Research Data Policy 2022 Campus Fryslân
(March 2022)

1. Introduction

This document establishes the Research Data Policy of Campus Fryslân[1]. All research at Campus Fryslân falls under the Research Institute Campus Fryslân. This Research Institute will in the future be subject to external evaluation according to the Strategic Evaluation Protocol 2021-2027.
The Research Data Policy of Campus Fryslân aims to support sustainable digital storage, preservation, integrity and sharing of research data from non-public sources.

This document outlines the general policy relating to research data management at Campus Fryslân, and it lays out the specific procedures expected of all staff and PhD researchers. In 2018, Campus Fryslân installed an Ethics Committee, which oversees ethical issues in (PhD) research projects. It may be advisable to further align the Research Data Policy and the Ethics Policy in the future, given the entwinement of many of the issues involved.

For the practical implementation of the Research Data Policy, please see the companion document to this policy: Research Data Protocol 2021 Campus Fryslân.

Campus Fryslân's overall position is one that acknowledges the professionalism and competence of its academic staff and PhD researchers, while also acknowledging that it is the faculty's legal and social responsibility to provide appropriate oversight in an efficient way.

2. Governance and standing of this document

The research data policy document was developed by the secretary of the Research Institute Campus Fryslân and has subsequently been approved by the Board of the Research Institute Campus Fryslân and by the Faculty Board Campus Fryslân.

Campus Fryslân's Research Data Policy will be revised from time to time and is subject to changes in the various regulations that underpin it. It needs to be read alongside the following documents:
1. The *UG Research Data Policy*[2] establishes the framework for research data handling and management at the University of Groningen, with which faculties, research institutes, graduate schools and researchers have to comply.
2. The *Netherlands Code of Conduct for Research Integrity*.[3]
3. The *Netherlands Code of Conduct for Scientific Practice*.[4]
4. *The European Code of Conduct for Research Integrity*.[5]
5. The European *General Data Protection Regulation*.[6]

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[1] This document benefitted from the URSI Research Data Management Policy and Procedure, November 2018.
[2] https://www.rug.nl/digital-competence-centre/ug-research-data-policy-2021.pdf
[3] VSNU, KNAW, NFU, NWO, TO2 federatie, Netherlands Association of Applied Sciences, *Netherlands Code of Conduct for Research Integrity*, 2018.
[4] VSNU, The Netherlands Code of Conduct for Scientific Practice: Principles of good scientific teaching and research, 2004, revision 2012.
[5] ALLEA, *The European Code of Conduct for Research Integrity*, revised edition 2017.
[6] European Union, General Data Protection Regulation, 2018.

6. The *Strategy Evaluation Protocol* (SEP) 2021-2027.[7]

3. Rights and responsibilities relating to this policy

This protocol and the procedures it includes apply to all staff involved in research and to all PhD researchers in the Faculty. PhD researchers are responsible for complying with these requirements, but it is expected that there is appropriate oversight in their research practice and activities from their supervisors.

Besides familiarity with the expectations of research data management in general, for each specific research project, the following requirements apply.

a. Shortly after the start of a research project, the principal investigator (for a project of a staff member) or PhD researcher (for a PhD project) shall complete the Research Data Management Plan (RDMP), also in situations where there is no use of data, to ensure that the Faculty is exercising its oversight responsibility.
Should there be a significant change to data or methodology over the course of a project, it is the researcher's obligation to provide an update to the RDMP and to revise what is stored on the RDMP Tool. Researchers will be expected to adhere to the plan (as updated from time to time) and that they and the RDMP comply with the expectations described in this document.
b. Near the completion of the research project, the principal investigator or PhD researcher will store all data in an appropriate digital and, if appropriate, anonymized form in the Campus Fryslân Research Data Repository.

