

Template

This form is in English, but feel free to respond in Dutch / Dit formulier is Engelstalig, maar u kunt gerust in het Nederlands de vragen beantwoorden.

For more explanation of some questions, see the appendix to this document: RDMP Q. & A.

1. Date of Submission

Day-Month-Year

2. Title of Your Research

Complete (working) title

3. Date of Commencement and (expected) Duration of Study

*Intended start date of the study and intended end date
(Day-Month-Year to Day-Month-Year)*

4. Applicant and Any Other Investigators

*Your name and email address and the names of any other investigators.
Are you the responsible investigator (Primary Investigator/P.I.)? If not, please state who is.*

Is the project a joint project with external partner organizations or institutions?

- *No*
- *Yes, please mention the name of the institution, the principal investigator or contact person at the other institution.*

Is this partner situated in- or outside the European Union?

Is there a (formal) agreement between the institutions regarding this research project?

4a. PhD Candidate

If you are a PhD candidate, please fill in the following:

0 PhD candidate-employee

0 PhD candidate, not an employee (external PhD candidate or scholarship PhD candidate)

Who are your supervisors?

5. Department/Section/Research Program

Research program and department or section where the research is conducted.

6. Description of the Study

a. Brief description of the study, especially the research question and methodology. (Tip: copy this information from the CWB application).

b. Previous studies in the same field. Have you conducted similar research yourself in the past, or are you aware of similar research at the University of Groningen? Was ethical review conducted in those cases?

7. Data Collection

What type of data will be collected?

- 0 Quantitative data (numerical and measurable information)*
- 0 Qualitative data (descriptive insights like opinions or observations)*

Do you use secondary data (data from existing sources)?

- 0 No*
- 0 Yes (please explain)*

*What method(s) will you use for the collection of data?
(delete or cross out the not-applicable options)*

- Structured individual interviews*
- Semi-structured individual interviews*
- Structured group interviews*
- Semi-structured group interviews*

- Observations
- Survey(s)
- Experiment(s) in real life (interventions)
- Other (please explain)

Which software will you use to analyze data?

- Software available in the University Workplace (i.e. Excel, Stata, Atlas-ti)
- Software purchased / licensed for this research project (please explain)
- Open software or software developed in this research project (please explain)

Will you use Artificial Intelligence tools to process data?

- Tools available in the University Workplace (i.e. Mistral Le Chat, Whisper)
- Software purchased / licensed for this research project (please explain)
- Open software or software developed in this research project (please explain)

8. Processing and Protection of Personal Data

Because of the **General Data Protection Regulation (GDPR)**, several matters must be recorded. This registration, combined with the other information from this form, can demonstrate that there is a legal basis for processing personal data and that the researcher takes appropriate "technical and organisational measures" to protect the personal data processed in the research.

Have a look at the Guide for more information on these questions.

A. Categories of Research Subjects

People whose personal data will be processed.

Delete or cross out what does not apply

0 Adults (not vulnerable)

- Minors < 16 years
- Minors < 18 years
- Patients
- Vulnerable persons (describe below)

Please note: research subjects can be "vulnerable persons", depending on the circumstances related to the project and the research subject. People are vulnerable in the context of the GDPR when:

- *They cannot freely give their consent or cannot object to participation in the research. For example, patients, detainees, and minors;*
 - *They are unable to form an opinion about the processing of their personal data (e.g., individuals with a certain mental disorder);*
 - *The processing of the personal data processed about them could harm them (e.g., processing political opinions of people in countries with oppressive regimes).*
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B. Categories of Personal Data that will be processed

Delete or cross out what does not apply.

