emerge during the project implementation. Compliance with the ethics standards of Horizon Europe will be guaranteed at all times.

4.1 ACTION POINTS

As described in the present deliverable, all official procedures will be followed for the exchange of goods and materials between Norway, Turkey and the EU countries that are involved. A traffic list for all samples exchanged will be kept in file (PRecycling Intranet) with all delivery details.

As described in the present deliverable, all procedures will be followed for the planning, the organization and the implementation of the above-mentioned activities. The consent forms will be distributed to all stakeholders/participants prior participation to the events.

4.2 FUTURE TASKS

As described in the present deliverable, all procedures will be followed for the planning, the organization and the implementation of the above-mentioned activities. Within Task 6.1, set of Safe-by-Design principles will be developed, based on on-site measurements. Emphasis will be given on the decision-making process regarding procedures and materials used. IM and AM processes will also be monitored in terms of exposure and process risks. A set of Safe-by-Design principles, aiming at the identification of potential new hazards introduced by the waste streams and novel processes applied, as well as the methods to address and mitigate the occupational risk will be provided as an output and will be described in D6.1.

4.3 DEVIATIONS FROM DOA

No deviation from DoA has been reported.

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6. ANNEXES

ANNEX 1: SAMPLE OF CONSENT FORM FOR INTERVIEWS

Participant Consent Form Template for Interviews

1. Data Subjects and Personal Data

a. Identification

As of ……, Beneficiary name hold personal data for following data subjects:

- Name, Surname, Reg. No

b. Categories of Personal Data

As of ……, hold following categories of personal data that are subject to GDPR:

- First Name, Last Name
- Position
- Obligations
- Etc.

c. Lawful basis of possession and processing

The lawful basis of possession and processing of the information of 1.b is necessary to accomplish a task within the project funded by the European Union's Horizon Europe Research and Innovation Programme under Grant Agreement No 101058670.

d. Purposes of possession and processing

Beneficiary have the right to possess and process the information of 1.b for following purposes:

- Interview as potential user of the web platform to be developed
- Definition of user requirements for the platform to be developed
- Understanding of user's needs and goals
- Other: please state

2. Consent and Withdrawal

a. Consent

Personal Data of 1.b. were given to Beneficiary with consent of the Data Subjects of 1.a.

b. Withdrawal of Consent

Data Subjects of 1.a have the right to fill out and sign the Form of Withdrawal of Consent at any time, in order to withdraw their consent of possession and processing of their personal data by Beneficiary. Beneficiary are obliged to delete any Personal Data as soon as possible after the Form is delivered.

3. Processing of Personal Data

a. Request for Process

For any process or use of Personal Information of any of the Data Subjects of 1.a, Beneficiary has to inform the Data Subject, from which a consent is required before further action.

b. Right to Denial

Data Subject has the right to deny the process or use of its Personal Information by IES when asked.

c. Record of Processing

A record of Processing is available to any Data Subject and to any Authority at any time. Any process, change or use of any Personal Information is registered in the Record of Processing along with the date, time and the person that made the changes. Beneficiary keeps also track of the related consent Forms for any of these processes.

d. Access to Record of Processing

Any Data Subject of 1.a and any related Authority can access and inspect the Record of Processing at any time.

4. Data Subject Rights

a. Data Subjects have the right to withdraw their initial consent by filling out and signing the related Form.
b. Data Subjects have the right to be informed every time their Personal Information is processed.
c. Data Subjects have the right to deny the process or change of their personal information.
d. Data Subjects have the right to access their Personal Information at any time.
e. Data Subjects have the right to access the Record of Tracking at any time.

5. Data Minimization

For the purposes of GDPR compliance, Beneficiary have minimized the Personal Data in possession. No further information about the data subject is required as of …/…/20…..

	Please answer the following questions by ticking the response that applies	YES	NO
1.	I ……..... voluntarily agree to participate in this Interview.	☐	☐
2.	My questions about the Project Interview content have been answered to my satisfaction and I understand that I may ask further questions at any point.	☐	☐
3.	I understand that even if I agree to participate now, I can withdraw at any time or refuse to answer any question without any consequences of any kind.	☐	☐
4.	I understand that I can withdraw permission to use data from my application form within two weeks after the application, in which case the material will be deleted.	☐	☐
5.	I understand that participation involves my presence in an Interview.	☐	☐
6.	I wish to participate in the Interview under the conditions set out in the Information Sheet provided in the Project's and Partners' internet sites.	☐	☐
7.	I understand that all information I provide for participation in the Training Session / Interview will be treated confidentially.	☐	☐
8.	I understand that signed consent forms and application forms will be retained in the Project's Intranet and will be available only to Consortium Members.	☐	☐
9.	I understand that under freedom of information legalisation I am entitled to access the information I have provided at any time while it is in storage as specified above.	☐	☐
10.	I understand that I am free to contact any of the people/organizations involved in the Project to seek further clarification and information.	☐	☐
11.	I consent to the information collected for the purposes of this Interview, once anonymised (so that I cannot be identified), to be used for any other purposes within the Project Framework.	☐	☐

Participant's Signature: _____ Date: _____

Participant's Name (Printed): _____

Contact details: _____

ANNEX 2: SAMPLE OF GENERAL CONSENT FORM

Participants consent form template

All the information provided by you in this form will be used only by Beneficiary name, on behalf of the PRecycling project for the purpose of organisation Workshop or similar events and not shared with any third parties.

