



EuComMeet
DEVELOPING ONLINE DELIBERATIVE SPACES

D2.4 - Report on platform's compliance with law

WP2 – Designing the M4D2 Participatory Spaces

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Project details and Deliverable information

Project details

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Document history and quality check

Document History

Version	Date (DD/MM/YYYY)	Created/Amended by	Changes
01	30/10/2024	UW	First draft
02	14/06/2024	UNISI	Final version

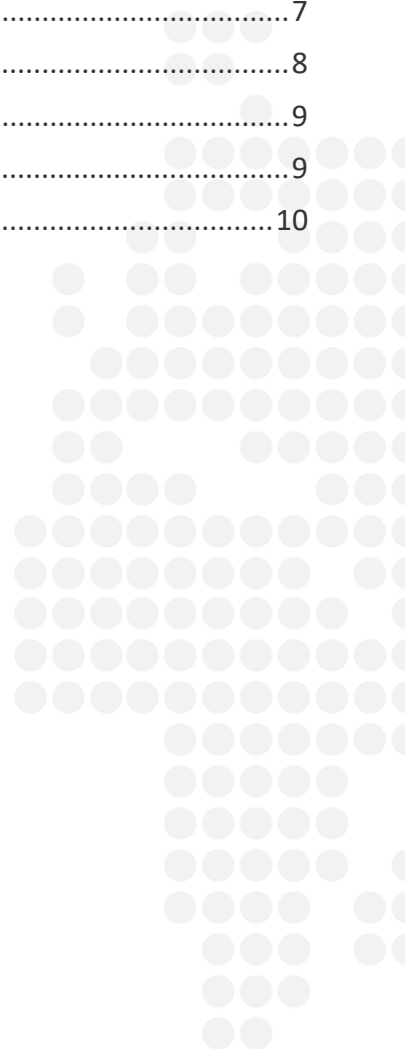
Quality check review

Reviewer (s)	Main changes
	Not sent for review. As a project's document, the DMP was shared among all partners, who provided their comments, feedbacks, and suggestions.



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List of abbreviations and definitions

Abbreviation	Definition
AGPL	Affero General Public Licence
CEN	European Committee for Standardization
CENELEC	European Committee for Electrotechnical Standardization
DoA	Description of Action
EC	European Commission
ETSI	European Telecommunications Standards Institute
F/LOSS	Free/Libre Open Source Software
GA	Grant Agreement
GARR	Gruppo per l'Armonizzazione delle Reti della Ricerca
GDPR	General Data Protection Regulation
H2020	Horizon 2020
HEN	Harmonised European Standard
HTTPS	Hypertext Transfer Protocol Secure
SSH	Secure Shell
TLS/SSL	Transport Layer Security/Secure Sockets Layer
VPS	Virtual Private Server
WCAG	Web Content Accessibility Guidelines



Disclaimer

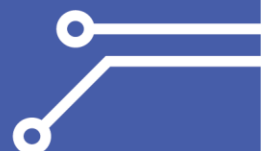
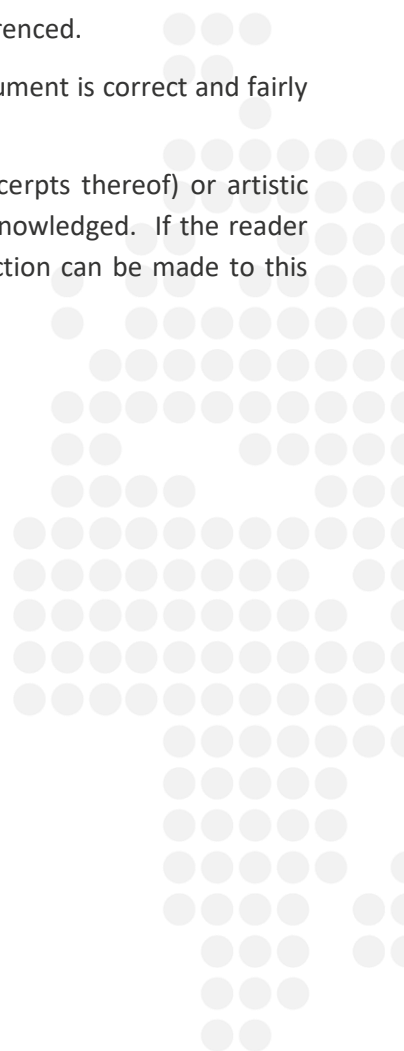
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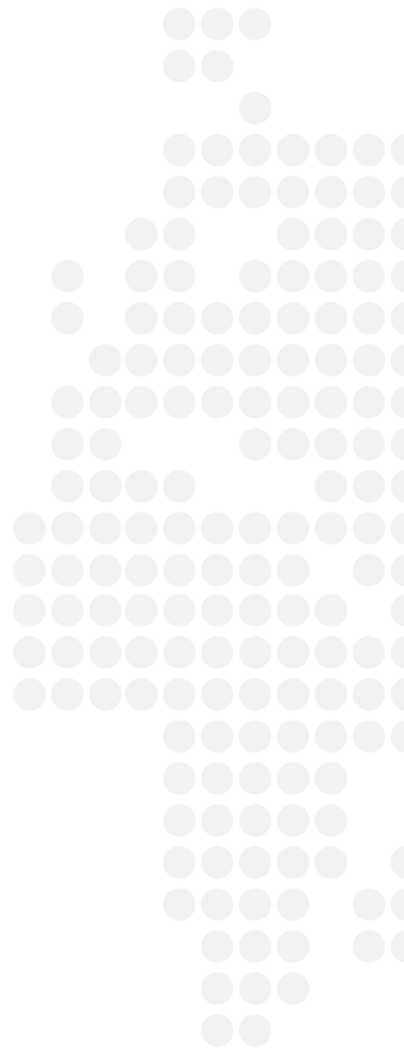
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Executive summary