4. Overarching principles

This policy is informed by several key overarching principles that govern research at the University of Groningen:
- All research is to be undertaken in an ethical way paying due respect to all participants in the research process and to groups or individuals who might foreseeably be harmed by the research process or outcomes.
- Although there are many aspects to ethical research, the concept of informed consent is fundamental. Essentially, all research participants should be fully informed about all aspects of the research, including plans for the storage of data, and their informed consent should be obtained before their data is collected.
- Research methodologies, experimental design, data, data analysis, statistics, results and interpretations should be subject to peer review and scrutiny, and all researchers should be able to substantiate their choices, and be able to provide access for validation of the integrity of the data.
- Where research is publicly funded, the results of the research should be made publicly accessible, either through the provision of open access publications or by making short summaries available.
- Where feasible and ethically appropriate, researchers will make their data available as open access in appropriate facility.

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[7] VSNU, KNAW, NWO, https://www.vsnu.nl/files/documenten/Domeinen/Onderzoek/SEP_2021-2027.pdf, The Hague, March 2020.

- All data must be stored in a way that meets the European General Data Protection Regulation, specifically: all data must be securely stored, and all data must be anonymized as soon as practical if appropriate.

5. Research data management throughout the whole research process

In collecting, organizing, store and determining access to data, the following questions have to be answered:

   i.   What data are you going to collect?
   ii.   What type of data or what file formats are involved?
   iii. Where and how will you store your data? Which backup methods and procedures do you use?
   iv. How are you going to organise and describe your data?
   v.   Who can access your data, will the archived data become available to others?
   vi. If there is an embargo, how are you going to manage access?
   vii. Which data will be archived when the project is finished? Where and for how long?
   viii. Who owns the data? Who is responsible for the management of your data?
   ix. Is there a provision for the means necessary to implement this plan?

a. Planning research and data needs

In planning research and the methodology to be used, it is important to consider the ethical as well as practical implications of how the research is to be conducted and data collected and managed, especially the requirement to anonymize the data, where appropriate, as soon as practical. Awareness of the requirements should influence the design of the research methods or approach. The planning of the research must include the need to consider ethical issues and the requirements relating to data management.

b. Data collection

Data is to be collected in an ethically responsible way. During the data collection process, the security of data already collected must be ensured. For example, questionnaires should be securely stored. Audio or video recordings should be transferred to a password protected device as soon as possible. Initially, data is likely to be re-identifiable, with the identification kept separate to actual data; however, it should be anonymized as soon as practical, if appropriate.

c. Access to data during the research process

Except for legitimate requests relating to scientific integrity concerns, it is generally advisable to restrict access to data until such time that the researcher is completely sure that original research data have verified (for coding accuracy) and maybe until all publications being produced from the data are finalized. However, all research participants have a right to see any data that pertains directly to them, and can request that their data be removed from the data set where this is feasible.

d. Storage of data after the research is completed

In line with the Netherlands Code of Conduct for Scientific Practice and the policies of the University of Groningen, raw data must be stored for 10 years (to enable scrutiny in relation to concerns about matters of scientific integrity). After 10 years, data that has not been made open access should be destroyed. Note that all data must be fully anonymized as soon as practical to do so, where appropriate.

6. Responsibility for data management

'Ownership' is a word with legal implications, and strictly speaking the ownership status of data is complicated by the employment status of the researcher as well as of any grant funding received. Nevertheless, irrespective of the formal ownership of data, all researchers have a responsibility for care of data, and the University of Groningen has a responsibility relating to any research done under its auspices. Therefore, unless there is a specific agreement to the contrary, responsibility for data management relating to the data from a specific research project will be regarded as the responsibility of the principal investigator or PhD researcher indicated in the RDM Plan submitted for that project.

Responsibility for data in cases when the researcher leaves the University
In the case of PhD researchers finishing their PhD or a staff member leaving to go to another institution, for all completed projects, it will be expected that all data (anonymized, where appropriate) will be deposited in the Faculty Research Data Repository in an appropriate form. For ongoing projects that are to remain at the University of Groningen, an alternative principal investigator is to be nominated. Where a project is to be transferred to the new institution, this will need to be recorded in the RDM system.

Responsibility for data when a researcher joins the University transferring a project
In the case of a finished project, it will normally be expected that the previous institution continues to manage the data storage provisions into the future. In cases where a staff member transfers a project, the Faculty will accept responsibility for the project and future data storage responsibility.

