Queen Mary
University of London

Senate

Paper Title	Research Data Access and Management Policy
Outcome requested	A Task and Finish Group has reviewed the existing QM Research Data Management Policy and prepared a revised policy for **consideration and approval** by Senate.
Points to note and further information	The VP-Research established the Research Data Access and Management Task and Finish Group to review the June 2012 QM Research Data Management Policy over the summer of 2013. External policy developments concerning open access to research data, comments on the existing QM policy on research data management from the Ethics of Research Committee, and some staff concerns around policies on data access, indicated that the policy should be reviewed.

The Task and Finish Group has prepared the draft revised policy in annexe B. The policy has been considered at the Vice-Principal's Research Advisory Group on 14 October and at the Ethics of Research Committee on 11 November 2013. Both groups approved the revised policy and commend it to Senate for discussion and approval. Further to these meetings an additional clause 18 has been added to the draft policy allowing appeals against any withholding of data to be heard by the Vice-Principal (Research).

Annual review and potential further revisions to the policy are expected, given the novelty of the area and the changing external policy environment. |
| **Questions to consider** | (i) The report from the Task and Finish Group is annexed at A. Senate is **asked to note** the decision in section 4 to set up a Research Data Management Group for 2013-14 initially to oversee implementation of the policy and the communications, support and guidance to be provided to QM staff in support of it.

(ii) Senate is **asked to consider and approve** the revised draft policy in Annexe B. (As the policy has been revised substantially a version showing the changes is not provided.) |

Summary of changes to the policy	1. The revised document specifies the definition of QM research data as "the final forms of information which are essential to the understanding of the published or otherwise publicly available final research output that represents the completion of a well-defined research project". Development of data curation at QM is at an early stage and the document states that data identified for open access will be offered for deposit either in a QMUL or an appropriate external repository, in accordance with relevant standards and community best practice, which may be determined by the area of research activity.
	2. The policy takes into account the developments concerning open access to research data since the first policy was prepared.
Regulatory/statutory reference points	RCUK requires all organisations applying for Research Council grant funding to have in place a Research Data Management Policy, and to be taking action towards full implementation of the policy by 2015.
Strategy and risk	The research data management policy is required by RCUK to accompany all research grant applications.
Reporting/ consideration route for the paper	The draft policy is recommended to Senate for approval. The approved policy will be incorporated into the QM and Barts Health NHS Trust Research Management Policies managed by the Joint Research Management Office, replacing the existing policy in section D.11, available at http://www.bartshealth.nhs.uk/research/strategy-and-policy/research-policies/
Authors	Cover paper - Mary Childs, ARCS Draft policy – Carol Rennie, Executive Officer (Research) on behalf of the Task and Finish Group, approved by the Vice-Principal (Research)
Sponsor	Professor Bill Spence, Vice-Principal (Research)

Report from the Task and Fi nish Group to review the QM Research Data Management Policy

1. Purpose

The purpose of the Task and Finish Group was to review the QM policy on Research Data Management approved by Senate in June 2012.

The Task and Finish Group was set up in response to changes to the external policy environment since the original QM policy was agreed, such as the new RCUK policy on open access to the results of publicly-funded research, and a recognition of the growing complexity of this area and how best to respond to and engage with the open data agenda, and the interface with IP and data protection issues, as well as technical/storage requirements.

2. Membership and meetings

The members of the Task and Finish Group were:

Professor Bill Spence (Chair), VP-Research
Michael Barnes, WHRI
Richard Christie, Assistant Director for Research, IT Services
Coleen Colechin, JRMO
Professor Maria Delgado, School of English and Drama
Anne Flanagan, CCLS
Sarah Malloy, Research Support Librarian
Professor Mark Plumbley, EECS
Professor Chris Reed, CCLS
Professor Peter Sasieni, Wolfson Institute
Paul Smallcombe, Records & Information Compliance Manager, ARCS
Professor Peter White, Wolfson Institute

The work of the Task and Finish Group was co-ordinated by Dr Carol Rennie, Executive Officer to the VP-Research.
The meeting secretary was Mary Childs, Secretary to VPRAG, ARCS.

Members were invited to comment on the existing policy and revised drafts by email. Comments on the existing QM policy from the Ethics of Research Committee were forwarded to the Group. Several members of the Task and Finish Group were also members of the Ethics of Research Committee.

One meeting was held on 17 July 2013 to discuss the revised draft policy and to decide on further action. The amendments to the policy recommended at the meeting were approved by the Task and Finish Group by email after the meeting.

3. Major changes to policy

The Task and Finish Group has recommended the following major changes to the policy and identified these areas for further work in 2013-14.

(1) The revised policy specifies (and narrows) the definition of QM research data to "the final forms of information which are essential to the understanding of the published or otherwise publicly available final research output that represents the

completion of a well-defined research project". Development of data curation at QM is at an early stage and the document states that data identified for open access will be offered for deposit either in a QMUL or an appropriate external repository, in accordance with relevant standards and community best practice, which may be determined by the area of research activity.

(2) The Group agreed that the complexity of funder requirements on research data management and the variety of forms of data indicated that the best approach to policy formation would be to have a single policy applying to all research activity underpinned by a suite of research data management guidelines providing information specific to particular types of data and issues. The Group advised that a "toolkit" of resources and examples to support research data management should be developed.

(3) Generic guidance on good practice in research data management should be available to researchers while the suite of research data management guidelines and the toolkit is developed.

(4) A note on the motivations for supporting good practice in research data management should be added to the beginning of the policy (this has been done).

The revised draft policy is annexed at B.

4. Establishment of a Research Data Management Group

The Task and Finish Group **recommends to VPRAG** that a Research Data Management Group should be established for 2013-14 initially to oversee implementation of the policy and the communications, support and guidance to be provided to QM staff in support of it.

Specific areas of further work identified include to:

- Prepare a suite of research data management guidelines providing information specific to particular types of data and issues to support the research data management policy. A "toolkit" of resources and examples to support research data management should be developed;

- Consider how research data management plans will be captured and stored. (A research data management planning template is available at http://www.itstrategy.its.qmul.ac.uk/research/researchdatamanagement/aboutdatamanagementplanning/index.html.) Suggestions include that:
  - o research data management plans might be captured by JRMO at the point of application (for externally funded research);
  - o The research data management plan might be required as evidence for research needing approval by the Ethics of Research Committee. For example to ensure that researchers working with human participants provide participants with a full explanation of open access as part of the consent form so as to ensure that future disclosure of research results to other researchers is not prevented by poor communication;

- Oversee pilot projects;

- