

Data Management Plan

Deliverable D7.3

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Executive Summary

The EuropeWave PCP action will use public procurement to deliver an EU wide innovation programme that will accelerate the development of credible wave energy technology and build confidence in the sector and its ability to deliver the potential economic rewards. Public authorities and suppliers will share benefits and costs in a competitive environment that will foster collaboration and stimulate innovative solutions. The EuropeWave concept brings together three key elements to achieve these:

- Pre-commercial procurement funding model
- Structured innovation – a stage-gated industrial development process
- Internationally agreed performance standards and metrics.

These three elements will link together to form a development framework that will ensure the best technology is developed in the shortest time frame in an environment of engineering rigour that will bring the wave energy sector to commercialisation and allow investors to regain confidence in the credibility of wave energy technology.

EuropeWave pools the resources of two R&D funding organisations from Atlantic-facing Member States/regions that are well placed to reap the potential environmental, economic and social benefits of wave energy. The involvement of Ocean Energy Europe provides a direct link to other key stakeholders that can play a role in realising the widest possible impacts for Europe.

This €19.6 million investment in demand-driven R&D, including a contribution of 50% from the participating Member States and regions, will provide a much-needed boost to wave energy innovators and demonstrate the power and influence of the PCP instrument to bridge the gap between conventional public R&D funding and commercial investment.

Abbreviations & Acronyms

Abbreviation/ Acronym	Description
CA	Consortium Agreement
CDE	Communication Dissemination & Exploitation
DMP	Data Management Plan
EC	European Commission
ECM	Enterprise Content Management
EEA	European Economic Area
EW	EuropeWave
GDPR	General Data Protection Register
PCP	Pre-Commercial Procurement
PMP	Project Management Plan
POPD	Privacy or protection of data
TCA	Trade and Cooperation Agreement
WP	Work Package
WPL	Work Package Leader

Partner short name	Full Partner Name
EVE	Ente Vasco de la Energía
OEE	Association Européenne de l'Énergie de l'Océan
WES	Wave Energy Scotland Limited

1 Introduction

The overarching objective of the EuropeWave project is to deliver a pre-commercial procurement (PCP) programme to accelerate the development of credible wave energy technology and build confidence in the sector and its ability to deliver the potential economic rewards.

This Data Management Plan outlines the approach to the management of data collected or generated during the project.

In this context the term data refers to: personal data, project management data, data collected by the beneficiaries in conducting the communication & dissemination activities, and data generated by the contractors providing the R&D services through the PCP contracts.

This Data Management Plan is a living document and will be reviewed at key stages of the project, ensuring that it remains applicable for all data collected or generated during the project.

WES, as project coordinator and leader of the project management activities, is responsible for any reviews and updates of the DMP. However, all project partners are accountable for any data collected or generated in relation to this project and must ensure that the protocols described in this document are adhered to.

2 Data summary

The data collected or generated by the EuropeWave project can be categorised into distinct areas:

- Data collected or generated by the beneficiaries in managing the project (project deliverables, internal file notes, internal communications, etc.)
- Data collected or generated by the beneficiaries in conducting communication, dissemination and exploitation (CDE) activities
- Data collected or generated by the beneficiaries in conducting the procurement exercise that results in the award of the PCP contracts for R&D services (including market consultation activities, tender submissions, etc.)
- Data generated by the contractors providing the R&D services under the PCP contracts.

2.1 Personal data

General project management activities, CDE activities, the procurement exercise and management of the ensuing PCP contracts will require the collection of personal contact data.

In leading the CDE activities, Ocean Energy Europe will collect and process personal contact data in specific websites or databases to allow the distribution of project information to mailing lists and event attendees. Anonymised and aggregated data may be shared with other beneficiaries for statistical analysis.

2.2 Commercially sensitive data

Data generated by the contractors performing the R&D services under the PCP contracts is commercially sensitive.

3 Documentation

The Project Management Plan (PMP) describes the internal communication requirements, including the common naming convention that should be used in all correspondence and document management. This ensures that data is well-organised and easily retrievable by the project partners.

Unreleased versions of a Project Deliverable should be given a working name consisting of:

- <Deliverable identifier>_
- <Up-to-three-words-from the deliverable name>_
- <version number

Example: D7.1_Project Management Plan_v0.1

Upon approval and release of a Project Deliverable by the Project Coordinator, in accordance with the document review process described in the PMP, the working name should be prefixed by the project name abbreviation and an integer version number applied:

Example: EW_D7.1_Project Management Plan_v1.pdf

4 Data storage, security and sharing

The EuropeWave project has adopted Objective's Enterprise Content Management (ECM) system ¹ to manage the project's document repository and provide the collaboration workspace platform.