Ownership and responsibility of data when cooperating with other organizations/institutions
This will be decided on a case by case basis, but for each project there must be a clear determination as to which institution will be responsible for management of data and compliance with the requirements of the European General Data Protection Regulation.

7. Implementing open access to data

University of Groningen policy is to have, in principle, all data publicly available. This policy is based on a "comply or explain" principle, meaning that exceptions to this policy are possible. A researcher may wish not to make the data publicly available when:
   a. Making the data publicly available would contradict any agreement as part of the informed consent process
   b. Where public release might have negative consequences for the people researched
   c. When there is an obligation or objective to protect results so that they can be commercially or industrially exploited (or reasonably expected to be exploited)
   d. Where public release could represent a security concern
   e. If open access would jeopardize achievement of the main aim of the research
   f. If there is any other legitimate reason not to publish the data.

If any of these reasons is to be claimed, the researcher will need to make this explicit in a letter to the Board of the Research Institute Campus Fryslân, which will make a decision as to whether or not the justification is sufficient.

8. Research data management tool

The Faculty makes use of the University of Groningen Research Data Management Tool. This tool supports the administration of the information about research data needed to secure adequate data management. The requirement will be for each project to submit a Research Data Management Plan using the Research Data Management Tool. This will need to be done near the start of each project.
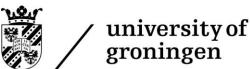
9. Faculty research data repository

The Faculty will manage a Research Data Repository. This will be in digital form and managed by the Research Data Management Officer. Researchers will be required to provide their data in an appropriate form (including anonymization, where appropriate). The function of the Faculty repository is to enable access only under certain specific circumstances relating to the need to be able to verify the data. Thus, researchers will also need to provide their data to an appropriate open access data provider. The Board of the Research Institute Campus Fryslân will be responsible for assessing any request to access data in the repository. Consistent with the prevailing requirements, data will be stored in this repository for a fixed period of 10 years. Note that the Faculty data repository is not an open access facility, it is merely established to allow scrutiny in relation to legitimate concerns about scientific integrity. To comply with the open access expectation, researchers will need to identify an appropriate open access data provider, such as might be provided by a scientific institute or a journal publisher.

10. Raising awareness of data management

The Faculty will take appropriate steps to inform staff and PhD researchers about the policy and expected procedures. Specifically all new PhD researchers will be required to complete a course covering research ethics and research data management issues. Furthermore, a special section in the PhD Training & Supervision Plan shall be dedicated to data management. Here, PhD researchers will be required to explain how they are planning to deal with research data.

11. Ensuring compliance

If researchers do not submit a RDMP within 6 months of commencement of the project, they will be sent a reminder to do this as soon as possible.

At the time of the 9 month go/no-go interview, all PhD candidates will need to declare that they are familiar with the Dutch Code of Conduct for Academic Practice; that they will obey this code. They will also be required to have completed a Research Data Management Plan using the Research Data Management Tool.

On completion of their PhD studies, the PhD Coordinator will interview all PhD researchers, and amongst other things, will ensure that all research data has been stored in the repository.

On termination of a staff member, the HR Department will be expected to ensure that any data from completed research projects has been stored in the repository.

12. Actions required of the Faculty

This Research Data Protocol implies that some actions need to be taken for this Research Data Protocol to be effective and efficient:

a. The Faculty needs to establish a Research Data Repository.
b. The Faculty will need to have a designated Research Data Management Officer to take overarching responsibility for the implementation of the Research Data Management Tool and the storage of data in the Faculty Research Data Repository.
c. The Board of the Research Institute Campus Fryslân will need to consider requests for exemption from the Open Access expectation of research data.
d. The Board of the Research Institute Campus Fryslân will need to consider requests for access to data stored in the Faculty Research Data Repository.
e. The Graduate School needs to monitor PhD researchers to ensure that they comply with the research data requirements.

The Research Data Policy 2021 Campus Fryslân has been approved by the Board of the Research Institute Campus Fryslân on 09-12-2022 and by the Faculty Board of Campus Fryslân on 01-03-2022.