

Institutional Research Data Management Policies and Procedures

This Guide is intended for those developing or updating policies and procedures relating to the management of research data as an institutional asset.

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WHY HAVE A RESEARCH DATA MANAGEMENT POLICY OR POLICIES?

Under the *Australian Code for the Responsible Conduct of Research* (2018) (or “the Code”), institutions have a responsibility to “establish and maintain good governance and management practices for responsible research conduct” (R1). They are also required to “develop and maintain the currency and ready availability of a suite of policies and procedures which ensure that institutional practices are consistent with the principles and responsibilities of the Code” (R3).

Institutional policies and procedures, which might include guidelines, protocols and standards, are fundamental to good governance and the effective management of research data, including data reuse and data sharing. Institutional research data management policies and procedures should:

- address current data-related issues, such as the evolving funder and publisher data policies which involve data sharing and reuse by other parties;
- ensure that all other related policies and procedures are consistent with, supportive of, and supported by, the institution’s overall research data management policy; and
- outline measures necessary for the implementation of the Code, informed by guidelines set out in the *Management of Data and Information in Research: A guide supporting the Australian Code for Responsible Conduct of Research* (2019) (hereafter “*the Management of Data and Information in Research guide*”).

Such institutional policies and procedures should be widely publicised to all those who have a role in ensuring that research data is managed as an institutional asset, i.e. researchers, research support staff, data managers, and librarians.

Consistent with the institutional responsibility to provide ongoing training and education to promote and support responsible research conduct (R4), the introduction of online and other training programs in research data management is an effective means to upskill staff and students, support policy implementation and build capacity for the development of best practices in the management of research data. The policy should have the objective of resourcing and encouraging good practice, rather than solely enforcing compliance.

RESEARCH DATA MANAGEMENT POLICY WITHIN AN INSTITUTIONAL FRAMEWORK

Each institution will have a range of policies that will support the research data policy. The nature of institutional governance means that a complex set of policies will be required to work together to form a policy suite that will support good research data governance practice.



Policy areas where legislative and institutional policies intersect with the research data management policy include

- Privacy policy (legislative and policy requirements)
- Cybersecurity (legislative and policy requirements)
- Australian Code for the Responsible Conduct of Research
- IP policies
- Ethics policies and procedures
- Governance policies such as audit and risk
- Archive requirements (legislative and policy including retention period)

In addition, research data practice in terms of policy is influenced by both funder requirements and institutions' responses to changing community needs, such as seen in recent years in relation to Indigenous Data Sovereignty and cybersecurity.

POSSIBLE APPROACHES TO CONSTRUCTING A RESEARCH DATA POLICY SUITE

Each institution will determine how best to construct the framework of policies, procedures and guidelines needed to support effective data management. The development of research data management policies may be approached in the following ways.

1. A single 'Research Data Management Policy' encompassing all data management issues.
2. Separate policies addressing different parts of research data management e.g. data ownership policy and/or data storage policy.
3. Research Data Management Policy can be:
 - a. incorporated into the institutional policy on the [Australian Code for the Responsible Conduct of Research](#); and
 - b. strengthened by cross references in related policies.
4. Policies on research data management and related topics may be supported by an instrument addressing procedural matters e.g.:
 - a. [University of Newcastle Responsible Conduct of Research Policy](#)
 - b. [University of Newcastle Records and Information Management Policy](#)
 - c. [University of Newcastle Research Data and Primary Materials Management Procedure](#)

EXAMPLES OF DATA MANAGEMENT POLICIES

A comprehensive list of Australian University Policies and Procedures relating to data management can be found on the [Australian Research Data Management Community list of policies](#).

Some international examples of institutional research data policies include:

- [Stanford policy on Retention of and Access to Research Data](#)
- University of Cambridge [Research Data Management Framework](#)
- University of Virginia [Open Access Guidelines for Faculty](#)

KEY TOPICS FOR INCLUSION IN DATA POLICIES

As explained in the *Management of Data and Information in Research* guide from the NHMRC, the primary objective of retaining data and information is “to enable the justification of outcomes of the research and the facilitation of sharing of research data” (pg 6). It follows that researchers are required to “retain clear, accurate, secure and complete records of all research including research data and primary materials. Where possible and appropriate, [researchers are required to] allow access and reference to these by interested parties”: The Code, R22.

