



S H E R P A

Shaping the ethical dimensions of smart information
systems– a European perspective (SHERPA)

Deliverable No. 6.2.

Risk register (UPDATED)

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Abstract	This revised deliverable explains how the SHERPA project continues to ensure that risks are identified until the end of the project. It outlines the critical risks for implementation, with a potential risk remaining, as well as the proposed risk mitigation measure.
Key Words	Risks, mitigation, Coronavirus, business continuity plan,

Revision History

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Executive Summary

This deliverable has been reviewed and updated with all, but one, risks becoming reductant as the project has now moves to completion. This revised deliverable outlines the critical risk for implementation, proposed risk mitigation measure and a progress column to show how risks have been managed.



Finally, the SHERPA business continuity plan is still attached to this version of the risk register as Appendix I.

Revision Notes

The risk register has been reviewed and this final version will now be re-submitted in M42. The revised register is displayed in section 3, a progress column has been added to show how previous risks have been managed.

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Table 1: List of acronyms/abbreviations

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List of acronyms/abbreviations

Abbreviation	Explanation
PRINCE2	Projects in controlled environments
GA	General assembly (face to face consortium or online meetings)
COVID-19	Coronavirus Disease 2019
BCP	Business Continuity Plan
GDPR	General data protection regulation
QA	Quality assurance
HLEG	High level expert group

Table 1: List of acronyms/abbreviations



Glossary of terms

Term	Explanation
Risk level	Threat event category – i.e. high, medium or low
Risk probability	The likelihood of the risk occurring
Risk mitigation measures	Steps taken to reduce the threat of the risk

Table 2: Glossary of terms



1. Methodology

In order to assess the likely impact of risks occurring during the lifetime of the project, we have used a qualitative PRINCE2 approach. This was done by proactively identifying risks before the initiation of the project, and now as the project is in its active/final phase new risks are being identified. This process has been carried out by the project consortium by reviewing SHERPA's vision, scope and deliverables in as full detail as possible. During the course of the project the risk register was reviewed at every physical/online GA meeting by the consortium. This allowed consortium partners to discuss new risks which had arisen as a result of on-going activities from work packages and tasks.

The table below shows the current remaining risk and the mitigation measure in place.

Please note: the remaining table containing the critical risk for implementation has been reviewed and agreed by the project consortium.

2. Critical risks for implementation

Below is the potential risk identified for the remainder of project SHERPA.

Description of risk	Affected WPs	Risk level	Risk probability (1 (low) to 5 (high))	Proposed risk mitigation measures	Progress column
Delays in final reporting submission	WP6	Medium	1	Ensure adequate internal deadlines are set by DMU so that partners are aware of timelines to submit technical and financial data.	ALL partners to be briefed of internal deadlines ahead of time.

Table 3: Critical risks for implementation

Previous risks now resolved or redundant

Description of risk	Affected WPs	Risk level	Risk probability	Proposed risk mitigation measures	
One or more partners are unable to produce work of sufficient quality in a timely manner.	All	Low	1	All current partners in the project have good track records in EC project work, and are a good fit for the work they will undertake in SHERPA. Nevertheless, the project will manage this risk by ensuring there is regular contact between the project co-ordinator and the partners. If this risk	



				<p>becomes serious, early remedial action will be taken, e.g., either to have another representative from the organisation assist in the production of the work or, in extreme cases, the work may be taken away from the partner and a new partner installed to take over (in agreement with the project coordinator and amendment to the grant agreement). In addition, the tested Quality Assurance System ensures timely suggestions for improvements of major deliverables.</p> <p>This risk has been deemed as high, as it did materialise in the form of non-performance of a partner in M2 of the project. However better engagement of partners will reduce the probability of this risk materialising again.</p>	
Delays in meeting milestones and deliverable delivery	WP6	Medium	3	<p>The project coordination team will regularly monitor project activities and monthly virtual meetings, as well as periodic physical meetings, which will be used to identify potential problems early and discuss and agree potential avenues for remedial action. WP leaders will ensure all tasks progress per schedule and take corrective action (in consultation with the co-ordinator) if they encounter problems.</p>	
Internal risk – lack of consistency between communication dissemination and advocacy efforts	All	Low	2	<p>SHERPA has already mitigate this risk through a detailed DCEAP ensuring that each section of the plan complements others. Furthermore, project meetings and WP5 meetings work to maintain a line of communication between the communications, disseminations, and advocacy tasks. As advocacy goes hand-in-hand with communications and disseminations, EBS will stay in regular contact with SHERPA partners via WP5 calls to closely monitor the message delivery and to stay consistent and transparent.</p>	



