University of Sussex Research Data management Policy

1. **OVERVIEW AND PURPOSE**

1.1   This policy articulates the University's approach to Research Data Management.

1.2   The University recognises that research data are a valuable research output[1], and that a systematic and rigorous approach to research data management and reproducibility[2] are essential for upholding the principles of research integrity that underpin institutional excellence in research. This policy exists in parallel to the *Code of Practice for Research* which outlines standards for professional conduct expected of all staff and students engaged in research, and supports the principles of the Sussex 2025 strategic framework.[3]

1.3   The University supports the various mechanisms by which its research can be accessed, used, reused, cited and built upon, thereby contributing to a fairer knowledge economy and upholding the principles of Open Research.

2. **SCOPE**

2.1   For the purposes of this policy, research data is defined as follows:

Research data are collected, observed or created, for the purposes of analysis to produce and validate original research results.

Research data includes all materials which are created in the course of research, including but not limited to field notebooks, online questionnaires, interview transcripts, data captured from lab equipment, digital models, algorithms and scripts, video and audio images.

Research data does not include incidental or administrative data generated in the course of research, or in the administration of teaching, or secondary literature such as materials used as part of a literature review.[4]

2.2   This policy covers all data collected during the process of research, both funded and unfunded.

2.2.1   Where they are more stringent, funder requirements on data sharing, archiving and retention length should take precedence over institutional requirements.

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[1] https://www.sussex.ac.uk/research/about/strategy/declaration-on-research-assessment
[2] https://www.ukrn.org
[3] https://www.sussex.ac.uk/strategy/
[4] See the University Master Records Retention schedule for details on how long to retain these documents. https://www.sussex.ac.uk/ogs/information-management/records-management/mrrs

2.3   It applies to all members of the University involved in the creation, collection or curation of research data.

2.3.1   Undergraduate and taught postgraduate student projects which collect data are subject to this policy where it relates to following good practice in research and management of research data, which includes ethical handling of data. These projects are not required to publish and/or retain data unless the data has value recognised by their supervisor. Students should retain data until their qualification has been awarded at graduation.

3.   RESPONSIBILITIES

Research data management (RDM) activities should be undertaken in light of the goals of the University's Sustainable Sussex strategy, with sustainability a key consideration when making decisions on which storage solutions to purchase or use, and as part of the curation process when deciding which data to keep in the long term.

3.1   All Sussex staff and students

All University of Sussex (UoS) staff and research students should create data management plans (DMPs) to document how they will manage their data across the research data lifecycle.

All staff and research students should:

   i.   Develop and record appropriate procedures and processes to collect, store, use, reuse, access and retain research data associated with their research;
   ii.   Establish and document agreements for managing research data when involved in a joint research project, collaborative research, or research undertaken in accordance with a contractual agreement;
   iii. Include within research grant proposals appropriate consideration of the cost and time implications of data storage and management;
   iv.   Ensure that the integrity and security of their data is maintained;
   v.   Be aware of their obligations and professional responsibilities when handling data protected by the UK Data Protection Act (2018), European Union General Data Protection Regulation (2018) and any other applicable data protection legislation;
   vi.   Plan for the on-going custodial responsibilities for the research data at the conclusion of the research project or on departure from UoS;
   vii. Plan for the destruction of research data (if required) as outlined in their DMP

3.2   Directors of Research & Knowledge Exchange

In addition to the recommendations made in 3.1, Heads/DRAKEs should:

   i.   Promote best practice in all aspects of research including Research Data Management. They should ensure that staff and students are aware of their responsibilities and obligations.

ii.   Identify and implement any training or skills development required by researchers to execute their responsibility.
iii.   Authorise procedures adopted by staff and student researchers (following consultation with their supervisor) for the collection, storage, use and, if required destruction, of their research data.
iv.   Establish and implement departmental procedures for the storage and retention of research data in line with UoS policy or legislative obligation.
v.   Ensure staff and research students conducting human research are aware of, and appropriately trained in, all of their responsibilities and obligations relating to research data collected in the course of their research.
vi.   Ensure questions relating to data compiled by members of their department can be addressed; particularly those relating to appropriate retention periods, access permissions, and any restrictions that should be applied to re-use and repurpose existing data.

