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**Abstract:** This document is the deliverable “D5.19 Report on stakeholder workshop about an SSH Code of Conduct” of the Horizon2020 project “Social Sciences & Humanities Open Cloud”. It is a report from a virtual Social Science and Humanities Stakeholder Workshop held on 17 March 2021, by members of Task 5.3. (Legal Issues of Innovative Data Access), with assistance from Work Package 6 (Fostering Communities, Empowering Users, & Building Expertise).

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## Executive Summary

### *Background information*

Description and analysis of the General Data Protection Regulation (GDPR) impact in relation to research in general and for selected countries is necessary in defining relevant documents and procedures. Further, there is a need to compare national implementation to identify if and how national variations reinforce existing legal barriers and restrictive practices or support open access and reusability of research data within the context of European Open Science Cloud (EOSC). The GDPR encourages the use of approved codes of conduct as a tool to ensure correct legal application and demonstrate compliance with the GDPR. This gives the scientific community a new opportunity to create a formal common framework to demonstrate compliance and facilitate harmonization of data-sharing rules and practices e.g., in relation to research.

### *Objective*

The Task 5.3 of the SSHOC project investigates the impact of the GDPR and its implications for cross-border research in Europe. The legal and ethical issues related to open access will be addressed, along with reusability of research data, and legal implementation of the FAIR principles. The purpose of the workshop held within this task was to share experiences about code of conducts, and to address the possible need for creation of code of conducts in the research sector. The overall aim was to initiate the work on a SSH GDPR Code of Conduct to be handed over to and finalised in Task 8.3 of the SSHOC project, which handles Legal and Ethical Issues.

### *Methodology*

The partners of Task 5.3 (CESSDA/NSD, DARIAH, CESSDA/DNA, and CNR) carried out a digital, three hours Stakeholder Workshop about a Social Science and Humanities Code of Conduct on the 17 March 2021. The workshop was organized as a combination of presentations by speakers followed by questions or comments. The last part of the workshop consisted of a thorough discussions of six prepared questions with 35 participants from the research sector. The discussions in the breakout rooms were moderated by task members.

### *Main outcome*

First, two members of Task 5.3 presented "Results from the Report on the impact of the GDPR and its implications for EOSC" and "Anatomy of a Code of Conduct and Implications for GDPR" respectively. Secondly, Michaela Theresia Mayrhofer from BBMRI ERIC held a presentation about the creation of a Code of Conduct for health research. The presentations were followed by a Q&A session. The most important outcome from the breakout rooms were the discussions about the use of consent as legal basis for processing personal data in research. It was addressed that the creation of information/consent form can be difficult and that the term voluntary can be questioned. It was also questioned if a legitimate interest could be a suitable legal ground in some cases, compared to public interest, and that appropriate

legal ground should be decided based on the context and planned research. It was also addressed that providing information to participants and facilitate their rights set in GDPR might be the most important action points, regardless of which legal ground is being used. Further, it was a common understanding that national regulation regarding safeguards in accordance with Art. 89 (1), might be handled differently. It was considered as beneficial to have clear guidelines regarding which safeguards to perform when processing personal data in research. It was highlighted, that challenges regarding reuse and sharing of personal data can often be a result of former information provided to participants, and that many problems could be removed if researchers in the future gathered broad consents. Thus, the workshop included interesting presentations and discussions and will inspire the further work of initiating a SSH Code of Conduct for the project team.

### *Major conclusions*

The presentations and the following discussions showed that creation of a code of conduct is a complex task. The importance of a structured work when creating a code of conduct, but also the will from the relevant sector when taking the initiative to creating one was emphasized. Thus, it was especially valuable that some of the workshop participants expressed their will to be included in the initiative of creating a SSH code of conduct. The crossing field and implications of ethics and privacy turned out to be especially relevant when processing personal data in research. Also, the need for mapping possible appropriate safeguards when processing personal data and addressing how to better facilitate reuse and sharing of personal data in the research environment was highlighted.

