



Research Data Management Policy

1 Introduction/Context

The effective management of research data is becoming increasingly important. UK Research and Innovation (UKRI) has affirmed that making research data available to users is a core part of its remit. UKRI's Common Principles on Data Policy¹ states that 'Publicly funded research data are a public good, produced in the public interest, which should be made openly available with as few restrictions as possible in a timely and responsible manner that does not harm intellectual property.'

Northumbria University recognises that data from its research should be well-managed to benefit the researcher, the University and the wider community. As such, there is an obligation to record, store and archive research data appropriately, in a way that is proportionate in terms of security and retention, and allows for sharing of data to contribute to the impact of the research. It is recognised that types of data used, collected and generated will vary between different disciplines. The approach taken in this policy is to be sensitive to these differences while ensuring that good practice is promoted and funder requirements are met.

This policy should be read in conjunction with other University policies, notably the Records Management Policy², the Research Ethics and Governance Handbook³, and the Data Protection Policy⁴.

2 Scope

The policy applies to all research conducted by staff and postgraduate research students at the University, regardless of whether it is funded or unfunded. The policy does not normally apply to activities such as surveys used to improve service provision, conducted by Students' Union or Service Departments, or to undergraduate work, unless it is included in scholarly publications.

3 Definition of Research

Research in the context of this policy is based on the Higher Education Funding Council for England (HEFCE) Research Excellence Framework (REF) 2014 definition, contained in Annex C of the 'Assessment Framework and Guidance on Submissions'⁵, which defines research as 'a process of investigation leading to new

¹ <https://www.ukri.org/funding/information-for-award-holders/data-policy/common-principles-on-data-policy/>

² <https://northumbria-cdn.azureedge.net/-/media/corporate-website/new-sitecore-gallery/services/legal/gdpr/pdf/201803recmanpolicyv3.-d-0.pdf?la=en&modified=20180524092603&hash=D1EA7AFA4D70756347E129CCE2E572CB5DEE06A7>

³ <https://northumbria-cdn.azureedge.net/-/media/corporate-website/new-sitecore-gallery/research/documents/pdf/northumbria-research-ethics--governance-handbook.pdf?modified=20190305153453&la=en&hash=0A38BE82CF2E4AD8A2AF51A1448EA6DAA99C75FF>

⁴ <https://northumbria-cdn.azureedge.net/-/media/corporate-website/new-sitecore-gallery/services/legal/gdpr/pdf/201804gendataprotectionpolicyv1.-d-0.pdf?la=en&modified=20180524092534&hash=979D755170FD92BE00268E924DA298A3E5C412AA>

⁵ <http://www.ref.ac.uk/2014/pubs/2011-02/>

insights, effectively shared.’ It **includes** work of direct relevance to the needs of commerce, industry, and to the public and voluntary sectors; scholarship; the invention and generation of ideas, images, performances, artefacts including design, where these lead to new or substantially improved insights; and the use of existing knowledge in experimental development to produce new or substantially improved materials, devices, products and processes, including design and construction. It **excludes** routine testing and routine analysis of materials, components and processes such as for the maintenance of national standards, as distinct from the development of new analytical techniques. It also **excludes** the development of teaching materials that do not embody original research.

4 Definition of Research Data

For the purposes of this policy, research data refers to any material collected, observed or created for the purpose of analysis and on which research conclusions are based. Research data may be numerical, descriptive or visual, and can be digital, paper-based or in other forms.

5 Definition of Researcher

For the purposes of this policy, researchers are defined as members of the University, including all staff and postgraduate research (PGR) students, and those conducting research on University premises or using University facilities.

The policy excludes Postgraduate Taught and Undergraduate students, unless their research findings are included in scholarly publications.

6 Governance

- i) The policy is approved by Research and Knowledge Exchange Committee, and monitored through the Research Data Management Working Group.
- ii) The policy will be reviewed annually.

7 Principles

The principles which underpin the use and management of research data by University staff and students are set out below. These principles are consistent with the principles of data protection set out in Article 5 of the General Data Protection Regulation⁶ and satisfy the requirements in Schedule 1, Part 4, 39 of the UK Data Protection Act 2018:

- i) Research data will be managed throughout the research data lifecycle⁷ in accordance with the University’s policies, guidelines and standards, and funder, legislative and ethical requirements.
- ii) Research data shall in most cases be collected for the purposes of creating new knowledge which is shared with others through publication and dissemination. In these cases, research is normally deemed to be ‘a task in the public interest’ (principles of lawfulness and purpose limitation Art.6 GDPR). In cases where special category data are being processed, then an additional condition will apply. For most research carried out by the University

⁶ <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/principles/>

⁷ <http://www.dcc.ac.uk/resources/curation-lifecycle-model>

this will normally be that processing is necessary for 'scientific or historical research purposes or statistical purposes' (GDPR Art.9).

