

GDPR Functionality in DMPonline.be

DMPbelgium admins meeting | 2019-06-05

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GDPR functionality: why?

- Accountability principle in the GDPR
 - not only compliance, but also *demonstrating* compliance
 - includes obligation to keep **records** of all personal data processing activities
- Many researchers now also required by funder/institution to write a **DMP**
- Integrate DMP writing & fulfilling GDPR register requirement
 - both should normally happen in early stages of project
 - one-stop shop for researchers

GDPR functionality is optional

- DMPbelgium member institutions can **opt in**
 - local users can make use of the new GDPR functionality
- But no changes for institutions NOT opting in
 - local users can continue to use the tool as before

GDPR functionality: overview of changes

1. Templates
2. 'Create new plan' wizard
3. New DPO role

GDPR functionality: opting in

- Means offering 2 types of templates
 1. 'Regular' templates (same as before)
 2. GDPR-compatible templates (contain institutional GDPR questions that researchers must answer to record personal data processing activities)
- User selects appropriate template via 'Create new plan' wizard

Wizard helps tool determine which template & guidance to show

Create a new plan

Please select from the following drop-downs so we can determine what questions and guidance should be displayed in your plan.

Project title (required)

Enter the title of
your project

- ☐ I will not process personal data
- ☐ I will process personal data

Indicate whether you will process personal data. Depending on your answer, you will be offered regular or GDPR-compatible templates

Personal data are any information relating to an identified or identifiable natural person, i.e. a living individual. Examples include but are not limited to names, occupations, (email) addresses, dates of birth, phone numbers, passport numbers, IP addresses, bank account numbers, physical characteristics, information about home ownership, health-related information, voice recordings, photographs etc.

Processing entails any operation on (sets of) personal data, whether by automated means or not. This includes collecting, recording, structuring, storing, using, disseminating, erasing data etc.

If not processing personal data

- ☒ I will not process personal data
☐ I will process personal data

Personal data are any information relating to an identified or identifiable natural person, i.e. a living individual. Examples include but are not limited to names, occupations, (email) addresses, dates of birth, phone numbers, passport numbers, IP addresses, bank account numbers, physical characteristics, information about home ownership, health-related information, voice recordings, photographs etc.

Processing entails any operation on (sets of) personal data, whether by automated means or not. This includes collecting, recording, structuring, storing, using, disseminating, erasing data etc.

If applying for funding, select your research funder.

Otherwise leave blank.

Name of funder, if applicable.

--Select your funder--

[Not applicable/not listed.](#)

Funder name

To see institutional questions and/or guidance, select your organisation.

You may leave blank or select a different organisation to your own.

Ghent University

[Not applicable/not listed.](#)

Choose a template*

There are a number of possible templates you could use. Please choose one.

Generic DMP

Generic DMP

Faculty of Psychology & Educational Sciences DMP

Faculty of Law & Criminology DMP

Tick to select any other sources of guidance you wish to see.

- ☐ DCC
☐ Faculty of Law & Criminology

Select funder to get its template

Select institution to get local guidance, as well as institutional template(s) - if funder not applicable

Select institutional template – if more than 1 available

Choose additional optional guidance

If processing personal data

- ☐ I will not process personal data
- ☒ I will process personal data

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[Not applicable/not listed.](#)

Funder name

To see institutional questions and/or guidance, select your organisation.

You may leave blank or select a different organisation to your own.

Ghent University

Choose a template*

There are a number of possible templates you could use. Please choose one.

GDPR Record [GDPR]

GDPR Record [GDPR]

Faculty of Psychology & Educational Sciences DMP + [GDPR]

Faculty of Law & Criminology DMP + [GDPR]

Tick to select any other sources of guidance you wish to see.

