



Research Data Management Policy

University of Wales Trinity Saint David

Group Research Data Management Policy

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1. Introduction

The area of research governance, policy and good practice is rapidly evolving with the development of online research data discovery and sharing capabilities. This is further driven by a move towards open access research publications and electronic publishing in which free and open access to data underpinning research claims is a growing expectation. Research policy at National and International levels is also stipulating that research data acquired using public funding should be treated as a public good, and made openly available to other researchers and the public, to the fullest extent possible. The UK Research Councils (RCUK), for example, have agreed a set of common principles for research data policy (<http://www.rcuk.ac.uk/research/datapolicy/>) which in summary states that:

- Publicly funded research data are a public good, produced in the public interest. These should be made openly available with as few restrictions as possible in a timely and responsible manner that does not harm intellectual property;
- Data with acknowledged long-term value should be preserved and remain accessible and usable for future research;
- Published results should always include information on how to access the supporting data;
- Sufficient metadata should be recorded and made openly available to enable other researchers to understand the research and the re-use of potential data;
- Research organisation policies and practices should ensure that relevant legal, ethical and commercial constraints on the release of research data are considered at all stages in the research process in order to ensure that the research process is not damaged by the inappropriate release of data.

Although the primary responsibility for good research data management rests with individual researchers, the University now has a clear institutional responsibility to ensure good practice and to adopt a systematic approach to research data management and preservation. This is increasingly imposed by research funders as a condition of financial support.

2. Purpose

2.1 This policy defines the responsibilities at individual and institutional level which should guide the work of those involved in funded research data collection, curation, storage and maintenance. This policy will ensure that research data produced by its staff will be managed to the highest standards throughout the research data lifecycle. This will ensure that, when required, accurate and retrievable research data are available to verify and defend the process and outcomes of research. The University acknowledges the importance and significance of legislation in this area, inter alia, the Freedom of Information Act 2000 and the Data Protection Act 1998 as amended from time to time.

The policy will also ensure that the research data the University generates through funded projects will be securely stored and available to researchers for the duration of their research, in addition to being available for the long-term conduct of research, teaching and for wider exploitation for the public good, by individuals, government, business and other organisations, as a project develops and after research results have been published.

2.2 This Policy guarantees that the University's obligations under research funders' data-related policy statements and codes of practice to ensure that sound systems are in place to promote best practice, including through clear policy, guidance, supervision, training and support in the management of research data, will be met.

3. Scope

The policy covers all funded research and experimental development and the associated research data generated by the University's researchers.

3.1 Research and experimental development (R&D) is defined as per the Frascati manual, as 'creative work undertaken on a systematic basis in order to increase the stock of knowledge, including knowledge of man, culture and society, and the use of this stock of knowledge to devise new applications'. The term R&D covers three activities: basic research, applied research and experimental development.

- **Basic research** is experimental or theoretical work undertaken primarily to acquire new knowledge of the underlying foundation of phenomena and observable facts, without any particular application or use in view.
- **Applied research** is also original investigation undertaken in order to acquire new knowledge. It is, however, directed primarily towards a specific practical aim or objective.
- **Experimental development** is systematic work, drawing on existing knowledge gained from research and/or practical experience, which is directed to producing new materials, products or devices, to installing new processes, systems and services, or to improve substantially those already produced or installed. R&D covers both formal R&D in R&D units and informal or occasional R&D in other units.

3.2 Research data is defined as that which is collected, observed, or created for purposes of analysing to produce original research results. Such research data are the recorded information, regardless of the form or the media in which they may exist, necessary to support or validate a research project's observations, findings or outputs. In practice, the nature of research data can vary widely depending on discipline. It can be textual, numerical, qualitative, quantitative, final, preliminary, physical, digital or print. It excludes administrative documents (such as job descriptions, emails or financial reports) and teaching materials. Research data comes in very many formats, including: Word documents, PDFs, spread sheets, CDs, DVDs, scanned lab books, online surveys, digital recordings, databases or computer software. It may include, but is not limited to:

- Instrument measurements
- Experimental observations
- Still images, video and audio
- Text documents, spreadsheets, databases
- Manuscripts, historical records and archive materials
- Quantitative data (e.g. household survey data)
- Survey results & interview transcripts
- Simulation data, models & software
- Slides, artefacts, specimens, samples

3.3 Researchers are defined as members of the University, including staff and doctoral students, honorary and visiting research fellows, and those who are not members of the University but who are conducting research on University premises or using University resources and facilities.

