



D1.2

Ethics & Data Management

Deliverable Table

Project Title & Acronym	Unlocking the Potential of social FARMing for inclusive, sustainable, and regenerative jobs against long-term unemployment - UPFARM
Grant Agreement N°	ESF-SI-2024-LTU-01-0023
Deliverable N°	D1.2
Deliverable Title	Ethics & Data Management
Work Package	WP1
Dissemination Level	Public
Due date	30 November 2025
Submission date	13 October 2025
Status	Final
Lead Beneficiary	ANCI Toscana
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Keywords	Ethics; Data Privacy; Data Management; GDPR.
Disclaimer	<div style="text-align: center;">    </div> <p>Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or European Social Fund Agency. Neither the European Union nor the Granting Authority can be held responsible for them.</p>



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History of Changes

Version	Date	Authors	Change Description
v1.0	23.09.2025	Elena Conti, Laura Martelloni, Sofia Mortati [ANCI Toscana]; Federico Grassi [Federsanità ANCI Toscana]	First Draft
v1.0	13.10.2025	Elena Conti, Laura Martelloni, Sofia Mortati [ANCI Toscana]	Final version for submission to ESFA

About **UPFARM**

UPFARM aims to strengthen social farming (SF) as a tool for inclusive and sustainable employment in Tuscany, addressing the needs of long-term unemployed individuals. Building on existing SF initiatives and networks in the region, the project develops new knowledge, methods, tools, and participatory governance models, with the goal of scaling up SF into a regional asset for job inclusion.

The strategy is implemented through four territorial living labs (Piana di Lucca, Area Pisana, Valdinievole, Zona Fiorentina Sud-Est), which will enhance the capacity of local alliances to work together on socio-occupational inclusion. The labs will combine capacity-building activities, co-design of services, and experimentation with new employment pathways, becoming both drivers and models of the scaling strategy.

The results and approaches developed will be disseminated at the regional level through an open call for new territories and partnerships. The project will also draw on the contributions of European partners to learn from their experiences, strengthen scaling pathways, and contribute to policy innovation at the EU level.

In addition to realizing 40 job placements for long-term unemployed people, UPFARM aims to leave a tangible and lasting legacy: tools, methods, and alliances capable of growing SF in Tuscany, spreading it to new areas, integrating it into public policies, and promoting a more inclusive and sustainable culture.

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List of Acronyms

CA	Consortium Agreement
DPEM	Data Protection and Ethics Manager
EC	European Commission
ESFA	European Social Fund Agency
ESF+	European Social Fund Plus
EU	European Union
GA	Grant Agreement
LTU	Long-term Unemployment
PC	Project Coordinator
PES	Public Employment Service
PM	Project Manager
SC	Steering Committee
WP	Work Package

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Executive Summary

This deliverable (**D1.2 Ethics and Data Management**) describes the ethical and data management framework applied in the UPFARM project and stands as a key reference for all project partners - particularly those involved in research activities as well as in the development and realisation of job placement pathways for long-term unemployed individuals.

The purpose of the document is to support all partners in managing the project according to the highest ethical standards of research and social innovation, in line with the most recent legal and ethical standards, including the General Data Protection Regulation (GDPR), national legislation, and the European Social Fund+ Programme.

The document sets out the principles, procedures, and safeguards that guide the collection, processing, storage, sharing, and reuse of project data. It addresses both general obligations, such as GDPR compliance and informed consent, and project-specific challenges, notably the management of sensitive data linked to the integrated service provision model in Tuscany. The framework ensures that personal data are handled with strict protection measures, while non-personal and anonymised outputs are shared in line with FAIR principles to maximise their reusability and impact.

By providing clear guidance on roles and responsibilities, data classification, retention and deletion procedures, and conditions for data sharing, the deliverable enables partners to act consistently and responsibly across all work packages. It also recognises areas where regulatory uncertainty persists – particularly regarding inter-service data sharing for multidisciplinary teams – and commits to updating approaches as the project advances.

Ultimately, this deliverable contributes to UPFARM's broader mission of fostering inclusive and sustainable employment through social farming, supporting the development of the project according to core principles of integrity, transparency, and accountability.

1. Introduction

1.1 Purpose of the Deliverable

This deliverable outlines the **initial ethics framework and data management strategy of the UPFARM project**, which aims to strengthen social farming (SF) as a tool for inclusive and sustainable employment in Tuscany, with a specific focus on supporting long-term unemployed individuals. The project combines territorial living labs, capacity-building, and co-design processes to develop new services and employment pathways, while also contributing to regional and European-level policy innovation.

Given the project's direct engagement with vulnerable groups and its reliance on participatory methods, **ethical considerations and responsible data management are central to its success**. This document therefore establishes the principles, procedures, and safeguards that will guide the collection, storage, processing, and sharing of data throughout the project lifecycle. It also ensures that the project remains fully compliant with relevant legal and ethical standards, including the General Data Protection Regulation (GDPR), national legislation, and the European Union's framework on social innovation.

Robust ethics and data management practices in UPFARM shall serve three main purposes:

- **Protecting participants' rights and dignity**, especially those of long-term unemployed individuals and vulnerable groups targeted by the project;
- **Ensuring transparency and accountability**, both within the project consortium and towards external stakeholders and the Granting Authority;
- **Enabling safe and meaningful use of data**, supporting evidence-based learning, dissemination, and scaling of social farming practices without compromising confidentiality.

This deliverable will thus provide a comprehensive framework for ethics and data governance, tailored to the specific goals and activities of UPFARM, while also ensuring replicability and alignment with broader EU standards.

However, it is important to underline that the ethical and data management framework described in this document **does not fully address all the key challenges that UPFARM will encounter in this field**. As explained later in more detail, UPFARM faces **a specific challenge related to integrated case management and service delivery, which the Tuscany Region is increasingly placing at the center of its policies for social and labor inclusion (DGRT 544/2023)¹**.

¹ See: https://federsanitatoscana.it/wp-content/uploads/2025/02/Delibera_n.1627_del_23-12-2024-Allegato-A.pdf

The regional model is based on multidisciplinary teams and integrated case management, which require effective data sharing among all the different services involved (e.g., social services, employment services, healthcare services, etc.) and foster public-private collaboration. This strategy, which values the contribution of multiple professional expertise, is promoted by the Tuscany Region while respecting the organizational and governance differences across the various territorial areas. However, the current regulatory framework does not provide fully clear or specific provisions regarding the modalities for sharing the sensitive personal data of vulnerable individuals among different service providers. This creates a **tension between two equally important objectives**:

- On the one hand, **strict compliance with GDPR and national data protection rules**, which impose strong limitations on data processing and sharing, especially regarding sensitive categories of data;
- On the other hand, the **practical need to enable integrated care and case management**, which presupposes the safe and appropriate exchange of information between services in order to support individuals holistically.

UPFARM acknowledges this challenge as a **critical ethical and operational issue**, which however cannot be solved by the project itself. What UPFARM can do is to **recognise the issue, address it responsibly within its activities, and contribute to the ongoing debate**. In this sense, the project commits to engaging with regional stakeholders and policymakers to raise awareness and explore potential approaches for lawful and responsible data sharing in the context of integrated, multidisciplinary service provision, while ensuring full compliance with existing regulations.

Accordingly, the consortium will adopt a dynamic and adaptive approach. In the final version of this deliverable (D2.3 - due M36), we will update and refine the measures, safeguards, and approaches developed during the project to address this challenge, aligning the current framework with any evolving legal and practical updates.

1.2 Connection with other documents

This deliverable is connected to other key project documents that have been produced or are in the process of being developed - forming together a broader reference package for ethical and responsible project management. These are, for instance:

- **The Grant Agreement (GA)** defines the legal and contractual framework of UPFARM and is the primary source of obligations, rules, and procedures in relation to the European Social Fund Agency (ESFA). It establishes the overall compliance requirements, including adherence to EU regulations on ethics and data protection.
- **The Consortium Agreement (CA)** governs cooperation among project partners, ensuring a common understanding of roles, responsibilities, and internal procedures.

It reinforces the provisions of the GA while specifying how partners jointly address issues of confidentiality, data sharing, and ethical safeguards in UPFARM.

- **The Project Management Handbook (D1.1)** serves as the project's internal operational guide. It translates the provisions of the GA and CA into practical workflows, decision-making processes, and reporting procedures, setting the requirements for reliable and transparent project management.

Moreover, key project deliverables scheduled for later stages of UPFARM - including the initial research reports, operational guidelines for the integrated case management of long-term unemployed individuals, job inclusion pacts and blueprint, evaluation reports, and others - will be developed with the present ethical and data management framework as their backbone. This shall ensure that all project outputs are grounded in the same principles of responsibility, transparency, and lawful data handling, enhancing the integrity and long-term impact of the project's results.

1.3 Structure of the Deliverable

The deliverable is organized as follows:

- **Section 2** outlines the **ethical framework**, presenting the guiding principles and standards applied in UPFARM, with specific reference to the Charter of Fundamental Rights, GDPR, the ESF+ Regulation, the European Code of Conduct for Research Integrity, and the provisions of the Grant Agreement.
- **Section 3** sets out the **ethical considerations** specific to UPFARM, including the project's key ethical principles, potential ethical issues, the participation of vulnerable groups, and the central challenge of cross-service data sharing.
- **Section 4** details the **data management strategy**, covering data types, collection methods, storage and security arrangements, sharing and reuse protocols, and retention/deletion procedures, with specific WP-level tables and alignment with FAIR principles.
- **Section 5** defines the **roles and responsibilities** across the consortium, including the Project Coordinator, Data Protection and Ethics Manager (DPEM), partner responsibilities, and mechanisms for monitoring, audit, and reporting.
- **Section 6** presents the **risk assessment and mitigation plan**, identifying key ethical and data-related risks and the preventive/corrective measures applied.
- **References** and **Annexes** provide supporting resources, including an informed consent template, an ethical checklist, and a summary of the data management plan.

2. Ethical Framework

This section provides an overview of the main policy and regulatory frameworks relevant to ethics and data management in UPFARM. Its purpose is to situate the project's approach within the broader European and national legal context for ethical and responsible research and social innovation, ensuring that all partners are aware of the obligations and standards that shall guide their work.

2.1 Charter of Fundamental Rights of the European Union

The Charter of Fundamental Rights of the European Union² comprises 54 Articles outlining the rights that must be upheld by both the EU institutions and Member States when applying EU law. All these Articles must be considered when conducting research within an ethical framework, as required for all EU-funded projects. In projects like UPFARM that entail a strong component of action-research, four specific Articles are particularly relevant:

- **Article 7 – Respect for private and family life:** Everyone has the right to respect for their private and family life, home, and communications.
- **Article 8 – Protection of personal data:** Everyone is entitled to the protection of their personal data. This data must be processed fairly, for specified purposes, and based on the individual's consent or another legal basis. Individuals also have the right to access their personal data and request corrections. An independent authority must oversee compliance with these rules.
- **Article 17 – Right to property:** This includes protection of intellectual property, which is relevant in contexts such as co-creation workshops where participants contribute ideas that may be used in project outputs.
- **Article 21 – Non-discrimination:** The Article underpins the principle of justice and must be observed in the fair selection of stakeholders involved in project activities.

2.2 General Data Protection Regulation (GDPR)

The General Data Protection Regulation (Regulation (EU) 2016/679) establishes the core legal framework for the protection of personal data within the European Union. It applies to all activities carried out under the project that involve the collection, processing, storage, or transfer of personal data. In practice, GDPR requires that data are:

- **Processed lawfully, fairly, and transparently**, with a clear legal basis (e.g. informed consent, legitimate interest, contractual necessity).
- **Collected for specified, explicit, and legitimate purposes**, and not further processed in ways incompatible with those purposes.

² https://www.europarl.europa.eu/charter/pdf/text_en.pdf

- **Adequate, relevant, and limited to what is necessary** in relation to the project's objectives.
- **Accurate and kept up to date**, with mechanisms for correction or deletion where appropriate and needed.
- **Stored securely**, ensuring confidentiality, integrity, and accountability throughout the data lifecycle.

Furthermore, individuals whose data is processed (data subjects) hold specific rights, including the right to information, access, rectification, erasure, restriction of processing, data portability, and objection. GDPR compliance is of capital importance for the UPFARM Consortium and will be strictly guaranteed throughout its duration.

2.3 European Social Fund+ Regulation

The European Social Fund+ (ESF+) Regulation (Regulation (EU) 2021/1057) sets the legal basis for ESF+ funded activities, with a strong emphasis on the respect of fundamental rights, equal opportunities, and non-discrimination. All projects supported under the ESF+ must ensure compliance with the principles enshrined in the EU Charter of Fundamental Rights, particularly regarding human dignity, equality between women and men, and the inclusion of vulnerable groups. The Regulation also requires that funded activities actively promote social cohesion and accessibility, prevent discriminatory practices, and contribute to equal treatment in line with EU and national legislation. These principles guide both the design and the implementation of project activities, ensuring that innovation and social impact are achieved in a fair, transparent, and inclusive way.

