

# Tools4LEAs |

A project of the European Anti-Cybercrime Technology Development Association  
(EACTDA)



D1.10 Final report on Ethical, legal,  
privacy, and social impact activities



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<b>Main author(s):</b>	Juan Arraiza	EACTDA
<b>Contributor(s):</b>	Sigute Stankeviciute	L3CE (seconded to EACTDA)
	Eva Skruba	EACTDA

**DOCUMENT CONTROL**

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## 1. Introduction

### 1.1. Main objective of this document

The main objective of this document is to report on the activities conducted in relation to the ethical, legal, privacy, and social impact matters of the Tools4LEAs project.

This deliverable is based on the previously submitted deliverable D1.9 First report on Ethical, legal, privacy, and social impact activities, adding to it the report of the activities conducted from Jul'22 to Jun'23. To easily identify the updates included in D1.10, they have been tagged with **[D1.10 UPDATE]**.

### 1.2. Relation to other deliverables

This deliverable is closely related to the following deliverables:

- **D1.8 Ethical, legal, privacy, and social impact handbook:** This deliverable reports on the project ethical, legal, privacy, and social impact activities conducted until June 2022, which are directly related to the handbook presented in D1.8.
- **D1.9 First report on Ethical, legal, privacy, and social impact activities:** this deliverable updates D1.9 reporting the work conducted during the period that goes from Jul'22 to Jun'23.

### 1.3. Structure of the deliverable

Section 2 presents a summary of the originally planned activities and the real/actual activities that have taken place until June 2023.

Section 2.1 presents the latest version of the Data Management Plan.

Section 2.2 presents the plan vs real of the Data Protection Impact Assessment activities.

Section 2.3 presents the plan vs real of the Social Impact Assessment activities.

Section 2.4 presents the plan vs real of the Ethics Assessment activities.

Then, section 3 summarises which is the goal and key aspects of this document, it acknowledges that there is still work to be done to improve the document, and it presents some of the areas of future work that have already been identified.

## 2. Plan versus Real

Below we summarise the originally planned data management, ethical, legal, privacy, and social impact activities versus the real/actual activities that have taken place in the Tools4LEAs project until June 2023.

### 2.1. Data Management Plan

Deliverable “D1.8 SELP management Handbook” presented an initial version of the Tools4LEAs’ Data Management Plan (DMP). In this deliverable we will copy & paste the text of the DMP as is from deliverable D1.8 and we will add an update in each of the sections of the DMP.

To ease the identification of the new content provided in this deliverable, the updates included in deliverable D1.9 were marked with **blue font colour** and tagged with a **[D1.9 UPDATE]** mark, and the updates included in deliverable D1.10 are now marked with **blue background colour**, **dark-red font colour**, and tagged with a **[D1.10 UPDATE]** mark.

**[D1.9 UPDATE]** Also note that the numbering of the sections has changed, as in deliverable D1.8 the Data Management Plan section was numbered “2”, whilst in this deliverable it is numbered “2.1”, and therefore, all the subsections have been adjusted accordingly in this deliverable.

#### 2.1.1. Data Summary

##### 2.1.1.1. What is the purpose of the data collection/generation and its relation to the objectives of the project?

During the project, it will be necessary to collect/generate data for software development of artificial intelligence (AI)-based tools/components. This data will be used for training new AI models and/or for evaluating the tools/components developed.

Also, during the course of the project demonstration and evaluation events will be organized. During these events, information about the professional background and/or the expertise of the participants in the events might be required.

**[D1.9 UPDATE]**

With regard to data needed for the new tool development projects, the table below summarises the work done during the setup phase of the Tools4LEAs project that goes from the start of the project until month 12 (June 2022):

ID	Project	Data collected / generated	Purpose of the data
DS001	PROJ0001	Several videos were downloaded from YouTube and/or MetaTube	Testing and evaluating the tool
DS002	PROJ0002	Several videos were downloaded from YouTube	Testing and evaluating the tool
DS003	PROJ0005	No data was collected or generated	N/A

<b>DS004</b>	PROJ0006	Graphsense tagpack dataset will be extended <sup>1</sup>	To generalize learning to other bitcoin-related blockchains.
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With regard to data collected or generated during the course of project demonstration and evaluation events, EACTDA Secretariat takes care of the travel and subsistence for the invited attendees. The Travel Information form that is requested the invited attendees to fill-in, includes personal data (name, email, telephone/mobile, home address, data of birth, passport number, nationality). This data is sent by the invited person to EACTDA's financial manager via secure channels (encrypted form using PGP or secured online repository), accessible only to EACTDA Secretariat staff that is responsible for organising the event. This data will be removed no later than 6 months after the event takes place, and once all the travel arrangements have been completed and paid.

This data collected or generated during the course of the demonstration and evaluation events is coded "DS005".

**[D1.10 UPDATE]** during the period that goes from July 2022 to Jun 2023 these were the updates:

<b>ID</b>	<b>Project</b>	<b>Data collected / generated</b>	<b>Purpose of the data</b>
<b>DS006</b>	PROJ-0007	VMs with multiple applications installed have been created in Windows, Linux, and Mac with no personal data other than the data of the tester used for the purpose of testing.	Testing and evaluating the tool.
<b>DS007</b>	PROJ-0008	A collection of RAM dumps extracted from different testing environments (Virtual Machines) and with operating systems such as MacOS, Linux, Windows). The data in those testing environments was from the testers, synthetic, or web browsing history.	Testing and evaluating the tool.
<b>DS008</b>	PROJ-0009	A collection of videos and images created by the test team with no personal data (only objects such as furniture or landscapes).	Testing and evaluating the tool.
<b>DS009</b>	PROJ-0010	A collection of Hard Drives with primary and extended partitions covering a variety of different file systems and different types of purposes, such as data storage (e.g., pendrives, backups) or HDs with	Testing and evaluating the tool.

<sup>1</sup> <https://github.com/graphsense/graphsense-tagpacks>



		operating systems installed (e.g., Ubuntu and Windows 10). Synthetic data has been created.	
<b>DS010</b>	PROJ-0012	For public accounts of legal entities (not individual subjects) in social networks the tool allows downloading the content and/or metadata.	Testing of the different plugins the tool has. After the testing is completed, the data is deleted. No further processing of the downloaded data is done.
<b>DS011</b>	PROJ-0013	Two HD images and several different types of files including synthetic data only.	testing and evaluating the tool
<b>DS012</b>	PROJ-0014	A dataset used in the COPKIT project, which is an anonymised subset of the Panama papers.	Developing, testing and evaluating the tool

#### 2.1.1.2. What types and formats of data will the project generate/collect?

For the most part of it, this information is not known yet, as it will depend on the scope of the new software tools/components that the project ends-up deciding to undertake, and as of September 2021 this information is not available yet. Deliverables D1.9 and D1.10, due months 12 and 24 respectively, will include this information.