## Abbreviations and Acronyms

EOSC	European Open Science Cloud
GDPR	General Data Protection Regulation, EU 2016/679
CoC	Code of conduct
SSH	Social Science and Humanities
NSD	NSD – Norwegian Centre for Research Data
GESIS	Leibniz Institute for the Social Science
UL-ADP	University of Ljubljana, Social science Data Archive (UL-ADP)
LIBER	Association of European Research Libraries
BBMRI-ERIC	European research infrastructure for biobanking
EDPB	European Data Protection Board
WP	Work Package
SSHOC	Social Science and Humanities Open Cloud

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# 1. Introduction and aim of the workshop

According to the EU report “Two years of the GDPR: Questions and answers” the implementation of General Data Protection Regulation<sup>1</sup> in 2018 has been an overall success<sup>2</sup>.

The report concludes that harmonization across the Member States is increasing generally, although there is a certain level of fragmentation that must be continually monitored. Furthermore, the report states that it is important to further support harmonization and consistent implementation of the GDPR across the EU. This includes making sure that national legislation is fully in line with the GDPR. To facilitate harmonization across Member States and sectors, the report highlights creation and use of Codes of Conducts as an important tool to ensure such harmonization.

Working in open access, implementing reusability of research data, and FAIR principles, addressing legal and ethical issues are some of the key aspects of daily work for researchers striving to be in line with the principles of integrity, accountability, independence, and impartiality. In recent years, many researchers have indicated the need for some guidance, standards, a Code of Conduct to support them to comply with GDPR while using data for the research. To fill this gap and support open access and reusability of research data within the context of European Open Science Cloud (hereinafter EOSC), the SSHOC partners initiated work on a Code of Conduct for the Social Sciences and Humanities.

The GDPR encourages the use of approved Codes of Conduct as a tool to ensure correct legal application and demonstrate compliance with the GDPR. Thus, it is warranted to describe and analyse the impact of the GDPR in relation to research in general and for selected countries. Further, there is a need to compare national implementation to identify if and how national variations reinforce existing legal barriers and restrictive practices or support open access and reusability of research data within the context of EOSC. A creation and use of Codes of Conducts give the scientific community a new opportunity to create a formal common framework to demonstrate compliance and facilitate harmonization of data-sharing rules and practices e.g., in relation to research.

The overall aim in SSHOC Work Package 5 is to facilitate innovations in data access and to provide tools and services for intelligently open data for the SSH domain to be incorporated into the EOSC. In Task 5.3 the aim is to gain insights on experiences about code of conducts.

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<sup>1</sup> See Official Journal of the European Union;

<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN> (accessed 10.06.2021)

<sup>2</sup> See The report from the European Commission (2020), “Two years of the GDPR: Questions and answers”; [https://ec.europa.eu/commission/presscorner/detail/en/qanda\\_20\\_1166](https://ec.europa.eu/commission/presscorner/detail/en/qanda_20_1166), 12.08.2020 (accessed 10.06.2021)

Therefore, this task investigates the impact of the GDPR and its implications for cross-border research in Europe. The legal and ethical issues related to open access are addressed, along with reusability of research data, and legal implementation of the FAIR principles. One of the activities planned within the task was to carry out a workshop where stakeholders can share their experiences about code of conduct and address the possible need for creation of Code of Conduct in the research sector. The aim of the workshop was to let participants gain practical insights into the challenges inherent in establishing a Code of Conduct and learn the how and why from experts in the field, and to incorporate the outcomes into an ongoing project task to initiate a Code of Conduct specifically for Social Sciences and Humanities researchers.

The overall aim was to initiate the work on a SSH GDPR Code of Conduct to be further elucidated in Deliverable 5.8 “Draft SSH GDPR Code of Conduct” and thereafter handed over to and finalised in Task 8.3 “Legal and Ethical Issues”. This report is meant to, in a short manner, present how the workshop was conducted and what was addressed.

## 2. Methodology

A workshop about Code of Conduct within Social Science and Humanities was held on 17 March 2021. Invitations were sent out to stakeholders within the SSHOC community, and the workshop was also advertised online<sup>3</sup>. The workshop was organized by members of task 5.3 and supported by members from WP 6 of with representatives from Association of European Research Libraries (LIBER), Leibniz Institute for Social Sciences (GESIS) and University of Ljubljana, Social science Data Archive (UL-ADP). The workshop was planned to be held face-to-face. However, due to the Pandemic this was not possible, and the workshop was therefore held virtually using Zoom, lasting about three hours.