3.4 Funded research is defined as that which is supported by an external research grant.

4. Policy

The University defines the following set of principles to be followed by researchers in order to ensure that research data are managed in accordance with relevant legislative, regulatory, contractual, ethical, and other obligations.

4.1 Responsibility for research data management through a research data management plan during any research project or programme lies primarily with Principal Investigators (PIs).

4.2 Researchers, faculties, support units and where appropriate external collaborators, need to work in partnership to implement good practice and meet relevant legislative, research funder and regulatory requirements. In respect of this, the University will provide training, support and advice for the research data management and research data management plans. The University will also advise on and provide the necessary mechanisms and services for storage, backup, registration, deposit and retention of research data assets in support of current and future access, during and after completion of research projects. The information provided in the research data management plans (see point 4.4) will be used by Research Innovation and Enterprise Services, Library and Learning Resources and Information Technology and Systems, and other Units as required, to demonstrate the University's compliance with its external obligations, and to identify areas where further research support is required. This will address factors such as advice and guidance, training, and technical infrastructure.

4.3 Research data must be created, maintained and shared in accordance with contractual, legislative, regulatory, ethical and other relevant requirements. Researchers are expected to maintain awareness of current requirements and obligations set by the University, and where applicable, those of the research sponsor, research partners, the supplier of externally sourced data and any other relevant bodies, and adopt practices that are appropriate and conform to best practice within the subject domain. These should include the application of appropriate measures to protect research participants throughout the research lifecycle and a range of contractual, legislative, regulatory and ethical requirements at local, national, and international level. In general these practices must ensure that research data and records are:

- Accurate, complete, authentic and reliable;
- Identifiable, retrievable, and accessible;
- Retained in a safe and secure manner;
- Retained in a manner that is compliant with legal obligations and, where applicable, the requirements of funding bodies and project-specific protocols approved by the University's Research Ethics Committee;
- Available to others in line with appropriate ethical, data sharing and open access principles;
- Commensurate with the legitimate interests and protection of human participants of research data.

4.4 All new research proposals for funded research must include research data management plans that explicitly address data capture, management, integrity, confidentiality, retention, sharing and publication. Research data management plans will, where appropriate, use research funder templates or the Digital Curation Centre's DMPonline tool (<https://dmponline.dcc.ac.uk/>) to ensure that research data are available for access and re-use where appropriate and under the requisite safeguards. Research data management plans must be signed-off by Research, Innovation and Enterprise Services before a grant-funding application is made.