The project will generate and collect administration data such as contact details of participants to the six-monthly demonstration and evaluation events or to other workshops or meetings, or data collected from expert and project participants via interviews, surveys, etc. It is not expected to collect large amounts of this type of administrative data.

[D1.9 UPDATE] and [D1.10 UPDATE]

See D1.9 update of section 2.1.1.1.

#### 2.1.1.3. Will you re-use any existing data and how?

Yes, publicly available scientific/research datasets<sup>2</sup> will be re-used as necessary during the course of the project. In most cases, this type of datasets will be used to evaluate the results of the new software tools/components developed during the project.

[D1.9 UPDATE] Yes, see D1.9 update of section 2.1.1.1 in what relates to DS001 and DS002.

[D1.10 UPDATE] Yes, see also D1.9 update of section 2.1.1.1 in what relates to DS006 to DS009 and DS011 and DS012.

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<sup>2</sup> E.g., CIFAR-10 or Cityscapes for computer vision, Enron dataset or SMS Spam collection for natural language processing.

2.1.1.4. What is the origin of the data?

See response to sub-section 2.1.1.2.

[D1.9 UPDATE] and [D1.10 UPDATE]

See D1.9 update of section 2.1.1.1.

2.1.1.5. What is the expected size of the data?

See response to sub-section 2.1.1.2.

[D1.9 UPDATE]

With regard to data needed for the new tool development projects:

ID	Data collected / generated	Purpose of the data	Expected size
DS001	Several videos were downloaded from YouTube and/or MetaTube	Testing and evaluating the tool	20-30 videos
DS002	Several videos were downloaded from YouTube	Testing and evaluating the tool	20-30 videos
DS003	No data was collected or generated	N/A	N/A
DS004	Graphsense tagpack dataset will be extended <sup>3</sup>	To generalize learning to other bitcoin-related blockchains.	No more than 3,000 transactions

And with regard to data collected or generated during the course of project demonstration and evaluation events, the total number of travel forms collected will be around 20-30.

[D1.10 UPDATE]

ID	Data collected / generated	Purpose of the data	Expected size
DS006	VMs and PCs with multiple applications installed have been created in Windows, Linux, and Mac with no personal data other than the data of the tester used for the purpose of testing.	Testing and evaluating the tool.	6-8 VMs
DS007	A collection of RAM dumps extracted from different testing environments (Virtual Machines) and with operating systems such as MacOS, Linux,	Testing and evaluating the tool.	7 RAM dumps

<sup>3</sup> <https://github.com/graphsense/graphsense-tagpacks>

	Windows). The data in those testing environments was from the testers, synthetic, or web browsing history.		
DS008	A collection of videos and images created by the test team with no personal data (only objects such as furniture or landscapes).	Testing and evaluating the tool.	
DS009	A collection of Hard Drives with primary and extended partitions covering a variety of different file systems and different types of purposes, such as data storage (e.g., pendrives, backups) or HDs with operating systems installed (e.g., Ubuntu and Windows 10). Synthetic data has been created.	Testing and evaluating the tool.	11 HD images
DS010	For public accounts of legal entities (not individual subjects) in social networks the tool allows downloading the content and/or metadata.	Testing of the different plugins the tool has. After the testing is completed, the data is deleted. No further processing of the downloaded data is done.	
DS011	Two HD images and several different types of files including synthetic data only.	testing and evaluating the tool	4 HD images and 8 files
DS012	A dataset used in the COPKIT project, which is an anonymised subset of the Panama papers.	Developing, testing and evaluating the tool	1 JSON file with 1700 entities.

#### 2.1.1.6. To whom might it be useful ('data utility')?

To the developers of the new tools and to the testers and end-users testing and evaluating those tools.

[D1.9 UPDATE]

With regard to utility of the data needed for the new tool development projects:

ID	Data collected / generated	Purpose of the data	Utility
DS001	Several videos were downloaded from YouTube and/or MetaTube	Testing and evaluating the tool	Testers and end-users evaluating the tool
DS002	Several videos were downloaded from YouTube	Testing and evaluating the tool	Testers and end-users evaluating the tool

DS003	No data was collected or generated	N/A	N/A
DS004	Graphsense tagpack dataset will be extended <sup>4</sup>	To generalize learning to other bitcoin-related blockchains.	Developers, Testers and end-users evaluating the tool

And with regard to the utility of the data collected or generated during the course of project demonstration and evaluation events, it is needed by EACTDA Secretariat to buy flight tickets, book hotel rooms, and in general to take care of the travel and subsistence aspects of the event.

**[D1.10 UPDATE]** In all cases for the newly added datasets, the utility has been for testers and end-users evaluating the tool.

### 2.1.2. Making data findable

2.1.2.1. Are the data produced and/or used in the project discoverable with metadata, identifiable and locatable by means of a standard identification mechanism (e.g., persistent and unique identifiers such as Digital Object Identifiers)?

When possible, Digital Object Identifiers will be used/generated and published.

[D1.9 UPDATE] As of the time of publication of deliverable D1.9, no data has been made findable using Digital Object Identifiers (DOI). However, DataCite Fabrica<sup>5</sup> has been pre-chosen as the official registration agency via which EACTDA and Tools4LEAs will request DOIs for the data that decides to publish.

**[D1.10 UPDATE]** same as for D1.9 update.

2.1.2.2. What naming conventions do you follow?

#### General Guidelines

- Include a text file, often called a readme, in your file directory that describes the naming conventions you are using. This information will be helpful for individuals who are new to the project.
- Use descriptive file names that are meaningful to you and your colleagues. This might include the project name, subject, or acronym.

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4 <https://github.com/graphsense/graphsense-tagpacks>

5 <https://doi.datacite.org/>

- Keep file names relatively short (no more than 25 characters when possible).
- Include dates in your filename, which can help with sorting different versions of your file. Recommended format: `yyyymmdd`.
- Use a sequential numbering system to keep track of different versions or revisions to a file. For example, try with leading 0's. (rehab01 instead of rehab1)
- Use hyphens, underscores, or camelCase instead of spaces.

### Things to Avoid

- Spaces within your files; not all software recognizes spaces within file names.
- Special characters in your file names such as: `"/ \ : * ? " < > [ ] & $`. These characters have specific meanings for various operating systems and could result in your files being deleted or misplaced.
- Long or wordy names that may not have meaning to you and other researchers on your team.

### Recommended naming convention:

- `[project-name]_[date (if/when applicable)]_[filename]_[version].[filetype]`

### Example:

- Tools4LEAs\_20210827\_D1.8\_v0.2.docx  
[D1.9 UPDATE] There are no news on this matter.  
[D1.10 UPDATE] same as for D1.9 update.

2.1.2.3. Will search keywords be provided that optimize possibilities for re-use?

Yes

[D1.9 UPDATE] There are no news on this matter.  
[D1.10 UPDATE] same as for D1.9 update.

2.1.2.4. Do you provide clear version numbers?

Yes. The convention will be as follows:

`vx.y` (e.g., v1.2)

“x” will be used for approved versions of the document/file.

“y” will be used for draft versions when “x” is “0” or for minor changes/updates if “x” is higher than “0”.

[D1.9 UPDATE] There are no news on this matter.  
[D1.10 UPDATE] same as for D1.9 update.

- 2.1.2.5. What metadata will be created? In case metadata standards do not exist in your discipline, please outline what type of metadata will be created and how.

This will depend on the type of data. See response to sub-section 2.1.1.2.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] same as for D1.9 update.

### 2.1.3. Making data accessible

- 2.1.3.1. Which data produced and/or used in the project will be made openly available as the default?

Whenever possible (when there are no restrictions), the data will be made openly available. However, this will depend on the type of data. See response to sub-section 2.1.1.2.

[D1.9 UPDATE] It is expected that data, if there are no security sensitive matters, collected and/or generated to test and/or evaluate the new developed tools will be made available (e.g., DS001 and DS002 will most likely be made available if the End-User Advisory Board of the Tools4LEAs project does not object and no ethical, data protection, privacy, or social impact considerations do not prevent from doing so).

[D1.10 UPDATE] The data collected and/or generated during the project can be used for testing and evaluating the tools. This data is going to be made available for EU public entities fighting cybercrime interested in evaluating (and hopefully adopting) the tools.

- 2.1.3.2. How will the data be made accessible (e.g. by deposition in a repository)?

Data will be made accessible by deposition in a repository. When looking for a repository for data, firstly it will be checked whether there is a thematic/community database where the data could be archived. Irrespective of the repository chosen, it will be checked whether it is sustainable in the longer term, the data is stored in a safe way, the data will remain findable, accessible and re-usable. Also, it will be checked if the repository describes the data in a standard way and uses accepted metadata standards and that it allows the Tools4LEAs project to specify a license governing access and re-usability of the data.

Well-known repositories such as Zenodo, Github, or Open Science Framework will be the first ones to be considered for deposition of data.

[D1.9 UPDATE] There are no news on this matter.

**[D1.10 UPDATE]** The data will be stored at EACTDA's repository and it will be made available to authorised EU public entities fighting cybercrime.

#### 2.1.3.3. What methods or software tools are needed to access the data?

This will depend on the repositories finally chosen to deposit the data, though simple and easy-to-access methods such as web browsers and/or ftp will be prioritized.

[D1.9 UPDATE] There are no news on this matter.

**[D1.10 UPDATE]** A web browser will suffice to request and obtain access to the datasets. In some cases, depending on the size of the dataset, alternative means might be required to transfer safely and securely large amounts of data.

#### 2.1.3.4. Is documentation about the software needed to access the data included?

This will depend on the repositories finally chosen to deposit the data.

[D1.9 UPDATE] There are no news on this matter.

**[D1.10 UPDATE]** There is documentation to access securely to the repository using a VPN.

#### 2.1.3.5. Is it possible to include the relevant software (e.g. in open source code)?

This will depend on the Intellectual Property Rights of the software.

[D1.9 UPDATE] There are no news on this matter.

**[D1.10 UPDATE]** There are no news on this matter.

#### 2.1.3.6. Where will the data and associated metadata, documentation and code be deposited?

Data and the associated metadata, documentation and code will be deposited at EACTDA's repository. Access to it will be restricted to authorised users only.

[D1.9 UPDATE] There are no news on this matter.

**[D1.10 UPDATE]** A priori, the data, associated metadata, documentation, and the code will be made available at EACTDA's repository as well as at Europol's Tool Repository.

2.1.3.7. Have you explored appropriate arrangements with the identified repository?

Yes. The repository will be owned and managed by EACTDA.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] In addition to EACTDA's repository, there is an agreement with Europol to use its Europol Tool Repository to distribute the tools, including the code, documentation, and evaluation data.

2.1.3.8. If there are restrictions on use, how will access be provided?

EACTDA will determine the access levels restrictions and it will provide access to the data.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter

2.1.3.9. Is there a need for a data access committee?

Yes. EACTDA Secretariat, following the instructions of the End-User Advisory Board of the Tools4LEAs project will determine the access rights to the repository and to the data stored in it.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter.

2.1.3.10. Are there well described conditions for access (i.e. a machine readable license)?

Not yet, though this will be considered for future enhancements of EACTDA repository.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter.

2.1.3.11. How will the identity of the person accessing the data be ascertained?

This has not been decided yet, though at minimum a user+password mechanisms will be implemented, and, if possible, a two-factor authentication method yet to be decided will also be used.

[D1.9 UPDATE] EACTDA repository has been implemented. It includes authorisation policies, and authentication and access control mechanisms that ensure that the policies are followed.



As of the time of publishing deliverable D1.9, the repository can only be accessed by authorised users that have previously authenticated themselves using credentials, a two-factor method, and that have done it via a Virtual Private Network (VPN).

**[D1.10 UPDATE]** there are no news on this matter.

#### 2.1.4. Making data interoperable

- 2.1.4.1. Are the data produced in the project interoperable, that is allowing data exchange and re-use between researchers, institutions, organisations, countries, etc. (i.e. adhering to standards for formats, as much as possible compliant with available (open) software applications, and in particular facilitating re-combinations with different datasets from different origins)?

The Tools4LEAs project will observe OpenAIRE guidelines for online interoperability, including OpenAIRE Guidelines for Literature Repositories, OpenAIRE Guidelines for Data Archives, OpenAIRE Guidelines for CRIS Managers based on CERIF-XML. These guidelines can be found at: <https://guidelines.openaire.eu/en/latest/>.

Partners will also ensure that BLAZE data observes FAIR data principles under H2020 open-access policy:

[http://ec.europa.eu/research/participants/data/ref/h2020/grants\\_manual/hi/oa\\_pilot/h2020-hi-oadatamgt\\_en.pdf](http://ec.europa.eu/research/participants/data/ref/h2020/grants_manual/hi/oa_pilot/h2020-hi-oadatamgt_en.pdf)

In order to ensure the interoperability, all datasets will use the same standards for data and metadata capture/creation.

As the project progresses and data is identified and collected, making it as interoperable as possible will be a primary objective. In specific, an effort will be done to ensure the use of data and metadata vocabularies, standards or methodology to follow to facilitate interoperability.

**[D1.9 UPDATE]** There are no news on this matter.

**[D1.10 UPDATE]** there are no news on this matter.

- 2.1.4.2. What data and metadata vocabularies, standards or methodologies will you follow to make your data interoperable?

At present, it has not been decided to use any data and metadata vocabularies, standards or methodologies specific to the security field.

However, initiatives such as the ontology developed in the scope of H2020 projects like MAGNETO or PREVISION, the Universal Message Format (UMF) promoted by Europol, and Cyber-investigation Analysis Standard Expression (CASE) standard are being monitored and considered for future use.