3.3   **Principal Investigators (PIs)**
       As described for research staff above, and in addition

i.   Ensure members of their research team have access to the project DMP
ii.   Identify and implement any training or skills development required by researchers to execute their responsibility.
iii.   Monitor implementation of the DMP by the project team.

3.4   **Library Research Data Management staff**
       Library RDM staff are responsible for providing guidance and support relating to good Research Data Management practice, and can advise researchers on:

i.   Planning and writing data management plans;
ii.   Identifying and understanding research funders' requirements;
iii.   Depositing, sharing and citing research datasets in external and local repositories;
iv.   Use of Sussex Figshare

3.5   **IT Services Research Support Team**
i.   Provide large scale, high performance networked storage
ii.   Provide a bespoke set of research storage servers
iii.   Advise on technical solutions for research projects; specifying, procuring and deploying servers and configuring access.
iv.   Support secure transfer of data between institutions

3.6   **School Technical Services teams**
       Supporting researchers with implementation of discipline specific tools and services

3.7   **Research Ethics, Integrity and Governance team**
i.   Provide guidance on the ethical handling and management of research data

ii. Provide initial support in the research governance of accessing external data necessitating institutional and ethics approval

3.8 **Research Development and Initiatives team**
   i. Provide initial support for research data management requirements in research funding applications
   ii. Signpost PIs and researchers to services, advice and guidance provided by other teams in developing research data management plans and costings for inclusion in research funding proposals.
   iii. Include advised costs in project budgets for internal approvals.

3.9 **RDM Steering Group**
   Contributing to and maintaining the RDM policy, ensuring that new developments and practices are included.

3.10 **PVC (Research and Enterprise)**
   Ultimately responsible for overseeing the implementation of the UoS Research Data Policy and ensuring that UoS complies with funder requirements.

3.11 **IT Services (overall)**
   Operating a helpdesk to support practical questions around use of tools.
   Supporting assessment of tools and resources for collecting data (eg new survey software).

4. **POLICY**

4.1 This policy takes as a framework the FAIR data framework, which indicates that data should be Findable, Accessible, Interoperable and Reusable.

   It is noted that there will be discipline specific practices and guidelines which will not be fully captured in this policy.[5]

4.2 **Data Management Planning**
4.2.1 Expectations of writing a DMP
   All research projects that include the collection and/or analysis of data should follow best practice and complete a data management plan (DMP) before the project begins. This establishes arrangements for research data management throughout the project lifecycle, and allows researchers to put in place systems and resources to support their work (including

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[5] For example https://www.gida-global.org/care, NHS Data and Security Protection Toolkit, and NHS Research Transparency strategy

planning for data capture, management, integrity, confidentiality, storage, retention, and transportation, sharing and publication.)

It is recommended that DMP Online, and the guidance included within, is used to help write a DMP.[6]

Where funders require a DMP, the plan should align with their templates and requirements. If the research project does not involve a funder which requires a DMP, the researcher should use a template proportionate to the type and scale of data to be collected eg the UoS template, or the UoS 'light' template.[7]

All projects which include the collection of personal data should have a DMP.

If the DMP identifies resources or tools that are necessary to support the research, it is the responsibility of the researcher to agree access to these resources in good time (eg additional storage space, use of HPC etc)

4.2.2   Support for DMP writing
The Library will provide training for writing DMPs, and review drafts which are sent to them. The University will provide access to the DMPOnline resource which supports DMP writing through templates for key funders. Where appropriate, the Library will maintain additional guidance for these templates within DMPOnline.