The workshop was interactive and target audience consisted of policy makers, practitioners and others working with GDPR, research ethics, and Codes of Conduct. In total 35 people from the research sector participated at this digital event.

During the workshop, presentations from NSD - Norwegian Centre for Research Data (NSD) and the European research infrastructure for biobanking (BBMRI – ERIC) were held. NSD presented their current findings in a report on the impact of GDPR and its implications for EOSC (Deliverable 5.7 of the SSHOC project), and addressed what a code of conduct is, what it entails, and benefits when such is created. BBMRI presented their experiences working on a code of conduct for health research and provided input on necessary steps to take and what kind of content a code of conduct might include. Slides from the presentations have been published at Zenodo<sup>4</sup>.

The participants had the possibility to address questions in a virtual chat during all presentations, and during a scheduled session for questions to the speakers and organizer. The last part of the workshop contained group discussions. The participants were divided into groups to discuss questions prepared by the organizer, regarding experiences, challenges, and recommendations for a Code of Conduct. The task had prepared six questions to gain relevant knowledge and experiences from the participants, as well as to ensure a focused discussion and, most importantly, to inspire future work, when initiating a code of conduct for SSH.

Some of the participants left the workshop earlier than expected after the presentations were finished, which led to fewer group discussions than originally planned. This was solved by merging the groups. Monitors, responsible for addressing questions and taking notes, participated actively in each group. At

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<sup>3</sup> See SSHOC workshop: SSH Code of Conduct; <https://sshopencloud.eu/events/sshoc-workshop-ssh-code-conduct-0> (accessed 06.07.2021)

<sup>4</sup> SSHOC workshop: SSH Code of Conduct (presentations): <https://zenodo.org/record/4655623#.YlJmE-kzbUp> (accessed 05.07.2021)

the end of the group discussions, the participants came back from the breakout rooms, and the monitor of each group presented the outcome of the discussions.

As part of SSHOC Work Package 5, the project team finalised a report on the impact of GDPR and its possible implications for EOSC (SSHOC Deliverable 5.7). Further, the project group is to initiate a Social Science and Humanities Code of Conduct (SSHOC Deliverable 5.8), which will be further developed in WP8.

## 3. Program

The workshop started with a general welcome, followed by an introduction of the speakers and a Mentimeter survey to reflect the participant`s background and expectations for their attendance. (Appendix 1: full workshop agenda, and Appendix 2: list of participants).

### 3.1 The Key Implications of GDPR for EOSC

Following the introduction and survey, members from Task 5.3 held two presentations. First was Ina Nepstad. Nepstad works as a senior advisor at NSD, where she assists researchers to enable high-quality research, while at the same time safeguarding privacy. Prior to this role, she worked at Haukeland University Hospital as a researcher specialising in blood cancer and allergology. Nepstad has a PhD from the University of Bergen (Bergen, Norway) and Hospital Cochin, INSERM (Paris, France), and a Master of Science (MSc) from the Norwegian University of Science and Technology (Trondheim, Norway).

Nepstad talked about key implications of GDPR for EOSC and presented findings from the SSHOC Report 5.7. - Report on the impact of the GDPR and its implications for EOSC (Legal issues of innovative data access). The report (unpublished) describes and compares the national implementation of the GDPR across Europe, by examining some European countries' national laws and conducting interviews with researchers. It also describes what implications GDPR might have for EOSC.

A part of the presentation covered processing of special categories of personal data. To lawfully process the special categories of personal data one would need a lawful basis that can be found under Art. 9 of the GDPR. The speaker stressed that it is prohibited to process sensitive data unless you have legal ground. It is common to use explicit consent or in a case of research the public interest/research purposes.

Nepstad proceeded with talk about how which bases to be used to lawfully process personal data depends on the purpose of use and showed how Article. 6 no.1 (e) in the GDPR in some countries is used for research purposes, that is researchers can process personal data, since their work is considered as the work done in the public interest, without documented consent from a person whose data are being used, and how this shows the need for the lawful processing of personal data in the public interest.

Further, the speaker stressed that some countries have provided lists of safeguards in addition to GDPR art. 89 (1), others have not. These varied approaches require standardization or a unified approach. Nepstad pointed out the following implications for EOSC:

- As all processing of personal data must have a legal ground, the different interpretations and supplements in national legislations might affect the users of EOSC.
- The wording in the consent given from the data subject to the researcher might cause hindrances for sharing data with others, including through EOSC.
- A plan should be made for the assessment of personal data within EOSC.