Photos will be taken during PRecycling Workshop project communication and dissemination activities including social media, the PRecycling website and other promotional purposes for the project.

Your name	
Your organisation	
Your position	
Email address	

I give permission for photos on which I am visible, to be used by PRecycling:

Yes	☐
No	☐

Please let us know in case of any questions or remarks:

In case you would like to change your answer in a later stage, just fill in this form again. The most recent entry will be taken into account.

You can at any time request from Beneficiary name will not use any of your personal data for the purpose of automated individual decision-making, including profiling.

If you have any query, please send an email to info@precycling-project.eu

Participant's Signature: _____ Date: _____

	Please answer the following questions by ticking the response that applies	YES	NO
1.	I ……. voluntarily agree to participate in this Workshop.	☐	☐
2.	My questions about the Project and Workshop content have been answered to my satisfaction and I understand that I may ask further questions at any point.	☐	☐
3.	I understand that even if I agree to participate now, I can withdraw at any time or refuse to answer any question without any consequences of any kind.	☐	☐
4.	I understand that I can withdraw permission to use data from my application form within two weeks after the application, in which case the material will be deleted.	☐	☐
5.	I understand that participation involves my presence in a Workshop.	☐	☐
6.	I wish to participate in the Workshop under the conditions set out in the Information Sheet provides in the Project's and Partners' internet sites.	☐	☐
7.	I understand that all information I provide for participation in the Workshop will be treated confidentially.	☐	☐
8.	I understand that signed consent forms and application forms will be retained in the Project's Intranet and will be available only to Consortium Members and kept in file from the organizer.	☐	☐
9.	I understand that under freedom of information legalisation I am entitled to access the information I have provided at any time while it is in storage as specified above.	☐	☐
10.	I understand that I am free to contact any of the people/organizations involved in the Project to seek further clarification and information.	☐	☐
11.	I consent to the information collected for the purposes of this Workshop, once anonymised (so that I cannot be identified), to be used for any other purposes within the Project Framework.	☐	☐
12.	I understand that photos from the event will be presented in Project's deliverables and the project website.	☐	☐

Participant's Signature: _____ Date: _____

Participant's Name (Printed): _____

Contact details: _____

ANNEX 3: SAMPLE OF GENERAL CONSENT FORM IN RESEARCH WITH CHILDREN

INFORMED CONSENT FORM AND CONFIDENCIALITY COMMITMENT

1. - INFORMATION ADDRESSED TO THE EXPERIMENTATION SUBJECT.

The research project for which we ask your participation is entitled:

"Plastics recycling from and for home appliances, toys, and textile. PRecycling".

To enable you to participate in this study, it is necessary to have your consent, and that you know the basic information necessary, so that this consent can be considered truly informed. Therefore, please read the following information carefully. If you have any doubts, express them, before signing this document, to the principal investigator of the project, either personally, by telephone or by email. The details of the principal investigator of the project also appear in this document.

The basic information you need to know is as follows:

a. *The purpose of the study.*
b. *Methodology to be used for the study, type and duration of collaboration expected from you.*
c. *Alternative preventive, diagnostic and/or therapeutic procedures available to those investigated with this study* (This section will be completed if applicable due to the type of study to be carried out).
d. *Possible discomforts and risks of your participation in the study.* There is no risk related to your participation in the study. (Especially indicate the health risks, highlighting the serious ones, even if they are infrequent; the less serious ones, when they are frequent; and the personalized risks).
e. *Measures to respond to adverse events:* (In the event that a subject was affected by an adverse event during his participation in the research, explain how it will be responded to).
f. Measures to ensure adequate compensation in the event that you suffer any damage.
g. *Benefits that are expected to be obtained with the research.*
h. *Consequences of non-participation*. (It should be noted that if you prefer not to participate, this will not affect your right to health care, and that the relationship with the people who offered you to participate will be just as cordial and dedicated with those who refuse to participate as with those who do participate).
i. *Possibility of withdrawal at any time and consequences*: You can withdraw from the project at any time by signing the revocation of consent that is included at the end of the document. Your withdrawal will not have any negative consequences for you and will be accepted without problems by the research team.
j. *Who has financed the study?* (Indicate financing sources).
k. *What institution performs the study?* (Indicate institution).
l. *Gratuity for participation*. (Indicate that experimental subjects will receive no financial compensation for participation in this study, or only compensation for inconvenience.)
m. *Forecast of subsequent use of the results*. (Indicate if the results will be used for teaching, research and/or scientific publication purposes).

n. *Research team.* (Indicate the name and complete location data of the Principal Investigator at his place of work, including telephone).

o. *The project will be carried out following the international ethical criteria contained in the Declaration of Helsinki*.