- ☐ DCC
- ☐ Faculty of Law & Criminology

Select funder to get its template

End user's institution is **automatically pre-selected**, so he/she will be shown institutional GDPR questions

Select institutional template – if funder not applicable & more than 1 template available

Choose additional optional guidance

If processing personal data, GDPR questions are included

“GDPR sections” are appended to DMP sections

- not part of DMP template as such
- contain institutional GDPR questions
- researcher needs to complete them to register processing activities regarding personal data

My FWO project

0/55 questions answered

approx. 30% of available space used

Plan details	Application DMP	Full DMP	Share	Export
1. General Information (3 questions, 0 answered) +				
2. Data description (2 questions, 0 answered) +				
3. Ethical and legal issues (4 questions, 0 answered) +				
4. Documentation and metadata (2 questions, 0 answered) +				
5. Data storage & backup during the FWO project (5 questions, 0 answered) +				
6. Data preservation after the end of the FWO project (3 questions, 0 answered) +				
7. Data sharing and reuse (6 questions, 0 answered) +				
8. Responsibilities (4 questions, 0 answered) +				
GDPR section: Collection and processing of data (4 questions, 0 answered) +				
GDPR section: Categories of personal data & data subjects (5 questions, 0 answered) +				

GDPR questions can be included/excluded in export document

My FWO project

Plan details | Application DMP | Full DMP | Share | **Export**

From here you can download your plan in various formats. This may be useful if you need to submit your plan as part of a grant application. Select what format you wish to use and click to 'Export'.

Application DMP

Full DMP

Format
✓ pdf
text
docx

Export

Adjust export settings here

Settings (Using template PDF formatting values)

Title

Title

Full DMP

Save Reset

Included Elements

Admin details	Sections
Project Name	1. General Information
Project Identifier	Name applicant
Grant Title	FWO Project Number & Title
Principal Investigator / Researcher	Affiliation
Project Data Contact	2. Data description
Description	Will you generate/collect new data and/or make use of
Funder	Describe the origin, type and format of the data (per da
Institution	3. Ethical and legal issues
	Are there any ethical issues concerning the creation an
	Does your work possibly result in research data with pc
	Do existing 3rd party agreements restrict dissemination
	Will you use personal data? If so, shortly describe the l
	4. Documentation and metadata
	What documentation will be provided to enable unders
	Will a metadata standard be used? If so, describe in de

GDPR section: Collection and processing of data

2. Are you collecting or processing primary personal data and/or secondary...
3. If you are processing secondary personal data, will you inform the person...
4. If no, explain why it is impossible or why it would take a disproportionate ...
1. Are you collecting or processing personal data?

GDPR section: Categories of personal data & data subjects

9. If yes, please justify the need to deviate from one or more of the rights m...
8. Will your research be seriously hampered if the persons whose personal ...
5. Are you collecting/processing any of the following special categories of d...
6. Which other categories of personal data are you collecting/processing?
7. Whose personal data are you collecting/processing?

GDPR functionality: opting in

- Linking **DPO**
 - new DPO role in 'sharing' menu
 - DPO can read, download, comment on plans
 - member institutions can designate institutional DPO
 - must be valid DMPonline.be user
 - ORCID strongly encouraged
 - institutional DPO is **automatically granted access** to plans with personal data
 - users cannot remove institutional DPO
 - users can add 'foreign' DPOs when needed

My FWO project

Plan details

Application DMP

Full DMP

Share

Export

You can give other users access to your plan and clarify each collaborator's role here. There are five roles/permission levels:

- Users with 'read only' access can only read the plan.
- Users with 'edit' access can contribute to the plan.
- 'Data Contacts' are any contact persons for the plan other than the principal investigator. They can contribute to the plan.
- 'Co-owners' can also contribute to the plan, but additionally can edit the plan details and control access to the plan.
- 'Principal Investigators' are the main researchers of the project associated with a plan. They can also contribute to the plan, but additionally can edit the plan details and control access to the plan. By default, the creator ('owner') of a plan is listed as principal investigator, but this can be changed and another principal investigator can be added.
- 'Data Protection Officer' (DPO) is the designated person who monitors the application of and compliance with the General Data Protection Regulation (GDPR) within an organisation. DPOs can read and export the plan, and also add comments. If enabled by your organisation, the organisational DPO is automatically added as a collaborator to your plan when you indicate that you are processing personal data.

Add each collaborator in turn by entering their email address below, choosing a role/permission level and clicking 'Add collaborator'. Any Principal Investigators and Data Contacts you add will also appear in your plan details.

Those you invite will receive an email notification that they have access to this plan. A notification is also issued when a user's permission level is changed.

Collaborators

Email address	Permissions
Myriam Mertens	Owner
Myriam Mertens	Principal Investigator
Hanne Elsen	Data Protection Officer

If working with a GDPR-compatible template, institutional **Data Protection Officer** is automatically added to list of collaborators. DPO can read, add comments & export plan. End user cannot remove institutional DPO.

Add collaborator

Email

Permissions:

Read only

Add collaborator

If needed, add 'foreign' DPO by entering email address & selecting "Data Protection Officer" from dropdown menu

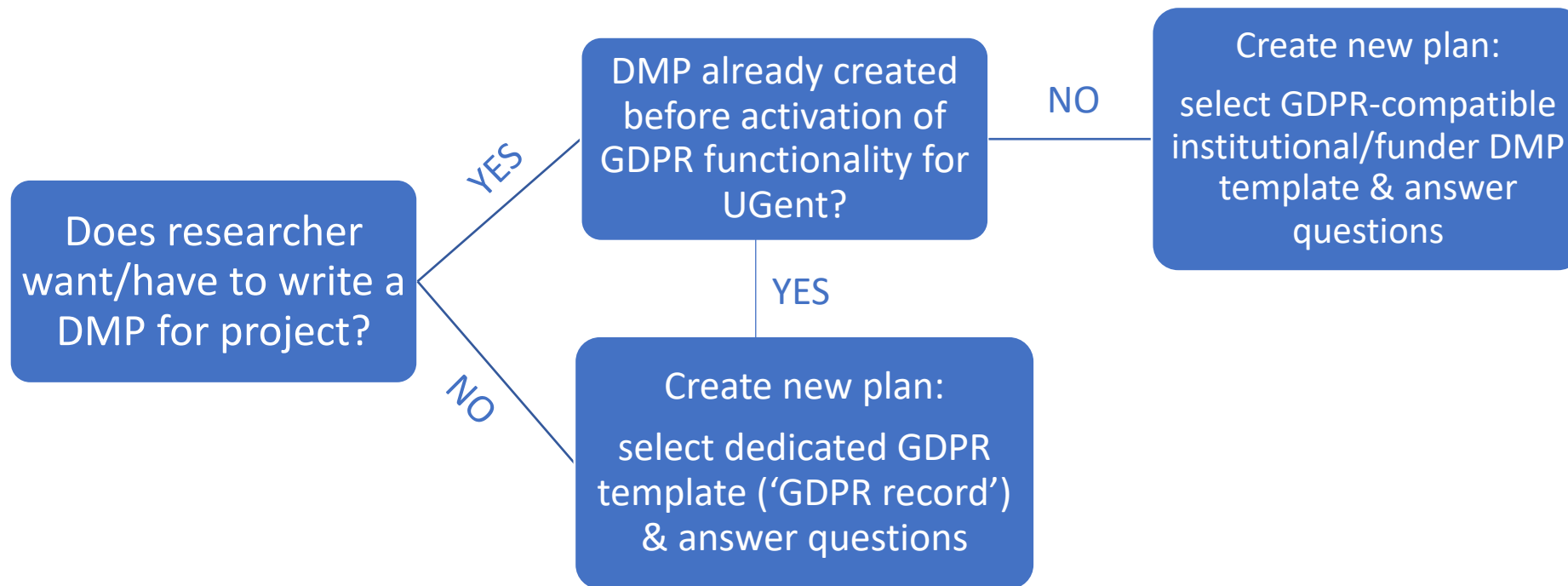
Description of
DPO
role/permission
level

Implementation @ UGent

- **BEFORE**: offering 3 institutional + 3 funder DMP templates
- **NOW**: offering 13 templates
 - GDPR version of each institutional DMP template
 - Dedicated institutional GDPR template (only GDPR, no DMP questions)
 - GDPR version of each funder template, with institutional customisation (i.e. institutional GDPR questions added)
 - in GDPR-compatible funder templates (e.g. FWO), default answer to question 'will you collect personal data?' is set to 'YES'

Implementation @ UGent

- 2 routes to GDPR registration via DMPonline.be



Implementation @ UGent

- To register processing activities, UGent researchers do not have to export & submit plans, but **simply complete the GDPR questions** in the tool
- We are building an automatic DMP export to a local SP database for our DPO (i.e. the *actual* GDPR register)

