Research Data Management – UCD Policy

Policy owner	UCD Research & Innovation	**Approval date and body**	GA, 25th June 2020

1.   Purpose

University College Dublin recognises that the management of research data is fundamental to both high quality research and academic integrity. Accurate and retrievable research data is an essential component of any research project and is necessary to verify and defend the process and outcomes of research.

Research data is valuable to researchers for the duration of their research, and may well have long-term value for research, teaching and for wider exploitation for the public good by individuals, government, business and other organisations.

The objective of the Research Data Management (RDM) Policy is to provide a framework for the management of research data to ensure that research data is stored, retained, made available for use and reuse, and disposed of according to best international practices for data management, as well as in compliance with legal, statutory, ethical, contractual and intellectual property obligations, and the requirements of funding bodies and publishers.

2.   Definitions

UCD Community means
- all UCD employees, whether part time or full time, permanent or temporary;
- all employees of UCD's wholly owned subsidiary companies or overseas campus/offices;
- all registered students of UCD;
- non-University employees who use University funds, facilities or other resources, including the University's name and reputation, to carry out teaching and/or research, and/or participate in UCD-administered research, including retired employees, visiting faculty and researchers; consultants, contractors, affiliated hospital staff, industrial personnel and research fellows, regardless of obligations to other companies or institutions; and
- all persons conducting teaching and/or research at or under the auspices of UCD including at any of UCD's overseas campus, including visiting faculty and researchers; consultants; contractors, Emeritus or adjunct appointments; and research fellows.

Researchers are defined as members of the UCD Community carrying out research.

Research data is information collected to be examined and considered, and to serve as a basis for reasoning, discussion or calculation. It is used as a primary source to support technical or scientific enquiry, research, scholarship, or artistic activity, is used as evidence in the research process, and/or is commonly accepted in the research community as necessary to validate research findings and results. Examples of research data are experimental data, observational data, operational data, third

party data, public sector data, monitoring data, or repurposed data. The focus in this policy is on research data that is available in either electronic or paper form.

Research data lifecycle is the sequence of stages that a particular unit of data goes through from its initial generation or capture to its eventual archival and/or deletion at the end of its planned life.

A **secure environment** is a system or facility which implements the controlled storage and use of research data.

A **data management plan** or DMP is a formal document that outlines how data is to be handled both during a research project and after the project is completed. Data management plans must assure that research data is traceable, available, authentic, citable, properly stored and that it adheres to clearly defined legal parameters and appropriate safety measures governing subsequent use.

3.   Scope

The scope of the policy covers research data created or managed by Researchers.

4.   Principles

(1) The University promotes best practice for research data management through clear policy, guidance, supervision, training and support.

(2) Researchers, service providers and, where appropriate, research sponsors and external collaborators should work in partnership to implement good practice.

(3) Research data will be managed by Researchers to the highest standards throughout the research data lifecycle as part of the University's commitment to research excellence.

(4) Research data should be compliant to the principles of FAIR data (Findable, Accessible, Interoperable, Re-Useable):
- Findable: Identifiable, retrievable, and available when needed;
- Accessible: Able to be made available to others in line with appropriate legal, statutory (including data protection regulations), ethical, contractual, intellectual property, data sharing and open access principles in a suitable repository or archiving system with persistent identifiers.
- Interoperable: Should be accurate, complete, authentic and reliable, and where possible made available in non-proprietary formats that facilitate data exchange and re-use;
- Re-Useable: Assigned a licence for open use where possible in compliance with intellectual property rights, and if no third-party rights, data protection, legal requirements or property laws prohibit it.

(5) Research data should be kept in a manner that is compliant with legal and ethical obligations and, where applicable, the requirements of funding bodies, publishers and protocols set out in the National Policy Statement on Ensuring Research Integrity in Ireland.

(6) Research data should be retained in a secure environment for as long as it is of continuing value to the researcher and the wider research community, and as long as specified by research funder, publisher, patent law, legislative and other regulatory requirements. The normal minimum retention period for research data is **ten years** after publication or public release of the work of the research. (Longer periods apply in certain cases, such as in relation to historical data.) If data includes personal or sensitive information, informants must be informed of the data retention policy at the time data is collected, in compliance with data protection regulations.

(7) If research data is to be deleted or destroyed, either because the agreed period of retention has expired or for legal or ethical reasons, this should be done so in accordance with all legal,

All policies and policy related documents and forms are subject to amendment. Please refer to the UCD Governance Document Library website for the official, most recent version.

2

ethical, research funder and collaborator requirements and with particular concern for confidentiality and security.

(8) If a personal data breach occurs, it is to be dealt with in accordance with UCD data protection policies.