2. - CONFIDENTIALITY COMMITMENT.

a. *Measures to ensure respect for private life and the confidentiality of personal data*: The appropriate measures have been adopted to guarantee the complete confidentiality of the personal data of the experimental subjects who participate in this study, in accordance with the Ley De Protección de Datos de Carácter Personal (LOPD) 3/2018, de 5 de diciembre.

b. *Measures to access the information relevant to you arising from the research or the total results*: You have the right to access the information generated about you in the study. (Detail the measures taken to access that information).

c. *Measures taken in an anonymized study*: (Include this paragraph if it is a study of this type: "An effective anonymization system has been established that does not allow the subsequent identification of the subject. In no case the collected consents, where the subject is identified, will join the questionnaires used in the study. If the results are used for study, teaching, research and/or publication purposes, the due anonymization of personal data will always be respected, so that the research subjects will not be identified or identifiable").

ANNEX 4: INFORMATION LETTER PRECYCLING PROJECT

AIJU
TECHNOLOGICAL INSTITUTE OF CHILDREN'S PRODUCTS & LEISURE

INFORMATION LETTER (draft version)

Dear parent,

Thank you very much for participating in the **PRecycling** project; an international project funded by the European Commission, led by the National Technical University of Athens (Greece), in which AIJU is participating.

The main purpose of this instruction sheet is to briefly inform you about the **PRecycling** project, explain how you will contribute to this survey, and make you aware of your rights and rewards for your participation.

The objective of this study is for you to give us your opinion on plastics recycling from and for home appliances, toys and textile. To participate in this study, you need only participate in this face-to-face interview, which takes about 45 minutes.

Potential benefits: the results of this survey will be used for research and/or scientific publication purposes.

For this reason, we invite you to participate in this study in which we will ask you for your opinion on plastics recycling from and for home appliances, toys and textile.

As your participation only consists in giving an opinion on various fictional possibilities, it poses no risk to you or your child.

Security, privacy and confidentiality: the **PRecycling** project employs the measures necessary to ensure the security and privacy of the families that participate. In the event that you require a description of the security measures, they will be sent to you.

All data collected will remain anonymous and will only be linked with a family code, in order to ensure the safety and confidentiality of you and your family. All personal data will follow the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 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).

Please note that you are free to withdraw at any time, and your withdrawal shall not affect your rights or those of your child.

This project is funded by the European Commission under the HORIZON EUROPE programme and the call "HORIZON-CL4-2021-RESILIENCE-01 (A DIGITISED, RESOURCE-EFFICIENT AND RESILIENT INDUSTRY 2021)". It is coordinated by the National Technical University of Athens (Greece), and AIJU is responsible for this task related to the tastes and preferences of users.

If you have any questions or require clarification regarding your participation in this project, please contact our technical expert, [redacted], via email [redacted] or phone (00) [redacted]

I thank you in advance for participating in the project, with my best regards.

[redacted]

Project Manager at AIJU's User Research Department.

ANNEX 5: CONSENT FORM PRECYCLING PROJECT

AIJU
TECHNOLOGICAL INSTITUTE OF CHILDREN'S PRODUCTS & LEISURE

CONSENT FORM

Dear participant,

We are contacting you on this occasion to ask you for your opinion **in the framework of the PRecycling project.**

Your participation in this study will consist in giving us your opinion about plastics recycling from and for home appliances, toys and textile, through a **face-to-face interview which takes about 45 minutes**. This information will be treated by AIJU as well as the other members that form the project consortium. In all cases, when the exchange of information between the various companies in the consortium takes place, the anonymity of respondents will be guaranteed.

The information resulting from this research will be used within the **PRecycling** European Project, funded by the European Commission; coordinated by the National Technical University of Athens (Greece), in which AIJU is participating as the leader of this task.

- Participation in this survey is completely voluntary, not mandatory. Furthermore, if you decide to participate, you can always withdraw from the survey at any time.
- All data collected will be treated through a layered system of anonymisation techniques rendering the processed data fully anonymised.
- All personal data will follow the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 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).
- All information gathered will only be used within the **PRecycling** project, which may include making publications. Anonymised datasets may be maintained after the end of the project, if they are deemed necessary to supplement potential peer-reviewed publications. In the event that researchers want to use the information for other projects, they will request your consent once again, complying at all times with current regulations and laws.