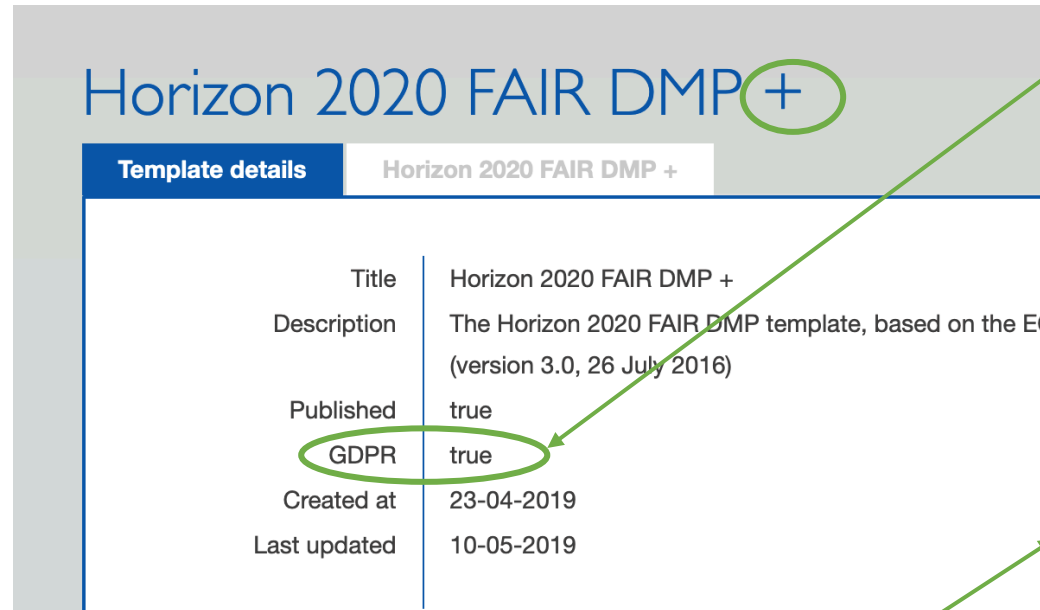
Next steps for consortium partners

- If NOT opting in: you don't have to do anything
- If opting in: 3 main tasks in DMPonline.be
 1. Adding [GDPR-compatible templates/template customisations](#)
 2. Switching on GDPR functionality so local users see adapted [wizard](#)
 3. Linking [DPO](#)

Opting-in checklist

1. Define your set of [institutional GDPR questions](#)
2. Admins: manually add GDPR-compatible institutional templates/customisations of funder templates via the [admin interface](#)
3. Tell us to [switch on the GDPR functionality](#) for your institution
4. Let us know the details of your [DPO](#) (name, email address, ORCID)
5. Admins: set '[GDPR](#)' & '[published](#)' attributes to "true" in plan details of institutional GDPR templates
6. [Inform](#) your local users