- 4.5** Research data must be stored in a managed environment that protects against data loss and corruption, unauthorised access and modification, and complies with relevant legal, regulatory, contractual, and other obligations for the period that it needs to be kept. In circumstances where institutional storage is not available (such as remote working or during fieldwork), the researcher should take steps to maintain the integrity of the data, and ensure that appropriate security measures are in place to prevent unauthorised access. The research data must be transferred into a managed storage environment at the earliest opportunity.
- 4.6** Research data created or captured by University researchers through funded projects should be offered to an appropriate data repository, or one designated by the Funder, except in circumstances that would breach Intellectual Property Rights (IPR), ethical, confidentiality, or other obligations. The deposit should take place upon completion of the research, or upon the publication of results, whichever maybe sooner. The data should be held for a period that meets relevant funder requirements (see 4.14). The University will also provide a Data Repository that may be used to manage funded research data over time, in such cases that deposit in an external repository is not possible.
- 4.7** When a dataset is lodged in an external data repository, a dataset record must also be created within the UWTSD research data repository. The UWTSD dataset record will detail where the dataset can be accessed. The dataset itself should not be duplicated in the UWTSD research data repository.
- 4.8** Research publications underpinned by funded research should include a short statement describing how and on what terms any supporting research data may be accessed, ideally via a formal citation. Researchers should therefore only publish research data with publishers (or responsible digital repositories) that provide persistent information for data, in the form of a persistent identifier. The normal standard to ensure persistent identification is the assignment of a Digital Object Identifier (DOI) for the dataset.
- 4.9** Research data should be accompanied by high-quality documentation and metadata to provide secondary users with essential information to independently understand the data, enable discovery, and allow for scientific re-use. Documentation should describe at least the origin of data, fieldwork and data collection methods, processing and/or the researcher's management of the data. Individual data items such as variables or transcripts should be clearly labelled and described.
- 4.10** In order to ensure that research teams get appropriate recognition for the effort involved in collecting and analysing data, those who undertake funded work may, where provided for in the terms of the grant agreement, be entitled to a limited period of 'privileged use' of the data they have collected to enable them to publish the results of their research. This period of privileged use shall not preclude the publication of metadata at the earliest opportunity. Where a delay in dissemination of deposited data is needed to allow grant holders to publish their research findings, an embargo period can be applied to the data. This embargo period should generally be no longer than 12 months from the end of the grant, but may be longer depending on circumstances. At the end of the exclusivity period the data must be made available on an open access basis. In cases where National Data Centres are used, these arrangements will be made directly with their officers. Where data is deposited in the UWTSD data repository the embargo period will be defined upon ingestion.
- 4.11** Publicly-funded research data that is not generated in digital format will be stored in a manner to facilitate it being shared in the event of a valid request for access to the data being received. The expectation in this regard is that originators convert and store such data in digital format in a timely manner. The process required for such access, and if

necessary, conversion, will be detailed in the research data management plan. In cases where conversion to a digital format is not possible, a copy of the UWTSD data-record should be printed and stored with the physical dataset.

4.12 In all cases, research data offered to a repository will be supported by a Research Data Management Plan. The plan must detail the manner in which the research data will be curated (e.g. the criteria used for the selection of data to be deposited, as distinct from the entire data set), the manner in which the selected data will be preserved for the full period of retention, in conformance with the UWTSD Records Management Policy and other relevant legislative, regulatory, or contractual obligations. Where necessary, appropriate safeguards should be put in place to protect participants and ensure that access conditions are met (e.g. anonymisation, access passwords, inclusion of rights statement) in compliance with the University's Research Ethics and Integrity Code of Practice.

4.13 The primary legislation in this respect to 4.12 is The Data Protection Act (1998) which requires that data obtained from research with people must be anonymised so that individuals, organisations or businesses cannot be identified before it can be shared with other researchers or archived. The Act applies only to personal, sensitive personal and confidential data, and not to all research data in general, nor to anonymised data, guidance on which are provided in Table 1. A person's identity can be disclosed from: a) direct identifiers such as names, addresses, postcode information, telephone numbers or pictures; b) indirect identifiers which when linked with other publicly available information sources, could identify someone, e.g. information on workplace, occupation or exceptional values of characteristics like salary or age. Guidance on the requirements of the Act can be provided by Research, Innovation and Enterprise Services and the University's Data Controller. Information is also available on the University's Research Data Management webpages.

Table 1. Data Protection.

Personal data
Personal data are data which relate to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, the data controller and includes any expression of opinion about the individual and any indication of the intentions of the data controller. This includes any other person in respect of the individual (Data Protection Act 1998).
Confidential data
Confidential data are data given in confidence or data agreed to be kept confidential, i.e. secret, between two parties that are not in the public domain, such as information on business, income, health, medical details, and political opinion.
Sensitive personal data
Sensitive personal data are defined in the Data Protection Act 1998 as data pertaining to a person's race, ethnic origin, political opinion, religious or similar beliefs, trade union membership, physical or mental health or condition, sexual life, commission or alleged commission of an offence, proceedings for an offence (alleged to have been) committed, disposal of such proceedings or the sentence of any court in such proceedings.