Based on the above, you declare that you have been fully informed about the intentions and objectives of the **PRecycling** project and understand that you are under no obligation to respond to this survey.

Mr./Mrs _____, of legal age, with DNI/NIF_____, residing in _____, as a parent/guardian of _____, minor child, **DECLARE** that: **I accept the terms and conditions stated above.**

If you have any questions regarding your participation in this project, please contact our technical expert, [redacted] via email [redacted] or phone (00) [redacted].

[redacted]
Project Manager at AIJU's Users Research Department.

ANNEX 6: SAMPLE OF ONLINE INTERVIEW CONSENT AND DOCUMENT OF BASIC INFORMATION OF DATA PROTECTION

Below there are showed three images that correspond to the consent to carry out an electronic study, and the page that contains the basic information regarding data protection.

PLASTICS RECYCLING FROM AND FOR HOME APPLIANCES, TOYS, AND TEXTILE

Dear participant,

We are contacting you regarding to the PRecycling Project, funded by the European Comission. In this time, we want to request your opinion on the plastics recycling from and for home apliances, toy and textile in the industry processes of European companies.

Your participation in this study will consist in giving us your opinion about plastics recycling, through an electronic survey which takes about 15 minutes. This information will be treated by AIJU as well as the other members that form the project consortium. In all cases, when the exchange of information between the various companies in the consortium takes place, the anonymity of respondents will be guaranteed.

The information resulting from this research will be used within the PRecycling European Project, funded by the European Commission, coordinated by National Technical University Of Athens (Greece), in which AIJU is participating as the leader of this task.

- Participation in this survey is completely voluntary, not mandatory. Furthermore, if you decide to participate, you can always withdraw from the interview at any time.
- All data collected will be treated anonymously through a system of codes.
- All information gathered will only be used within the PRecycling project, which may include making publications. In the event that researchers wish to use the information for other projects, they will request your consent once again, complying at all times with current regulations and laws.

Based on the above, you declare that you have been fully informed about the intentions and objectives of the PRecycling project and understand that you are under no obligation to respond to this survey.

I accept the terms and conditions stated above

I do not accept the terms and conditions stated above

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council , dated 27 April, 2016, in terms of the protection of natural persons with regard to the processing of personal data and the free circulation of these data (hereinafter, "RGPD"), Organic Law 3/2018 dated 5 December, Protection of Personal Data and guarantee of digital rights (hereinafter, "LOPD-GDD"), and other development regulations, AIJU informs that the data that you provide through this form will be included in a file under the responsibility of AIJU, being able to exercise the rights of Access, Rectification, Cancellation and Opposition by writing with the Ref. "Personal Data" addressed to AIJU, the email rgpd@aiju.es.

Privacy Policy

Through this document, the *Asociación de Investigación de la Industria del Juguete, Conexas y Afines* (AIJU) informs users of the website, in compliance with the provisions of the regulatory framework on the protection of personal data, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 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), on its personal data protection policy in order that the interested parties decide to give their consent for the processing of their personal data in a free, specific, informed and unequivocal manner.

To do this, they must read this privacy policy and carry out a clear affirmative action by checking the acceptance box of the privacy policy contained in the existing information collection forms on this website and therefore if they wish to provide THE COMPANY with personal data that are requested on the website for the purposes and uses described.

Responsible Data	
Identity	ASOCIACIÓN DE INVESTIGACIÓN DE LA INDUSTRIA DEL JUGUETE, CONEXAS Y AFINES (CIF: G03182862)
Address	AV. DE LA INDUSTRIA, 23, 03440 IBI (ALICANTE)
Email	rgpd@aiju.es
Telephone number	96 555 44 75
Purpose in the processing of your data and retention periods	
Contact	Respond to questions sent to AIJU, as well as respond to requests for information about the services we offer
Join Us	Main Purpose: management and sending of Family Panel interviews. Secondary Purpose: to send advertising and/or promotional information of the Association and management of the Panel gift points record.
Request for information on new courses	Send applicants updated and personalized information on training courses that may be of their interest
Access to the training area	In the training area, users will be able to access the following resources: pre-registration in courses, a contact form to resolve all questions related to the training area and job vacancies.
AIJU Newsletter	Manage subscriptions to the AIJU newsletter, periodically sending information about services, projects and news that may be of interest.
Legitimation in the treatment of your data	
	User's authorization by marking the corresponding box.
Conservation terms	

General	The data will be kept as long as the user does not express their right to cancel or request to be unsubscribed from the notification/newsletter service.
Specific	The maximum term of conservation of curricular information by the association will be one year
	Recipients of your data
Assignee(s)	There are no transfers of data to third parties unless the transfer is based on a legal communication obligation and/or as indicated in the form itself and is precise due to its nature.
	Exercise of rights
Access, rectification, opposition, deletion, automated decisions, limitation, portability	You can exercise your rights through the following means: Email to rgpd@aiju.es, providing documentation proving the identity of the applicant (copy of the front of the National Identity Document, or equivalent). In any case, you can request the protection of the Spanish Agency for Data Protection through its website.
Response time	1 month
Minors	AIJU informs that it is not in its interest to collect personal data from minors for their treatment, (the minimum age is established by current data protection legislation), for this reason we ask minors not to send us their personal data. If AIJU identifies this type of data, it will eliminate it immediately.
AIJU reserves the right to modify this data privacy policy to adapt it to new legislation and jurisprudence, as well as to interpretive criteria of this regulation that are published by the relevant bodies. In such case, AIJU will announce such changes on the website well in advance of their implementation.	