4.2.3   The PI should make the DMP available to all researchers working on the project. Ideally DMPs will be shared openly to facilitate knowledge sharing.

4.3   Ownership of research data/IP as it relates to academics/research students

All research data generated by UoS academics are wholly owned by the University (or funder) and remain with the University if the academic leaves the institution. The University IP policy provides more detailed guidance.[8]

4.3.1   Ownership or exclusive rights to reuse or publish research data should not be granted to commercial publishers, agents or others without retaining the rights to make the data openly available for re-use, unless this is a condition of funding.

4.4   **Management of data**

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[6] https://dmponline.dcc.ac.uk/

[7] These templates to be made available via DMPOnline
[8] http://www.sussex.ac.uk/staff/research/contractsandip/ip

4.4.1   Where the project requires the use of HPC and other specialist resources, this must be accounted for in the DMP. Support will be provided by ITS Research Support.

4.5   **Collection and use of personal research data**

4.5.1   Research which includes the collection and use of personal research data should have a DMP written in conjunction with the ethics review process.

4.5.2   Researchers should follow guidance set out in the Research Governance Standard Operating Procedures[9], and by the Division of General Counsel, Governance and Compliance in relation to Data Protection[10].

4.5.3   Researchers working with clinical research data should ensure they have full awareness of principles and regulations.

4.5.3   In line with funder requirements[11], research projects should explore the possibilities of ethically sharing research data before any data collection begins, seeking expert advice from funders where appropriate. If the data cannot be shared, it is the responsibility of the researcher to obtain agreement for this approach with the funder at the start of the project.

4.5.4   The researcher should use consent forms which make clear reference to data sharing and which do not unnecessarily place restrictions on future use. These should be reviewed by an ethics committee.

4.6   **Storage**

4.6.1   Security and back-up
         Researchers should ensure research data are kept securely. They should familiarise themselves with up to date security policies, and seek support where these policies do not cover the circumstances of their project.[12]

4.6.2   Throughout the project, data should be stored alongside sufficient metadata and documentation to allow the data to be retrieved and understood.

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[9] https://www.sussex.ac.uk/webteam/gateway/file.php?name=research-governance-standard-operating-procedures-june-2017.pdf&site=377

[10] https://www.sussex.ac.uk/ogs/policies/information/dpa

[11] https://v2.sherpa.ac.uk/juliet/ can be used to find funder requirements on open access, publication and data archiving.
[12] https://www.sussex.ac.uk/infosec/policies

4.6.3   One copy of research data should be held on Sussex services. PIs should ensure that access is not limited to a single person.

4.6.4   Researchers working away from campus should plan how data will be securely captured, backed up and transferred.

4.7   **Retention of data**

4.7.1   Data should be retained in line with funder requirements. If no funder requirements apply, data should be retained for at least 10 years from the close of the project.

4.7.2   If data have not been deposited into a repository, data which cannot be shared may be retained on University provided systems[13]. Researchers should have a clear plan for stewardship of this data during the retention period, for example if they leave the University, and for secure disposal.

4.7.3   DMPs should indicate when data are to be destroyed, and researchers should familiarise themselves with processes to ensure secure deletion of electronic data.

4.8   **Access and sharing**

4.8.1   Researchers should follow funder requirements on data sharing. When publishing and archiving data, researchers may need to make distinctions between their own research data which they have created, and research data which they are using but do not control (such as material from archives or existing datasets).

Where there are no funder requirements, UoS policy is for researchers to plan to share their data within 3 months of the end of the project.

4.8.2   Researchers should explore options for data sharing during their DMP writing, including seeking expert guidance from funders where appropriate. Where it is not possible to openly share research data due to ethical or commercial concerns, researchers should consider if access could be granted under restricted circumstances, for example after an embargo period has elapsed, or by requiring registration to access the data.[14]

4.8.3   Researchers should follow funder requirements to submit details of data held to a data registry during the course of the project.