In a more general perspective the "DCAT application profile for European data portals" (DCAT-AP), developed in the framework of the EU ISA Programme will be used when/as appropriate. The

European Data Portal is implementing the DCAT-AP as the common vocabulary for harmonising descriptions of datasets harvested from several data portals of 34 countries. The DCAT-AP specification is available at: [https://joinup.ec.europa.eu/asset/dcat\\_application\\_profile/](https://joinup.ec.europa.eu/asset/dcat_application_profile/).

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] The Capability Manager of EACTDA/Tools4LEAs attended an event organised by the JRC in which a new to be developed ontology on cybercrime was discussed. Should that new ontology be published, EACTDA intends to adopt it.

2.1.4.3. Will you be using standard vocabularies for all data types present in your data set, to allow inter-disciplinary interoperability?

Using standard vocabularies will be done as much as possible, but it cannot guarantee that it will be done for all data types, as it is still not known at present the details of all the data sets that will be used.

[D1.9 UPDATE] As of the date of publication of deliverable D1.9, Graphsense Tagpack standard has been used for DS004.

[D1.10 UPDATE] there are no news on this matter.

2.1.4.4. In case it is unavoidable that you use uncommon or generate project specific ontologies or vocabularies, will you provide mappings to more commonly used ontologies?

Yes.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] There are no news on this matter. Whenever possible, EACTDA/Tools4LEAs will not generate project specific ontologies or vocabularies.

2.1.5. Increase data reuse

2.1.5.1. How will the data be licensed to permit the widest re-use possible?

When no security, confidentiality, or IPR issues are expected, the data will be licensed unrestricted.

When restrictions apply, it will be considered whether it is possible to produce and license with no restrictions samples of aggregated data.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter.

#### 2.1.5.2. When will the data be made available for re-use?

No embargos are foreseen, so in principle data with no restrictions will be made available for re-use as soon as it is possible.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter.

#### 2.1.5.3. Are the data produced and/or used in the project useable by third parties, in particular after the end of the project?

Data will be made available to third parties in accordance to the licensing conditions described in 2.1.5.1.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter.

#### 2.1.5.4. How long is it intended that the data remains re-usable?

No time limit has been foreseen for making data re-usable, and the time that the data itself will remain re-usable will depend on the specific characteristics of each dataset, as some might expire sooner than others.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter.

#### 2.1.5.5. Are data quality assurance processes described?

Data quality assurance is the process of identification and elimination of any data anomalies via the processes of data profiling and cleansing.

Good data quality requires disciplined data governance, rigorous management of incoming data, accurate requirement gathering, thorough regression testing for change management and careful design of data pipelines, in addition to data quality control programs for the data delivered both externally and internally. For all quality problems, it is much easier and less costly to prevent the data issue from happening in the first place, rather than relying on defending systems and ad hoc fixes to deal with data quality problems.

The process to ensure data quality assurance in the project is described as follows:

1. Rigorous data profiling and control of incoming data.
2. Careful data pipeline design to avoid duplicate data.
3. Accurate gathering of data requirements.
4. Enforcement of data integrity.
5. Integration of data lineage traceability into the data pipelines.
6. Automated regression testing as part of change management.

## 7. Capable data quality control teams.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter.

### 2.1.6. Data security

#### 2.1.6.1. What provisions are in place for data security (including data recovery as well as secure storage and transfer of sensitive data)?

From a security perspective, sensitive data is data that must be protected against unwanted disclosure, regardless of it being personal sensitive data or any other type of data (e.g., confidential data or classified information). In this sense, access to sensitive data should be safeguarded. Protection of sensitive data may be required for legal or ethical reasons, for issues pertaining to personal privacy, or for proprietary considerations.

Examples of sensitive data are:

- **Personal data:** identifiers such as names or identification numbers, physical, physiological, genetic, mental, economic, cultural or social characteristics, it also includes location data from GPS or mobile phones. Sensitive personal data according to GDPR is data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, biometric data, health data and sex life data (art 9(1) of GDPR). This type of sensitive personal data requires special protection and therefore has special regulation for processing.
- **Confidential data:** trade secrets, investigations, data protected by intellectual property rights  
Security: passwords, financial information, national safety, military information...
- **Combination of different datasets** that can be combined into sensitive or personal data.
- **Biological data:** endangered (plant or animal) species, where their survival is dependent on the protection of their location data (biodiversity community).
- **Personal and sensitive metadata**

It is important to take into account that, when handling and dealing with sensitive data, special attention must be given to collecting, processing, handling and storing data.

In the Tools4LEAs project, all the data identified as sensitive will be encrypted using PGP, and only those people with the need-to-access the data will be granted access during the period in which they have the aforementioned need-to-access the data.

[D1.9 UPDATE] Personal data collected in relation to the travel and subsistence arrangements (DS005) is encrypted using PGP and stored in an online repository accessible only to those EACTDA Secretariat staff that participate in those activities.

Confidential data (such as IPR related or end-user needs and requirements) is stored in an online repository accessible only to those with the need to access/know. When in motion, this data is encrypted using in most cases PGP.

[D1.10 UPDATE] there are no news on this matter.

2.1.6.2. Is the data safely stored in certified repositories for long term preservation and curation?

Yes. Depending on the nature of the dataset, it might be stored in different repositories.

The Tools4LEAs project will have its own tools (and data) repository, which will be used for data that is restricted to authorised people, normally for the data that has certain security, confidential, or IPR related restrictions.

For any other data that does not have restrictions, domain-specific or general-purpose repositories will be used, depending again on the nature of the data at hand.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter.

2.1.7. Ethical aspects

2.1.7.1. Are there any ethical or legal issues that can have an impact on data sharing?

These can also be discussed in the context of the ethics review. If relevant, include references to ethics deliverables and ethics chapter in the Description of the Action (DoA).

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter.

2.1.7.2. Is informed consent for data sharing and long-term preservation included in questionnaires dealing with personal data?

Yes. Please find the version of Informed consent that was used by EACTDA for the June Demonstration & Evaluation Event and Tools4LEAs End User Advisory Board meeting in Annex I.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter.

2.1.8. Other issues

2.1.8.1. Do you make use of other national/funder/sectorial/departmental procedures for data management? If yes, which ones?

No.

[D1.9 UPDATE] There are no news on this matter.

[D1.10 UPDATE] there are no news on this matter.

## 2.2. Data Protection Impact Assessments

Plan				Real				Status
What	Who	When	How	What	Who	When	How	
DPIA evaluation procedure prepared	Authors of this document	Undefined	Undefined	DPIA evaluation procedure prepared	Authors of this document	June'23	See the description below	done
DPIA template reviewed and updated (if necessary)	Authors of this document	Undefined	Undefined	DPIA template reviewed. No updates made.	Authors of this document	No later than Oct'22	EACTDA team (included L3CE seconded personnel) drafting the template, and then validating it or making improvements as per the review and comments of the ELSA committee.	done

The DPIA evaluation procedure for the Tools4LEAs project has been defined as follows. Firstly, the GDPR requires to conduct DPIA in case of:

1. a systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including profiling, and on which decisions are based that produce legal effects concerning the natural person or similarly significantly affect the natural person;
2. processing on a large scale of special categories of data referred to in Article 9(1) of GDPR, or of personal data relating to criminal convictions and offences referred to in Article 10 of GDPR; or
3. a systematic monitoring of a publicly accessible area on a large scale.

When the technology is developed or improved within the Tools4LEAs project the DMPs should be the primary source to evaluate if the DPIA is required under GDPR. The analyses of DMPs should be conducted under task 1.5. A working group of at least 2 people should be created to evaluate the DMPs. While evaluating the DMPs the working group can consult the technology developer, other team members, external experts or ELSA committee.

In case the DPIA is required in accordance of GDPR, it should be conducted jointly by above mentioned working group and the technology developer. The template of DPIA presented in D 1.8 and updated (if necessary) should be used for DPIA evaluation. While conducting DPIA the working group can consult other team members, external experts or ELSA committee.

The results of DPIA and recommendations made as ant outcome of DPIA should be presented to EACTDA secretariat (quarterly) and ELSA committee during it's meetings.

**[D1.10 UPDATE]** updates marked in "red" font colour in the table above.

The questionnaires regarding personal data processing were prepared for the evaluators of the tools. Table 1.

Table 1. Questionnaire on personal data processing for development and testing purposes.

No.	Question	Answer
1.	<p><b>Will personal data be processed?</b></p> <p><b>Personal data</b> – any information that makes possible identify a precise person directly or indirectly in the context of additional information.</p> <p><b>Processing</b> – any action with personal data, including collection, deleting, anonymization and etc.</p>	<p><i>If yes, please:</i></p> <ol style="list-style-type: none"> <li>1. <i>list all types of personal data processed;</i></li> <li>2. <i>list all the personal data processing operations.</i></li> <li>3. <i>Companies, institutions involved in processing and their roles.</i></li> <li>4. <i>Provide information which companies/institutions will be controller and processor.</i></li> </ol>
2.	<p><b>Will you develop <u>new</u> data sets for the tool?</b></p>	<p><i>If yes, please:</i></p> <ol style="list-style-type: none"> <li>1. <i>What kind of data sets;</i></li> <li>2. <i>How long the data will be stored;</i></li> <li>3. <i>Will personal data be processed;</i></li> <li>4. <i>Will the data be transferred to the 3<sup>rd</sup> countries.</i></li> </ol>

3.	<b>Which <u>existing</u> data sets will you use?</b>	<i>Please:</i>  <i>1. Provide the list of data sets and the links to it</i> <i>2. Provide information if the data sets used will contain personal data.</i>
4.	<b>Do the privacy and security principles apply for the tool?</b> I. e. Does the tool was designed to observe the principles of data privacy and security.	If <b>yes</b> , please explain how these principles were incorporated in the tool. If <b>not</b> , please explain why it is not relevant and how it will ensured by default.

No personal data was processed during the development and testing stages of the tools, therefore, a Data Protection Impact Assessment (DPIA) is not required to be conducted. However, personal data will be processed through the following tools for law enforcement purposes: ConFind, FoBro, FiRST, DFD-AI, JPVD. This processing of personal data is carried out in accordance with national laws that implement Directive (EU) 2016/680 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 by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA (hereinafter – LED directive).

Following Art. 27 of LED directive the DPIA should be conducted if the processing of personal data will likely result in “a high risk to the rights and freedoms of natural persons”. The ALIGNER project delivered “The ALIGNER Fundamental Rights Impact Assessment”<sup>6</sup>. We recommend to use “The ALIGNER Fundamental Rights Impact Assessment” to evaluate the level of risk to human rights and freedoms before the personal data processing operations will start.

1. Recommendations for operational DPIA of ConFind, FoBro, FiRST, DFD-AI, JPVD tools: Data Protection Impact Assessment (PIA): Competent Law Enforcement body or related institution should conduct a thorough DPIA to identify and assess potential privacy risks and impacts associated with the tools. This assessment should consider data collection, storage, processing, and sharing practices, as well as the potential consequences for individuals' privacy.
2. Fundamental Rights Impact Assessment. As mentioned above, it is recommended to use the methodology developed by ALIGNER project. Competent Law Enforcement body or related institution should conduct it before the operational use.

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<sup>6</sup> <https://aligner-h2020.eu/fundamental-rights-impact-assessment-fria/>



3. Apply national criminal procedure regulations in a light with human rights impact assessment, ethical and social impact assessment. When applying national criminal procedure regulations, it is crucial to ensure that they are aligned with human rights principles and values. Conducting a human rights impact assessment, as well as ethical and social impact assessments, should help achieve this alignment.
4. Data Minimization: Competent Law Enforcement body or related institution should ensure that only the minimum amount of personal data necessary for the investigative purposes will be collecting and retaining. Competent Law Enforcement body or related institution should limit access to personal data to authorized individuals with a legitimate need to know. The data storage and deletion processes should ensure minimalization principle as well.
5. Anonymization and Pseudonymization: Competent Law Enforcement body or related institution should ensure that any identifying information is adequately protected and accessible only to authorized personnel.
6. Security Measures: Competent Law Enforcement body or related institution should implement robust security measures to safeguard the confidentiality, integrity, and availability of the collected data. This includes encryption, access controls, secure storage, and regular security audits.
7. Retention and Deletion Policies: Competent Law Enforcement body or related institution should establish clear retention and deletion policies to ensure that personal data is not kept for longer than necessary. Regularly review and delete data that is no longer required for the investigative purposes.
8. Accountability and Governance: Competent Law Enforcement body or related institution should designate a Data Protection Officer or privacy team responsible for overseeing the implementation of privacy measures and ensuring compliance with data protection regulations. Foster a culture of privacy and provide training to personnel involved in using the tools.
9. Regular Audits and Assessments: Competent Law Enforcement body or related institution should conduct periodic audits and assessments to evaluate the effectiveness of privacy measures and identify any areas for improvement. Stay up to date with evolving privacy regulations and adapt the tools accordingly.

### 2.3. Social Impact Assessments

Plan				Real				Status
What	Who	When	How	What	Who	When	How	
Social impact assessment template prepared	Authors of this document	Undefined	Undefined	Social impact assessment template prepared	Authors of this document	No later than Oct'22	ELSA Committee to revise the assessment template	done

[D1.10 UPDATE] updates marked in “red” font colour in the table above.

The positive social impact assessment can be attributed to the tools' contribution to the fight against cybercrime. They were specifically developed with the purpose of enhancing criminal investigations and enabling law enforcement agencies to more effectively address cybercrime issues. By providing advanced capabilities and streamlined processes for investigations, these tools have the potential to improve the efficiency and effectiveness of combating cyber threats.