ANNEX 7: AUTHORIZATION OF PARENTS OR GUARDIANS: VIDEO RECORDING OF CHILDREN

AIJU
TECHNOLOGICAL INSTITUTE OF CHILDREN'S PRODUCTS & LEISURE

AUTHORIZATION OF PARENTS OR GUARDIANS:
VIDEO RECORDING OF CHILDREN

Dear parents:

At AIJU (Technological Institute of children's products & leisure), within our usual work methodology, it is sometimes necessary to make video recordings to observe in detail the reality of children's activity in the context of play. These recordings or images are used by AIJU in its research projects or services with the sole purpose of studying children's behavior and contributing to improving the quality of children's toys and/or products, as well as verifying the work carried out.

Through this document we request your authorization to be able to take images of your children in the context of the game, with the commitment on our part not to use this content other than for analysis, internal viewing or for the inclusion of some images in the report, you hereby give your consent so that the data collected in any case may be transferred to the company _____ for the same purpose.

****

Mr./Mrs....., with DNI....., as mother/father or legal guardian of the child ..... I authorize the recording session in which my child participates.

I DECLARE that I legally hold parental authority/guardianship of the minor.

I RELEASE all image rights of my child.

In accordance with current regulations on data protection (EU Regulation 2016/679 of the European Parliament and of the Council of 27 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; as well as the provisions of *Ley Orgánica 1/1982* in Spain) we inform you that the data you provide through this form will be included in a file responsibility of AIJU. The personal data that you include in this document will not be transferred to third parties, except legal obligations. You can request additional information on data protection, as well as exercise your rights by writing to AIJU, through the e-mail oepi@aiju.es, with the Ref. "Personal Data".

I EXPRESS my consent and express authorization so that AIJU can use the images and audiovisual material in which my child appears directly or indirectly and are included in its database for the purposes indicated in this document with the only limitations contained in the *Ley Orgánica 1/1982, de 5 de mayo, de protección civil del derecho al honor, a la intimidad personal y familiar y a la propia imagen*, granting the obligation to inform the Public Prosecutor, in the Ley Orgánica 1/1996 de 15 de enero, de protección jurídica del menor and in the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 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).

I AUTHORIZE the image of my child and audiovisual material to be transferred by AIJU to third-party companies with which AIJU has formalized a confidentiality agreement and commitment to use said data for the treatment purposes exclusively indicated by the association and that will not be different and /or contrary to those reported in this document.

I have read, understand and accept the privacy policy and I give my free, specific, informed and unequivocal consent for the processing of my data.

You can request additional information on Data Protection, as well as exercise your rights at the address rgpd@aiju.es.

Signature: .....

Interview Date:.....

In accordance with current regulations on data protection (EU Regulation 2016/679 of the European Parliament and of the Council of 27 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; as well as the provisions of *Ley Orgánica 1/1982* in Spain) we inform you that the data you provide through this form will be included in a file responsibility of AIJU. The personal data that you include in this document will not be transferred to third parties, except legal obligations. You can request additional information on data protection, as well as exercise your rights by writing to AIJU, through the e-mail oepi@aiju.es, with the Ref. "Personal Data".

ANNEX 8: IMAGE RIGHTS ASSIGNMENT AGREEMENT

AIJU
TECHNOLOGICAL INSTITUTE OF CHILDREN'S PRODUCTS & LEISURE

IMAGE RIGHTS ASSIGNMENT AGREEMENT

HEREBY AGREE AND ESTABLISH

On the one part, Mr./Mrs._____, of legal age, with DNI/NIF_____, representing the ASOCIACIÓN DE INVESTIGACIÓN DE LA INDUSTRIA DEL JUGUETE, CONEXAS Y AFINES, (hereinafter referred to as **"THE ASSIGNEE or AIJU"**

On the other part, Mr./Mrs. _____, of legal age, with DNI/NIF_____, residing in _____, as a parent/guardian of _____, minor child, hereinafter "**THE ASSIGNOR**" DECLARE:

BOTH PARTIES MANIFEST AND DECLARE

That under the provisions of *Ley Orgánica 1/1982, de 5 de mayo, de protección civil del derecho al honor, a la intimidad personal y familiar y a la propia imagen*, they declare that they have sufficient capacity to be bound and formalize this IMAGE RIGHTS ASSIGNMENT AGREEMENT, hereinafter, the "Agreement", whose purpose is the transfer of image rights from the ASSIGNOR to the ASSIGNEE, as well as the establishment of the conditions of their use, and which will be governed by the following,

TERMS OF THE AGREEMENT

ARTICLE 1.- OBJECT. IMAGE RIGHTS ASSIGNMENT.