2.4 European Code of Conduit for Research Integrity

In 2017, the European Federation of Academies of Sciences and Humanities (ALLEA) revised the *European Code of Conduct for Research Integrity* to reflect evolving dynamics in EU research funding, regulation, institutional responsibilities, and review processes. This Code serves as a self-regulatory framework for research conducted across Europe and applies to all scientific and scholarly disciplines. The document outlines key principles for safeguarding research integrity, provides examples of good practices, and offers guidance on how to address breaches of responsible research conduct. According to the Code, research integrity is grounded in four core principles:

- **Reliability**, ensuring that research quality is evident in design, methodology, analysis, and the responsible use of resources;
- **Honesty**, in developing, conducting, reviewing, reporting, and communicating research in a transparent, fair, comprehensive, and unbiased manner;
- **Respect**, for colleagues, research participants, and the environment;
- **Accountability**, throughout the research process - from conception to publication.

2.5 UPFARM Grant Agreement Provisions

The Grant Agreement of UPFARM reinforces the obligations of all Beneficiaries with regard to ethics and research integrity (Article 13). Beneficiaries are required to uphold and promote the fundamental values of the EU, including respect for human dignity, freedom, democracy, equality, the rule of law, and human rights (with particular attention to the rights of minorities). In addition, the Grant Agreement establishes strict rules for the processing of personal data (Article 14). Any processing must comply with applicable EU, international, and national data protection legislation, in particular the GDPR mentioned earlier. Access to personal data may only be granted to personnel where strictly necessary for the implementation, management, or monitoring of the Grant Agreement. In such cases, beneficiaries must ensure that personnel are bound by confidentiality obligations. Finally, beneficiaries are required to inform individuals whose personal data is transferred to the Granting Authority and to provide them with the relevant information, including the Portal rules.

3. Ethical Considerations

This section outlines the main ethical challenges and considerations of the project, highlighting issues related to data protection, voluntary participation, and the broader principles of fairness, transparency, and inclusiveness.

3.1 Key ethical principles

UPFARM's core aim is to **strengthen social farming as a driver of inclusive, sustainable, and regenerative employment in Tuscany, particularly for long-term unemployed individuals**. It does so by setting up four territorial Living Labs in the so-called health areas ('Società della Salute') of Lucca Plain, Pisa, Valdinievole, and South-East Florence³. The Living Labs act as spaces of experimentation where **local alliances develop new knowledge, tools, and participatory governance models to enhance labour and social inclusion through social farming, and test them through innovative job placement pathways in the field**.

UPFARM's methodology combines preliminary mapping and research, capacity-building, co-design, and collaborative experimentation, ensuring that interventions are rooted in the realities of local communities - particularly of vulnerable individuals - while fostering innovative job placement pathways. Participation and active engagement of diverse stakeholders - from long-term unemployed individuals to social farmers, labour and social services, third-sector organizations, researchers, and policy makers - are therefore at the heart of the project's approach, forming the backbone of its scaling strategy. In addition, UPFARM benefits from the contribution of European partners which provide inspiration, mentoring, and opportunities for knowledge exchange, strengthening the project's capacity to scale social farming as a regional asset and to contribute to policy innovation at EU level.

UPFARM is grounded in a set of ethical principles that guide all activities and interactions with participants, partners, and stakeholders:

- **Voluntary participation:** The fundamental ethical principle of UPFARM is that participation by long-term unemployed individuals is strictly on a voluntary basis. Engagement in project activities - particularly job placement opportunities - is never

³ Established in Tuscany in 2008 (by Regional Law no. 60, amending Regional Law no. 40/2005), the *Società della Salute* (Health Societies) are non-profit public entities created through the voluntary adhesion of the municipalities belonging to the same district area (*zona-distretto*) and the territorially competent Local Health Authority (*Azienda USL*). Their purpose is to jointly manage territorial health, social-healthcare, and integrated social services. By integrating the services and activities of municipalities and health authorities, the *Società della Salute* provides unified responses to people's social and healthcare needs, becoming both the single institutional interlocutor and the main access point to territorial services. Based on data concerning the health status of the local population, the *Società della Salute* defines objectives and plans territorial social-healthcare interventions to achieve them. Their responsibilities also include promoting healthy lifestyles and managing the interventions of the integrated system of social services under the competence of local authorities.

See: https://www.regione.toscana.it/sst/organizzazione/societa-della-salute#cosa_sono

mandatory or coercive. Clear and accessible information shall be provided to potential participants, who retain the right to decline participation or withdraw at any stage without facing any negative consequences.

- **Dignity:** All individuals shall be treated with dignity and respect, regardless of their socio-economic status, background, or personal circumstances. The project shall actively work to counter the stigma associated with unemployment and any intersecting determinant (including related to age, gender, education, ethnicity, legal condition, health status, and more).
- **Non-Discrimination:** UPFARM shall ensure equal access and fair treatment for all participants, explicitly rejecting discrimination on the grounds of gender, age, disability, ethnicity, religion, sexual orientation, or any other personal characteristic.
- **Inclusion and Equity:** The project is committed to inclusive practices that provide equitable opportunities for engagement and benefit. This entails tailored approaches that consider participants' specific needs, ensuring that barriers to labour and social inclusion are reduced or removed.
- **Transparency and Accountability:** The project shall ensure that processes, rights, and responsibilities are communicated in clear and understandable ways. Decisions affecting participants are to be taken with transparency, and accountability mechanisms shall be in place to ensure the respect of ethical standards across all project activities.

3.2 Ethical issues

UPFARM addresses sensitive dimensions of social inclusion, employment, and personal empowerment of long-term unemployed individuals. While its activities are fully aligned with the EU's ethical standards and data protection regulations, the project faces some specific ethical challenges that are inherent to its objectives and implementation context.

UPFARM is structured into the following key streams of work:

- **Preliminary mapping and research (WP3)**, aimed at achieving a deeper understanding of the unique and challenges faced by the long-term unemployed in Tuscany, and unveil the potential of social farming to meaningfully address them;
- **Co-design of tools, practices, and approaches to integrated and enduring job inclusion in social farming for long-term unemployed individuals (WP4-WP5)**
- **Realisation of job placements for 40 long-term unemployed individuals** across the Living Labs' territories **(WP6-WP7)**
- **Monitoring and evaluation of the Living Labs' work and the broader project (WP8-WP9)**, seeking to assess and capture key results and learnings to effectively

support the scaling of social farming as a regional asset for long-term work inclusion and empowerment of vulnerable people.

- **Communication, dissemination, and exploitation activities (WP10-WP11)** that support engagement across the Living Labs, prepare the ground to full regional scaling, and expose the project to transnational learning exchange.

The full WPs architecture is shown in the following figure (Figure 1)

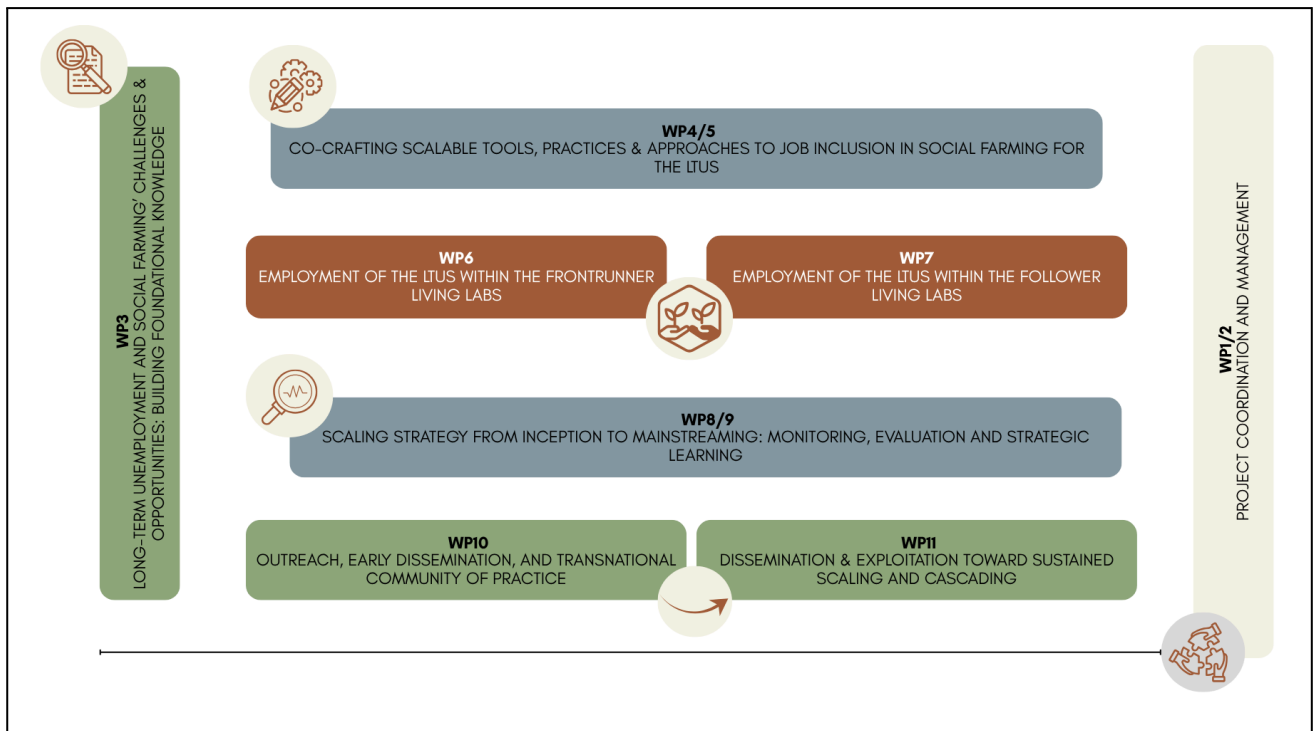


Figure 1, UPFARM's PERT Diagram

While the preparatory and supporting work packages - such as mapping and research (WP3), co-design activities (WP4–WP5), monitoring and evaluation (WP8–WP9), and communication and dissemination (WP10–WP11) - do not raise ethical or data-related issues beyond established good practices and existing regulatory frameworks, the situation is significantly different in the WPs dedicated to job placement and direct engagement with long-term unemployed individuals (WP6–WP7). Within these latter streams of work the highest challenges emerge, particularly regarding the **handling and sharing of sensitive personal data** - for example related to legal status, health status, socio-economic vulnerability, and more. Given the centrality of this challenge in UPFARM, this is described later in a dedicated paragraph (3.3.1).

The following Table summarises the project WPs where activities potentially raising ethical issues are located:

Table 1, Overview of Ethical Issues across Work Packages

Work Packages	Objectives	Activity Lead	Ethical issues
WP1 Project Coordination and Management (1st Reporting Period) M1-M18 Lead: ANCI	WP1 will assure that UPFARM is kicked off and delivered effectively and efficiently within the 1st reporting period, including by fostering a trustful and collaborative working environment among all partners as well as by adopting the highest standards of ethics and responsible innovation.	A1.1 Project MGT 1st Reporting Period	No particular ethical issues envisaged
		A1.2 Admin and finance 1st Reporting Period	
		A1.3 Ethics & Data Management 1st Reporting Period	
		A1.4 Quality assurance 1st Reporting Period	
WP2 Project Coordination and Management (2nd Reporting Period) M19-M36 Lead: ANCI	WP2 covers project coordination and management for the 2nd reporting period, making sure that it develops effectively and efficiently toward closure.	A2.1 Project MGT 2nd Reporting Period	No particular ethical issues envisaged
		A2.2 Admin and finance 2nd Reporting Period	
		A2.3 Ethics & Data Management 2nd Reporting Period	
		A2.4 Quality assurance 2nd Reporting Period	
WP3 LTU and Social Farming' challenges & opportunities: building	WP3 is a preparatory WP that seeks to build and share foundational knowledge for the Living Labs and the whole project. More in detail, WP3 aims to dig deep into the unique needs and challenges	A3.1 Policy Mapping	A3.2 involves collecting personal experiences and perspectives from long-term unemployed individuals, as well as information from service providers and community representatives. Ethical issues that may arise include: <ul style="list-style-type: none"> ● Informed consent: ensuring participants fully understand the purpose of the study and their rights. ● Confidentiality and privacy: protecting sensitive
		A3.2 LTU in Tuscany: mapping 'who & why'	
		A3.3 Social Farming potential in Tuscany: SWOT analysis	