Research data management policies and related procedures should address the following activities, which are part of generating, collecting and handling data:

- | | |
|--|--|
| Data control, ownership, and custodianship | Data consent: recording and respecting the consent wishes of human research participants with regard to primary use, sharing, archiving and disposal |
| Data documentation and compilation | Data access, data sharing and dissemination/licensing arrangements |
| Data quality, standardisation, harmonisation and audit | Data publishing and acknowledging the use of research data produced by other researchers |
| Data life-cycle control | |
| Data security and access constraints | |

Research Data Management Policy Checklist

The Research Data Management Policy Checklist for Australian Universities/Institutions is available at Appendix A (see pp 5-8).

APPENDIX A

CHECKLIST FOR A RESEARCH DATA MANAGEMENT POLICY FOR AUSTRALIAN UNIVERSITIES / INSTITUTIONS

Purpose of this document:

This document is intended as a basic starting point for institutions planning to write, or update, their research data management policy. It is intended to be informative, not prescriptive.

Overview

This document addresses key issues and considerations in the development or revision of research data management policies and procedures. It is understood that each institution will have its own method/template for writing policies. Some aspects of research data management outlined here may not be included in the formal policy but rather addressed in accompanying procedures or guidelines. For the purpose of assisting institutions with their research data management policies and procedures, this document offers information on the following topics:

- | | |
|---|---|
| <input type="checkbox"/> Name of Policy | <input type="checkbox"/> Destruction of Records |
| <input type="checkbox"/> Policy Purpose, Key Principles or Objectives | <input type="checkbox"/> Data Ownership, Custodianship and Stewardship |
| <input type="checkbox"/> Definitions | <input type="checkbox"/> Use of third party data |
| <input type="checkbox"/> Exceptions | <input type="checkbox"/> Collaborative Research Projects |
| <input type="checkbox"/> Application and Responsibilities | <input type="checkbox"/> Special Requirements |
| <input type="checkbox"/> Data Management Plans | <input type="checkbox"/> Where to Get Advice |
| <input type="checkbox"/> Period of Retention of Research Data and Records | <input type="checkbox"/> Register of Research Data and Records Stored within the Institution |
| <input type="checkbox"/> Storage of Research Data and Records | <input type="checkbox"/> Related Policies, Related Documents / Schedules, Related Legislation |
| <input type="checkbox"/> Security and Protection | <input type="checkbox"/> Commencement Date and Review date |
| <input type="checkbox"/> Access to Research Data and Records | <input type="checkbox"/> Responsible Officer, Contact Officer, Approval Authority |
| <input type="checkbox"/> Removal or Movement of Data and Records | |

Name of Policy

This should be clear, concise and informative without including acronyms or abbreviations e.g. 'Research Data Management Policy', 'Management of Research Data and Records Policy' etc.

Policy Purpose, Key Principles or Objectives

Identify and clearly state the aims to be achieved by this policy. Institutions may wish to consider the application of FAIR (Findable, Accessible, Interoperable, Reusable) and CARE (Collective Benefit, Authority to Control, Responsibility, Ethics) Data Principles.

Definitions

Define key terms and phrases e.g. 'research data,' 'metadata,' 'disposable,' 'data custodian,' 'institutional repository,' etc.

Exceptions

Outline situations where this policy may not apply, or define what is not covered in this policy e.g. research data does not include local administration data etc.

Application and Responsibilities

Who this policy applies to - for example all staff, all academics, etc - and what are their responsibilities under this policy?

Researchers

What are the specific responsibilities of researchers under this policy?

Research Students and Research Supervisors

What are the specific responsibilities of research students and their supervisors under this policy?

Institution

What are the specific responsibilities of the institution under this policy? Consider identifying a senior Responsible Officer for implementing and exercising the responsibilities in the policy.

For guidance, see Parts 2 and 3 of the [Management of Data and Information in Research guide](#).

Data Management Plans

The [Management of Data and Information in Research](#) guide strongly encourages the development of a Data Management Plan “as early as possible in the research process.” Institutions may wish to consider mandating the requirement for a Data Management Plan.

The [National Statement on Ethical Conduct in Human Research](#) (updated 2018) states “For all research, researchers should develop a data management plan that addresses their intentions related to generation, collection, access, use, analysis, disclosure, storage, retention, disposal, sharing and re-use of data and information, the risks associated with these activities and any strategies for minimising those risks.”

Period of Retention of Research Data and Records

Ensure that the prescribed periods of retention applicable to research data and records are consistent with discipline specific norms and requirements under any relevant state, territory or federal legislation.