The ASSIGNOR declares that he legally holds parental authority/guardianship of the minor and assigns to the ASSIGNEE the image rights of the minor, expressly authorizing the capture, reproduction and dissemination of images, photographs, graphic material, etc. (hereinafter "the images").

ARTICLE 2.- LIMITS OF IMAGE RIGHTS TRANSFER.

THE ASSIGNOR only authorizes the use - collection, reproduction and dissemination - of the aforementioned images, or parts of them, within the limits established in this clause.

Any form of use of the images that does not respect the provisions herein must have a new written authorization from the assignor.

1. ***Material scope:***

THE ASSIGNEE may reproduce and disseminate the aforementioned images, or parts thereof, using all the technical means and supports currently known, particularly, written, audiovisual and electronic supports, including the Internet, and those that may be developed in the future, with the sole exception and limitation of those uses that may violate the right to honor in the terms provided in *Ley Orgánica 1/1982, de 5 de mayo, de protección civil del derecho al honor, a la intimidad personal y familiar y a la propia imagen*.

THE ASSIGNOR authorizes that the images or part of them in which the child/ward takes part may be included in the AIJU database and be published in the following media: YouTube channel, social network profiles, campaigns online and guides or catalogs of AIJU.

2. ***Temporal scope:***

The authorization and transfer of the image rights carried out by THE ASSIGNOR is granted for a period of 10 years. For new publications, the ASSIGNEE will request a new authorization for this purpose.

Once the previous period has expired, the audiovisual material published within the assignment period will not be deleted.

The consent given will be revocable by the ASSIGNOR at any time under the provisions of article 2 of *Ley Orgánica 1/1982, de 5 de mayo, de protección civil del derecho al honor, a la intimidad personal y familiar y a la propia imagen*. This authorization will be revocable by the ASSIGNOR without prejudice, where appropriate, to compensation for damages caused to the ASSIGNEE, including justified expectations.

After the termination of the relationship with the ASSIGNOR, he may exercise the cancellation of its image on said supports, provided that it is reasonable, well-founded and the company is in a position to carry out the cancellation.

3. ***Territorial scope:***

Due to the nature of the publication media (youtube channel, website and social networks) the transfer of image rights is understood to be carried out on a universal basis, without specific geographical limitation.

4. ***Transfers to third parties:***

In the event that the ASSIGNEE assigns the exploitation rights over the aforementioned images, or parts thereof, to third parties, individuals or legal entities, they will not be authorized to use them without first obtaining written authorization from the ASSIGNOR.

You are informed that the images collected as the object of this study will be transferred for research purposes to the participant companys on the PRecycling Project. You may oppose such assignment by communicating it in advance.

ARTICLE 3.- GRATUITOUS AGREEMENT

The Parties agree that this assignment is made free of charge, without THE ASSIGNOR being able to demand any consideration in exchange for the assignment of their image rights to the ASSIGNEE.

ARTICLE 4.- APPLICABLE REGULATIONS

Ambas partes se someten a la legislación española y a los términos acordados en el presente contrato, con las únicas limitaciones contenidas en la Ley Orgánica 1/1982, de 5 de mayo, de protección civil del derecho al honor, a la intimidad personal y familiar y a la propia imagen, concediendo la obligación de informar al Ministerio Fiscal, en la Ley Orgánica 1/1996 de 15 de enero, de protección jurídica del menor y en el Reglamento (UE) 2016/679 del Parlamento Europeo y del Consejo de 27 de abril de 2016 relativo a la protección de las personas físicas en lo que respecta al tratamiento de datos personales y a la libre circulación de estos datos y por el que se deroga la Directiva 95/46 CE (Reglamento General de Protección de Datos)

ARTICLE 5.- DATA PROTECTION

In accordance with current regulations on data protection (EU Regulation 2016/679 of the European Parliament and of the Council of 27 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; as well as the provisions of *Ley Orgánica 1/1982* in Spain) we inform you that the data contained in this contract will be processed by AIJU in order to formalize this agreement as well as to comply with the obligations and purposes stipulated therein. For its part, those images collected from the minor will be treated with the purpose and limitations agreed, taking into account that the minority of age to give consent in matters of data protection is set at 13 years.