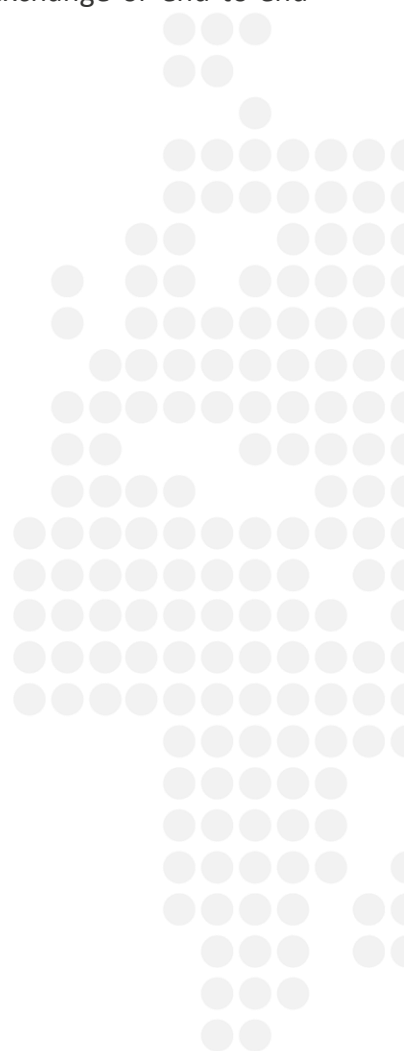
The Report on platform's compliance with law provides information about how The CONVIVIUM platform created in the duration of EuComMeet - Developing Participatory Spaces using a Multi-stage, Multi-level, Multi-mode, Multi-lingual, Dynamic Deliberative approach (M4D2) project is conform with the requirements of the law. The report provides information about the data protection measures, accessibility and licensing.





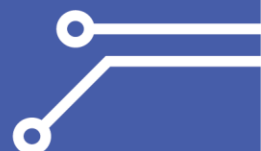
1. General information about the platform

The CONVIVIUM platform of the EuComMeet project has been created based on the NextCloud and Jitsi softwares with additional customised code that was required by the project. Jitsi Meet is mainly used as a video conferencing feature of the platform and NextCloud provides many functionalities of the CONVIVIUM platform. NextCloud¹ and Jitsi² provide the possibility to use features with the possibility of enhanced privacy and security of personal data, such as file access control, secure access exchange or end-to-end encryption.



¹ For more details about security features provided by NextCloud <https://nextcloud.com/gdpr/> [access 14.09.2023]

² For more details about security features provided by Jitsi <https://jitsi.org/security/> [access 14.09.2023]



2. Data Protection

The CONVIVIUM platform uses ISRG Root X1 R3 certificate for TLS cryptographic protocol. TLS provides security for the platform's users by encryption of data in transit. That protection is in accordance with the art. 32 (a) and (b) of GDPR. TLS provides required personal data encryption and the ability to ensure the ongoing confidentiality of processing systems and services.