- General personal data
 - Special categories of personal data:
 - Nationality
 - BSN (Citizen Service Number) or V-number (foreigners registration number)
 - Information revealing racial or ethnic origin
 - Information revealing political opinions
 - Information about a person's physical health
 - Information about a person's mental health
 - Information about a person's sex life or sexual orientation
 - Information revealing religious or philosophical beliefs
 - Information revealing membership in a trade union
 - Biometric information
 - Genetic information
 - Criminal record
 - Other (explain below)
-

C. Providers of Personal Data

Who will provide the personal data that will be used in the research? If the personal data will be provided by an external party (not being the researcher or the University of Groningen), describe which party(ies) this concerns and indicate whether an agreement has been signed.

- Data provided by the researcher
- Data provided by the University of Groningen
- Data provided by an external party (explain below)

Explanation: *In interviews or surveys, the researcher provides the data themselves. For external parties, agreements must include provisions on handling the personal data used in your research.*

D. Data Protection

What technical and organisational measures do you take to protect the personal data of those involved?

Pay attention to the different phases of the research:

- *Recruitment of participants (if applicable);*
- *Data collection and transfer of data;*
- *Storage and archiving during and after the research;*
- *Sharing and publishing of research data;*
- *Reports and publications.*

E. Personal data forwarded outside the EU

Will any personal data be transferred to countries outside the European Economic Area?

Please note: The European Economic Area includes EU, Norway, Iceland and Liechtenstein.

The United Kingdom is a non-EU country after 1 May 2021 and is subject to an adequacy decision issued by the European Commission¹.

9. Data Management

- A. Where will the (raw) data be stored during the research?
- On your personal drive (X-drive) of the UG network
 - In a Publication Package or other shared drive (Y drive) on the UG network
 - On a Unishare drive
 - On a (shared) UG Google Drive
 - Other, please specify
- B. Are there non-digital data (such as field notes, diaries, paper surveys, photocopies of original documents, etc.) that need to be stored during and after the research?
- No
 - Yes. Please specify and explain where these documents will be stored during the research and (when applicable) archived for the long term; how is access and management (including destruction after archiving) arranged.
- C. Will you be sharing data during your research with researchers who are not part of the research group as described in Section 4?
- No
 - Yes, please mention their names and the organization they work for.
- D. Are there shared responsibilities for data management?
- No

¹ https://commission.europa.eu/document/download/a7907f8f-6e1c-4782-a193-d16b2cfe7650_en?filename=JUST_template_comingsoon_standard_26.pdf

- Yes, please explain below.
- E. Where will the data be stored after the research?
- Data is archived in a Publication Package or other shared drive (Y drive) on the UG network
 - Data is archived in another location (please explain below)
 - There is no data to be archived (please explain below)
- F. For how long should the data be kept after the project ends?
- 10 years (this is the standard retention period according to the Faculty Data Management policy)
 - Less than 10 years (please explain why and for how long)
 - More than 10 years (please explain why and for how long)
- G. Will data suitable for reuse, or data not available in the publication(s), be archived and published in a repository to be available for other researchers?
- Yes, in DataverseNL (the default UG repository)
 - Yes, in ... (please specify)
 - No, data suitable for reuse is published in another way (please specify)
 - No, there are no data suitable for reuse (please explain)
 - No, for data protection or other (legal) reasons, data is not made available to other researchers (please explain)
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For any questions regarding data management and data protection or a review of your RDMP, you are very welcome to contact Tamara Hummel, Privacy & Security coordinator for Research. Email: t.hummel@RUG.nl

Attachment: RDMP Q. & A.

Q.7 Data collection

Empirical research collects both quantitative and qualitative data, which can be either

- a. primary data gathered through direct observation or experimentation, or
- b. secondary data from existing sources.

Q.8 Processing and Protection of personal data

The GDPR has a number of legal grounds for processing personal data in scientific research. For example, the explicit consent of those involved if you want to process special personal data. You must be able to demonstrate that you meet the conditions.

NB These questions concern the processing of personal data, so you also need to answer them if you only use secondary data in your research.

What is meant by vulnerable participants?