<p>foundational knowledge</p> <p>M1-M7 Lead: IRS</p>	<p>faced by the long-term unemployed in Tuscany, and unveil the potential of social farming to meaningfully address them. This shall ensure that the project develops with and for the LTUs, placing their needs and aspirations at the very centre of the Living Labs' actions.</p>	<p>A3.4 Systematisation & workshop</p>	<p>personal and employment-related information.</p> <ul style="list-style-type: none"> ● Potential distress: discussing experiences of unemployment may cause emotional discomfort. ● Power dynamics: managing the relationship between researchers and participants to avoid coercion or bias. ● Data use and sharing: ensuring personal data is handled according to legal and ethical standards.
<p>WP4</p> <p>Co-crafting scalable tools, practices, and approaches to job inclusion in social farming for the LTU (1st Reporting Period)</p> <p>Lead: ANCI</p>	<p>WP4 is a transversal WP that gathers together all partners and Living Labs' stakeholders in a collective, collaborative, and creative process of crafting scalable tools, practices, and approaches to integrated and enduring job inclusion in social farming for the LTUs.</p>	<p>A4.1 Co-governance Hub</p> <p>A4.2 Co-creating targeted outreach and engagement measures</p> <p>A4.3 Co-designing integrated profiling & matchmaking tools</p> <p>A4.4 Crafting tailored job opportunities and job placement pathways</p> <p>A4.5 Co-designing personalised support during job placement</p>	<ul style="list-style-type: none"> ● Involvement of Vulnerable Groups: LTUs) may experience stigma or limited agency. Ensuring their voluntary and informed participation is crucial to avoid any risk of exploitation. Participation in Living Lab activities must not create unrealistic expectations. ● Collection and Processing of Personal and Sensitive Data: Co-design sessions may collect information on LTUs' socio-economic conditions, employment histories, or health/disability status. These fall under personal and potentially sensitive data categories, requiring GDPR-compliant data collection. ● Power Dynamics: Ethical facilitation is needed to ensure equal voice, respect, and non-discrimination. ● Confidentiality: Group-based activities may expose participants to each other's personal experiences. Safeguards must be put in place to maintain confidentiality and prevent misuse of disclosed information outside the project setting.
<p>WP5</p> <p>Co-crafting scalable tools, practices, and approaches to job inclusion in social</p>	<p>WP5 is a transversal WP that gathers together all partners and Living Labs' stakeholders in a collective, collaborative, and creative process of crafting scalable tools, practices, and approaches to integrated and</p>	<p>A5.1 Co-governance Hub</p> <p>A5.2 Co-creating targeted outreach and engagement measures</p> <p>A5.3 Co-designing integrated profiling & matchmaking tools</p>	<ul style="list-style-type: none"> ● Data Sharing Between Services: The WPs contribute to the development of integrated job inclusion pathways, which require multidisciplinary collaboration and may involve sharing sensitive data

<p>farming for the LTU (2nd Reporting Period)</p> <p>M19-M34 Lead: ANCI</p>	<p>enduring job inclusion in social farming for the LTUs.</p>	<p>A5.4 Crafting tailored job opportunities and job placement pathways</p> <p>A5.5 Co-designing personalised support during job placement</p>	<p>between services (PES, social services, employers). This presents legal and ethical challenges, as the regulatory framework for inter-service data sharing is not fully defined.</p> <ul style="list-style-type: none"> ● Use of Multimedia and Documentation: Living Lab activities may be documented with photos, videos, or recordings for dissemination and learning purposes. This raises ethical concerns around image rights and privacy, which must be managed through explicit consent and anonymisation where appropriate.
<p>WP6 Employment of LTU individuals within the frontrunner living labs</p> <p>M8-M24 Lead: PISA</p>	<p>WP6 concretely realises innovative pathways of job placement and inclusion of LTU individuals within Social Farming initiatives in the frontrunner living labs, working as testbeds for the collaboration models, working tools, and personalised service provision and support co-designed in Wp4 and Wp5.</p>	<p>A6.1 Frontrunner Outreach & Engagement</p> <p>A6.2 Frontrunner Profiling, Matchmaking, and Job Placements' inception</p> <p>A6.3 Frontrunner Job Placements</p> <p>A6.4 Frontrunner personalised support during job placement</p>	<ul style="list-style-type: none"> ● Processing of personal and sensitive data: Employment of LTUs requires collecting and managing highly sensitive information, including contact and financial details, employment contracts, health/disability status (for reasonable accommodations), and socio-economic vulnerability data. ● Informed consent and autonomy: Ensuring that LTU individuals freely agree to participate in employment pathways without coercion, with the option to withdraw at any time. ● Fairness and non-discrimination: Safeguarding equal treatment of participants in hiring and workplace practices, with particular attention to gender, age, disability, and migration status.
<p>WP7 Employment of LTU individuals within the follower living labs</p> <p>M16-M33 Lead: FIORSE</p>	<p>Wp7 realises innovative pathways of job placement and inclusion of LTU individuals within Social Farming initiatives in the follower Living Labs, building on the experience and learnings of the frontrunners, and paving the way to full scaling and cascading across</p>	<p>A7.1 Public Notice of Expression of Interest for LTUs' job placement</p> <p>A7.2 Follower Outreach & Engagement</p> <p>A7.3 Follower Profiling, Matchmaking, and Job Placements' inception</p> <p>A7.4 Follower Job Placements</p>	<ul style="list-style-type: none"> ● Contextual vulnerabilities: New territories may involve different profiles of LTUs, requiring careful adaptation of consent and data handling procedures. ● Confidentiality in case management: Employment and case management data must be processed under strict confidentiality, accessible only to authorised staff within multidisciplinary teams. ● Risk of stigmatisation: LTUs may face stigma in

	the whole Region.	A7.5 Follower personalised support during job placement	workplaces or communities. Measures must be taken to protect their dignity and ensure safe participation. <ul style="list-style-type: none"> ● Cross-service data sharing: Data exchange between social farms, employment services, and social/health providers creates legal and ethical challenges (Tuscan “grey area”). Specific protocols must be applied.
<p>WP8 Scaling strategy from inception to mainstreaming: monitoring, evaluation and strategic learning (1st Reporting Period)</p> <p>M3-M18 Lead: UNIFI</p>	Wp8 realises ongoing monitoring and punctual evaluation processes of the Living Labs’ work and the broader project, seeking to assess and capture key results and learnings to effectively support and steer the scaling strategy from its inception, to delivery, to mainstreaming SF as a regional asset for work inclusion and empowerment of vulnerable people.	A8.1 Theory of Change and M&E Tools A8.2 Monitoring progress and assessing co-benefits (First Reporting Period) A8.3 Uncovering and capturing 'scaling learnings' from inception, to transferring, to mainstreaming (First Reporting Period)	<ul style="list-style-type: none"> ● Use of personal and sensitive data for evaluation: Monitoring activities may involve surveys, interviews, or focus groups with LTUs and stakeholders. These could generate sensitive data (e.g. disability status, migration background, socio-economic vulnerabilities). ● Informed consent for evaluation: Participants must be clearly informed that their contributions will be used for monitoring and evaluation, with the option to withdraw. ● Anonymisation and pseudonymisation: All evaluation datasets must be anonymised or pseudonymised before analysis to protect participants’ identities.
<p>WP9 Scaling strategy from inception to mainstreaming: monitoring, evaluation and strategic learning (2nd Reporting Period)</p> <p>M19-M34 Lead: UNIFI</p>	Wp9 realises ongoing monitoring and punctual evaluation processes of the Living Labs’ work and the broader project, seeking to assess and capture key results and learnings to effectively support and steer the scaling strategy from its inception, to delivery, to mainstreaming SF as a regional asset for work inclusion and empowerment of	A9.1 Monitoring progress and assessing co-benefits (Second Reporting Period) A9.2 Uncovering and capturing 'scaling learnings' from inception, to transferring, to mainstreaming (Second Reporting Period) A9.3 Final ‘Lessons Learnt and Future Plans’ report	<ul style="list-style-type: none"> ● Confidentiality of stakeholder feedback: Service providers, social farmers, and LTUs may share critical opinions. Safeguards must prevent attribution of feedback to identifiable individuals. ● Avoiding misuse of findings: Results must not reinforce stigma against LTUs or specific communities; reporting should emphasise collective learning and systemic challenges. ● Data integrity: Ensuring that monitoring and evaluation data is accurate, complete, and not manipulated to meet expected outcomes. ● Consistency in safeguards during scaling: As activities expand, monitoring and evaluation involve

	vulnerable people.		<p>more partners and contexts, increasing risks of uneven application of data protection protocols.</p> <ul style="list-style-type: none"> • Fair representation: Ensuring evaluation results capture the diversity of participant experiences and do not over-represent “successful” cases at the expense of those facing greater challenges.
<p>WP10</p> <p>Outreach, early dissemination, and transnational Community of Practice</p> <p>M2-M18 Lead: IH</p>	<p>WP10 aims to establish and initiate an effective communication, dissemination, and exploitation strategy that can support engagement across the Living Labs; prepare the ground to full regional scaling; and expose the project to transnational learning exchange.</p>	<p>A10.1 Building early institutional conditions for scaling</p> <p>A10.2 Branding, Outreach and Storytelling</p> <p>Transnational CoP</p> <p>A10.3 Clustering and mutual learning exchange events</p> <p>A10.4 Early dissemination</p>	<ul style="list-style-type: none"> • Collection of personal data for communication purposes: Names, contact details, and affiliations of event participants, stakeholders, and CoP members will be collected for registration, mailing lists, and surveys. • Consent for multimedia materials: Photos, videos, and recordings of events may include identifiable individuals. Explicit consent must be obtained before publication on websites, media, or social networks. • Anonymity in stakeholder contributions: During CoP sessions, workshops, or surveys, participants may share opinions or critical perspectives. Safeguards are needed to prevent attribution of comments without consent. • Protection of vulnerable participants: When LTUs or other vulnerable groups take part in outreach or dissemination activities, special care must ensure they are not exposed to stigmatisation through public communication. • Data minimisation in mailing lists: Only essential contact information should be stored, with clear unsubscribe/opt-out mechanisms. • Cross-border data sharing: Involving transnational partners in the CoP raises additional considerations about data transfer, requiring GDPR-compliant safeguards.
<p>WP11</p> <p>Dissemination & Exploitation toward sustained scaling and cascading</p> <p>M19-M36 Lead: IH</p>	<p>WP11 seeks to nurture and boost enabling conditions for UPFARM to transition into a full regional scaling action as the project is over. At the same time, this Wp also aims to inspire and influence policies and social innovation practices toward the spread of social farming as a viable tool for job integration and social inclusion across other European Regions and territories.</p>	<p>A11.1 Boosting enabling conditions for scaling</p> <p>A11.2 Storytelling, impact stories</p> <p>A11.3 Community of Practice: a Thinking LAB/Capitalization</p> <p>A11.4 Clustering and mutual learning exchange events</p> <p>A11.5 Advanced dissemination and final event</p>	

			<ul style="list-style-type: none">• Intellectual property and open access: Outputs (policy briefs, methodologies, tools) must balance open access commitments with proper attribution of sources and respect for confidentiality where applicable.
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3.3 Participation of Vulnerable Groups

The active involvement of vulnerable groups is at the core of UPFARM. The project focuses on **long-term unemployed individuals**, who may also face **multiple and intersecting vulnerabilities related to age, gender, ethnicity, legal status, education, health conditions, or other socio-economic factors**. Their participation is essential to fully understand diverse experiences, expectations, and concerns, and to ensure that job inclusion pathways and social farming practices are designed in an **inclusive and sustainable** way.

Most of UPFARM's activities are expected to directly involve members of these groups, turning the risk of social exclusion into an opportunity for active participation and voice in shaping their own employment pathways. For this reason, the project adopts the following principles of responsible and ethical research and innovation:

- **Care and sensitivity:** All participants in Living Labs, pilots, and related activities will be treated with respect, ensuring that their integrity and personal privacy are protected.
- **Respect for diversity:** No ethnocentrism or bias will be tolerated. All forms of diversity – including gender, sexual orientation, cognitive or physical abilities, cultural background, and socio-economic status – will be respected and valued.
- **Safeguarding dignity and autonomy:** The dignity, wellbeing, autonomy, safety, and security of participants will always take priority over project objectives.
- **Empowerment and agency:** Participants will be recognised as active contributors, with full respect for their values, perspectives, and right to make their own decisions.

3.3.1 Key ethical and data privacy challenge in UPFARM: cross-service data sharing

As introduced earlier, **the Tuscan model of integrated case management and multidisciplinary teams is based on the coordinated action of social, health, and employment services**. In order to make integrated case management effective, data sharing among different services and institutions is necessary. However, within the current regulatory framework, there is still no fully defined legal provision governing the sharing of sensitive data between services in this context. This creates a grey area: on the one hand, data sharing is essential to implement the integrated approach promoted by the Region; on the other, it must be reconciled with the safeguards and requirements concerning data protection and individual privacy, first and foremost the GDPR. The issue is of crucial importance, particularly when dealing with vulnerable individuals under the responsibility of multiple services at the same time. Many reflections and in-depth discussions are being carried out both at national and regional levels in an effort to identify concrete and effective solutions.