- The required safety measures differ from one country to another. When organizing EOSC, a plan should be made for the assessment of the suggested safety measures is sufficient.

## 3.2 Anatomy of a Code of Conduct

Secondly, Mathilde Steinsvåg Hansen, also a member of task 5.3, talked about the “Anatomy of a Code of Conduct and Implications for GDPR”. Hansen has a law degree from the University of Bergen. She has been working as an advisor at NSD since 2019, where she provides guidance to researchers about privacy legislation. She also works as a Data Protection Officer for external institutions.

In her presentation Hansen introduced the concept of the Code of Conduct, its definition, and its relevance. She explained how a Code of Conduct can be defined as a set of voluntary accountability tools/guidelines which set specific data protection rules for categories of controllers and processors. Further how a Code, therefore, assists members of the specific Code with data protection compliance and accountability, and how the code can be applicable in specific sectors or relating to particular processing operations. Hansen then proceeded with the talk about how a Code of Conduct identifies and resolves key data protection challenges, important to the sector, with insurance from supervision authorities that the code is appropriate. Further how a code is written by an organization/association representing a sector in a way that the sector understands and enables the sector to solve these challenges and showed how the basis for a Code of Conduct is regulated in GDPR art. 40 and 41.

Furthermore, Hansen explained how a Code of Conduct is relevant because it will help the sector to comply with GDPR. She stressed that a Code can be a useful and effective accountability tool, providing a detailed description of the most appropriate, legal, and ethical set of behaviours for a sector. Hansen talked about how, from a data protection viewpoint, a code can operate as a rulebook for controllers and processors who design and implement GDPR compliant data processing activities. Further how developing a Code of Conduct can help build public trust and confidence in the concrete sector`s ability to comply with data protection laws. Moreover, how it can help to reflect on the processing activities and ensure that rules of a specific field are followed to achieve best practice. She ended her presentation by talking about how the creation of a Code of Conduct might be potentially cost-effective.

## 3.3 Creation of a Code of Conduct in Health Research

The last presentation was held by, Michaela Theresia Mayrhofer from BBMRI ERIC. Mayrhofer`s a presentation was about the creation of a Code of Conduct for health research, a work initiated by the BBMRI ERIC, and led by Mayrhofer. Mayrhofer is a political scientist and historian by training. She was educated in Vienna, Louvain-la-Neuve, Essex and Paris. Her PhD thesis was shortlisted for the ‘best thesis 2010’ young scientist award by the Austrian Society for Political Science. Research interests include the governance of life sciences, societal implications of AI and data protection. Michaela has been working for BBMRI-ERIC since 2013, serving as Head of ELSI Services & Research since 2019.

In her presentation Mayrhofer shared experiences from BBMRI ERIC`s work on trying to create a Code of Conduct for health research. She described how the code initiative had started with biobanks and extended to clinical trials, studies, cohorts, registries, and genome databases` data for harmonized data sets, as well as considering links to patient data and electronic health data.

Moreover, she explained what a Code of Conduct is, and what Article 40 of the GDPR entails. She also talked about the requirements prior to submission of a Code as defined by the European Data Protection Board (EDPB), and listed that an initiative must have:

- explanatory statement included;
- scope clearly defined;
- monitoring body identified;
- stakeholder consultation demonstrated;
- compliance with applicable national legislation confirmed<sup>5</sup>.

Further, the complexity of creating and/or initiating a code of conduct was highlighted. The required Monitoring Body, who must be independent, have the right expertise, an appropriate governance structure and procedure, transparent complaints handling, and review mechanisms has been one of the issues that several code initiatives have struggled with.