Storage of Research Data and Records

Detail where and how research data and records are to be stored. These may be digital (e.g. files, datasets, photos, recordings etc) or physical objects (e.g. paper, artifacts etc).

Security and Protection

Which records are required to be kept in secure conditions and how and where this is to take place?

Access to Research Data and Records

Who has access to the data and in what manner? This may differ depending on the type and sensitivity of the data.

The Code states that “to foster responsible research conduct, institutions will provide access to facilities for the safe and secure storage and management of research data, records and primary materials and, where possible and appropriate, allow access and reference” (R8). Issues of data management and reuse need to be addressed in relation to ethics and privacy. For more information, please see the ARDC Guide on [Data Sharing considerations for Human Research Ethics Committees](#).

Removal or Movement of Data and Records

By whom? What will be moved? From where to where? When and how will this happen? Consider for example the situation in which a researcher leaves the institution.

Destruction of Records

Who will do this? What will be destroyed? Where, when and how will this happen? Reference the applicable Retention and Disposal authority and consider whether data can be disposed of according to the schedule, or has ongoing value or significance requiring retention.

Data Ownership, Custodianship and Stewardship

The ownership, custodianship or stewardship of research data and primary materials produced at the institution may be covered in this policy, or in a related one. The question of whether intellectual property rights subsist in a set of research data is a complex matter. For information on this issue and other related questions, please see the [ARDC Research Data Rights Management Guide](#).

Use of Third Party Data

There can be implications for managing data from third parties (i.e. data brought in from other data suppliers). See, for example, the Monash University guidelines on [Using Third Party Research Data](#).

Collaborative Research Projects

When multi-centre or collaborative research projects are undertaken, responsibilities for the management of research data and primary materials must be clarified and documented in a written agreement before a project begins.

Special Requirements

These may include specific requirements regarding some or all of the following (and possibly more):

- Laboratory Notebooks
- Patents
- Privacy
- Research Involving Human Participants
- Sponsored Research - Conditions of Award (Grant or Contract Research)
- Archival Value
- Discipline Specific Practices or Codes
- Research and Data Collection in Indigenous Communities
- Ethnographic Data

Where to get Advice

Provide information for readers to seek additional information about matters covered in this policy within the institution.

Register of Research Data and Records Stored within the Institution

Institutions may consider establishing a catalogue of research data and documenting where such data is stored or deposited.

Related Policies

What other institutional policies are related to this one? This may include such things as institutional policy on intellectual property, cybersecurity and recordkeeping.

Related Documents / Schedules

What other institutional or external documents are related to this policy e.g. *The Australian Code for the Responsible Conduct of Research*, *the National Statement on Ethical Conduct in Human Research*, or the institutional research data management guidelines or procedures.

Related Legislation

List relevant Commonwealth, state, local and institutional laws which have a bearing on the terms of this policy e.g. state archive statutes, the *Privacy Act 1988* (Cth), and the *Freedom of Information Act 1982* (Cth).

Commencement Date

When does this policy come into effect?

Review Date

When is this policy due to be reviewed?

Responsible Officer

This person/position is responsible for this policy. Alternatively, responsibilities for the oversight and implementation of research data management policy may be distributed across multiple actors, both individual and collective, within the university.

For example, La Trobe University's [Research Data Management Policy](#), stipulates that "the Research and Graduate Studies Committee (RGSC) will oversee the direction and implementation of research data management across the University" (Section 4, Part A). Specific responsibilities for this policy is outlined for researchers and a range of offices, office holders and service providers within the university including the Deputy Vice Chancellor (Research and Industry Engagement), Associate Provosts (Research), Heads of School, the Human Research Ethics Committee, the Research Office, the University Library, Records and Archives Services, Information Services and the Office of Research Infrastructure (Section 4, Part B).

Contact Officer

The person who has direct functional responsibility and accountability for all areas of work that are covered by the policy, and its related procedures. A Contact Officer may be the person who directly reports to the Responsible Officer..

Approval Authority

Which committee/board is responsible for the approval of this policy and any subsequent amendments?

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FEEDBACK

We welcome your feedback on this guide. Please email contact@ardc.edu.au with any comments or questions.

ABOUT THE AUSTRALIAN RESEARCH DATA COMMONS

The Australian Research Data Commons (ARDC) enables the Australian research community and industry access to nationally significant, data intensive digital research infrastructure, platforms, skills and collections of high quality data.

The ARDC is supported by the Australian Government through the National Collaborative Research Infrastructure Strategy (NCRIS).



Australian Research Data Commons

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