The merged Nextcloud and Jitsi software with custom code are installed on two separated VPS with Ubuntu LTS 22.04 operating system. Both VPS are hosted on the GARR's cloud. GARR³ is an Italian computer network providing services for universities and research organisations. The VPS are under the control of UNISI. Additionally, Nethood and ADAPT Centre have access to the VPS. All of the entities with access to the CONVIVIUM platform's software are based in the EEA. If personal data processing occurs, it would be under EU data protection laws. That would guarantee the adequate protection standards of users' data in accordance with GDPR.

Data gathered in VPS is secured by measures taken in order to access the servers. Nethood, UNISI and ADAPT have the same level of access to the servers, through an encrypted SSH. Every person from those organisations has root access to the VPS with a personal SSH public key. These measures provide additional security of the gathered data and protects it from unauthorised access.

3. Accessibility

The CONVIVIUM platform provides features and tools that enable vast accessibility for users with different types of needs. The platform follows standards to make everything usable also without mouse, and with assistive software such as screen readers. It aims to be compliant with the WCAG 2.1 guidelines on AA level, and AAA level when it comes to high contrast themes. WCAG is an internationally recognized standard of web accessibility providing guidelines for institutions, organisations and users. WCAG 2.0 was published on

³ For more information about GARR and its security <https://cloud.garr.it/> [access 14.09.2023]

11 December 2008. In June 2018 WCAG 2.1 was published, with additional success criteria of accessibility. A, AA and AAA are different conformance levels, with A being the lowest standard and AAA being the highest.

Some of the WCAG guidelines are part of the accessibility requirements of the HEN EN 301 549 European Standard for ICT products and services. The current version of HEN EN 301 549 is 3.2.1 became the only relevant standard on 12 February 2022. The standard is based on standardisation Mandate 554 and established by European Standard Organizations CEN, CENELEC and ETSI. HEN EN 301 549 v3.2.1 provides a requirement of meeting the WCAG 2.1. Compliance with HEN EN 301 549 v3.2.1 on accessibility for public sector bodies in the EU has been enforced due to Web Accessibility Directive⁴ which came into effect in June 2021. Therefore, the CONVIVIUM platform's aim of compliance with the WCAG 2.1 guidelines enables it to be on par with public sector bodies on much of their requirements regarding accessibility.

4. Licensing

The CONVIVIUM platform is licensed under F/LOSS. Free software provides the end-users with a control over the software and they can utilise it without boundaries or oversight. Open source licence provides the copyright holder the rights to use, study, change and distribute the software and its source code without restrictions. Most of the software is created under GNU AGPLv3. AGPLv3 is a copyleft licence, which guarantees that derivatives of the software will enable copying and linking of the software. The patent clause of the AGPLv3 establishes that all users have a non-exclusive, non-transferable, worldwide, royalty-free licence on any patents owned by code contributors.

The documentation section (<https://docs.eucommeet.eu/en>) of the platform is licensed under Creative Commons BY-NC-SA 4.0. Under the licence the documentation might be used only with attribution to author or licensor, the distribution, linking and modifications are copylefted and the documentation is for non-commercial use only.

⁴ Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies

The CONVIVIUM platform's F/LOSS licensing is in accordance with the EuComMeet project obligation stipulated in the Grant Agreement number: 959234. The utilisation of open-source licences is consistent with the adopted declarations and strategies of member states and European Commission.

The 2017 Tallinn Declaration of European Union Member States indicates their position regarding open licence policies: '[The Member States call upon] the Commission to consider strengthening the requirements for the use of open source solutions and standards when (re)building of ICT systems and solutions takes place with EU funding, including by an appropriate open licence policy — by 2020.'⁵

The Commission provides reasoning showing the importance of open source software for the public service and the Institution's strategy:

'it is public code, which makes it a good use of public money, one that promotes freedom of choice and avoids getting 'locked in';

it makes it easy to use and reuse software solutions, so we can pool efforts to create valuable cross-border services that are interoperable, and increase efficiency;

and it is easy and efficient to add features to open source software, which can be freely shared with anyone, for any purpose. This means that everyone can benefit.'⁶

Those statements indicate the importance of an appropriate licensing policy in accordance with public policy goals.

⁵ p. 6, Tallinn Declaration on eGovernment at the ministerial meeting during Estonian Presidency of the Council of the EU on 6 October 2017

⁶ p.2, Open source software strategy 2020 – 2023; C(2020) 7149