Also, Mayrhofer explained how the criteria for approval needs to meet a particular need of a sector (e.g. health research), facilitate the application of the GDPR; specify the application of the GPDR; provide sufficient safeguards; and provide effective mechanisms for monitoring the compliance of the code. Mayrhofer also went through how a Code may be submitted, approved, and accepted. She then proceeded to talk about the levels of involvement of the BBMRI ERIC Code initiative from 2017-2020, (see details below):

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<sup>5</sup> See Guidelines 1/2019 on Code of Conduct and Monitoring Bodies under Regulation 2017/697, version 2.0. 4 June 2019; [https://edpb.europa.eu/our-work-tools/our-documents/guidelines/guidelines-12019-codes-conduct-and-monitoring-bodies-0\\_en](https://edpb.europa.eu/our-work-tools/our-documents/guidelines/guidelines-12019-codes-conduct-and-monitoring-bodies-0_en) (accessed 10.06.2021)

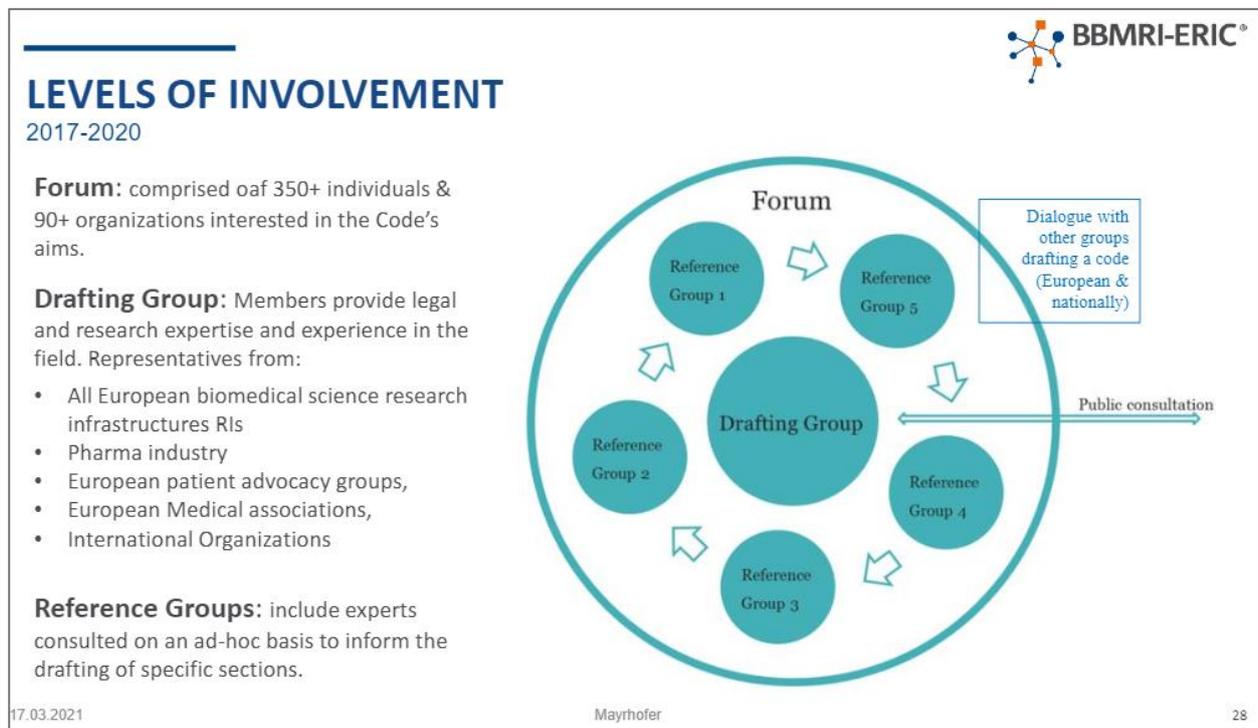


Figure 1: Excerpt from BBMRI presentation at the workshop

The key topics in the BBMRI ERIC's Code, mentioned by Mayrhofer were:

- legal basis/consent,
- personal data/anonymization
- controller/joint controller/processor

Mayrhofer talked about how their code does not promote one legal basis over another, as the decision is context dependent and might have a specification in national law (country derogation), and what is considered to be anonymized data always will be context dependent.