4.8.4   In alignment with FAIR principles, research data should be discoverable and accessible. Researchers can achieve this by creating a repository record for their data which describes the dataset, even if the data are not freely available. Documentation to support the dataset should be made available alongside the data; this may include blank consent forms, template surveys and questionnaires, codebooks, and information on data processing. Where specific software or algorithms

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[13] Such as Box, OneDrive or a system agreed by ITS.
[14] Doctoral researchers and early career researchers should note that funders often have less stringent data sharing requirements for them.

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have been produced as part of the research, and are necessary to interpret the data, these should be provided.

4.8.5 Researchers should licence metadata and research data (where possible) with a licence that permits re-use.

4.8.6   Researchers should include a Data Access Statement with any published work, indicating where and under what circumstances the data underpinning the publication can be accessed. This may include reference to reasons why the data cannot be shared openly. If no new data were created, the Data Access Statement should indicate this.

4.8.7   Researchers should share negative results where these would be useful to the research community.

4.9   Research projects with external collaborators should define expectations and responsibility for data management within the DMP. Projects should create clear agreements about ownership of the data and responsibilities for long term storage/sharing. Technical requirements for transferring data between collaborators should be outlined, having been agreed with ITS.

4.10   Funded research projects requiring a collaboration agreement including the transfer of non-personal data should contact the RES Research Development team in the first instance to complete the instruction forms required.[15] Arrangements regarding the sharing or transfer of personal data within a collaboration agreement will be managed by the GDPR team.

5 LEGISLATION AND GOOD PRACTICE

5.1 The details of the Data Protection Act 2018 can be found at the following link:
http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted
5.2 FAIR principles for research data: https://www.go-fair.org/fair-principles/

Review / Contacts / References	
Policy title:	Research Data Management Policy
Date approved:	
Approving body:	
Last review date:	2014
Revision history:	
Next review date:	May 2023
Related internal policies, procedures, guidance:	

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[15] For collaboration agreements and non-personal data agreement enquiries to: contracts.instructions@sussex.ac.uk

Data Protection Policy:
https://www.sussex.ac.uk/ogs/policies/information/dpa/dataprotectionpolicy

Data Breach Reporting Process
https://www.sussex.ac.uk/ogs/policies/information/dpa/dataprotectionpolicy

Research governance standard operating procedure
https://www.sussex.ac.uk/webteam/gateway/file.php?name=research-governance-standard-operating-procedures-june-2017.pdf&site=377
[http://www.sussex.ac.uk/staff/research/governance]

Code of practice for research
https://www.sussex.ac.uk/webteam/gateway/file.php?name=code-of-practice-for-research-june-2018.pdf&site=377
http://www.sussex.ac.uk/staff/research/governance

Research Governance Standard Operating Procedures
https://www.sussex.ac.uk/webteam/gateway/file.php?name=research-governance-standard-operating-procedures-june-2017.pdf&site=377

University Master Records Retention schedule
https://www.sussex.ac.uk/ogs/information-management/records-management/mrrs

University policy on Exploitation and Commercialisation of Intellectual Property
http://www.sussex.ac.uk/staff/research/contractsandip/ip

Information Security Policies
https://www.sussex.ac.uk/infosec/policies
Information Classification and Handling Policy
Information Classification and Handling Matrix
IT asset Management Policy
Workstation Disposal Policy
BYOD Policy
Cryptography Policy
Backup Management Policy
Travelling abroad with University Information policy
Video conferencing policy

Open Access publication policy
https://www.sussex.ac.uk/webteam/gateway/file.php?name=open-access-publication-policy-final-290422-(1).pdf&site=269

Open Research statement
Pending May 22

Figshare policy
http://www.sussex.ac.uk/library/researchdatamanagement/findandshare/sure/policies
[Update pending May 22]

Policy owner:	Library

Lead contact / author:	Research Data Management Librarian