Below, a brief overview is provided of documents that clearly set out principles and objectives which recognize sharing and collaboration as the distinctive feature of the relationship

between services, with the aim of responding to the complexity of multidimensional disadvantage, which also characterizes long-term unemployed individuals.

- In the Decree of 5 November 2021 of the Ministry of Labour and Social Policies, **'Adoption of the National Programme for the Guarantee of Workers' Employability (GOL)'**, reference is made to **Pathway 4 'Work and Inclusion'** of the GOL programme - an action for reforming the system of active labour market policies and vocational training - calling for *'close collaboration with territorial services in order to ensure integrated case management and maximise the expected impacts'* in terms of improving employability and supporting the labour market entry and re-entry of the most fragile and vulnerable segments of the workforce.
- In Tuscany, with Regional Government Resolution (DGR) 544 of 15 May 2023, specific Regional Guidelines for Social-Labour Integration were adopted. These establish the **Integrated Employment Inclusion Service** as a single, permanent, integrated team, designed to ensure unified access and case management while sharing tools and opportunities. This model also addresses privacy issues, since integrated case management requires the structured exchange of data and information.
- With Decree No. 93 of 11 June 2024 of the Ministry of Labour and Social Policies, the **'Guidelines for the establishment of Service Networks related to the implementation of the Inclusion Allowance (AdI)'** were approved. These are among the key documents for developing *'operational guidelines for the creation of institutional networks necessary to ensure a paradigm shift in the model of support for vulnerable people and families, and in the implementation of integrated measures for social and labour activation, such as the AdI, fostering a network-based logic'*. Such an approach is deemed necessary *'in all contexts where the presence of complex needs makes it appropriate to take charge of the individual or household by adopting a holistic approach'* and *'by specifying, for example, how to extend collaboration between services and the method of multidisciplinary teams to interventions aimed at all categories of fragile and vulnerable individuals'*, among which long-term unemployed people can certainly be included. To this end, *'suitable solutions may also be identified to ensure, in compliance with legislation on privacy and the processing of personal data, the exchange - also through the interoperability of information systems - of information on beneficiaries of interventions among the various services involved'*. These guidelines represent a common national framework but may be further specified and more precisely articulated at regional and local levels and/or within territorial areas, in line with the specificities, resources, organizational arrangements, and regulations characterizing each territory.

In line with these inputs, the Tuscany Region further approved the **Regional Operational Guidelines for Multidisciplinary Teams** with Regional Government Resolution (DGR) No. 1627 of 23 December 2024, a text that has already become a reference point for social and employment services across the region. Focusing on the contents most relevant to the need

and possibility of circulating information and exchanging data, the following key excerpts are reported:

- *'Within the activities of the multidisciplinary teams (MTs), suitable solutions may also be identified to ensure, in compliance with legislation on privacy and the processing of personal data, the exchange - also through the interoperability of information systems - of information on beneficiaries of interventions among the various services involved in the different activities of the MTs.'*
- *'The members of the team are appointed by the heads of the relevant services and represent them in decision-making. They are required to share data and information, opportunities and resources, in compliance with privacy regulations and with the principles of appropriateness of expenditure.'*
- *'It is also important to ensure the transfer of the information necessary to the MT. During team meetings, all information collected is verified and supplemented, by directly consulting documentation and databases (e.g., GePI, Idol, SIISL, etc.) and by valuing the contributions provided by the services involved. Once they receive the meeting call, the services are required to gather the information in their possession in order to share their knowledge and assessments (historical, evaluative, and prospective) within the team.'*
- *'With regard to health information, the MT may contact healthcare services to obtain, subject to the authorization of the persons concerned, information relevant solely for analysis and planning purposes on the health status of the individuals followed, in order to focus individual planning as appropriately as possible.'*
- *'Each service is required to inform individuals of the opportunity represented by referral to the team, as well as to collect authorizations according to its own internal procedures. Each team member is bound by professional confidentiality, aimed at maintaining a pact of loyalty and deep respect for the dignity and privacy of the referred citizens.'*

This approach, open to sharing and integration, is promoted by the Tuscany Region also through the activities of the Community of Practice for Social Inclusion in Tuscany, as well as through seminars and public meetings designed to support territorial agreements between entities and institutions responsible for social/health services and employment services, in order to structure multidisciplinary teams.

This closer level of engagement with territories, services, professionals, and citizens is fundamental in the search for practices capable of developing solutions to the issue of data sharing while respecting legislation on privacy and data protection. Indeed, the most significant innovations have emerged precisely from the territories. Among them is the initiative presented at the national webinar organized by the Ministry of Labour and Social Policies, ANCI, and the World Bank⁴, concerning the Società della Salute of Valdinievole which, for the first time in Tuscany, formalized together with ARTI (Regional Employment Agency of Pistoia and Lucca) a **Memorandum of Understanding for the Integrated Employment**

⁴ See: <https://federsanitatoscana.it/inclusione-sociale-e-lavorativa-la-valdinievole-modello-a-livello-nazionale>

Inclusion Service and the related Guidelines for the Social-Labour Multidisciplinary Team. These documents are the result of long-term collaborative work involving professionals and managers from various services, as well as the Data Protection Officers (DPOs) of both institutions⁵.

Concretely, under the agreement between SdS and ARTI:

- Both entities act as **independent data controllers** (GDPR Art. 4(7)) and commit to applying all relevant privacy regulations.
- The data processed include **common, special, health, and judicial data** relating to ADI beneficiaries and GOL profiled users, in both digital and paper form.
- **Data sharing** is permitted only for the purposes defined by national legislation (ADI, GOL) and cannot be disclosed to third parties unless required by law.
- **Security measures** include encrypted file transfers, password-protected exchanges, and IT platforms, with a commitment to strengthen safeguards if deemed necessary.
- **Authorized and trained personnel** are the only ones permitted to process the data, ensuring compliance with privacy rules and protection of citizens' dignity.

The principles of voluntary participation, which are at the core of all UPFARM activities, are clearly reflected here. All LTU individuals engaged in the project will do so on a voluntary basis, with full respect for their dignity, autonomy, and freedom of choice. This ensures that no participant is subject to coercion or pressure, and that inclusion pathways are designed around individual motivations, abilities, and aspirations.

While acknowledging that UPFARM does not have the mandate to fill regulatory gaps, the project aims to build on the contributions outlined in this section and to further develop the experimental approaches tested in Tuscany, drawing on the richness of the partnership. This will guarantee not only the necessary attention to compliance with regulations and internal procedures of the institutions involved, but also openness to multiple perspectives. UPFARM recognizes this challenge and is committed to operating within existing legal frameworks, while closely monitoring developments in national and regional legislation. Where possible, the project will adopt practical solutions - such as explicit informed consent, anonymization or pseudonymization of data, and clear data access protocols - to ensure that collaboration among services complies with both legal requirements and the rights of participants.

Finally, the project acknowledges broader ethical considerations related to non-discrimination, transparency, fairness, and inclusiveness. These principles will guide all activities, from participant recruitment to the governance of territorial alliances and the dissemination of results.

⁵ See:

<https://www.sdsvaldinievole.it/2025/02/06/servizio-integrato-inclusione-e-lavoro-firmato-in-valdinievole-il-primo-protocollo-dintesa-regionale/>

3.3.2 Key approaches: Informed Consent and Ethical Conduct of researchers, practitioners, and staff

A key cornerstone of UPFARM's ethical approach is that participation by long-term unemployed individuals and other vulnerable groups is **strictly voluntary**. Engagement in project activities is never mandatory or coercive. To ensure true voluntariness, the project applies the principle of **informed consent**, meaning that all participants:

- receive **clear, accessible, and non-technical information** on the purpose of their involvement, the expected activities, and the use of their data;
- are explicitly informed of their **right to refuse participation or withdraw at any time** without facing negative consequences;
- are offered information and consent materials in **formats adapted to their needs** (simplified language, oral explanations, or translation, as necessary).

The ethical integrity of UPFARM also depends on the conduct of researchers, practitioners, and staff who interact directly with participants. All project partners shall have a **duty of care** to safeguard participants' dignity, wellbeing, and privacy. This entails:

- maintaining **confidentiality** of personal information shared during activities such as interviews, focus groups, or co-design sessions;
- handling disclosures of sensitive or distressing information with **empathy and professionalism**, and, where appropriate, referring individuals to relevant support services;
- ensuring that **power imbalances** between institutional actors and vulnerable individuals are actively mitigated in participatory settings, so that LTUs have a genuine and equal voice;
- receiving adequate **ethical guidance and training** to carry out their roles responsibly and consistently across the consortium.

In the following Section, more details are provided on how these approaches and procedures shall apply throughout the whole data cycle.

4. Data Management Strategy

This section describes the strategy for data management in UPFARM, coherently with the highest standards of ethical and responsible research and (social) innovation and in compliance with the most recent EU and national legislation in the field. Sub-sections describe intended practices and protocols across the full cycle of data management including data types, collection, storage, sharing & reuse, deletion/retention.

4.1 Types of data collected

In UPFARM, project data are classified both by **source (primary or secondary)** and by **format (texts, tables, datasets, multimedia)**. A key distinction is also made between **personal and non-personal data**, since personal data require specific safeguards and lawful processing procedures. A common policy on personal data processing has been agreed among UPFARM partners to ensure compliance with GDPR and to guarantee consistent practice across the consortium.

To answer the research questions and implement the project activities, UPFARM will rely on a mix of primary and secondary data, combining both qualitative and quantitative analysis.

The main data formats expected in the project include:

- **Documents** (e.g. reports, briefs, deliverables, presentations);
- **Datasets** (structured data collected through surveys, monitoring, or partner records);
- **Multimedia** (photos, videos, audio recordings produced during project activities);
- **Software/Digital tools** (where relevant to support job placement pathways or data analysis in Living Labs).

Based on the mode of collection, UPFARM distinguishes between:

- **Surveys, interviews, focus groups, and co-design sessions**, generating qualitative and quantitative primary data on long-term unemployed individuals, social farming practices, and stakeholder perspectives;
- **Assessment data**, including project monitoring data, field notes from Living Labs, and inventories of existing social farming practices and services;
- **Demonstrations and pilots**, documenting activities in Living Labs (capacity-building, co-design, and employment pathways), serving both as a source of evidence and as a showcase for innovative practices;
- **Public events and communication activities**, such as workshops, dissemination events, transnational Community of Practice sessions, and outreach campaigns, which generate registration data, participant feedback, and multimedia content for dissemination;

- **Literature and secondary sources**, including policy reports, academic publications, and statistical datasets.

This classification allows the consortium to define the appropriate ethical safeguards, storage solutions, and access protocols for each type of data, ensuring both lawful processing and the potential for safe reuse.

The figures that follow (Figure 2 and 3) provide a snapshot of the data formats and sources of collection in the project:

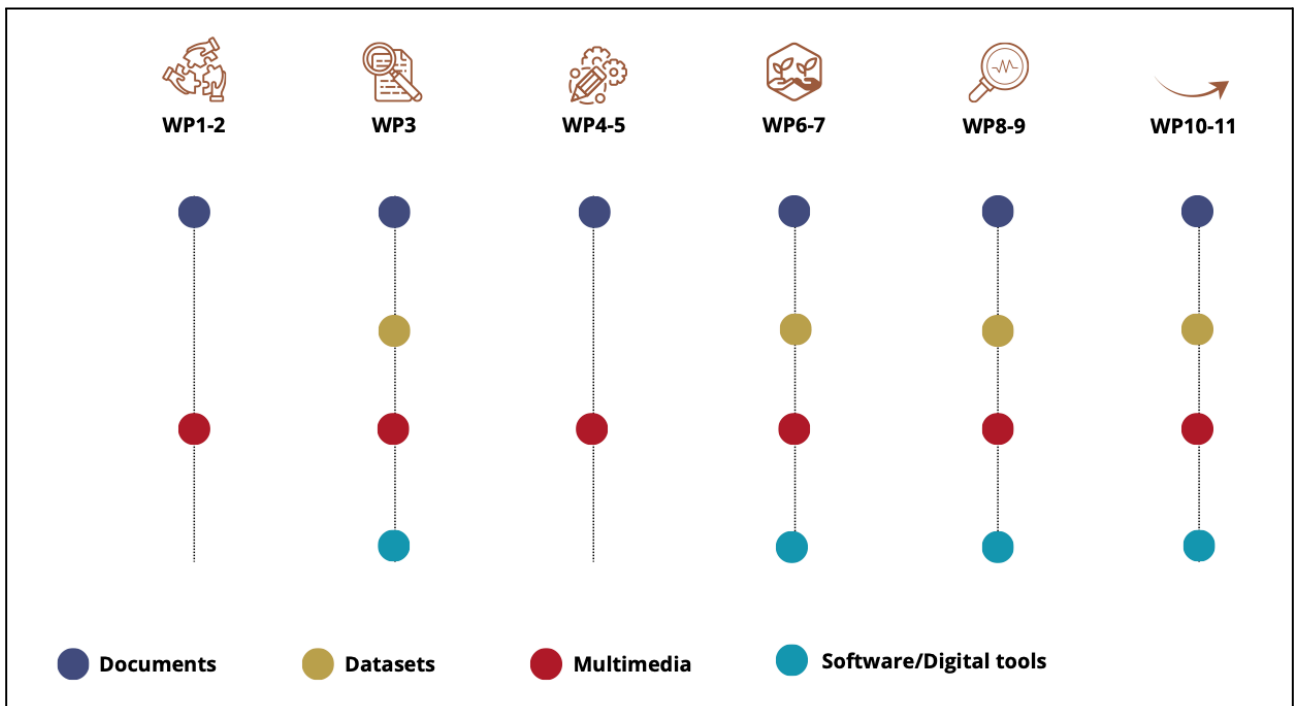


Figure 2, Data Formats in UPFARM

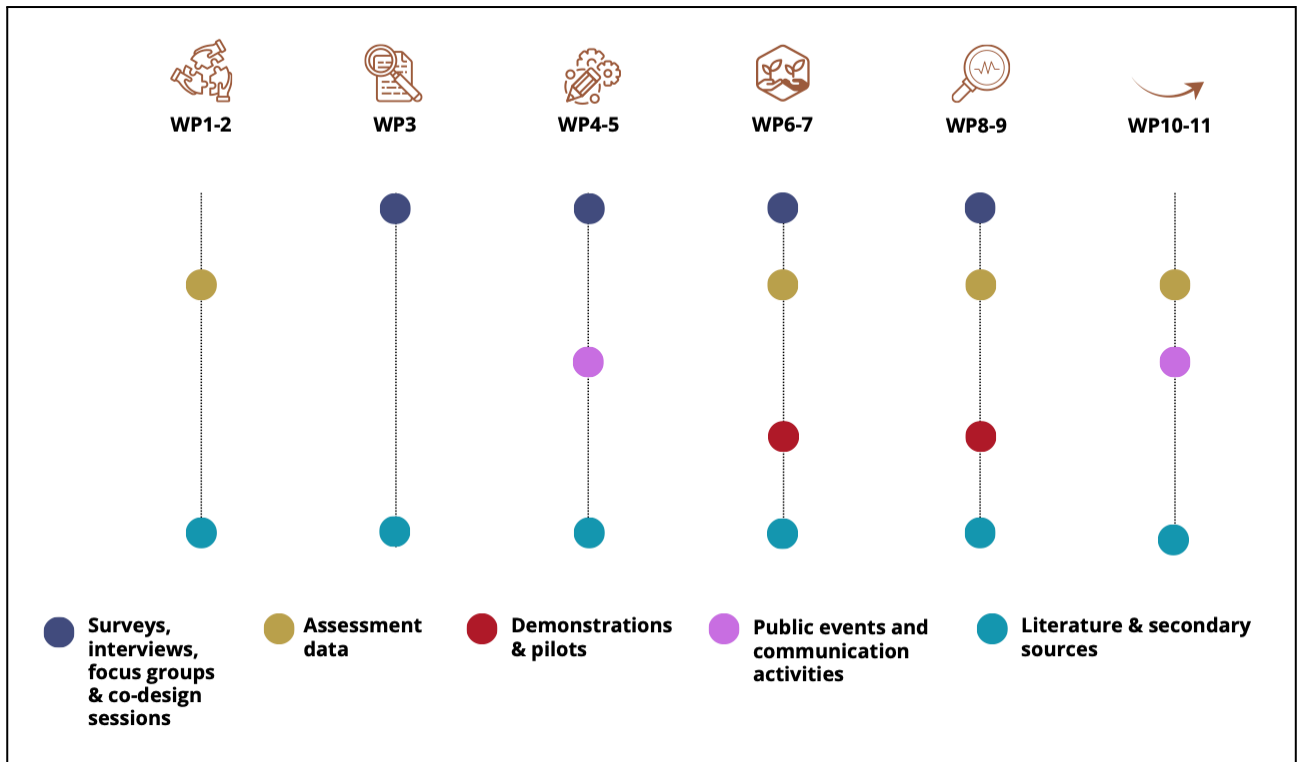


Figure 3, Main categories of data sources in UPFARM

The following tables provide a structured overview of the types of data generated and processed within each Work Package (WP) of UPFARM.



4.1.1 WP1-2 Project Coordination & Management (1st and 2nd Reporting Periods)

Lead Beneficiary: **ANCI Toscana**

Data origin	<input checked="" type="checkbox"/> Primary data <input checked="" type="checkbox"/> Secondary data
Type of Collection	<ul style="list-style-type: none"> Assessment data (technical progress reports; reports from evaluation in WP8-9; employment data from WP6-7)
Content of data	<ul style="list-style-type: none"> Text (reports, deliverables, meeting minutes) Numeric (tables, budgets, cost statements)
Personal data	<input checked="" type="checkbox"/> YES [mainly limited to working contacts of the persons working in the project] <input type="checkbox"/> NO
Sensitive data	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

File Formats	DOC/DOCX JPEG/PNG/SVG PDF PPT/PPTX XLS
Primary data collection mode	<ul style="list-style-type: none"> • Textual data, produced through reports, project deliverables, timelines and work plan preparation; • Numeric and tabular data, derived from the update on financial aspects and project technical progress.
Secondary data collection mode	Data provided by the other WPs and by the LLs to carry out the project management and consortium coordination.
Purpose of data	<ul style="list-style-type: none"> • Project efficient management, financial monitoring and reporting; • Compliance with research ethics and open science, and a proactive approach to gender equality;



4.1.2 WP3 Long-term Unemployment and Social Farming' challenges & opportunities: building foundational knowledge

Lead Beneficiary: **IRS**

Data origin	<input checked="" type="checkbox"/> Primary data <input checked="" type="checkbox"/> Secondary data
Type of Collection	<ul style="list-style-type: none"> • Surveys, interviews, and focus groups • Datasets • Literature and secondary sources
Content of data	<ul style="list-style-type: none"> • Text (interview transcripts, field notes, reports, policy briefs) • Numeric (statistical datasets, tables, counts) • Audiovisual (potential recordings of focus groups, presentations, workshops)
Personal data	<input checked="" type="checkbox"/> YES [Names and contact details of stakeholders, identifiers from interviews/surveys] <input type="checkbox"/> NO
Sensitive data	<input checked="" type="checkbox"/> YES [information on health conditions, disability, socio-economic vulnerability, migration status (insofar as relevant to LTU pathways)] <input type="checkbox"/> NO
File Formats	DOC/DOCX

	JPEG/PNG/SVG PDF PPT/PPTX CSV XLS MP3/MP4
Primary data collection mode	<ul style="list-style-type: none"> • Textual data (interviews, focus group notes, surveys with LTUs and stakeholders) • Numeric/tabular data (quantitative survey results, statistics from PES and regional sources)
Secondary data collection mode	<ul style="list-style-type: none"> • Literature review (academic publications, policy reports) • Labour market statistics, PES datasets
Purpose of data	To build foundational knowledge on the challenges and opportunities of social farming for long-term unemployed individuals; to map existing practices, barriers, and enabling conditions; to provide evidence for co-design in Living Labs.
<p>Ethics & Data Privacy note</p> <p>Because WP3 may involve direct engagement with long-term unemployed individuals and other vulnerable groups, special attention will be given to lawful collection and processing of personal and sensitive data. This includes informed consent procedures, anonymisation of transcripts and datasets, and restricted access protocols. Sensitive data will only be processed when strictly necessary for research purposes and always in line with GDPR Article 9 safeguards.</p>	



4.1.3 WP4-WP5 Co-crafting scalable tools, practices, and approaches to job inclusion in social farming for the LTUs (1st and 2nd Reporting Periods)

Lead Beneficiary: **ANCI Toscana**

Data origin	<input checked="" type="checkbox"/> Primary data <input checked="" type="checkbox"/> Secondary data
Type of Collection	<ul style="list-style-type: none"> • Focus groups, co-design sessions • Assessment data • Demonstrations and pilots • Literature and secondary sources
Content of data	<ul style="list-style-type: none"> • Text (co-design outputs, reports) • Audiovisual (recordings of workshops, presentations)
Personal data	<input checked="" type="checkbox"/> YES [Mainly working contacts of participants to co-design]

	sessions] <input type="checkbox"/> NO
Sensitive data	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
File Formats	DOC/DOCX JPEG/PNG/SVG PDF PPT/PPTX
Primary data collection mode	<ul style="list-style-type: none"> • Textual data (case management documentation, co-design reports, focus group notes) • Numeric/tabular data (Living Lab participation data) • Audiovisual data (optional recordings of workshops, with consent).
Secondary data collection mode	Literature and existing evaluation studies on Living Labs and innovative governance arrangements for job inclusion.
Purpose of data	To co-design, test, and evaluate innovative tools and practices for job inclusion in social farming.



4.1.4 WP6-WP7 Employment of LTU individuals within the frontrunner and follower living labs

Lead Beneficiary: **SdS PISANA⁶ / ANCI Toscana**

⁶ It is worth highlighting that at the time of writing this deliverable, the UPFARM Consortium is in the process of amending the Grant Agreement to replace BE 11 Società della Salute Pisana with Azienda USL Toscana Nord Ovest (AUSL TNO). Società della Salute (SdS) Pisana is no longer in a position to continue its participation in the project, following the decision taken in August 2025 to start the procedure for its dissolution. Società della Salute (SdS) in Tuscany are typically consortium bodies that bring together municipalities and local health authorities (Aziende USL) to manage social and health services in an integrated way. This is a well-established model of territorial governance in Tuscany established with Regional Law n. 40/2005 and subsequent amendments and additions which, until now, had never experienced such a precedent. In the case of the SdS Pisana, the decision of dissolution was mainly due to non-approval of the 2025 budget and position taken in recent months by the Municipality of Pisa. According to the procedure established by the regional law, the continuity of services will be guaranteed by the Azienda USL Toscana Nord Ovest (AUSL TNO). Therefore, in order to ensure the smooth continuation of the project, it is agreed in cooperation with ESFA to replace SdS Pisana with AUSL Toscana Nord Ovest, which is already assuming responsibility for the management of social and health services in the area. The AUSL is the main public health authority of North-West Tuscany, with broad and consolidated competences in coordinating both healthcare and social welfare services - thus ensuring institutional solidity, operational continuity, and greater technical and administrative capacity.

Data origin	<input checked="" type="checkbox"/> Primary data <input checked="" type="checkbox"/> Secondary data
Type of Collection	<ul style="list-style-type: none"> • Surveys, interviews • Datasets • Assessment data • Demonstrations and pilots
Content of data	<ul style="list-style-type: none"> • Text (employment contracts, monitoring reports, case management notes) • Numeric (employment statistics, subsidy tracking, monitoring indicators) • Audiovisual (optional photos/videos of activities in frontrunner social farms, only with explicit consent)
Personal data	<input checked="" type="checkbox"/> YES [Employment-related personal data (names, contact details, contracts, payment information)] <input type="checkbox"/> NO
Sensitive data	<input checked="" type="checkbox"/> YES [possible data on disability status, health conditions, socio-economic vulnerabilities (as relevant to employability and workplace adaptation)] <input type="checkbox"/> NO
File Formats	DOC/DOCX JPEG/PNG/SVG PDF PPT/PPTX CSV XLS
Primary data collection mode	<ul style="list-style-type: none"> • Administrative and monitoring data from employment records and case management • Surveys/interviews to document LTU experiences and employment outcomes
Secondary data collection mode	<ul style="list-style-type: none"> • PES records, social service databases, regional statistics on employment • Policy documents and subsidy regulations
Purpose of data	To manage the employment of LTUs in frontrunner Living Labs; to ensure correct use of subsidies and co-investments; to document job placement experience.
Ethics & Data Privacy note Because WP6 & 7 involves the direct employment of long-term unemployed individuals, strict safeguards are applied to ensure lawful and ethical processing of personal and sensitive data. These include GDPR-compliant employment contracts, anonymisation of	

monitoring datasets, and restricted access to raw personal data (limited to employers, case managers, and authorised project staff). Sensitive information will only be collected when strictly necessary for fulfilling contractual obligations or ensuring appropriate workplace adaptation.