After addressing key topics, Mayrhofer went on to talk about the structure of the Code and how they now had decided on using a FAQ-style non legalistic language on questions that arise in the workflow for a researcher/data controller, followed by a rule/recommendation, explanation, and example, that will lead to a structure like:

- 1.0. Question
- 1.1. Rule/Recommendation
- 1.2. Explanation
- 1.3. Example

Examples of questions that may be addressed in the Code were: *What are my information obligations?; Can I use data for future/further purposes?; What is a data controller?.* Example below:

## EXAMPLE: PERSONAL DATA

**Rule:** Data may (only) qualify as personal data due to additional information, that is available for identification.

**Explanation:** The status of data as personal data depends on who gets to know the data and what other information is available to him.

**Example:** The name "Peter Smith" is not enough information to identify somebody globally, but it would be sufficient in a classroom.

The same research data set might be considered anonymous, if access is controlled and the data only available for research projects, which have undergone an ethical scrutiny, whereas it might be considered personal data, if it is published in an open access database on the web. This is due to the fact, that the more people have access to data, the more likely it is, that some people with additional information or other means for identification at hand will access them.




17.03.2021
Mayrhofer
32

*Figure 2. Excerpt from BBMRI presentation at the workshop on personal data*

Mayrhofer continued with showing how BBMRI ERIC is working with other complementary codes such as ESOMAR's EUCROF and GEANT's Code of Conduct initiatives, as well as smaller national code initiatives. At the end of her presentation, she presented next steps for the code initiative. The presentations were followed by a Q&A session.

## 4. Key discussion points and recommendations

### 4.1 Questions prepared for each group

Below is a list of all questions and summary from the group discussion.

1. Our understanding is that different legal basis for processing of personal data are being used in research projects. Do you believe that the use of legal basis for processing personal data in research, is based on ethical considerations? For instance: is consent being used as legal ground for processing of personal data, because there might be demands of consent in ethical guidelines?
2. Our understanding is that national legislation across Europe presents different terms in relation to which appropriate safeguards are required, when a public interest/scientific or historical research purposes are being used as legal basis, cf. GDPR art. 89 nr. 1. Which terms should be necessary when processing research data and why?
3. Which challenges/limitations have you experienced in relation to possible reuse of research data, containing personal data?
4. Which challenges/limitations have you experienced in relation to sharing research data containing personal data, across borders (within EU/EEA)?
5. Which advantages/disadvantages and/or possible hinders can you identify regarding one common infrastructure to store/manage research data containing personal data in Europe?
6. Both ethical considerations and privacy considerations dictates that information should be provided to participants in research projects. Can you think of/have you experienced any challenges, harmonizing GDPR information and ethical information?

### 4.2 Summary from group discussions

The group discussions showed how the use of consent as legal basis for processing personal data in research, is often based on ethical considerations. It also showed how legal bases depends on context and country and are used differently in different countries, in addition that there is a Northern Europe/Southern Europe divide. One example is from Finland, where researchers are obliged to use public interest (GDPR art. 6 (1) e) as the legal ground, whilst the consent from participants is considered as an ethical consideration. In Austria, on the other hand, they only use consent (GDPR art.6 (1) a) as legal

basis for research. In other countries in Europe, e.g., Norway, the use of legal ground differs from one project to another, but the most common legal basis for research purposes is consent.

The discussions also showed how the difference between the use of consent as legal basis for processing personal data in research, or on ethical considerations is unclear, both for participants and researchers. One group suggested that an ethical or legal consent, can be seen as an ethical safeguard. Further, it was addressed that the creation of information/consent form can be difficult. It was also stated that consent in some cases is considered problematic, as the term of voluntary can be questioned. For instance, in health research, the participants can be patients and willing to join most projects to get better, when asked. This might compromise the term of voluntary consent, which again affects the validity of consent as a legal ground.

The participants also discussed if legitimate interest (GDPR art.6 (1) f)) could be a suitable legal ground in some cases, compared to public interest. According to some participants this will depend on who is responsible for the research. For instance, in some countries a discussion has been made if Universities is allowed to use public interest as legal ground or if legitimate interest is better, compared to research institutions.

Further, it was addressed that which legal ground to be appropriate should be decided based on the context and planned research. For instance, the use of consent as legal ground in projects conducting experiments was described as problematic in many cases, as it might be destructive to the purpose of the research. The discussions demonstrated that there is a need for further guidance from the European Data Protection Board, and that which legal basis to use for processing personal data for research purposes, may be a relevant topic for a future Code of Conduct for SSH research.