Admin interface: funder templates

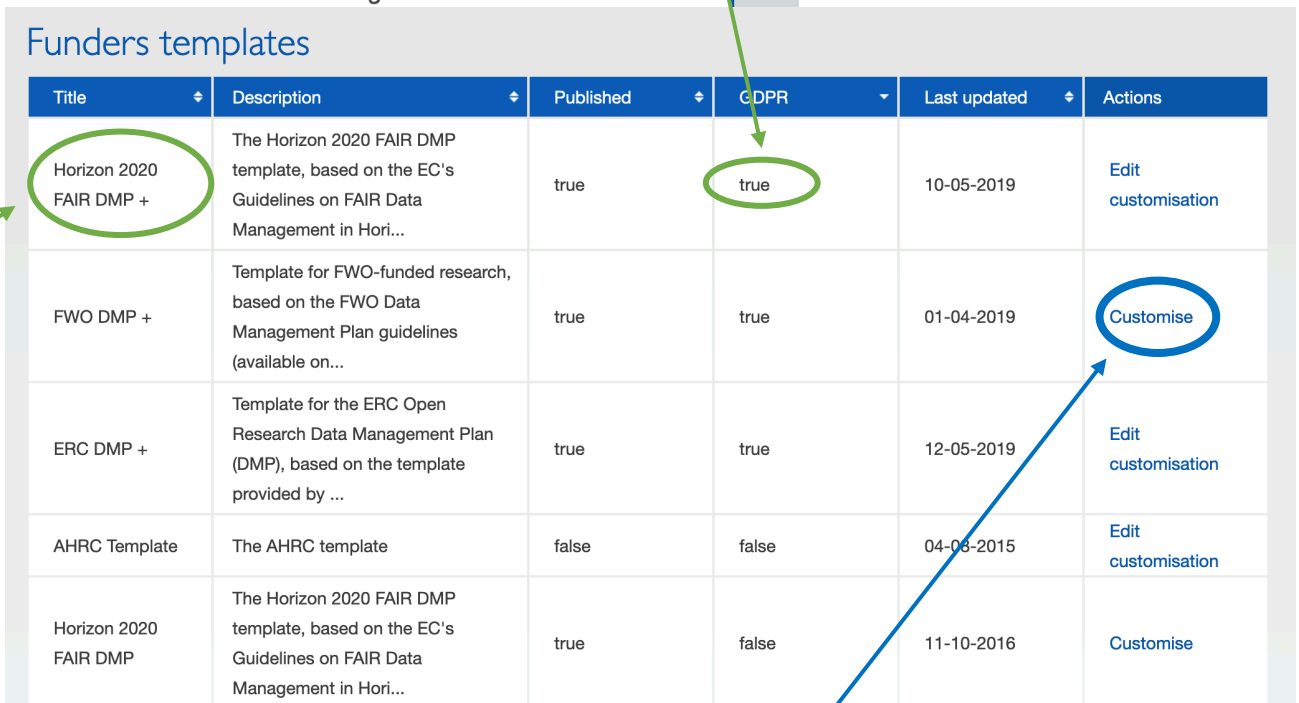


Template details	
Horizon 2020 FAIR DMP +	
Title	Horizon 2020 FAIR DMP +
Description	The Horizon 2020 FAIR DMP template, based on the EC's <i>Guidelines on FAIR Data Management in Horizon 2020</i> (version 3.0, 26 July 2016)
Published	true
GDPR	true
Created at	23-04-2019
Last updated	10-05-2019

For GDPR versions of templates, the 'GDPR' attribute in the Template details is "true".

→ When end user selects 'I will process personal data' in the 'Create new plan' wizard, only published templates where GDPR = true will be available.

GDPR versions of funder templates are also recognisable by the '+' sign in the template title.



Funders templates					
Title	Description	Published	GDPR	Last updated	Actions
Horizon 2020 FAIR DMP +	The Horizon 2020 FAIR DMP template, based on the EC's Guidelines on FAIR Data Management in Hori...	true	true	10-05-2019	Edit customisation
FWO DMP +	Template for FWO-funded research, based on the FWO Data Management Plan guidelines (available on...	true	true	01-04-2019	Customise
ERC DMP +	Template for the ERC Open Research Data Management Plan (DMP), based on the template provided by ...	true	true	12-05-2019	Edit customisation
AHRC Template	The AHRC template	false	false	04-08-2015	Edit customisation
Horizon 2020 FAIR DMP	The Horizon 2020 FAIR DMP template, based on the EC's Guidelines on FAIR Data Management in Hori...	true	false	11-10-2016	Customise

To add institutional GDPR questions to a funder template, **customise** the funder template's GDPR version

Admin interface: institutional templates

To add a GDPR version of an institutional template, select 'Create a template', enter all institutional DMP & GDPR questions, and set GDPR attribute to "true".

Own templates

If you wish to add an institutional template for a Data Management Plan, use the 'create template' button. You can create more than one template if desired e.g. one for researchers and one for PhD students.

Your template will be presented to users within your institution when no funder templates apply. If you want to add questions to funder templates use the 'customise template' options below.

Create a template

Title	Description	Published	GDPR	Last updated	Actions
GDPR Record	Template for UGent researchers who need to record personal data processing activities (but who ar...	true	true	01-04-2019	Edit
Faculty of Psychology & Educational Sciences DMP +	FPPW DMP template including institutional GDPR questions (based on GDPR template v5.5_MM + DMPonl...	true	true	12-05-2019	Edit
Faculty of Law & Criminology DMP +	DMP template version 1 (2019-02-25) of the Faculty of Law & Criminology.	true	true	13-05-2019	Edit
DMP#4166 template version 1.0 (2015-02-10)					

If needed, a separate institutional template with only GDPR questions can also be added

Thank you! Any questions or
feedback?