4.1.5 WP8-9 Scaling strategy from inception to mainstreaming: monitoring, evaluation and strategic learning (1st and 2nd Reporting Periods)

Lead Beneficiary: **University of Pisa**

Data origin	<input checked="" type="checkbox"/> Primary data <input checked="" type="checkbox"/> Secondary data
Type of Collection	<ul style="list-style-type: none"> • Surveys, interviews, and focus groups • Assessment data • Demonstrations and pilots • Literature and secondary sources
Content of data	<ul style="list-style-type: none"> • Text (evaluation reports, survey responses, stakeholder feedback, case studies) • Numeric (quantitative indicators on LTU employment, participation rates, scaling progress) • Audiovisual (optional recordings of evaluation workshops, with consent)
Personal data	<input checked="" type="checkbox"/> YES [contact information and identifiers may be collected in surveys/interviews (though anonymisation will be applied for evaluation datasets)] <input type="checkbox"/> NO
Sensitive data	<input checked="" type="checkbox"/> YES [only insofar as evaluation touches on issues such as disability status, socio-economic vulnerability, or other factors relevant to inclusion outcomes] <input type="checkbox"/> NO
File Formats	DOC/DOCX JPEG/PNG/SVG PDF PPT/PPTX CSV XLS MP3/MP4
Primary data	<ul style="list-style-type: none"> • Textual data (evaluation notes, survey and interview)

collection mode	transcripts) <ul style="list-style-type: none"> • Numeric/tabular data (monitoring indicators, aggregated employment outcomes, evaluation metrics)
Secondary data collection mode	<ul style="list-style-type: none"> • Administrative and statistical datasets from PES/social services • Existing literature and evaluation frameworks
Purpose of data	To monitor and evaluate the outcomes of LTU employment and social farming pathways; to assess the effectiveness of Living Labs as pilots for scaling; to extract strategic lessons for replication in other territories; to provide evidence for mainstreaming into regional and EU-level policy frameworks.
Ethics & Data Privacy note In WP8–WP9, most data used for monitoring and evaluation will be aggregated and anonymised to protect participants’ identities. Where personal or sensitive data are collected (e.g. in surveys or qualitative evaluations), strict GDPR-compliant safeguards will apply, including informed consent, pseudonymisation, and restricted access. Sensitive information will only be processed when essential to assess inclusion outcomes. Evaluation results shared publicly will always be presented in aggregated or anonymised form.	



4.1.6 WP10 Outreach, early dissemination and Transnational CoP & WP11 Dissemination & Exploitation toward scaling and cascading

Lead Beneficiary: **IH**

Data origin	<input checked="" type="checkbox"/> Primary data <input checked="" type="checkbox"/> Secondary data
Type of Collection	<ul style="list-style-type: none"> • Public events and communication activities • Assessment data • Literature and secondary sources
Content of data	<ul style="list-style-type: none"> • Text (deliverables, newsletters, policy briefs, stakeholder feedback) • Numeric (event participation statistics, website traffic analytics, survey results) • Audiovisual (photos, videos, recordings of events and CoP sessions, with consent)
Personal data	<input checked="" type="checkbox"/> YES [names, contact details of stakeholders, event participants, CoP members] <input type="checkbox"/> NO
Sensitive data	<input type="checkbox"/> YES

	<input checked="" type="checkbox"/> NO
File Formats	DOC/DOCX JPEG/PNG/SVG PDF PPT/PPTX CSV XLS MP3/MP4
Primary data collection mode	<ul style="list-style-type: none"> • Registration and attendance data from dissemination events and CoP meetings • Participant feedback surveys • Media and communication outputs (web, newsletters, social media, presentations)
Secondary data collection mode	Literature review, policy documents, EU/national strategies to inform dissemination outputs and policy briefs.
Purpose of data	To support early outreach and awareness-raising; to document and facilitate transnational exchange within the Community of Practice; to monitor the effectiveness of dissemination activities; to prepare communication outputs and exploitation materials for scaling and cascading UPFARM practices.
<p>Ethics & Data Privacy note</p> <p>Personal data in WP10–WP11 will be limited to what is necessary for event organisation, communication, and stakeholder engagement (e.g. names and emails for mailing lists, participant registrations). Informed consent will be obtained for participation in surveys and for the use of photos or recordings in dissemination. No sensitive data will be collected in these WPs. Public outputs will be openly accessible under FAIR principles, ensuring transparency, reusability, and broad dissemination of UPFARM’s results.</p>	

The tables above illustrate how data are generated, classified, and used throughout UPFARM’s work programme. Summarising:

- **WPs 1–2 (Project Management & Coordination)** primarily handle administrative and financial data, involving limited personal information (e.g. partner contact details, payment data) but no sensitive data.
- **WPs 3–6 (Knowledge building and Employment of LTUs)** represent the core of the project’s data collection activities. These WPs generate both personal and sensitive data, as they involve direct engagement with long-term unemployed individuals and multidisciplinary service teams. Special safeguards therefore apply, including informed consent, data minimisation, anonymisation, and restricted access protocols.
- **WPs 8–9 (Monitoring, Evaluation, Strategic Learning)** rely heavily on aggregated and anonymised datasets derived from earlier WPs. Here the emphasis is on reusing and

analysing data for evaluation and scaling, while ensuring that personal and sensitive identifiers are removed.

- **WPs 10–11 (Outreach, Dissemination, Exploitation)** produce mainly non-personal data (deliverables, communication materials, policy briefs). Personal data are limited to event registrations, mailing lists, and feedback surveys, and no sensitive data are processed.

This classification confirms that personal and sensitive data are concentrated in specific WPs that deal with service delivery and direct beneficiary engagement. The consortium will therefore focus its strongest ethical and legal safeguards in these areas, while maximising the open sharing and reuse of non-personal outputs in line with FAIR principles. This way, the data management approach supports both the integrity of the project's ethical commitments and the long-term reusability and impact of UPFARM's results.

4.2 Data Collection Procedures

UPFARM collects data through a range of activities including interviews, workshops, co-design sessions, surveys, and monitoring of job placements. These activities involve diverse stakeholders such as long-term unemployed individuals, social farmers, public employment services, social service providers, policy makers, and researchers. The following subsections describe the operational procedures applied to ensure that all data collection is ethically sound, GDPR-compliant, and proportionate to project objectives.

4.2.1 Informed Consent

In UPFARM, informed consent will be systematically obtained prior to the participation of long-term unemployed individuals and other stakeholders in research, co-design, Living Lab activities, or job placement pathways. **No vulnerable individual unable to give an informed consent will take part in UPFARM.** To ensure compliance with ethical and legal standards:

- **Consent forms** will be provided in written form and, where needed, accompanied by oral explanations to guarantee understanding.
- **Plain and accessible language** will be used, avoiding technical or legal jargon. Where necessary, translation or simplified materials will be made available.
- Participants will be explicitly informed of: the **purpose of data collection and project activities**; the **voluntary nature** of participation; their **right to withdraw consent at any time** without penalty; the ways in which their personal and sensitive data will be processed, stored, and shared.
- For specific activities such as video recording, photography, or use of quotes, **separate and explicit consent** will be requested.

All signed consent forms will be securely stored by the responsible partner, and a register of consent will be maintained as part of the project's audit trail. Consent forms templates adapted for specific project activities are provided as Annex to this Deliverable (Annex 1).

4.2.2 Safeguards and Protection of Personal and Sensitive Data

Given UPFARM's focus on the socio-occupational inclusion of long-term unemployed individuals, the **collection and processing of personal and sensitive data** is unavoidable for developing tailored employment pathways. The data collected may include:

- **Contact information and demographic details** (e.g. name, age, gender, place of residence);
- **Socio-economic data** (e.g. employment history, education, financial situation);
- **Special categories of data under GDPR Article 9**, where strictly relevant to employability, such as health or disability status, or migration background.

In line with the GDPR principle of **data minimisation**, UPFARM will only collect the information that is **strictly necessary** to achieve project objectives. Sensitive data will be gathered exclusively when essential to design job pathways, implement reasonable workplace accommodations, or meet contractual and regulatory obligations.

To safeguard participants' rights and ensure compliance with GDPR, the following protective measures will be applied across all project activities:

- **Anonymisation and pseudonymisation:** All datasets will be anonymised wherever possible. Where full anonymisation cannot be achieved, pseudonymisation will be applied so that identifying elements are replaced with codes accessible only to authorised staff.
- **Confidentiality and staff training:** All personnel handling personal or sensitive data will be trained in confidentiality protocols and required to comply with strict ethical and legal standards.
- **Role-based access control:** Sensitive information will be accessible only to authorised members of the multidisciplinary teams directly responsible for case management.
- **Confidentiality in group settings:** In collective activities (e.g. co-design sessions, focus groups), facilitators will establish clear ground rules, reminding participants to respect the confidentiality of personal information shared by others.
- **Secure storage:** Data will be stored on encrypted, access-restricted platforms. UPFARM relies on Google Drive under GDPR-compliant agreements, with additional safeguards such as two-factor authentication and restricted folder access.

4.2.3 Respect, Non Discrimination, Diversity

All project activities will be carried out with respect for participants' dignity and autonomy.

Particular attention will be given to:

- **Preventing discrimination** based on gender, sexual orientation, disability, ethnicity, culture, or socio-economic background;
- Avoiding **power imbalances** in co-design sessions, ensuring LTUs have a genuine voice alongside institutional stakeholders;
- Creating **safe spaces** in workshops and focus groups, where personal experiences can be shared without fear of stigmatisation.

4.2.4 Preventing Stigmatisation and Ensuring Safe Participation

UPFARM acknowledges that participation itself may expose individuals to risks of being labelled or stigmatised. To counter this:

- Results will be reported only in **aggregated or anonymised form**;
- Documentation of activities (photos, videos) will require **explicit consent** and, where necessary, anonymisation (e.g. blurred faces);
- Facilitators in Living Labs will receive guidance to ensure that **no undue pressure** is placed on participants to disclose information they are uncomfortable sharing.

4.2.5 Special Procedure for Cross-Service Data Sharing

As highlighted in Chapter 3, the Tuscan model of integrated care relies on cooperation across employment, social, and health services, which may involve the sharing of sensitive data between institutions. Since the regulatory framework for such exchanges is not yet fully defined, UPFARM adopts a precautionary operational approach:

- Informed consent will explicitly cover the possibility of data sharing across services.
- Data minimisation will apply, limiting shared information to what is strictly necessary for integrated case management.
- Pseudonymisation/aggregation will be preferred for monitoring and evaluation whenever feasible.
- Controlled access will ensure that only authorised staff within each service can view shared data.
- Ongoing review: procedures will be updated in line with any new regional or national guidance.

4.3 Data Storage and Security

Data generated and processed in UPFARM will be stored and managed using secure, cloud-based solutions, with Google Drive serving as the primary collaborative platform for document sharing, version control, and internal communication among partners. The use of

Google Drive provides a centralised and user-friendly repository that ensures accessibility while maintaining appropriate security safeguards.

To guarantee ethical and lawful data handling, the following principles will be applied:

- **Access Control:** Access to project folders is restricted to authorised project staff through role-based permissions. Sensitive data (e.g. personal information on long-term unemployed participants) will be stored in dedicated subfolders with *limited access* granted only to partners directly responsible for their processing.
- **Encryption & Security Standards:** Google Drive ensures data transmission via TLS (Transport Layer Security) and stores data in encrypted form (AES-256 encryption at rest), which aligns with EU data protection standards.
- **Backups & Version Control:** Google Drive automatically maintains backups and version histories, reducing the risk of data loss or corruption and allowing recovery of previous versions if needed.
- **Compliance:** Google, as data processor, provides GDPR-compliant data processing terms. However, partners remain responsible as data controllers for ensuring that only necessary data are uploaded and that no unnecessary sensitive information is shared through open channels.
- **Separation of Data Types:** Non-personal project outputs (e.g. deliverables, reports, communication materials) will be stored in shared folders accessible to all partners. Sensitive and personal data will be handled under strict access limitations and, where possible, pseudonymised or anonymised prior to storage.

Finally, as part of UPFARM's commitment to responsible data management, these storage and security arrangements will be reviewed periodically, and updates will be reflected in the final version of this deliverable, should new risks or improved practices emerge.

4.3.1 Disclaimer on International Data Transfers

While Google Drive provides GDPR-compliant contractual safeguards, including Standard Contractual Clauses (SCCs), the issue of international data transfers - particularly to the United States - remains a matter of legal and regulatory debate within the European Union. The UPFARM consortium acknowledges this challenge and commits to a cautious approach: (i) limiting the upload of personal and sensitive data to what is strictly necessary, (ii) prioritising anonymisation or pseudonymisation whenever possible, and (iii) restricting access through role-based permissions. Should new legal or regulatory developments arise during the course of the project, the consortium will review and, if necessary, adjust its data storage and security practices to ensure continued compliance with GDPR and national requirements. This flexible approach reflects both awareness of the existing uncertainty and commitment to responsible data stewardship.

4.4 Data Sharing and Reuse

UPFARM recognises the importance of ensuring that data generated during the project is managed in a way that balances openness and transparency with ethical and data protection requirements. In line with EU and national regulations, as well as the GA, the project adopts a differentiated approach depending on the type of data involved.