Objective's ECM system features embedded anti-virus, 2-step verification, as well as native encryption and protection across devices.

Objective Connect, Objective's secure file sharing application designed specifically for government and regulated industries, provides the collaborative workspace. The software provides document version control and easy searching to ensure that information is always readily accessible.

The system is certified for global standards (ISO9001 & ISO27001) for information security and conforms with NCSC, DSM and G Cloud-12 cloud security principles for data management.

All data held is securely hosted in the UK within the Objective Connect cloud.

Objective Connect links with the ECM system and thus internal governance frameworks are applied automatically preventing unauthorised sharing. The system is fully auditable.

Access to the workspace is by invitation only with invitations issued by the workspace owner. Users must register with Objective prior to accepting the invitation to the workspace. The workspace owner controls a user's privileges.

Objective Connect will be used to manage the collaboration between the beneficiaries, and, the collaboration between the buyers group and the R&D service contractors.

¹ <https://www.objective.co.uk/>

An Objective Connect workspace has been established for the beneficiaries. Further separate workspaces will be created for each individual R&D service contract.

Ocean Energy Europe, who are leading the communication, dissemination and exploitation activities will hold some data within specific websites and databases to facilitate the distribution of information event attendees and mailing list subscribers. Any details will be shared only with consortium members for statistical analysis and any data used for reporting purposes will be anonymised and aggregated where required to ensure confidentiality.

5 Retention

5.1 Project documentation

In line with Article 18 of the Grant Agreement, all project documentation will be held for five (5) years following the final payment of the grant. Documentation relating to the project will be held by WES in the ECM system.

5.2 Tender submissions

Unsuccessful tender submissions will be retained for a period of twelve (12) months from the publication of the contract award notice before being destroyed.

Successful tender submissions will be retained for a period of ten (10) years from the end of the contract.

5.3 PCP contracts

Contractors must keep, for a period of six (6) years after the termination or expiry of the Framework Agreement and Call-off Contracts (together PCP Contracts) or until 31 October 2031 (whichever is later), records and other supporting documentation relating to the execution of the PCP Contracts.

6 Legal requirements

6.1 Personal data

The collection and processing of personal data by the EuropeWave project beneficiaries will be in accordance with the “data minimisation” principle, i.e. relevant and limited to the purposes of the project, and security measures are in place to prevent unauthorised access to personal data or the equipment used for processing that data.

An individual has the right to request details of their personal information held by the EuropeWave project, and request that such information is erased. Such requests will be dealt with in line with the GDPR.

EuropeWave’s full privacy policy and data usage statement is published on the project website.

6.2 Transfer of data between the EU and the UK

The EU-UK Trade and Cooperation Agreement (TCA) came into effect on 1 January 2021.

The TCA included provisions permitting the transfer of data between the EU and the UK to continue, temporarily, while the EU assessed the adequacy of the UK's data protection system. Transfers of data from the UK to the European Economic Area (EEA) were not restricted.

In June 2021 the European Commission's adequacy decision confirmed the UK's data protection system continued to be aligned with EU data protection rules, meaning the transfer of data from the EU to the UK could continue as if the UK were a Member State.

The adequacy decision is time limited, expiring after 4 years, i.e. before the end of the EuropeWave project. The EuropeWave project will monitor the status of the adequacy decision and will ensure that appropriate safeguards are in place should the outcome of the review be a change from the status quo.

6.3 Intellectual property rights

Under the terms of the PCP contracts engaging the contractors to provide the R&D services, the contractor retains ownership of the results generated during the contract and of the intellectual property rights attached to the results and is obliged to take measures to exploit the results commercially within four (4) years.

7 Ethical requirements

Ethical requirements are covered extensively within the ethics deliverables, specifically D1.2.

There are no perceived ethical issues associated with the collection or generation of data in the EuropeWave project.

8 Resources

Wave Energy Scotland (the project coordinator) uses the Objective document management system in its day-to-day activities. The use of the system for the EuropeWave project can be accommodated within WES's current contract terms, at least in the initial phase of the project. However, additional capacity is anticipated once the collaboration workspaces for the R&D service contracts are established. The cost of securing this additional capacity is not expected to exceed €50,000 over the project's lifetime and is included in the project budget.

9 Responsibility

As project coordinator, Wave Energy Scotland has ultimately responsibility for data management within the project. Other beneficiaries are individually responsible for ensuring that their use of the collaboration workspace is carried out correctly.