(9) Increasingly, research projects are funded by external parties and/or involve collaboration with third parties such as other research performing organisations, charities, industry, etc. In such cases, contractual requirements such as the funder's terms and conditions, grant agreement(s), collaboration agreement(s), industry contract(s) etc. may apply to the project. These contractual requirements constitute legally binding obligations on the University and the Researchers involved in the project, and often include specific provisions regarding ownership, management, retention and access to data, confidentiality obligations, IT security, publication requirements etc. Contractual obligations apply in addition to the principles and requirements contained in this policy. If there is a conflict between this policy and a contractual obligation, the contractual obligation will override the requirements of this policy and it is the researcher's responsibility to ensure compliance.

5. Roles and responsibilities

Researchers are responsible for:

- Managing research data in accordance with the principles above;
- Developing and documenting clear procedures for the collection, storage, use, re-use, access and retention or destruction of the research data and records associated with their research. This shall include, where appropriate, defining protocols and responsibilities in a joint or multi-institution collaborative research project. This information should be incorporated, where appropriate, in a research data management plan. For research that includes personal data, the researcher needs to identify what contracts or agreements with collaborators or contractors are required to satisfy data protection obligations;
- Planning for the ongoing custodianship (at the University or using third-party services) of their data after the completion of the research or, in the event of their departure or retirement from the University, reaching agreement with the Head of School/Institute Director (or their nominee) as to where such data will be located and how this will be stored. Where personal data is part of the research data, it has to be assured that any agreement made is in line with the communication provided to and reasonable expectations of research participants;
- Ensuring that any requirements in relation to research data management placed on their research by publishers, funding bodies or regulatory agencies or under the terms of a research contract with the University are also met.

The University provides resources to facilitate Researchers in meeting their responsibilities, in the form of supporting services and expert advice as well as technical infrastructures. Information on available supports is available at the online UCD Research Portal. The University is committed to, and will maintain oversight of, good practice in research data management. To this end, it reserves the right to verify that all research data has been kept in a manner that is compliant with this policy and, where applicable, the requirements of funding bodies and publishers.

6. Personal data and the General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) came into force on 25 May 2018. It is intended to strengthen data protection for individuals across the EU, and imposes increased obligations on organisations that process personal data. Processing is very broadly defined as the collection, storage, recording, disclosure of, structuring, making available and erasure or destruction. The GDPR

All policies and policy related documents and forms are subject to amendment. Please refer to the UCD Governance Document Library website for the official, most recent version.

3

applies to the processing of personal data by controllers and processors in the EU, regardless of whether or not the processing takes place in the EU, and furthermore it restricts the transfer of personal data to locations outside the EU unless certain conditions or safeguards are in place. At the core of the GDPR are seven principles which must be observed by all data controllers and processors. These are transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality and accountability.

The definition of personal data is broad under the GDPR and encompasses "*any information relating to an identified or identifiable natural person*". The GDPR specifically includes "*location data*", "*online identifiers*" such as IP addresses and "*genetic*" data as examples of personal data. Certain categories of personal data attract a greater level of protection under the GDPR. These include: personal data relating to racial/ethnic origin, political opinions, religious/philosophical beliefs, trade union membership, health and biometric data, and data concerning sex life or sexual orientation. However, the GDPR does not apply to fully anonymised or aggregated data where a living individual cannot under any circumstances ever be identified or singled out.

If your research data includes personal data as defined under the GDPR it is very important that the following are consulted: Article 9 of GDPR, UCD GDPR website and the Health Research Board's GDPR guidance for researchers.

7.   Related documents
- UCD Information Security Management Policy
- UCD Data Protection Policy
- UCD University Records Management Policy
- UCD Intellectual Property Policy
- UCD Research Integrity Policy and Procedure
- UCD Code of Responsible Conduct of Research
- UCD Funded Research Activity Policy
- UCD Code of Good Practice in Research with Humans and Animals
- UCD Research Ethics Policy
- National policy statement on ensuring research integrity in Ireland
- EU General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- Data Protection Act 2018 (Section 36(2)) (Health Research) Regulations 2018
- The European Code of Conduct for Research Integrity

8.   Acknowledgements

University College Dublin wishes to acknowledge the use of the following documents whilst formulating this policy.

- The University of Oxford Policy on the management of research data and records
- The National Open Research Forum (NORF) document on National Research Data Principles for Ireland
- League of European Research Universities (LERU): LEARN research data management toolkit
- The University of Edinburgh Research Data Management Policy
- University of Tasmania: Management of Research Data Policy

9.   Version history
- V1.0   Approved by RIIG 27/02/2020
- V1.0   Approved by UMT 18/03/2020

All policies and policy related documents and forms are subject to amendment. Please refer to the UCD Governance Document Library website for the official, most recent version.

4

- V1.0   Noted by ACEC 18/05/2020
- V1.0   Approved by GA 25/06/2020