4.14 Research data generated through funded projects, and any associated records should be retained for as long as they are of continuing value to the researcher and the wider research community, and as long as specified by research funder, patent law, legislative and other regulatory requirements. In general, as specified in the RCUK

'Guidance on best practice in the management of research data' the UK Research Councils expect data that underpins findings in publications should be accessible for at least ten years after publication. Individual Research Councils' and other funders' data policies and good research practice guidance provide additional requirements and should be consulted and retention periods specified in each Research Data Management Plan. In many instances, researchers will resolve to retain research data and records for a longer period than the minimum requirement. If research data and records are to be deleted or destroyed, this should be done so in accordance with particular concern for confidentiality and security.

- 4.15** Where permitted, the management and sharing of research data should be supported through the allocation of research funding. Such funding should seek to recover the costs of any need for long-term curation and dissemination that requires the provision of staff and system resources. Information Technology and Systems will provide a schedule of associated costs.
- 4.16** Rights assigned to funded research data should not unnecessarily restrict its management, sharing or use. The ability to store, manage, share and use research data is dependent upon intellectual property rights being understood and allocated from the outset of the research process. Rights information indicating ownership and permitted use of research data should be clear and unambiguous and documented in consent forms, contracts, and partnership or collaboration agreements. Researchers are encouraged to apply a licence that enables research data to be accessed and analysed and reused by many parties, such as CC-BY licence. All rights should be in accordance with the University's Intellectual Property Policy.
- 4.17** Subject to third party interests, and in accordance with the University's Intellectual Property Policy, research data which supports a scholarly work produced by a member of University staff, shall be owned by the University and retained for an appropriate period of time in accordance with Point 4.14. This period may extend beyond the period of employment of the staff member with the University.
- 4.18** Subject to third party interests and in accordance with the University's Intellectual Property Policy, research data which supports a scholarly work produced by a student of the University, will remain the intellectual property of the student and be retained for an appropriate period of time in accordance with Point 4.14.
- 4.19** Where research is supported by a contract with, or a grant to the University that includes specific provisions regarding ownership, retention of and access to data, the provisions of that agreement will take precedence.

5. Monitoring

The University will review the content and implementation of this policy on an annual basis. The review will take place prior to the beginning of the academic year to allow for any revisions to be approved by Senate / Council by December / January each year. Implementation of the Policy will be monitored by the Open Access Steering Group. Membership of the Group shall include one representative from Research, Innovation and Enterprise Services (Chair); Library and Learning Resources, Information Technology & Systems and two Faculty representatives. The Open Access Steering Group will report to the Research Committee.

6. Take-down Policy

The University will make every reasonable effort to ensure that all data published in the UWTSD data repository complies with the Law of England and Wales (English Law). However, should any employee, student or third party feel that certain content in some way infringes English law or rights the University will, upon notification, review the legal status of the relevant material and remove it if the complaint is found to be valid. Valid grounds for the removal of content from the repository include (but this is not an exhaustive list):

- Violation of intellectual property rights, including copyright;
- Breach of moral or other rights protected by law (for example, derogatory treatment of work, libel, data protection, privacy);
- Ethical issues including plagiarism, falsified research, and the failure to adhere to ethical guidelines;
- Issues of National security.

To register a complaint, the complainant should contact the Chair of the Open Access Steering Group using the email address researchdata@uwtsd.ac.uk. The following information should be included:

- Contact details;
- Details of the item (title, author, URL, etc.);
- A description of the grounds for the complaint including any evidence or proof.

On receipt of the complaint, the Chair of the Open Access Steering Group will:

- Acknowledge that the complaint has been received;
- Make an initial assessment of the validity of the complaint;
- Temporarily remove the item from public view if further investigation is required.

Following the initial assessment, if a complaint is judged to be invalid, no further action will be taken and the complainant will be informed of this decision; valid complaints will be investigated by the Chair of the Open Access Steering Group, the author of the item in question and, if necessary, the University's Corporate Services Unit. All attempts will be made to resolve the issue swiftly and to the satisfaction of both the complainant and the author.

If, as a result of investigation, the item concerned is judged to have infringed an aspect of English law, it will be permanently withdrawn from the repository. A historical metadata record of the withdrawn item accompanied by a notice detailing reasons for withdrawal will remain in the repository but will not be accessible by the public.