The discussions also addressed that providing information to participants and facilitate their rights set in GDPR might be the most important action points, regardless of which legal ground is being used. However, the participants also talked about how the content of information required by Article 13 and 14 in the GDPR, might compromise ethical considerations in research, as it can be confusing for the participants.

Further, it was a common understanding among the participants that national regulation regarding safeguards in accordance with Art. 89 (1), might be handled differently. For instance, in Norway the involvement of the data protection officer when processing special categories of personal data is explicitly stated in national law, whilst this is not explicitly regulated in other countries besides what is regulated in the GDPR. In general, pseudonymization and transparency was highlighted as important safeguards. Further, it was addressed that privacy training of staff might be one of the most important safeguards, which can be forgotten. The participants also considered it beneficial to have clear guidelines regarding which safeguards to perform when processing personal data in research.

The discussions also showed how in some countries, challenges regarding reuse and sharing of personal data were normal. For instance, instead of sharing/reusing data containing personal information, the data in some cases would be needed to be anonymized before further reuse. The participants discussed

how this can be compromising for the purpose of research, as personal information might be necessary for the purpose. In other countries, the fear of sharing/transferring special categories of personal data has led to bringing relevant receivers to the physical dataset, instead of providing remote access or transferring the data.

The discussions highlighted that the challenges regarding reuse and sharing of personal data often can be a result of often unintended limitations set in participant information sheets and/or consents forms, e.g. where researches' promise to not share data with others and/or anonymize or delete data when the project ends. It was discussed that many problems could be removed if researchers in the future gathered broad consents, and/or also possibly if researchers used a different legal ground than consent and provided participants with information about possible reuse/sharing of their data. It was addressed that this reflects the importance of training staff, as it might result in less challenges in reuse and sharing of personal data if planning projects in a way to enable sharing/reuse of data, within the regulation set in the GDPR.

Some participants also stressed that anonymization is hard to perform. Therefore, unless the project team is sure to enable anonymization, it should not use wording to promise anonymizations. Instead, information about what they attend to do, including possible reuse/sharing of the data should be included in the information provided.

## 5. Conclusion

The workshop included valuable presentations and discussions and will facilitate further work in initiating SSH Code of Conduct for SSHOC Task 5.3 and Task 8.3.

The participants provided beneficial input during the discussions, and the presentation from BBMRI ERIC was informational and inspiring for the work ahead. BBMRI ERIC's experiences shows that creation of a code of conduct is complex. This indicates the importance of a structured work when creating a code of conduct, but also the will from the relevant sector when taking the initiative for creating one.

The content of SSH code of conduct to be initiated is yet to be determined. However, based on the information provided by the participants, some relevant themes will be subject for further assessment. For instance, the crossing field and implications of ethics and privacy is interesting and seems to be affecting different aspects when processing personal data in research.

Further, the need of mapping possible appropriate safeguards when processing personal data and addressing how to better facilitate reuse and sharing of personal data in the research environment. It is the project group's opinion that these topics cover a range of questions raised, which will be subject for further assessment when initiating a code of conduct.

At the workshop participants expressed their will to be included in the initiative of creating a SSH code of conduct. Knowing the complexity of such work and the need for collaboration in the sector, the project group considers this as a positive start.

## 6. References

- The report from the European Commission (2020), “Two years of the GDPR: Questions and answers”; [https://ec.europa.eu/commission/presscorner/detail/en/qanda\\_20\\_1166](https://ec.europa.eu/commission/presscorner/detail/en/qanda_20_1166), (12.08.2020)
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<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN> (11.06.2021)
- Guidelines 1/2019 on Codes of Conduct and Monitoring Bodies under Regulation 2016/679 - version adopted after public consultation;
- [https://edpb.europa.eu/our-work-tools/our-documents/guidelines/guidelines-12019-codes-conduct-and-monitoring-bodies-0\\_en](https://edpb.europa.eu/our-work-tools/our-documents/guidelines/guidelines-12019-codes-conduct-and-monitoring-bodies-0_en)
- SSHOC workshop: SSH Code of Conduct;  
<https://trust-it-services.com/events/sshoc-workshop-ssh-code-conduct>