On the other hand, the potential negative social impacts should also be considered and assessed. As these tools involve the processing of personal data for law enforcement purposes, there may be concerns related to privacy and data protection. It is essential to ensure that the use of these tools aligns with legal requirements and safeguards the rights and freedoms of individuals.

To fully evaluate the social impact of the operational use of these tools, a comprehensive social impact assessment should be conducted by competent law enforcement. This assessment should consider factors such as the effectiveness of the tools in combating cybercrime, the potential risks to privacy and data protection, and any broader societal implications that may arise from their implementation.

2.4. Ethics Assessments

Plan				Real				Status
What	Who	When	How	What	Who	When	How	
Ethic assessment template prepared	Authors of this document	Undefined	Undefined	Ethic assessment template	Authors of this document	Jun'22	<ul style="list-style-type: none"> <li>• Relate assertions/questions to different target groups</li> <li>• ELSA Committee to revise the assessment template</li> </ul>	<b>done</b> ; find it in ANNEX II; pending the review by the ELSA committee

[D1.10 UPDATE] updates marked in “red” font colour in the table above. The composition of the ELSA Committee as of June 2023 is as follows:

EACTDA Ethical, Legal, and Social Aspects Committee

MEMBER LIST

Name	Organisation	Category (*)	Position	Role	Email	Observations	Knowledge and experience		
							Legal (Data Protection, Privacy, etc.)	Ethics	Social Aspects
Sigute Stankeviciute	L3CE	A	Researcher	Chair	<a href="mailto:sigute@l3ce.eu">sigute@l3ce.eu</a>	Appointed Chair of the committee until Jun'23			
David Ríos Morentín	VICOMTECH	A	Researcher	member	<a href="mailto:drios@vicomtech.org">drios@vicomtech.org</a>		Knowledge and experience in EU policy and regulation, having worked at the European Commission for >5years	Former area coordinator of HE CL3 SSRI destination, which covers cross security domain ELS aspects. >10 years experience as researcher and project coordination and familiar with the basic ethics screening principles.	Former area coordinator of HE CL3 SSRI destination, which covers cross security domain ELS aspects. >10 years experience as researcher and project coordination and aware of the social implications of technology development for security.
Snezhana Krumova	Law and Intern	A	Researcher	member	<a href="mailto:snezhana.krumova@netlaw.bg">snezhana.krumova@netlaw.bg</a>				
Henrik Legind	Legind Technol	M	Researcher	member	<a href="mailto:henrik@legind.com">henrik@legind.com</a>		Not an expert in legal issues (not a lawyer). Participated in a number of H2020 project where partners with expertise in legal and ethical issues contributed regarding those issues.	Not an expert. I have participated in a number of H2020 security projects, and in this connection relevant discussions and privacy-by-design for the software development.	Not an expert.
Donatela Casaburo (TBC)	KU Leuven	A	Researcher	member	<a href="mailto:donatella.casaburo@kuleuven.be">donatella.casaburo@kuleuven.be</a>	IT & IP Law researcher	Legal expert on IT & IP related matters with experience in multiple security research projects		
TBC	Cybercrime	A	Researcher	member					
TBC	LT Police	P	end-user	member					
Juan Arraiza	EACTDA		Business Manager	Secretary	<a href="mailto:juan.arraiza@eactda.eu">juan.arraiza@eactda.eu</a>		Not an expert. Not a lawyer. I have worked though in several H2020 projects as coordinator for ~10 years approx and I am familiar with the principles and the basics.	Not an expert. I have worked though in several H2020 projects as coordinator for ~10 years approx and I am familiar with the principles and the basics.	-
Eva Skruba	EACTDA		Capability Manager	Observer	<a href="mailto:capabilitymanager@eactda.eu">capabilitymanager@eactda.eu</a>				

(\*) Legend: "A" academia & RTOs, "M" Industry and others, "P" Public entity fighting cybercrime (e.g., Law Enforcement Agencies)

During the development and testing phases of the tools, an Ethical Impact Assessment was conducted. Since no personal data was processed and no real-life testing was performed during these phases, no ethical issues were identified at that time. However, it is important to recognize that the operational use of some of the tools will involve the processing of personal data, which could potentially impact human rights.

As European Union (EU) countries implement the LED directive, it is crucial to consider that different countries may have varying criminal procedure laws, which can result in different levels of protection for human rights. Therefore, when applying criminal procedure regulations, it is necessary to take ethical considerations into account. This entails ensuring that the regulations align with ethical principles such as respect for autonomy, fairness, and the protection of vulnerable individuals.

In this context, it becomes important for the National Competent Law Enforcement body or related institution to carefully evaluate not only the legal requirements for the application of the tools according to national laws (such as judicial authorization, time limits, and information provided to data subjects), but also whether the national criminal procedure laws ensure the ethical use of the tools. Merely adhering to the law does not guarantee ethical use from a human rights perspective.

**[D1.10 UPDATE]** The lawfulness of data processing and use of the tools should be evaluated in a light the European Convention on Human Rights and case of European Court of Human Rights, not only national criminal procedures law.

To ensure ethical use of the tools, the National Competent Law Enforcement body or related institution should analyze whether the national laws adequately safeguard against potential ethical concerns. This analysis should involve assessing whether the laws provide sufficient protection for individual rights, privacy, and other relevant ethical considerations.

**[D1.10 UPDATE]** By conducting a comprehensive evaluation that includes both legal requirements and ethical considerations, it is possible to promote the ethical use of the tools in accordance with human rights principles. This approach helps to ensure that the operational use of the tools not only complies with the law but also upholds ethical standards, safeguarding the rights and dignity of individuals throughout the criminal procedure process.

### 3. Summary

#### 3.1. Conclusion

**[D1.10 UPDATE]** Deliverable D1.10 reports on all the ethical, legal, privacy and social impact activities conducted until June 2023.

No personal data was processed for development and testing of the tools. Therefore, DPIA was not conducted and no social or ethical impact made. However, some of the tools will process personal data in operational implementation. Therefore Competent Law Enforcement body or institution should conduct DPIA, Human Rights Impact Assessment, Ethical Impact Assessment and Social Impact Assessments.

Recommendations for operational use of the tools that process personal information is provided above.

By conducting these assessments, the aim is to strike a balance between effective law enforcement and safeguarding individual rights and societal well-being. It enables policymakers and stakeholders to identify any potential conflicts between the regulations and human rights, ethics, or social values.

The lawfulness of data processing and use of the tools should be evaluated in a light the European Convention on Human Rights and case of European Court of Human Rights, not only national criminal procedures law.

The outcome of DPIA, Human Rights Impact Assessment, Ethical Impact Assessment and Social Impact Assessments might be that national criminal procedure laws do not ensure adequate protection of human rights. Based on the findings of the assessments, appropriate measures can be taken to address any identified issues, modify the regulations if necessary, or introduce safeguards to protect individual rights.