- iii) Data management plans should be written for all new research projects, regardless of whether submission of such plans is required when applying for research funding. The plan must address how the data will be captured, managed, stored, retained, shared, published, and how any confidentiality and data protection issues will be addressed.⁸ See also Section 10 for further guidance on data management plans.
- iv) Personally identifiable data should be anonymised or pseudonymised where possible as soon after collection as possible. Where researchers can undertake some or all of their research activities without using identifiable personal data, they should make arrangements to do so (principle of data minimisation). Where research requires the processing of personal data, and where the University is the data controller, then there must be a clear legal basis for processing and this must be communicated to the data subject (principle of lawfulness, fairness and transparency).⁹
- v) Where personal data are stored and processed for research purposes by University staff this must be carried out in accordance with the University's information security policy (principle of integrity and confidentiality).¹⁰
- vi) Data should be made available for access and re-use where legally, ethically and commercially appropriate.
- vii) Researchers must provide sufficient metadata and explanatory documentation about their research data to ensure that data are discoverable, understandable and re-useable. Such metadata will be published by the University, normally within 12 months of the data being generated. If access to data is restricted, the metadata should outline the reasons for this and the conditions which need to be met for access to be granted.
- viii) Data must be retained in an appropriate format for a period of at least 1 year from the end of the project for low risk projects, 3 years for moderate risk projects and 7 years for high risk projects, in accordance with the University's Research Records Retention Schedule (principle of storage limitation)¹¹, unless other funder regulations apply (for example, EPSRC stipulates a retention period of 10 years, plus an additional 10 from the last date at which access to the data was requested by a third party). Where possible and applicable, research data that are not in a digital format will be digitised to facilitate access.
- ix) Where possible, or if mandated by the funder, retained data must be submitted to an appropriate archive or database for long-term preservation.

⁸ Plans should be developed at proposal stage to ensure that potential costs of data management are included in the bid, and recorded on Northumbria's Ethics Online portal when applying for ethical approval.

⁹ Further information on processing of personal data under the General Data Protection Regulation can be found here: <https://www.northumbria.ac.uk/about-us/leadership-governance/vice-chancellors-office/legal-services-team/gdpr/gdpr---principles/>

¹⁰ <https://one.northumbria.ac.uk/hr/home/organisationaldevelopment/Documents/Forms/AllItems.aspx>

¹¹ <https://www.northumbria.ac.uk/about-us/leadership-governance/vice-chancellors-office/legal-services-team/records-management/records-retention-schedule/>

Researchers should avoid retaining data using methods that might not persist for 10 years, such as project websites.

- x) All data which are created as part of research at Northumbria University must be registered with the University, even if the data are hosted elsewhere. All reasonable steps must be taken to ensure that research data are not stored in a jurisdiction that offers lower levels of protection than are available in the UK.
- xi) Published papers should include a statement describing how, and on what terms, supporting research data may be accessed.

8 Data Management Responsibilities

- i) The most senior Northumbria researcher associated with a research project (whether funded or unfunded) is the Data Lead for that project and is ultimately responsible and accountable for research data management within that project.
- ii) For funded projects, the Data Lead will normally be the Principal Investigator.
- iii) For Postgraduate Research Students, the Data Lead will normally be the Principal Supervisor.
- iv) The Data Lead is responsible for ensuring that all research staff and students working on a project are aware of the University's data management policy and supporting guidelines and procedures, and for reviewing data management plans annually. The Data Lead may assign specific data management responsibilities to other researchers on a project.
- v) In the absence of the Data Lead, responsibility for research data management devolves to the department Research and Innovation Lead.
- vi) Stakeholders and Services across the University will work together to create a robust infrastructure for the research data lifecycle.

9 Implementation and Communication

- i) The University will provide training, support, advice and guidance regarding research data management through the researcher development training programme (including the PGR training programme) and web-based guidance.
- ii) The University will provide mechanisms and services for storage, backup, registration and retention of research data during a research project and after its completion.

10 Further Guidance

The University Library has published comprehensive guidance on research data management: <http://library.northumbria.ac.uk/research-data-management>

Further guidance on producing Data Management Plans is available through the Digital Curation Centre:

<https://dmponline.dcc.ac.uk/>

Information on RCUK individual funder policies is available through:

<http://www.dcc.ac.uk/resources/policy-and-legal/funders-data-policies>

Approved by Research and Knowledge Exchange Committee by Chair's action on 29th October 2018. In light of the changing landscape around RDM the Policy is subject to annual review.