7. Links to other policies / procedures

This policy should be read with reference to the following policies and codes of practice as amended from time to time:

- Records Retention Schedule
- Research Integrity and Ethics Code of Practice
- Intellectual Property Policy
- Acceptable Use Policy
- Copyright Policy
- Data Protection Policy
- Records Management Policy
- Open Access Publication Policy

Primary legislation:

- Freedom of Information Act 2000
- Data Protection Act 1998
- Environmental Information Regulations 2004
- Human Rights Act 1998. Article 8

8. Resource Implications

Implication	Detail
Finance	Annual costs of £5574 for the hosting of the EPrints repository have already been budgeted from within the general Information Technology and Systems departmental budget. Additional storage requirements for research data on funded projects, such that is identified in the respective Research Data Management Plan, will be costed into the grant and met by those funds.
Staff	The application of the Policy can be absorbed by current staffing.
Assets	Any additional storage requirements and related IT costs, for research data on funded projects will be costed into the grant and met by those funds.
Partners	The policy is an expectation for accessing RCUK grants, and is an emerging expectation from HEFCW, the EU and other funding agencies regarding provision of a World class research environment. The policy will positively impact research collaborators who need to exchange data across diverse platforms and demand effective systems to store, access and share data securely across multi-institutional research teams.
Timescales	The policy is a requirement for accessing RCUK grants and will be implemented upon the completion of the Research Data Repository and training resources, expected in December 2015. The Policy should be implemented at that point, or soon thereafter, upon which a programme of staff development will be

	undertaken. The policy will be monitored and reviewed annually.
Leadership	Professor Mike Phillips

9. Impact Assessment

Implication	Impact Considered (Yes/No)	Impact Identified
Legal	Yes.	<p>Primary legislation to which the Policy relates include:</p> <ul style="list-style-type: none"> • Freedom of Information Act 2000 • Data Protection Act 1998 • Environmental Information Regulations 2004 • Human Rights Act 1998. Article 8 <p>The Policy also has provision regarding intellectual property rights (including copyright, trade secrets and database rights).</p>
Contribution to the Strategic Plan	Yes	The policy contributes to the University's Research Strategy in ensuring that our research activity and outcomes influence the evidence base of policies developed in Wales and beyond. The policy will contribute to University's research environment and ability to generate research income.
Risk Analysis	Yes	Research data management is essential for the good governance of research. The Policy mitigates risk of loss of income from non-compliance with funding agency expectations; mitigates risk of loss or corruption in the non-secure storage of research data, transferring that to external providers for long-term archiving and manages legal and ethical risks associated with data security, integrity & confidentiality.
Equality	Yes	The provision of training and communication associated with this Policy will take into consideration those with protected characteristics.
Welsh Language	Yes	Once approved the Policy will be made available bilingually. The web-resources which will underpin successful policy implementation will be hosted bilingually while the data repository will have a bilingual interface.
Environmental and Sustainability	Yes	Successful implementation of the Policy will allow users to store, access and communicate electronically as an alternative to less sustainable means. The Policy recognises that publicly funded research data are a public good, produced in the public interest and that public access to it remove the costly duplication of resources

		associated in generating it.
Communication/ Media / Marketing	Yes	Research, Innovation and Enterprises Services and Library and Learning Resources will promote internal awareness of the policy and its implementation through staff development events, web-based resources and other forms of advocacy. This will ensure that internal awareness of publicly-funded research data holdings are achieved, and that researchers and research students have a general awareness of the regulatory environment. Published research papers will include a short statement describing how and on what terms any supporting research data may be accessed while the data repository will be promoted to an external audience through Corporate Communications.

Policy author(s):

Dr. Matt Briggs. Executive Research Development Officer

10. Document version control

Version No:	Reason for change:	Author:	Date of change:
0.1	Approval of Policy at Research Committee	MB	
0.2	Proof reading amendments	CG	

Current status of Policy: Approved

The Policy is applicable to: The Dual Sector Group (i.e. UWTSd FE and HE)

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