Inadequate policymakers mapping process and inadequate analysis of EU and national legislation process	WP5/All	High	4	Inadequate policymakers mapping might result in missed advocacy opportunities. To mitigate this risk, EBS will very carefully plan each advocacy initiative taking into account the political context in the EU (both at the EU and national level) and the targeted audience. In addition, EBS will conduct the ACT-ON model assessment to ensure that advocacy will be carried out in the most effective and informed way.	
Challenges in reaching out to policy makers during advocacy	All	High	3	Communication and dissemination is key, such as the artistic representation gives greater access to a more diverse audience including policy makers.	
Partners run out of budget	All	High	1	Monitoring of budget will be carried out throughout the project to keep track of expenditure and resources.	
Coronavirus pandemic - Business Continuity Plan	ALL	High	5	A BCP plan has been written to capture the measures taken to avoid disruption during this unprecedented time of pandemic	
Coronavirus pandemic - loss of engagement with outside world	ALL	High	5	Social media presence is vital during this time of global pandemic. Therefore SHERPA online webinars are still going ahead. The pending focus groups of WP4 will also be online via Zoom	
Coronavirus pandemic - impact on advocacy plans	WP5/ALL	Medium	4	Opting for online correspondence with MEPS and national bodies instead of in person. Delay in results possible (due to delay in response)	
Coronavirus pandemic	ALL	High	5	Minimisation of travel to meetings (including GA and Stakeholder board meeting), Either opted for online meetings or postpone until the virus threat is reduced.	
Loss of personnel as the project enters its final phase	ALL	Medium	3	Ensure each partner has sufficient handovers so information is not lost through the replacement process.	



Lack of interest in attending the final SHERPA event	All	Medium	3	In September 2021, EBS will organise a final conference, bringing together all stakeholders interested in the SHERPA project findings and advocacy outcomes. One of the risks of organising a conference in Brussels is the number of other events occurring simultaneously that SHERPA will have to compete against. This may result in a low number of key policymakers present and thus lost engagement opportunities. The best way to mitigate this risk would be to keep stakeholders informed about the final conference during each advocacy meeting, as well as through communications and dissemination activities.	
SHERPA is 'slow' in communicating its findings	All	High	1	Constant engagement with HLEG and collaboration with SIENNA and PANELFIT will ensure that the project findings are dynamic and achieve impact.	
Brexit	All	High	5	The SHERPA consortium contains four UK-based partners, including the coordinator. A hard Brexit that would cut off the UK from H2020 would therefore constitute a significant risk. This risk is mitigated by the UK government's guarantee to continue funding all H2020 activities that were awarded prior to Brexit. However, Brexit might make it impossible for the coordinator to be UK- based. Should this be the case, coordination will be taken over by the University of Twente - Professor Philip Brey who is an experienced EU project coordinator (SATORI, SIENNA).	
Inadequate ACT-ON model analysis	WP5/All	High	4	The ACT-ON model will serve as the main tool to gather contacts for advocacy purposes. An inadequate and incomplete list might slow down the advocacy efforts or shift advocacy resources in the wrong direction. The mitigation measures will include four	



				reviews of the ACT-ON model tool to ensure that all partners agree with EBS' actions.	
GDPR requirements for privacy notices and opt-in procedures could hinder recruitment of newsletter subscribers and use of stakeholder contact list developed by WP2.	WP5	Medium	3	<p>As of year 1 of the project, no issues have arisen regarding newsletter subscribers. Our stakeholder list currently has approx. 1000 contacts and is continuing to grow as more people join our network.</p> <p>However, a strategy to mitigate this risk will be developed by WP1, WP2 and WP5 together should the problem arise.</p>	
Non-adherence to impact-related elements of previously agreed Quality Assurance Plan	All	High	3	<p>Ascertaining via a short survey whether QA criteria are not well aligned with SHERPA expectations (June 2019), short video by QA Lead about the problem (June 2019), alignment of QA problem with policy audience challenge and co-operation of QA lead with impact task force. Design of SHERPA brief format by QA lead (Aug 2019).</p>	
Lack of interest from project stakeholders, and challenge to compile a sufficiently large and representative list.	WP2, 5	Low/ Medium	3	<p>WP2 focuses on stakeholder identification, analysis and consultation – three key elements of successful CSAs. Stakeholders will be involved in every step in our approach using a variety of means: interviews, focus groups, Delphi study, survey, meetings, workshops, communication actions, Stakeholder Board.</p> <p>Compiling a contact list is tedious work, but the partners will need to redouble their efforts to develop a sufficiently large contact list for partners to succeed in this and other tasks.</p> <p>It will be problematic to share personal details of stakeholders with all partners, especially due to GDPR. It is better for partners to contact stakeholders individually (unless they are on the stakeholder board).</p>	



				Stakeholders can decide for themselves if they wish to be in the database, they can have an option to opt in when signing up to the newsletter.	
Lack of agreement on outcomes/ recommendations	WP4	Medium	3	The evaluation, validation and prioritisation work will include key stakeholders from the outset, and it is more likely that they will agree on the problem description and criteria for evaluation.	
Poor response rate and other inherent difficulties - Delphi study	WP2	Medium	3	Partners involved in the Delphi study have successful experience of carrying out such exercises. The partners will carefully consider the subject selection and optimise the timeframe for completing the study, prior to its initiation. Additional precautions pertaining to low response rates, unintentionally guiding feedback, and surveying experts about their limited knowledge of the topic rather than soliciting their expert judgements will be built into the design and implementation of the study.	
Low participation	WP3 Task 3. 4 - standardis ation	Medium	3	A key characteristic of standards is that they are developed by all parties concerned. It will be important to get stakeholders to actively participate in the defining of the scope and the development of the standard. A stakeholder analysis will be made based on the methodology of the Dutch standardisation institute and communication materials will be developed. Partners will make their best efforts to draw participation from their networks (including the network of CEN with many stakeholder groups).	
No consensus possible	WP3 Task 3. 4 - standardis ation	Medium	3	The consortium views this as low risk, and will work hard to achieve consensus. This will be mitigated by additional discussions and meetings, if needed. Normally, a CEN Workshop Agreement (CWA) reserves time for two plenary meetings, but in the task,	



				there will be time for an additional consultation (in person or online).	
Challenges in reaching out to stakeholders in certain fields	WP2	Medium/High	3	To ensure that the stakeholder board is well represented and covers a broad range of expertise. The consortium will focus on contacting experts from particular areas of domain that are currently lacking within the stakeholder board. Recruitment will be similar to that described above, ie. approaching existing contacts, networking via conferences/events and reaching out to potential stakeholders using online methods that are compliant with GDPR.	
Lack of impact due to lack of visibility	WP5	Medium	3	Setup of 'SHERPA visibility working group' to review and plan dissemination/communication events	
Data protection/privacy processes within sherpa	ALL	Medium	3	Periodically update the DMP plan by reviewing data sets, and methods of data collection and processing throughout the project	
Advocacy - no messages so far	WP5/ALL	High	5	Communicating and bringing together findings from reports/documents effectively	
Inter-link between WPs and Tasks especially in WP3	WP3/ALL	Low	2	Ensure on-going bilateral meetings between task leaders, involve the coordinator for advice and consensus	
Lack of gender balance diversity within the stakeholder board and network	WP2	High	3	It is vital to achieve gender balance within the stakeholder board to ensure that the views of the board members are representative of society as a whole. Currently active recruitment of female experts is required. This will be achieved by; approaching existing female contacts, networking via conferences/events and reaching out to potential stakeholders using online methods that are GDPR compliant.	
Coronavirus pandemic - Impact on focus groups	WP4	High	4	All focus groups will be online, which could lead to a risk of low participation and lack of engagement. However, in	