You can request additional information on data protection as well as exercise your rights by writing to the following email address: rgpd@aiju.es

ARTICLE 6.- APPLICABLE JURISDICTION

The parties to this contract undertake, expressly renouncing the applicable jurisdiction, to the courts and tribunals of Valencia for the resolution of disputes that may arise.

IN WITNESS THEREOF, THE PARTIES EXECUTE THIS AGREEMENT ON ____/____/____.

ASSIGNOR **ASSIGNEE**

ANNEX 9: ETHICS ASPECTS REVIEW TABLE

		YES	NO	Page	Information to provide	Documents to provide
Does your research involve the participation of people?		X			Confirm that informed consent has been obtained.	Informed Consent Forms + Information Sheets (see text box below).
If so…	Are they volunteer for research in the social or human sciences?	X			Details on recruitment, inclusion and exclusion criteria and informed consent procedures.	Ethical behavior normative (if required).
	Are they people who cannot give their informed consent (including children, minors)?	X*			Details on the procedures for obtaining the approval of the guardian / legal representative and children's agreement. Details about the measures you plan to take to ensure that participants are not coerced.	Ethical behavior normative.
	Are they vulnerable individuals or groups?	X*			Details about the type of vulnerability. Details on the procedures for obtaining the approval of the guardian / legal representative and the agreement of the children. Demonstrate the efforts necessary to ensure a fully informed understanding of the implications of participation.	Ethical behavior normative.
	Are they children or minors?	X*			Details about the age ranges. Details about child/minor consent procedures and parental consent. Details about the measures that are intended to be taken to guarantee the well-being of the child / minor. Justification for children's participation.	Ethical behavior normative.
	Are they patients?		X		Details of the nature of the illness/condition/disability. Details on recruitment, inclusion and exclusion criteria and informed consent procedures. Details about the policy for unexpected incidents.	Ethical behavior normative.

		YES	NO	Page	Information to provide	Documents to provide
	Are they healthy volunteers for medical studies?		X		-	Ethical behavior normative.
Does your research also involve physical interventions on study participants?						
If so…	Does it involve invasive techniques (for example, human tissue or cell harvesting, surgical or medical interventions, invasive brain studies, TMS, etc.)?		X		Risk assessment for each technique and as a whole.	Ethical behavior normative.
	Does it involve the collection of biological samples?		X		Details on the type of samples to be collected. Details on the procedures for the collection of biological samples.	Ethical behavior normative.

* In some cases, the social research carried put for PRecycling project will involve children

ANNEX 10: PERSONAL DATA VERIFICATION TABLE

		YES	NO	Page	Information to provide	Documents to provide
Does your research involve the collection and/or processing of personal data?		X			Details on procedures for data collection, storage, protection, retention, transfer, destruction, or reuse (including collection methodology (digital recording, imaging, etc.), storage and sharing methods (LAN, cloud, etc.), data structure and preservation (encryption, anonymization, etc.), data exchange or fusion plan, commercial exploitation of data sets, etc.). Details on data security procedures (protective measures to prevent unforeseen use or disclosure, including the mosaic effect, for example, obtaining identification by merging multiple sources). Confirm that informed consent has been obtained. Details about the transfer of data to third countries (type of data transferred and country to which it is transferred; see the third country transfer reference below).	Documents with notifications / authorizations for the collection and / or processing of personal data (if necessary). Informed consent letter + Information letter + Other consent documents (if applicable). Authorization document for the transfer of data to a third country (if necessary).
If so…	Does it involve the collection or processing of sensitive personal data (for example, health, sexual lifestyle, ethnicity, political opinion, religious or philosophical conviction)?		X*		Details on procedures for data collection, storage, protection, retention, transfer, destruction, or reuse (including collection methodology (digital recording, imaging, etc.), storage and sharing methods (LAN, cloud, etc.), data structure and preservation (encryption, anonymization, etc.), data exchange or fusion plan, commercial exploitation of data sets, etc.). Details about data security procedures (protective measures to prevent unforeseen use or disclosure, including the mosaic effect, for example, obtaining identification by merging multiple sources). Confirm that informed consent has been obtained. Details about the transfer of data to third countries (type of data transferred and country to which it is transferred; see the third country transfer reference below).	Document of the notification/authorization for the processing of confidential data (if necessary).
	Does it involve the processing of genetic information?		X			

		YES	NO	Page	Information to provide	Documents to provide
	Does it involve tracking or observation of participants (for example, surveillance or location data and Wan data, such as IP address, MAC address, cookies, etc.)?		X			Document of the notification/authorization for monitoring or observation (if necessary).
Does the research involve further processing of previously collected personal data ("secondary use") (including use of pre-existing data sets or sources, merging of existing data sets, sharing of data with non-member states of the EU)?			X		Details about the database or the data source. Details about the procedures for data processing. Details on data security procedures (protection measures to prevent unforeseen, use or disclosure, including the mosaic effect, that is, obtaining identification by merging multiple sources). Confirmation that the data is publicly and openly accessible or that consent has been obtained for secondary use (and details of how this consent was obtained (automatic opt-in, etc.). Confirm permissions by the owner/administrator of the dataset.	Open public access evidence document (e.g., print screen from website). Informed consent forms + Information sheets + other consent documents Documents with the permissions (if necessary).

