Research Data Management Policy and Procedure

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1. **Introduction**

The social standing of academic inquiry and of universities in general will only be maintained and enhanced if all research is done in an appropriate and ethical manner, including protecting the confidentiality of personal information, while at the same time enabling peer review and verification of data. Therefore, conducting academic research requires compliance with a range of procedures and protocols that have been implemented at European, Netherlands and University levels. Of particular note is the legal requirement of the university to comply with the European General Data Protection Regulation. It is therefore important that all researchers are aware of and comply with this policy and the requirements and general expectations it discusses.

This document outlines the general policy relating to research data management in the Faculty of Spatial Sciences, and it lays out the specific procedures expected of all staff and PhD students based in the Faculty.

The Faculty’s overall position is one that accepts that its academic staff are professional and competent, but acknowledges 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**

This research data management (RDM) policy document was developed in response to a specific request from the University Board, and is consistent with university trends around the world. This document was developed by the URSI Executive and has subsequently been approved by the Faculty Board. This document will be revised from time to time and is subject to changes in the various regulations that underpin it. It also needs to be read alongside the following documents:

- the Faculty’s policy and procedures on [Research Ethics](#)
- the 2017 [University of Groningen Code of Conduct on Integrity](#)
- the [University of Groningen Research Data Policy](#)
- the 2018 [Netherlands Code of Conduct for Research Integrity](#)
- the [European Code of Conduct for Research Integrity](#)
- the [European General Data Protection Regulation](#)

3. **Rights and responsibilities relating to this policy**

This policy document and the procedures in it apply to all staff involved in research and all PhD students in the Faculty. PhD students are regarded as being responsible in their own right for compliance with these requirements, but it is expected that they are being appropriately overseen in their research practice and activities by their supervisors.

Apart from familiarity with the expectations of research data management in general, for each specific research project or PhD project, the following requirements apply.

1. Shortly after commencement of the research project, the principal investigator (for a funded project to a staff member) or PhD student (for a PhD project) needs to complete a Research Data Management Plan using the online tool available [click on this link](#). This must be done for all projects irrespective of their data requirements. In situations where there is no use of data, the RDM Tool is very easily completed, but
must be done 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 RDM Plan and to revise what is stored on the RDM Tool. Researchers will be expected to adhere to the plan (as updated from time to time) and that they and the Plan comply with the expectations described in this document.

2. Near completion of the research project, the principal investigator or PhD student will need to lodge all data in an appropriate digital and anonymised form in the Faculty Research Data Repository.

4. **Overarching principles**

This policy is informed by several key overarching principles that govern research at the University of Groningen and at universities in general:

- All research is to be undertaken in an ethical way paying due respect to all participants in the research process.
- 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 has been 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.
- 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 anonymised as soon as practical (see Article 5e).

5. **Research data management throughout the whole research process**

(1) **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 anonymise the data as soon as practical. Awareness of the requirements should influence the design of the methodology. The planning of the research must include the need to consider ethical issues and the requirements relating to data management.

(2) **Data collection**

Data is to be collected in an ethically responsible way. During the data collection process, there needs to be security of data already collected. 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 anonymised as soon as practical.
(3) 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 finalised. 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.

(4) 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 is required to 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 anonymised as soon as practical to do so.

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 a PhD researcher finishing their PhD or a staff member leaving to go to another institution, for all completed projects, it will be expected that all data (anonymised) 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 principle 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 will 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 about 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:
1) Making the data publicly available would contradict any agreement or undertaken given as part of the informed consent process
2) Where public release might have negative consequences for the people researched
3) When there is an obligation or objective to protect results so that they can commercially or industrially exploited (or reasonably expected to be exploited)
4) Where public release could represent a security concern
5) If open access would jeopardize achievement of the main aim of the research
6) 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 URSI Director, who will make a decision on whether or not the justification is sufficient.

8. **Research data management tool**

The Faculty has developed a Research Data Management Tool. This tool helps in administrating 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 commencement 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). The function of the Faculty repository is only 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 URSI Director 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. **Awareness-raising about data management**

The Faculty will take appropriate steps to inform staff and PhD students about the policy and expected procedures. Specifically, from January 2018 on, all new PhD candidates 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**

When researchers do not submit a RDMP within the 3 months of commencement of the project, they will be sent a reminder to do this as soon as possible. (this will be linked to the project database)

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 students, and amongst other things, will ensure that all research data has been lodged 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 lodged in the repository.

12. **Actions required of the Faculty**

1. The Faculty need to implement the Research Data Management Tool.
2. The Faculty needs to establish a Research Data Repository.
3. 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.
4. The URSI Director will need to consider requests for exemption from the Open Access expectation of research data.
5. The URSI Director will need to consider requests for access to data stored in the Faculty Research Data Repository.
6. The Graduate School needs to monitor PhD students to ensure that they comply with the research data requirements.

**Applicable definitions**

*Ius Promovendi* is the legal right of an academic staff member (historically a professor) to award a PhD.

*Personal data*. The European Regulations defines ‘personal data’ as “any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

*PhD research project* means a research trajectory undertaken by a PhD student under the supervision of a Primary Supervisor.

*PhD student* means anyone enrolled in a PhD programme at the Faculty, irrespective of their status (part time/fulltime; internal/external, etc) or type of funding.

*Primary Supervisor* means the staff member who has primary management responsibility for the supervision of a PhD student (this might be the professor promotor, but it could also be an Associate or Assistant Professor).

*Principal Investigator* means the person who has primary responsibility for a research project. Every designated research project shall have a defined Principal Investigator.
Promotor is a person with an *Ius Promovendi* who is recorded as being the person who will eventually award the PhD to the PhD student and at least has nominal oversight of the PhD research (also see Primary Supervisor).

**Research** is a systematic process of investigation into a particular topic.

**Research data** means any data collected in the course of research for a specific research project.

**Research Data Management** refers to the concept about how research data should be managed.

**Research Data Management Plan** refers to the plan for how research data will be managed that is uploaded onto the Research Data Management Tool.

**Research Data Management Policy** refers to this document, the policy statement of the Faculty of Spatial Sciences on research data management.

**Research Data Management Tool** refers to the online management system developed and implemented in the Faculty.

**Research Data Repository** means the digital archive where research data will be stored by the Faculty for 10 years.

**Research Project** means a designated research trajectory, which could be a PhD research project or a research project undertaken by a staff member. A research project is normally identified by any of the following: any research activity that entails the collection of primary data or the extensive use of secondary data; the allocation of funding to conduct a specific research task; the appointment of research staff to undertake the research; a PhD trajectory; or any research activity that requires gaining research ethics approval. For each research project, a separate Research Data Management Plan must be submitted.

**Researcher** means anyone involved in a research project, including staff members and PhD students.

**Staff** means anyone employed by the University of Groningen in any capacity other than for the purposes of doing a PhD.

**Comments on this Policy**

Please direct comments on this policy to the Director of the Urban & Regional Studies Institute.

The Faculty Board of Spatial Sciences approved this policy document on November 13th 2018 after it has been discussed in the Faculty Council on May 7th 2018.