#### 3.2. Evaluation

**[D1.10 UPDATE]** There has been an important work conducted to setup and appropriately tackle the ethical, legal, privacy and social aspects of the project. However, there have been certain delays in establishing the ELSA committee as well as in conducting the ELSA assessments. As a consequence, important lessons learned have been extracted which will serve in the future Tools4LEAs v2 project. As for example, there will be a preliminary ELSA assessment of the new project proposals, but as soon as a project is approved, the ELSA committee will be informed so that they can revisit and complement/amend/improve the preliminary assessment.

#### 3.3. Future work

**[D1.10 UPDATE]** The ELSA related work and knowledge gained in the Tools4LEAs v1 project, reported in this deliverable, will serve as the ground, the starting point for the Tools4LEAs v2 project.

## ANNEX I – Inform Consent

**INFORMED CONSENT FORM (sample from EACTDA event)**

**Event(s):** Tools4LEAs Demonstration and Evaluation event & End-User Advisory Board meeting

**Location:** Donostia – San Sebastian (Spain)

**Date(s):** 2022-06-27 & 2022-06-28

**Purpose:** The main purposes of the two events are as follows. For the Tools4LEAs Demonstration and Evaluation event: to present and demonstrate the tools, developed during Phase 1 of the Tools4LEAs project, so that the attendees provide their expert evaluation about them. And for the End-User Advisory Board meeting, the purpose is to discuss about the end-user needs list, to discuss the new items added to the bottom-up list of pre-existing tools/assets, and to finalise an end-user list prioritisation exercise.

I declare that my participation in this event is voluntary. I have been informed that I can choose not to participate or to leave the event at any point without any negative consequences.

By participating in this event, I confirm that:

- I am 18 years or older and competent to provide consent.
- I have read the information about this event and this informed consent procedure.
- I have been fully informed about the aims and purposes of the Tools4LEAs project; more information can be found at [tools4leas.eactda.eu](https://tools4leas.eactda.eu) or requested at [info@eactda.eu](mailto:info@eactda.eu).
- I have been given the opportunity to ask questions regarding the purpose of the event.
- I agree that my data collected in the event can be used for scientific and research purposes and that I have no objection that my data is published in project-related dissemination and/or communication materials in a way that does not reveal my identity.
- I agree that I may be included in some photos and/or electronic media images, taken at this event. I am aware that this material may be used for the purpose of disseminating and communicating the project activities, for example in publications or in EACTDA's and/or the Tools4LEAs project's official social media platforms.

Information may be shared between any of the other team members participating in this project in an anonymous form. I have been informed that all the information I give will be treated as confidential.

This consent form is made pursuant to the relevant national, European, and international data protection laws and regulations and personal data treatment obligations. Specifically, this consent document complies with the EU General Data Protection Regulation (2016/679) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

**NAME:**

**SIGNATURE:**

**DATE:**

## ANNEX II – Ethics Assessment Template

If deemed appropriate, during the course of the Tools4LEAs project ethics assessments might be conducted to ensure that the project complies with the ethical principles described in section “Ethics Assessments”. To facilitate those assessments, the following guidelines/template is proposed.

### 1) Context

**Provide information about the Tools4LEAs project and the specific work being assessed to set the scene. Such information should include: funding, motivation, expected scientific outcomes, study design, methods used, reasons for this particular project being important, etc.**

The Tools4LEAs project is establishing a framework that allows delivering on a regular basis new tools or new versions of tools with no license costs, access to source code and documentation, necessary for the installation and use of the tools developed, and that effectively help European public security practitioners at their work fighting cybercrime.

The project organises EUAB meetings to collect, analyse and prioritise end user needs, and demonstration and evaluation events. Relevant stakeholders, including members of EACTDA, Tools4LEAs EUAB members and other invited external experts participate in these activities. The name, affiliation, and contact information of these persons are collected. The project fully respects the international, EU and national legal framework on privacy and data protection. In particular, compliance with the General Data Protection Regulation are taken into account. Participation in the aforementioned activities is always on a voluntary basis. The potential participants receive sufficient written information on the research project in order to be able to make a choice of whether or not to participate. They are informed:

- On the right as to which of one's data are processed, by whom and for what purposes.
- That they can withdraw their participation in the study at any time without negative consequences.

The potential participants are asked for their informed written consent in a clear procedure (see Annex I). When appropriate/necessary, data extraction renders the data irreversible anonymous.

See also 2.1.1.1. (What is the purpose of the data collection/generation and its relation to the objectives of the project?) for detailed information.

### 2) Overall Ethical Issues

**Describe the ethical issues raised by the objectives of the Tools4LEAs project, its respective results or findings and the potential consequences of your research outcomes. Provide details about how the identified overall ethical issues will be addressed.**

See 2.1. Data Management Plan and especially 2.1.1.1. for ethical issues, raised by the objectives of the Tools4LEAs project and 2.1.6. for how the identified overall ethical issues will be addressed.

### 3) Participants



**Provide details about how you will be recruiting participants (inclusion/exclusion criteria, sites of recruitment, process...) and how informed consent (procedure for informing people, choices offered...) will be obtained. See “ANNEX I – Informed consent form template” for further details.**

EACTDA and the Tools4LEAs project follow some internal documents and rules to describe in details procedures of becoming an EACTDA member (see [EACTDA Internal-Rules-Proposal Part-I \(Membership-Governance-Financial\)](#)), hiring new secretariat members (see [EACTDA Internal-Rules-Proposal Part-III \(Code-of-Conduct\)](#)) and the [Tools4LEAs EUAB ToR](#) for the composition of the project End Users Advisory Board.

When inviting participants to events, organised by EACTDA and the project Tools4LEAs, different criteria are considered: objectives and scope of the event, profile of the invitees etc. “Informed consent form” must be signed by all participants.

An ELSA Committee with external experts is in the process of establishing.

#### **4) Risks and Benefits to Stakeholders**

**Go through the list of all directly involved or indirectly affected groups of people discussing what the potential risks to them are (e.g., social, physical, psychological, financial...) and how they might benefit (e.g., reward, self-esteem, new skills, fun).**

The main aim of the Ethics Assessment Template is to establish potential risks of different target groups. The ELSA Committee’s task will be to react to those potential risks and evaluate the assessments.

#### **5) Data Collection and Privacy**

**Explain in detail which data you will be collecting, how you collect it, how it will be stored and secured and what measures will be taken to protect the privacy of people involved.**

See 2.1. Data Management Plan.

#### **6) Legal Boundaries and Guiding Documents**

**What relevant ethical and legal documents apply to the proposed research and/or what ethical guidance documents will be relied on? In which ways will these documents apply?**

The below mentioned documents apply to the implementation of the Tools4LEAs project in order to provide clarification and support with ethical guidance, clarify processes, terminology, share use cases and templates:

[Ethics and data protection](#)

[Identifying serious and complex ethics issues in EU-funded research](#)

[General Data Protection Regulation](#)

[EU Charter of Fundamental Rights](#)

[Ethics guidelines for trustworthy AI](#)**7) Ethics Monitoring**

**Explain which structures or procedures you have in place to monitor ethics and to be able to react to ethical issues that were not foreseen in this document.**

An ethics assessment template will be prepared for EACTDA staff members, new tool development projects coordinators/participants and other project stakeholders. The objective of the ethics assessment template is to monitor ethics through project implementation. ELSA Committee has been established and one of the objectives is to react to ethical issues and to evaluate the results of ethics assessments.