* This data will be collected only in the event that it is extremely necessary for the correct development of the project.

ANNEX 11: ETHICS ENVIRONMENT, HEALTH AND SAFETY REQUIREMENT TEMPLATE - I

Partners Logo, Institution, Address ...etc.

DD/06/2022

Ethics Review – PRecycling project

[Partners Name] ensures that appropriate health and safety procedures conforming to relevant local/national guidelines/legislation[8],[9] are followed from the staff involved in PRecycling project. All European health and safety conformities[10],[11] will be strictly adhered. Local laws[12],6[13] and standards will be applied to as part of the grant. All staff members are aware of local and European standards in all areas of engineering practice[14], health[15] and safety conformance and in personal health and safety aspects[16],[17].

Specifically:

1. All staff members involved in PRecycling project are informed of potential laboratory hazards
2. All laboratory hazards are properly identified and marked (compliance with health and safety legislation and codes of practice
3. Continuous improvement of health and safety management and performance
4. Reducing risks to as low as reasonably practicable through sensible and effective risk assessment and risk management processes
5. Provisions will be taken for appropriate resources, information, supervision, instruction and training
6. Prevention of incidents, including accidents, near misses, injury or ill health, arising from the activities of [Partners Name], and effective emergency response
7. Investigation of incidents so that lessons can be learned and shared to prevent future occurrences

[8] 17/1996 “Measures for safety and health improvement of employees in the workplace, in accordance with 89/391/EU and 91/383/EU”
[9] 16/1996 "Minimum safety and health specifications in the workplace, in accordance with 89/654/EU
[10] Directive 89/391 - OSH "Framework Directive"
[11] EU, Directorate-General for Research & Innovation “Guidance: How to complete your ethics self-assessment”, Version 5.0, 15/03/2016
[12] 395/94 "Minimum safety and health specifications for the use of working equipment by the employees, in accordance with 89/655/EU"
[13] 396/94 "Minimum safety and health specifications for the use of personal protective equipment by the employees, in accordance with 89/656/EU"
[14] Directive 2009/104/EC – use of work equipment
[15] Directive 2009/161/EU – indicative occupational exposure limit values
[16] Regulation (EC) No 1272/2008 - classification, labelling and packaging of substances and mixtures
[17] Directive 92/58/EEC - safety and/or health signs

8. The integration of health and safety objectives into strategic and operational planning, including teaching, research, design and maintenance of the built estate and procurement practices
9. Leadership by the senior management team to encourage a positive health and safety culture, and to check that policies and procedures are implemented effectively
10. Ensuring that managers and staff are equipped with the knowledge, competence, confidence and capacity to deal effectively with health and safety issues, and have access to competent specialist advice
11. Effective consultation and communication on health and safety with staff, students and others who may share our facilities or activities
12. Ensuring that staff and students understand their personal responsibility to act safely and responsibly and that they are encouraged to contribute to the continuous improvement of health and safety standards
13. All staff members are aware of proper laboratory equipment handling, use of necessary protective equipment, first aid and emergency procedures
14. All chemicals involved in PRecycling research will be handled and used according to Materials Safety Datasheets (MSDS)
15. Chemicals disposal & recycling is performed according to internal rules and procedures of [Partners Name]
16. All laboratory equipment is accompanied by user manuals and service logbooks
17. All laboratories are properly ventilated, illuminated, and equipped with fire extinguishers, fire prevention plans and evacuation plan

[additional organisation internal polices/regulations or local regulations/laws]

All possible processes related to the implementation of PRecycling project research tasks do not involve possible harm to the staff involved in the project and to the environment; no contamination of the air, water and land is expected.

[Title and name of signing person]

signature

[role in project]

DD/06/2022

ANNEX 12: ETHICS ENVIRONMENT, HEALTH AND SAFETY REQUIREMENT TEMPLATE - II

Partners Logo, Institution, Address ...etc.

DD/06/2022

Ethics Review - PRecycling project

[Partners Name] is involved in tasks that have to do with dissemination/exploitation/management of PRecycling project (results). Therefore, due to the nature of its activities the company staff doesn't have to report any particular health and safety procedures conforming to relevant local/national guidelines/legislation.

Nevertheless, [Partners Name] confirms that will observe the highest principles of ethics, equity, integrity, professional conduct and fair practice in dealing with the other partners of the PRecycling project and will conduct business in a manner designed to enhance the operations carried out during the project.

[additional company internal polices/regulations]

[Title and name of signing person]

signature

[role in project]