- **Personal and sensitive data:** Personal data collected from long-term unemployed individuals in the context of Living Labs and job placement pathways is treated with the highest level of confidentiality. Such data will only be shared among authorised members of the multidisciplinary teams directly involved in case management, and always under the principle of **data minimisation**. Sharing between services will be governed by specific protocols, encryption standards, and access controls. Reuse of personal or sensitive data outside the project scope is **not permitted**.
- **Research and evaluation data:** Where possible, qualitative and quantitative data collected for research purposes (e.g. surveys, focus groups, interviews) will be anonymised or pseudonymised before sharing. Aggregated datasets, stripped of personal identifiers, may be made available within the consortium for analysis and evaluation. Opportunities for reuse by external researchers will be explored, subject to the establishment of clear data-sharing agreements and in full compliance with GDPR.
- **Administrative and financial data:** Administrative records are restricted to project partners and the ESFA for purposes of audits, monitoring, and evaluation. These data are not reusable beyond their regulatory function.
- **Project outputs and non-personal data:** Non-personal project results, such as deliverables, methodological tools, training materials, and policy briefs, will be openly shared through the project website, institutional repositories, and public dissemination channels. These materials are intended to be freely reusable, contributing to the broader scaling of social farming practices in Tuscany and beyond.
- **Multimedia and communication materials:** Photos, videos, and event recordings will only be shared publicly when explicit informed consent has been obtained from participants, or when the materials have been fully anonymised (e.g. blurred faces, removal of identifiers). Such content will be reused primarily for communication, dissemination, and awareness-raising purposes.

4.4.1 Alignment with Open Science and FAIR principles

UPFARM will ensure that, wherever feasible, project data and outputs follow the **FAIR principles** - making them Findable, Accessible, Interoperable, and Reusable:

- **Findable:** Non-personal datasets, reports, and tools will be published through trusted repositories and the project website, accompanied by clear metadata and documentation.

- **Accessible:** Open access will be provided to project deliverables and public outputs, in line with EU open science policies and transparency objectives.
- **Interoperable:** Where datasets are shared, they will be formatted according to recognised standards, enabling integration with other research resources.
- **Reusable:** Anonymised or aggregated data, as well as methodologies and training resources, will be shared under open licences where appropriate, ensuring their uptake and adaptation by other researchers, practitioners, and policymakers.

The following Table provides a consolidated overview of the main categories of data generated in UPFARM and the principles guiding their sharing, reuse, and alignment with FAIR standards.

Data Type	Sharing Conditions	Reuse Potential	FAIR Alignment
Personal and sensitive data (e.g. LTU case files, health/employment history)	Restricted to authorised multidisciplinary teams; access strictly controlled; not shared externally	No reuse permitted outside project scope	Not applicable (ethical & legal restrictions override)
Research data (surveys, interviews, focus groups – anonymised)	Shared within consortium; anonymised datasets may be shared externally under agreements	Reusable for further research and evaluation	F: documented metadata; A: access via request/agreement; I: use of standard formats; R: anonymisation enables safe reuse
Administrative & financial data (contracts, timesheets, ESFA reports)	Shared only with ESFA and project partners for audits/monitoring	No reuse beyond regulatory compliance	Not applicable
Project outputs & non-personal data (deliverables, methodological tools, training materials, policy briefs)	Published openly on project website, repositories, dissemination platforms	Freely reusable for practice, research, and policy	Fully aligned with FAIR: open access, metadata, standard formats, licensing
Multimedia & communication	Shared publicly only with consent or	Reuse for communication and	Partially FAIR (findable, accessible;

materials (photos, videos, recordings)	anonymisation (e.g. blurred identities)	dissemination	but limited interoperability/reuse due to ethical constraints)
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Table 2, Data type and alignment with FAIR principles

4.5 Data Retention and Deletion

All data collected and processed within UPFARM will be retained only for as long as necessary to achieve the objectives of the project and to meet contractual and legal obligations. In line with GDPR principles of storage limitation, personal data related to long-term unemployed individuals and other stakeholders will be stored securely and kept in a form that permits identification only for the duration of the project and for a limited period thereafter, where required for audit or reporting to the ESFA. Once this retention period has expired, data will be anonymised or securely deleted, using recognised methods to prevent recovery. Non-personal data, such as project deliverables, methodological tools, and anonymised datasets, will be preserved beyond the project to enable reuse, dissemination, and policy learning. Each partner organisation is responsible for applying appropriate retention and deletion protocols within its own systems, while the consortium will ensure that shared guidelines are respected and consistently applied across all Living Labs and project activities.

4.5.1 Exceptions and Contractual Requirements

Retention periods may be extended beyond the standard project timeline where national regulations, institutional policies, or contractual obligations impose longer storage requirements, particularly for financial, administrative, or audit purposes. In particular, the Grant Agreement (GA) defines the following standard time-limits after the project end (counted from the final payment):

- Confidentiality obligations: 5 years
- Record-keeping: 5 years
- Reviews: 5 years
- Audits: 5 years
- Extension of findings from other grants of the Initiative to this Grant: 5 years
- Impact evaluation: 5 years

Any data retained for these purposes will remain subject to strict access controls and security safeguards. Where possible, personal data will be pseudonymised or minimised during this extended retention period to reduce risks to data subjects.

In the following Table, we summarise the retention and deletion mechanisms according to

data type.

Data Type	Examples	Retention Period	Deletion / Anonymisation Method	Responsible Partners
Personal data of LTUs	Contact details, socio-demographic information, health-related data, other personal data (where relevant for job inclusion pathways)	Duration of project + up to 5 years after final payment (for audits, reviews, impact evaluation, per GA)	Secure deletion or anonymisation (e.g. encryption wipe, certified deletion tools); pseudonymisation if temporary retention required	ARNERA CALAFATA ANCI IRS UNIFI PISA FIORSE CAP VALD
Living Lab pilot data	Documentation of pilots, co-design sessions, job inclusion pacts, working contracts	Duration of project + 5 years (audit & evaluation purposes)	Anonymisation and/or deletion of raw identifiable data; retention of aggregated results	ARNERA CALAFATA ANCI IRS UNIFI PISA FIORSE CAP VALD
Research & evaluation data	Interview transcripts, surveys, focus group notes, anonymised datasets	Duration of project + 5 years (to ensure reusability, impact evaluation, reporting obligations)	Anonymisation of personal identifiers; secure deletion after expiry	UNIFI IRS ANCI
Admin & financial data	Timesheets, contracts, invoices, financial records	5 years, per GA record-keeping and audit requirements	Secure archiving in institutional systems; deletion after expiry	All partners
Project outputs (non-personal)	Deliverables, policy briefs, methodological tools, training materials	Indefinitely (for dissemination, knowledge transfer, and policy use)	Public archiving via project website, repositories, institutional databases	All partners

Multimedia & communication materials	Photos, videos, event recordings	Duration of project + consent-based period (if involving identifiable persons); indefinite for anonymised/public material	Consent-based deletion; anonymisation (blurring faces, removing identifiers)	Communication lead + Local Labs
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Table 3, Data retention and deletion methods

5. Roles and Responsibilities

This section sets out the governance arrangements established in UPFARM to ensure that ethical principles and data protection obligations are respected throughout the project. Clear allocation of roles and responsibilities is essential to guarantee accountability, transparency, and effective compliance with EU and national requirements. The following sub-sections describe the responsibilities of the key managerial figures, the appointment and mandate of the Data Protection and Ethics Manager (DPEM), the obligations of individual partners in handling personal and sensitive data, and the mechanisms for monitoring, auditing, and reporting to the funding authority. Together, these provisions create a robust framework for ethical oversight and for the secure, responsible management of data across the consortium.

5.1 Responsibilities for Ethical Management

The responsibility for performing UPFARM activities in an ethical manner is split among the following figures:

- The **Project Coordinator (PC)**, appointed in the person of Laura Martelloni [ANCI Toscana], ultimately responsible for ensuring that project activities are conducted in full respect of the ethical principles set out by the EU and international conventions and standards;
- The **Data Protection and Ethics Manager (DPEM)**, appointed in the person of Elena Conti [ANCI Toscana], who is responsible for monitoring the project activities raising potential ethical issues and for carrying out periodic compliance checks with established and applicable norms, guidelines and legislations;
- The Project Manager (PM) and Quality Lead, appointed in the person of Sofia Mortati ANCI Toscana, supporting both the DPEM and the PC in the fulfilment of their tasks;
- The **individual partners**, who are ultimately responsible for field activities and everyday operations, including the recruitment of participants, collection of informed consent forms, etc.;
- **All WP and Activity leaders** are expected to supervise and check the work and procedures performed by their teams in accordance with this document, and report non-compliance, if any, to the PC, DPEM and PM.

Based on the above sharing of responsibilities, the UPFARM consortium will:

- Ensure the fulfilment of the EU ethics requirements;
- Supervise the implementation of ethical principles and standards in all activities related to participation of individuals in the project;
- Provide advice and recommendations on ethics to the partners in charge of field activities;

- Be accountable in case of non-compliance and take immediate action.

5.2 Appointment of a Data Protection and Ethics Manager (DPEM)

Mrs. Elena Conti [ANCI Toscana] is appointed as the DPEM of the UPFARM Consortium, a role that includes the Data Protection Officer introduced by the GDPR. The DPEM will act as contact person for all the data subjects involved in the Project with regard to any issue related to processing of their personal data and to the exercise of their rights under the GDPR. As stipulated by Art. 38 of the GDPR, he will not be entitled to receive instructions from any partner regarding the exercise of his duties and directly report to the Project Board about his activity of supervision to personal data management as carried forward by individual partners and the Consortium as a whole.

As outlined in Art. 39 of the GDPR, the DPO's responsibilities include, but are not limited to, the following:

- Educating the Consortium Partners on important law compliance requirements;
- Training and advising the staff involved in data processing;
- Conducting audits to ensure compliance with the GDPR and this Deliverable and address potential issues proactively;
- Serving as point of contact between the UPFARM Consortium and GDPR Supervisory Authorities;
- Monitoring the performance and providing advice on data protection efforts;
- Maintaining comprehensive records of all data processing activities conducted by the Consortium, including the purpose of processing activities, which must be made public on request.
- Interfacing with data subjects to inform them about how their data is being used, their rights to have their personal data erased, and what measures the Consortium has put in place to protect their personal information.

5.3 Partner responsibilities for Data Management

According to the data protection and ethics policy established for UPFARM, each partner collecting data and/or contributing to the project dataset(s) shall appoint a Data Protection Officer (DPO) or, in the case they are not obliged to appoint such a figure, create a specific Data Protection Policy for UPFARM. The list of DPOs/DPPs for UPFARM are collected and kept on file within the internal project management platform, and can be provided upon request by the European Commission and/or by any relevant Ethics Board or Ethics Reviewer eventually called to revise the compliance of UPFARM with the set ethical standards.

All WP leads must supervise and check the work and procedures of their teams in accordance with this document, and report about non-compliance, if any, to the DPEM and SC.

In case of collecting any data, all UPFARM research teams shall follow the procedure below:

- Once the research team has identified a set of participants, they shall consult the DPEM to receive guidance and advice;
- If researchers recruit potential participants by email/telephone, will inform them of the research purposes and their roles well in advance;
- Before the start of any project event, including face to face interviews, meetings and online gatherings, each participant will be provided with an information sheet (see the Annex to this document) containing relevant information that can help make an informed decision about joining the project initiative or not;
- It will be written on the information sheet that participation is entirely voluntary and availability can be revoked at any time;
- The informed consent form will particularly explain how data will be processed, give the contact details of the researcher(s) involved, the DPEM and the local DPO should the participants have any questions after the event/initiative;
- The informed consent form must be signed before the start of any activity;
- The partner who organised the initiative is also responsible for storing the signed forms (in the project's repository) for future reference.

5.4 Monitoring, Audit, and Reporting Mechanisms

To ensure consistent and transparent implementation of the ethical and data protection framework, UPFARM applies the following mechanisms for internal monitoring, periodic auditing, and reporting to the funder:

- **Periodic compliance checks:** The DPEM will conduct internal reviews at least once per reporting period, with additional checks when new activities involving vulnerable groups or sensitive data are launched. Findings will be shared with the Project Coordinator (PC) and the Steering Committee (SC).
- **Corrective measures:** In case of non-compliance or identified risks, the DPEM, in consultation with the SC, will issue recommendations and partners will be required to take immediate corrective action.
- **Data subject rights:** All partners must promptly notify the DPEM if a participant exercises their GDPR rights. The DPEM ensures that such requests are addressed within the required legal timeframe (generally 30 days) and records the response in the project's compliance log.
- **Ethical reporting to the funder:** The SC, supported by the DPEM, will include updates on ethics and data management in periodic technical and financial reports to the ESFA. The consortium will also respond to any ad hoc requests from ESFA, providing documentation on procedures, compliance checks, and corrective measures.
- **Documentation and audit trail:** Records of consent forms, data processing activities, and compliance checks will be maintained by the responsible partners. These records may be made available to supervisory authorities or the funder upon request

6. Risk Assessment and Mitigation

This chapter identifies the main ethical and data protection risks that may arise during the implementation of UPFARM, with a particular focus on the engagement of vulnerable groups, the processing of personal and sensitive data, and the dissemination of results.