<ol style="list-style-type: none"> 1. Regulatory Options (AHR) 2. Exploratory (AHR) 3. Exploratory (UCLanCY), Scheduled on April 9th 4. UKAIS (DMU) - 9th April 5. ETHICOM (DMU) - 5th May 				order to facilitate this effectively, there will be a limit to the number of attendees allowed to participate.	
Unclear link to evaluation and prioritisation	WP4	Medium	3	Clarify messages and insights from WP1 (and WP3) in a way that is conducive to being provided as input into evaluation and prioritisation	
Coronavirus pandemic - impact on project timelines	ALL	High	5	The unprecedented situation of the pandemic can create project delays which could potentially affect impact of project goals. A possibility would be to review the project in its entirety and discuss with the EC Project Officer regarding a possible extension.	
Final event or conference, unclear of which high profile speakers will be available	WP5	Medium	3	Proposed to hold the meeting at STOA venue (European Parliament's Science and Technology Options Assessment)	
Coronavirus pandemic - cancellation of diversity workshop	WP6	Medium	5	Either opted for online meetings or postpone until the virus threat is reduced.	
Shortage of stakeholders to comment on scenarios in Task 1.2, 2.4	WP1, WP2	Medium	1	It is not only a challenge to get a sufficiently large stakeholder list, but also a well-balanced list that represents all the different types of stakeholders adequately. Partners will need to contact stakeholders from	



				different backgrounds and experiences. The extended contact list will need to be utilised to draw appropriate stakeholders to the scenario development process.	
Shortage of stakeholders to comment on scenarios in Task 1.2, 2.4	WP1, WP2	Medium	1	It is not only a challenge to get a sufficiently large stakeholder list, but also a well-balanced list that represents all the different types of stakeholders adequately. Partners will need to contact stakeholders from different backgrounds and experiences. The extended contact list will need to be utilised to draw appropriate stakeholders to the scenario development process.	
Late delivery (online survey)	WP2	Medium	3	All members of the consortium reach out to their networks to ensure adequate number of survey responses.	
Late delivery (guidelines, options)	WP3	Medium	3	WP3 task leaders work together closely to ensure that work is interlinked, and findings are communicated within specific timelines to support subsequent tasks.	

Table 4: Previous risks

3. Progress

This is the final review of the SHERPA risk register as the project moves to completion. The remaining potential risk is now the timely submission of the periodic and final project reports.



4. Appendix I - Business Continuity Plan



Shaping the ethical dimensions of smart information systems– a
European perspective (SHERPA)

Business Continuity Plan

Project Response to Covid-19

This project has received funding from the
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Current Situation

Following the advice and guidelines of the UK government, the coordinating university of SHERPA, De Montfort University, majority of staff are working from home. Therefore, all on-going project work including; Final STOA event (23rd March 2021), General Assembly meeting (20th & 21st April 2021) and the final SHERPA event/Stakeholder board meeting (22nd September 2021), have taken place online instead.

The need for a business continuity plan was vital to ensure that the on-going activities of the project continued with minimal disruption, whilst ensuring that the project consortium complied with safety measures set out by each respective country.

Coordinator's Mitigation Measures

The need for effective communication amongst partners is important to ensure that deliverables/reports and milestones are still on track. All partners have access to emails, MS Teams, GoToMeeting, Zoom and Skype so everyone can be contacted.

Furthermore, partners have been sent a number of key dates for their diaries which reflect internal deadlines for Period 3 reporting, including technical and financial reporting.

The risk management plan for specific activities, please see section below.

Partner Activities Affected and Mitigation

Partner Contingency Measures

The following sections outline how partners prepared their risk mitigation on an organisational level.