## 7. Other sources and links

- SSHOC workshop: SSH Code of Conduct (presentations);  
<https://zenodo.org/record/4655623#.YIjmE-kzbUp>
- Workshop Blog; Workshop notes: Code of Conduct for the Social Sciences and Humanities;  
[https://docs.google.com/document/d/172aBQjLQxkVAJfxEIDR3ZDPbp\\_AUKaz8/edit](https://docs.google.com/document/d/172aBQjLQxkVAJfxEIDR3ZDPbp_AUKaz8/edit)
- SSHOC workshop: SSH Code of Conduct ;  
<https://www.sshopencloud.eu/events/sshoc-workshop-ssh-code-conduct-0>

## 8. Appendix 1 - Workshop Agenda<sup>6</sup>



**Date:** 17 March 2021 - 14:00 to 16:30

**Location:** Online

The SSHOC project announces an interactive workshop for policy makers, practitioners and others working with GDPR, research ethics, and Codes of Conduct.

Participants will gain practical insights into the challenges inherent in establishing a Code of Conduct and learn the how and why from experts in the field.

The outcomes of the workshop will be incorporated into an ongoing project task to set up a Code of Conduct specifically for Social Sciences and Humanities researchers.

### Agenda

- Presentation of findings from SSHOC report on the impact of the GDPR and its implications for EOSC, *Ina Nepstad and Mathilde Steinsvåg Hansen, NSD - Norwegian Centre for Research Data*
- Anatomy of a Code of Conduct and Implications for GDPR, *Ina Nepstad and Mathilde Steinsvåg Hansen, NSD - Norwegian Centre for Research Data*
- Creation of a Code of Conduct in health research, *Michaela Th. Mayrhofer, BMRI ERIC*
- Plenary and break-out discussion of experiences, challenges, and recommendations

<sup>6</sup> See SSHOC workshop: SSH Code of Conduct ;  
<https://www.sshopencloud.eu/events/sshoc-workshop-ssh-code-conduct-0>

## 9. Appendix 2 - Aggregated list of participants that signed up for the event

No.	Organization	Job Title	Country/Region Name
1	DLA Marbach	Researcher	Austria
2	TU Delft	Data steward	Netherlands
3	UL-ADP (Social Science Data Archives)	Head of department	Slovenia
4	Sciences Po	Postdoctoral Researcher	United States of America
5	GESIS - Leibniz Institute for the Social Sciences	Preservation specialist	Germany
6	Library Service and Partnerships, Copenhagen University Library, Research Services	Special Advisor - Data Steward	Denmark
7	CSIC	Researcher	Spain
8	UL/ADP	Researcher	Slovenia
9	Central Humanities Library, Faculty of Arts, University of Ljubljana	Head	Slovenia
10	GESIS	National Project Manager PIAAC Germany	United States of America
11	ZRC SAZU	Researcher	Slovenia
12	CNR	researcher	Italy
13	GESIS	Data Infrastructure Coordinator	Germany
14	Sciences Po	Junior researcher	France
15	Sciences Po Paris	Assistant Statistician	France
16	Zaporizhzhya Institute of Economics and Information Technologies	Dr	Ukraine
17	Sciences Po	IT project manager	France
18	DANS	Advisor for legal affairs	Netherlands
19	DANS	Service manager	Netherlands
20	GESIS - Leibniz Institute for the Social Sciences	Researcher	Germany
21	KTU	Researcher	Lithuania
22	CNR	Research fellow	Italy
23	National Centre for Social Research (EKKE)	Senior Researcher	Greece
25	University of Oulu	Research support service	Finland
26	UoITC	Professor	Iraq

27	UK Data Archive	Research Data Services Officer	United Kingdom
28	CLIC CLARIN University of Groningen	Lawyer	Netherlands
29	Jagiellonian University	Research associate	Poland
30	Athena RC/ILSP	Researcher	Greece
31	GESIS	Softwareentwickler	Germany
32	Universität Bielefeld	Projektmitarbeiterin	Germany
33	University of Essex	Senior Research Data Officer	United Kingdom
34	IDS Mannheim	Legal Expert	Germany
35	DaSCH	DARIAH Cooridator	Switzerland
36	University of Graz	Department Manager	Austria
37	University of Helsinki	Research Director	United States of America
38	Institute of Ethnology and Folklore Research	Assistant	Croatia
39	CESSDA ERIC	Project Manager	Norway