**8) Conflict Resolution**

**What are the potential conflicts that may arise in the research (e.g., between stakeholders and researchers) and how are they to be solved?**

Potential conflicts will be reported to and solved by the ELSA Committee, and they will also be reported in the respective deliverables.

**9) Other Ethical Concerns**

**Present, if applicable, other ethical concerns that need to be addressed (for example, unintended uses of an application, findings unrelated to the study goals etc.).**

Other potential ethical concerns that need to be addressed is the misuse of results of new tool development projects within the organisations, using them (by employees) or by criminals, who could provide themselves illegal access to the tools. In order to mitigate these concerns it is important to train all directly affected groups of people, protect the information and inform all directly and indirectly affected stakeholders about potential threats.

Please find the WIP version of Ethics Assessment Template below:

Audit and supervision coverage		Rating scale [FA/LA/PA/NA]	[S/P/O] - EACTDA secretariat member (S) - new tool development project coordinator/participant (P) - other (O)	Controls
class	sub-class			Assertion / question
Fundamental rights	Solidarity and Subsidiarity	FA		The <b>Tools4LEAs</b> project provides a working environment that fosters solidarity between <b>Tools4LEAs</b> participants coming from different Member States.
Fundamental rights	Solidarity and Subsidiarity	FA		The <b>Tools4LEAs</b> project provides a working environment that fosters solidarity between <b>Tools4LEAs</b> beneficiary organisations.
Fundamental rights	Solidarity and Subsidiarity	LA		<b>The Tools4LEAs beneficiary organisations share proportionally, or at least reciprocally, in the benefits, burdens, and risks of collaboration in the project. (assertion under revision)</b>
Fundamental rights	Solidarity and Subsidiarity	FA		The <b>Tools4LEAs</b> project provides a working environment that fosters team orientation, mutual respect, and openness for different views and approaches.
Fundamental rights	Freedom and Privacy	LA		The <b>Tools4LEAs</b> project provides a working environment that fosters compliance with privacy-related laws and regulations, as well as foster privacy-related ethical standards.
Fundamental rights	Freedom and Privacy	FA		The <b>Tools4LEAs</b> project provides a working environment that does not unduly restrict the professional autonomy of <b>Tools4LEAs</b> participants.
Fundamental rights	Policies, Standards, Procedures, and Guidelines	LA		The <b>Tools4LEAs</b> project provides the necessary and sufficient policies, standards, procedures, and guidelines, related to fundamental human rights issues. <a href="https://www.citizensinformation.ie/en/government_in_ireland/european_government/eu_law/charter_of_fundamental_rights.html#IS2ea8">https://www.citizensinformation.ie/en/government_in_ireland/european_government/eu_law/charter_of_fundamental_rights.html#IS2ea8</a>
Privacy - PII	GDPR requirements	FA		In the scope of the <b>new tool development project</b> that I lead, GDPR legal requirements are well understood by the project participants.
Privacy - PII	GDPR requirements	LA		In the scope of the <b>new tool development project</b> that I lead, technical and organizational measures to ensure data protection were designed and are being implemented for all processing activities.
Privacy - PII	Awareness and engagement	FA		In the scope of the <b>new tool development project</b> that I lead, generic privacy requirements and concerns were formally presented and discussed in a formal venue or procedure (telco, meeting, conference, workshop, or other effective
Privacy - PII	Legal capabilities and competency	FA		I understand the legal concepts of "personal data", "consent", "data breach", "profiling", and I am able to apply these concepts in the scope of the <b>new tool development project</b> that I lead.
Privacy - PII	Legal capabilities and competency	FA		I understand the legal concepts of "pseudonymisation", "encryption", and I am able to apply these concepts in the scope of the <b>new tool development project</b> that I lead.
Privacy - PII	Legal capabilities and competency	FA		I understand the legal concept of "high risk data processing operations" and I am able to apply this concept to assess risk to rights and freedoms of the natural person, in the scope of the <b>new tool development project</b> that I lead.
Privacy - PII	Policies, Standards, Procedures, and Guidelines	LA		The <b>Tools4LEAs</b> project provides the necessary and sufficient policies, standards, procedures, and guidelines, related to privacy issues.
Ethics requirements	"Dual-use" ethics category	FA		<b>In the scope of the new tool development project that I lead, the issues of Tools4LEAs dual-use items (i.e. for both civil and military purposes) were formally presented and discussed, namely according to the requirements of deliverable</b>
Ethics requirements	"Humans" ethics category	FA		In the scope of the <b>new tool development project</b> that I lead, the issues of human participation in Tools4LEAs research activities (identification, recruitment, and consent) were formally presented and discussed, namely according to the
Ethics requirements	Policies, Standards, Procedures, and Guidelines	FA		The <b>Tools4LEAs</b> project provides the necessary and sufficient policies, standards, procedures, and guidelines, related to ethical issues.
Gender and diversity	Intercultural enablers	FA		In the scope of the <b>new tool development project</b> that I lead, I have not encountered significant difficulties and roadblocks related to intercultural communication, understanding, and appreciation.
Gender and diversity	Negative discrimination	FA		In the scope of the <b>new tool development project</b> that I lead, I have not encountered significant difficulties and roadblocks related to women's attraction, participation, or retention in the workplace.
Gender and diversity	Negative discrimination	FA		In the scope of the <b>new tool development project</b> that I lead, I have not encountered significant gender stereotypes and unconscious bias, that may impact negatively organizational performance.
Gender and diversity	Policies, Standards, Procedures, and Guidelines	FA		The <b>Tools4LEAs</b> project provides the necessary and sufficient policies, standards, procedures, and guidelines, related to gender and diversity issues.
Responsible research and innovation	Goal achievement	FA		Overall, the <b>Tools4LEAs</b> project fosters responsible research and innovation.
Responsible research and innovation	Roles and empowerment	FA		In the scope of the <b>new tool development project</b> tasks that I lead, I am responsible for fostering responsible research and innovation.
Responsible research and innovation	Roles and empowerment	FA		In the scope of the <b>new tool development project</b> tasks that I lead, I feel motivated and empowered to foster responsible research and innovation.
Responsible research and innovation	Policies, Standards, Procedures, and Guidelines	FA		The <b>Tools4LEAs</b> project provides the necessary and sufficient policies, standards, procedures, and guidelines, related to responsible research and innovation.
Usefulness of ELSA Audit	Promotion of RRI	FA		Is the Final ELSA Audit useful for promoting RRI?