DMU

DMU as a public university is working with the UK government to implement the recommended measures to deal with the pandemic. The University has put in place a number of measures to allow staff to work from home and continues to provide support and services. The main measures are

<https://www.dmu.ac.uk/coronavirus/index.aspx>



DMU as the coordinator ensures continuity in the provision of coordination services, in particular during the preparation of the periodic report. The DMU team consists of four individuals who are in regular contact to ensure work continues as planned. Not only email, but Skype addresses of all partners can be found here:

<https://docs.google.com/spreadsheets/d/1AznQqXpPvgjbbVkgK04Etrs8301qeAAe91Pugejjoac/edit#gid=63430614>. In addition the DMU team has regular weekly meetings (via Zoom) to review and discuss the ongoing tasks being led by DMU and any other relevant issue for the project. In this way, all members of the team are being kept up to date on progress and so would be able to cover for each other in cases of incapacity.

U Twente

The University of Twente (UT), in line with Dutch government regulations, is now operating on a remote basis. The main measures taken, including the closing of all buildings, are described at <https://www.utwente.nl/en/products-services/product/p1112937/novel-corona-virus>

The tasks led by UT (1.1, 1.4 and 3.2) have all been completed. The UT team now consists of two individuals who are in regular contact to ensure that remaining contributions continue seamlessly and commitments are met in the event of sickness.

EUREC

Most members of EUREC's staff work from home anyway and all staff members had the possibility to work fully remote before the outbreak of the virus already. There will be no difficulty in changing the entire work to online communication or calls as this is in place for all anyway. All systems and tools to hold online meetings or share information are in place also. Staff can be contacted via mail or Skype during the working hours. There will not be a change in productivity due to the outbreak due to this change.

UCLanCY

In line with measures taken by the Republic of Cyprus, the Ministry of Education and the Cyprus QAA with respect to the COVID-19 outbreak, UCLan Cyprus has been temporarily closed and all staff are requested to work from home until further notice. Therefore, all meetings among SHERPA experts of UCLan Cyprus and with other SHERPA experts take place online via tools such as Microsoft Teams at regular intervals.

The business continuity plan of UCLan Cyprus includes full delivery of online teaching, postponements of face to face activities and continuity of all research projects through alternative methods and activities if necessary. With respect to SHERPA activities led by UCLan Cyprus, alternative plans had been discussed by the SHERPA consortium and were implemented, including tasks that required the completion of focus groups or interviews. These took place online with the use of online platforms such as Skype in alignment with corresponding interview and focus group protocols and ethics approvals.

Trilateral

As many members of Trilateral's staff were remote prior to the COVID-19 outbreak, systems for online work and communication were already in place. As such, Trilateral does not anticipate a significant change



in productivity. Those not already working from home were instructed to do so until further notice. Meetings will continue to take place online, and all staff are available during working hours over email, Skype, GoToMeeting, and other similar tools. All documents, including working drafts and research materials, are uploaded to an internal Sharepoint; staff have been reminded to not store any documents remotely on their own computers. Additionally, Trilateral has designated 'back-up' staff for each project, and those back-ups have been briefed by team leads on the overall project, ongoing tasks, and near-future deadlines. A contingency plan for all projects is currently being developed and recorded.

NEN

NEN asked staff members to work from home until at least April 6 (or further notice). Meetings will take place online as much as possible or are postponed until the situation changes. Digital tools for working from any location outside the office have been in place for some time at NEN. Online collaboration tools to hold meetings and share documents were mostly in place before this crisis or have been upgraded. More information is available on the [website](#) (in Dutch).

Mutual Shoots

All staff at Mutual Shoots are working from home until at least Monday 13th April (the current lockdown period set by the UK Government) or until further notice. Therefore attendance at meetings will be facilitated by online tools such as GoToMeeting, Skype or Zoom and no travelling will be permitted. Online collaboration tools such as Google Docs will continue to be used to share documents between staff and other organisations while regular weekly reviews will take place to ensure that work is progressing as planned. The Executive Directors of the board are to cover for each other in cases of incapacity.

Aequitas Human Rights

The Researcher and SHERPA's project coordinator works from home and the organisation is following the official instructions of the Republic of Cyprus. Meetings will take place online as much as possible and all the work will continue as normally but from home.