6.1 Risk Assessment and Mitigation Procedures

In line with the EU's ethics requirements, UPFARM has carried out a preliminary assessment of the key ethical and data protection risks that may emerge during the project. The table below summarises the main risks and the corresponding mitigation measures adopted by the consortium:

Risk	Mitigation Measure
Stigmatisation or discrimination of participants (e.g. LTUs identified publicly)	Use of anonymised/aggregated reporting; explicit consent for photos/videos; facilitators trained to create safe spaces.
Lack of informed consent	Use of clear, plain-language consent forms; oral explanation and translation when needed; right to withdraw at any time.
Misuse of sensitive data (e.g. health, disability, migration status)	GDPR-compliant protocols; minimisation; role-based access control; pseudonymisation/anonymisation.
Data breaches or unauthorised access	Secure storage on encrypted, access-controlled platforms (Google Drive with 2FA); periodic audits; immediate corrective action if incidents occur.
Unclear legal framework for cross-service data sharing	Explicit participant consent; minimisation of shared data; pseudonymisation for evaluation; continuous monitoring of regulatory updates.
Insufficient staff awareness	Training of all partners' staff in confidentiality and GDPR obligations; ongoing support by DPEM.

Table 4, Data Risks & Mitigation Measures

This framework will be reviewed periodically, and updated in the final version of the deliverable if new risks emerge or if additional safeguards are introduced during project implementation.

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Annex 1 - UPFARM Informed Consent Form



INFORMATION NOTICE

This template must be used whenever a partner involves individuals in interviews. It must be placed under the partner's letterhead and a copy of the information notice must be provided to each interviewee as a handout. The template is provided in English for reference purposes, but its final version must be translated into the interviewee's native language. [TO BE DELETED]

Title of the Project: **UPFARM [Unlocking the Potential of social FARMing for inclusive, sustainable, and regenerative jobs against long-term unemployment]**

Funded by the ESF Social Innovation Initiative+ - Call ID: ESF-SI-2024-LTU-01

Grant Agreement No: ESF-SI-2024-LTU-01-0023

Project Coordinator: Laura Martelloni, ANCI Toscana (la.martelloni@gmail.com)

Data Protection and Ethical Manager: Elena Conti, ANCI Toscana (elena.conti@ancitoscana.it)

Contact person for this interview: **Name Surname, Email address, telephone number**

INVITE

We invite you to participate in the European project UPFARM - Unlocking the Potential of social FARMing for inclusive, sustainable, and regenerative jobs against long-term unemployment. **Your participation is voluntary:** if you decide not to take part, there will be no negative consequences. Before making your choice, please read this information carefully. If anything is unclear, you are welcome to ask questions.

WHAT IS THE PURPOSE OF UPFARM?

UPFARM aims to strengthen social farming (SF) as a tool for inclusive and sustainable employment in Tuscany, addressing the needs of long-term unemployed individuals. Building on existing social farming initiatives and networks in the region, the project develops new knowledge, methods, tools, and participatory governance models, with the goal of scaling social farming as a regional instrument for labor inclusion. The project is implemented through four territorial living labs (Piana di Lucca, Area Pisana, Valdinievole, South-East Florence area), which will enhance the capacity of local alliances to work together on socio-occupational inclusion. The project also benefits from the contribution of European partners, learning from their experiences and contributing to policy innovation at the EU level. In addition to achieving 40 job placements for long-term unemployed individuals, UPFARM aims to leave a lasting legacy: tools, methods, and alliances capable of growing social farming in Tuscany, spreading it to new territories, integrating it into public policies, and promoting a

more inclusive and sustainable work culture.

WHY AM I INVITED TO TAKE PART?

We are conducting interviews with long-term unemployed individuals, staff from Employment Centres, social service providers, third-sector organisations, social farmers, and community representatives. Your contribution will help us understand the challenges and opportunities for labour inclusion through social farming in Tuscany and beyond.

WHAT WILL HAPPEN IF I TAKE PART?

If you decide to take part, you will be asked to sign this consent form. The interview will take approximately [insert duration]. With your consent, it may be recorded. Audio files will be deleted after transcription. Even after you start, you can stop the interview or withdraw your data at any time, without giving a reason and without any consequences.

WHAT TYPE OF DATA WILL BE COLLECTED?

We may collect:

- Personal data: name, age, gender, job, education, contact details.
- Special categories of personal data (sensitive data) under GDPR Art. 9: health status, disability, migration background, socio-economic vulnerability (only if strictly relevant to your employability and inclusion pathway).
- Your opinions on topics related to the UPFARM project.
- Photos and/or videos (only if you consent).

Your answers will normally be anonymised (e.g. grouped or pseudonymised). You may refuse to answer any question. You may also choose that your organisation is not associated with your responses.

HOW WILL MY DATA BE USED?

- **Confidentiality:** Interview content will be stored securely. Identifiers will be removed wherever possible.
- **Anonymisation:** Reports and publications will never reveal your identity without your explicit consent.
- **Use of images:** Photos/videos may be used in project communication (websites, media, social media) only with your explicit consent.
- **Joint Controllers:** All UPFARM partners act as joint controllers of your data (GDPR Art. 26).
- **Rights:** You can exercise your GDPR rights (access, rectification, erasure, restriction, objection, portability) by contacting the DPEM indicated above.

HOW LONG WILL MY DATA BE KEPT?

Personal and sensitive data will be stored securely for the duration of the project plus up to 5

years after the final payment, in line with the Grant Agreement and audit requirements. After this period, data will be securely deleted or anonymised. Public outputs (e.g. anonymised datasets, reports) may remain available indefinitely.

HOW IS THE PROJECT BEING FUNDED?

UPFARM is funded by the ESF+ Social Innovation Initiative+ (ESF-SI-2024-LTU-01), Grant Agreement No: ESF-SI-2024-LTU-01-0023.

WHAT WILL HAPPEN TO THE RESULTS OF THE STUDY?

The results will be used to develop knowledge and practical tools for labor inclusion through social farming, to produce reports and guidelines supporting the territorial Living Labs, and to disseminate good practices at regional and European levels.

WHO SHOULD I CONTACT FOR FURTHER INFORMATION?

If you have any questions or need more information about this study, please contact me using the following contact details: [to be completed with the full contact details and indication of the UPFARM partner]. Thank you for reading this information sheet and for considering taking part in this research.

CONSENT FORM

Please tick the relevant boxes:

- I consent to participate in the UPFARM interview.
- I consent / I do not consent to my interview being audio recorded.
- I consent / I do not consent to my interview being video recorded.
- I consent / I do not consent to the use of my image (photos/videos) for project communication.
- I request that the name of my organisation is not associated with my responses.

I have read and understood the information sheet, and I have had the opportunity to ask questions. I understand that my participation is voluntary and that I can withdraw at any time without any consequences. I have been given a copy of this consent form.

Name of participant: _____

Signature: _____

Date: _____

Annex 2 - UPFARM Ethical Checklist

Area	Check Item	Yes	No	Notes/Actions needed
A. Participant Engagement	Participation is voluntary and clearly communicated	<input type="checkbox"/>	<input type="checkbox"/>	
	Information sheets provided in plain language (with translation if needed)	<input type="checkbox"/>	<input type="checkbox"/>	
	Informed consent obtained and securely stored	<input type="checkbox"/>	<input type="checkbox"/>	
	Participants reminded of right to withdraw anytime without consequences	<input type="checkbox"/>	<input type="checkbox"/>	
	Measures in place to avoid stigmatisation/discrimination	<input type="checkbox"/>	<input type="checkbox"/>	
B. Informed Consent	Separate explicit consent obtained for audio/video recording	<input type="checkbox"/>	<input type="checkbox"/>	
	Separate explicit consent obtained for use of photos/images	<input type="checkbox"/>	<input type="checkbox"/>	
	Participants informed of data use, storage, and sharing	<input type="checkbox"/>	<input type="checkbox"/>	
C. Data Collection	Only necessary data collected (data minimisation)	<input type="checkbox"/>	<input type="checkbox"/>	
	Sensitive data collected only when strictly necessary	<input type="checkbox"/>	<input type="checkbox"/>	
	Confidentiality protocols applied in group sessions	<input type="checkbox"/>	<input type="checkbox"/>	
	Anonymisation/pseudonymisation applied where possible	<input type="checkbox"/>	<input type="checkbox"/>	
D. Data Storage & Security	Data stored only on secure platforms (Google Drive, GDPR-compliant)	<input type="checkbox"/>	<input type="checkbox"/>	
	Role-based access controls applied	<input type="checkbox"/>	<input type="checkbox"/>	
	Encryption and two-factor authentication enabled	<input type="checkbox"/>	<input type="checkbox"/>	

	Backups/version control in place	<input type="checkbox"/>	<input type="checkbox"/>	
E. Data Sharing & Reuse	Personal/sensitive data shared only within authorised teams	<input type="checkbox"/>	<input type="checkbox"/>	
	Research datasets anonymised before sharing	<input type="checkbox"/>	<input type="checkbox"/>	
	Public dissemination limited to anonymised/non-personal data	<input type="checkbox"/>	<input type="checkbox"/>	
F. Data Retention & Deletion	Retention complies with GA (5 years after final payment)	<input type="checkbox"/>	<input type="checkbox"/>	
	Sensitive data securely deleted/anonymised when no longer needed	<input type="checkbox"/>	<input type="checkbox"/>	
	Secure deletion methods applied (e.g. encryption wipe)	<input type="checkbox"/>	<input type="checkbox"/>	
	Non-personal outputs archived for long-term reuse	<input type="checkbox"/>	<input type="checkbox"/>	
G. Oversight & Responsibilities	DPEM consulted for sensitive/vulnerable group activities	<input type="checkbox"/>	<input type="checkbox"/>	
	Each partner has appointed DPO or adopted Data Policy	<input type="checkbox"/>	<input type="checkbox"/>	
	WP leaders monitor compliance and report issues	<input type="checkbox"/>	<input type="checkbox"/>	
H. Risk Management	Risks of stigmatisation/discrimination addressed	<input type="checkbox"/>	<input type="checkbox"/>	
	Cross-service data sharing managed with consent/minimisation	<input type="checkbox"/>	<input type="checkbox"/>	
	Data breaches managed with corrective measures + notification	<input type="checkbox"/>	<input type="checkbox"/>	
	Ethical reporting to ESFA integrated into project reports	<input type="checkbox"/>	<input type="checkbox"/>	

Annex 3 - Data Management Plan (Summary)

Category	Description
Types of Data	<ul style="list-style-type: none"> - Primary: surveys, interviews, focus groups, co-design sessions, job placement records, monitoring and evaluation reports. - Secondary: literature, statistical datasets, policy documents. - Personal & sensitive: demographic, contact, socio-economic, health, disability, migration background (only if necessary). - Administrative/financial: contracts, timesheets, ESFA reports. - Outputs: deliverables, tools, training materials, policy briefs, multimedia.
Collection & Processing	<ul style="list-style-type: none"> - Informed consent, voluntary participation, plain-language communication. - Data minimisation: only necessary data collected. - GDPR-compliant processing, with attention to vulnerable groups.
Storage & Security	<ul style="list-style-type: none"> - Google Drive (GDPR-compliant terms), encrypted storage, two-factor authentication. - Role-based access control (multidisciplinary teams, WP leaders, authorised staff). - Paper-based consent forms digitised and stored securely.
Sharing & Reuse	<ul style="list-style-type: none"> - Personal & sensitive data: restricted to authorised staff; no external reuse. - Anonymised data: shared within consortium; possible controlled external reuse. - Administrative/financial data: shared only with ESFA and auditors. - Non-personal outputs: open access via project website, repositories, dissemination platforms (FAIR).
Retention & Deletion	<ul style="list-style-type: none"> - Retained securely for 5 years after final payment (as per GA). - Then securely deleted or anonymised. - Public outputs (reports, deliverables, anonymised datasets) remain available indefinitely.
Roles & Responsibilities	<ul style="list-style-type: none"> - Project Coordinator: overall compliance. - Data Protection & Ethics Manager (DPEM): GDPR compliance, audits, participant rights. - Partners: informed consent collection, secure storage, reporting compliance.
Risk Mitigation	<ul style="list-style-type: none"> - Risks: stigmatisation, misuse of sensitive data, breaches, lack of consent, unclear cross-service data sharing. - Mitigation: anonymisation/pseudonymisation, encryption, clear consent protocols, staff training, continuous monitoring.



UPFARM

Seeding Regenerative Futures



UPFARM is co-funded under the ESF+ Social Innovation+ Initiative with Grant Agreement No. ESF-SI-2024-LTU-01-0023



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