Vulnerable participants are defined as those who have (or think they have) a dependency relationship with the sponsor or implementer of the research. This dependency may be psychological, social, economic, political, or other. A dependency relationship can result in participants feeling compelled to give consent or not daring to refuse the processing of their data. Examples include employees or students of the RUG, children vis-à-vis their parents/carers/school, but also other vulnerable persons, such as patients vis-à-vis their health care provider/insurer, people entitled to benefits vis-à-vis the municipality or UWV, prisoners vis-à-vis the judicial authorities, and so on.

What is general personal data?

The term "personal data" includes any information relating to an identified or identifiable natural person (or "data subject").

General personal data includes, for example, a home address, date of birth, telephone number.

Please note: as combinations of data **could** be used to identify a person, this data – which may at first not look like personal data – must be counted as such!

For example:

the combination 'name X' 'man' 'owns a Toyota' 'in the Netherlands'	= directly identifiable (person X)
the combination 'man' 'owns a Toyota' 'address' 'in the Netherlands'	= indirectly identifiable (address leads to person X)
the combination 'man' 'owns a Toyota' 'in the Netherlands'	= truly anonymous
the combination 'man' 'owns a Toyota' 'in Groningen'	= given the number of Toyota owners, probably still truly anonymous

the combination 'man' 'owns a Lada' 'in the Netherlands'	= unclear, because how many people own a Lada in the Netherlands?
the combination 'man' 'owns a Lada' 'in Groningen'	= probably indirectly identifiable (the combination leads to person Y)

As you can see, data that does not directly identify a person must still be considered to be personal data if it is reasonable to assume that the data could be combined, either now or in the future, with other data and lead to the identification of a person .

This includes datasets that use unique identification numbers, even if you as the researcher do not know who the numbers refer to, or datasets with unique combinations. This is pseudonymized data, and therefore personal data.

What is Sensitive personal data?

According to the GDPR (art. 9), the following personal data should be considered as 'Special categories of personal data':

- personal data that reveals racial or ethnic origin;
- personal data that reveals political opinions;
- personal data that reveals religious or philosophical beliefs;
- personal data that reveals trade union membership;
- data about a person's health;
- data concerning sexual behaviour or sexual orientation;
- genetic data (data that provides unique information about physiology or health and/or the health of family members);
- biometric data that allows the unique identification of a person (data that provides unique information on physical, physiological or behavioural characteristics).

[Special categories of personal data explained by the "Autoriteit Persoonsgegevens" \(in Dutch\)](#)

[Special categories of personal data by the "UK Information Commissioner's Office" \(in English\)](#)

Conducting research with special personal data

To do scientific research with special personal data explicit permission must be requested from the participant for the processing of these data.

Of course, in addition, all GDPR conditions apply to be able to process ordinary personal data.

Note: If there is a high risk of misuse of personal data you should first perform a "Data Protection Impact Assessment (DPIA)". Please check, using the "DPIA scan" in the Appendix of the Readers Guide, whether this may be the case.

Why is the data provider asked?

If you do not collect the personal data yourself but receive it from another party, or if you have personal data that you have collected yourself is processed by a party outside the RUG, an agreement such as a 'data sharing agreement' or 'data processing agreement' must be drawn up for this purpose in order to comply with the requirements of the AVG.

What are technical and organizational measures?

Technical measures are, for example, pseudonymization and encryption. Organizational measures include not storing data on devices or keeping consent forms and transcripts separate.

More information on the website of the DCC:

www.rug.nl/research/research-data-management/data_protection-gdpr/measures/

Why is it asked if personal data is transferred to countries outside the European Economic Area?

The GDPR imposes restrictions on the transfer of personal data outside the European Union, to third countries or international organizations, to ensure that the level of protection of individuals provided by the GDPR is not undermined.

In this case, it must be demonstrated by the researcher that it is necessary for the research to transfer these data, for example because there is a research partner in those countries and what (additional) measures have been taken to achieve the same level of protection.

SAMPLE