F-Secure

F-Secure's company-wide business continuity plan is publicly presented here:

<https://community.f-secure.com/en/discussion/122453/covid-19-pandemic-f-secure-s-business-continuity-arrangements>

Naturally, a crisis management team has been established, business travel has been restricted, and remote work is strongly encouraged and fully facilitated. The AI division of the company has weekly meetings (virtual ones, at the moment) of the management group, and since several key SHERPA contributors at F-Secure are members of that group, the project progress, action points and plans are regularly discussed and



reviewed. For the technical work in Task 3.5, two senior members of the Data Science team are contributing in close collaboration and regularly sharing their progress with the management group. Remote work is quite popular at F-Secure's R&D, so we do not expect the present situation to bring any new significant risks.

European Business Summit

Since the European Business Summits' business is greatly affected, EBS has placed some employees on part time or on 'economic unemployment due to force majeure' at this time until 19th of April (subject to revision). Those who will continue working will work from home. All meetings scheduled for advocacy or otherwise took place online.

Pineapple Jazz

Our current work is affected quite a bit, as most exhibits, workshops and festivals are shutting down. Where possible work continues at home, or shifts to find an online outlet. For example:

- Meetings and planned lectures are now organised through Skype etc.
- The education project with the HRO school was kickstarted just before things got serious, but the educational lectures and support I was giving them must now be done remotely. I am reacting to their concepts as we speak. Creating installations for the Liberation festival is moot, as it is cancelled, but students continue as if it may continue anyway.
- My own work that was planned to launch there - a variation on the waterguns - may shift. We are exploring if there could be an online experience/exhibit - a decision on that will be made shortly.
- The waterguns launch at NEMO's big exhibit on data and algorithmic bias is up in the air, as there is doubt whether an exhibit can open in summer. This installation is in an advanced stage of development, and in the worst case the launch could simply be delayed until next summer.
- Other plans to show the works mentioned above at exhibits this summer have also gotten a hit, as most exhibits have cancelled or frozen plans.
- Candle is heavily affected, with planned exhibits (e.g. house of the future in Eindhoven) being moot. Similarly, hands-on workshops are no longer possible.
- The plan to develop a work on adversarial AI with FSC will also have to be looked at in this new light.



Risks and Mitigation

This section lists the activities planned in SHERPA between April 2021 and October 2021. It describes how these may be affected by the Covid pandemic and which measures have been taken or are considered to address any risks arising from them.

Lead Partner	WP / Task / Activity	Date	Risk	Mitigation
DMU	April GA meeting	20-21/04/21	Physical meeting impossible	Meeting held online instead
EBS	Advocacy interviews	04-10/2021	Physical meeting in Brussels may not be possible	Individuals were contacted for online webinar or individual meetings if necessary instead
EUREC	Stakeholder Board meeting	22/09/2021	Physical meeting in Brussels may not be possible	Meeting held online instead
EBS	Final project meeting	22/09/2021	Physical meeting in Brussels may not be possible	Meeting held online instead

Review and Update

Due to fluctuations in COVID-19 cases the chance of any physical meetings is negligible. For now all meetings will be held online.



Appendix

Correspondence from EC Project Officer - Roberta Monachello on 5th March 2020

“The following is the line that the REA adopted in accordance with the European Commission:

Meetings or events you are organising in your project with many participants travelling from different countries (Member State and/or third country) should be switched to video conferencing and non-refundable travel/accommodation already paid by consortium members will be reimbursed provided that they do not receive reimbursement through another source (such as travel insurance).

If video conferencing is not possible and the coordinator postpones or cancels the meeting the same applies regarding non-refundable travel/accommodation.

Coordinators should justify this to their project officers (e.g. type of meeting, how many participants from how many countries) and also in their financial statements and periodic reports at the time of reporting.

As the situation is evolving rapidly, the Commission will continue to revisit and align its measures with the recommendations of national health authorities as the guidelines of the European Centre for Disease Prevention and Control.”

Correspondence from EC Project Officer - Roberta Monachello on 24th March 2020

“The situation in Europe is dramatically changed from the last time we were in contact!

Anyway, with the hope that we will soon be over of this emergency situation, let's try to keep the projects running!

Concerning the project review, since the expert seems fine with the 3rd of July, I was wondering if the date would still be convenient for you. Please let me know!

It is however too early to decide if we will organise a meeting here in BXL as originally discussed, or if we go for a videoconference.”

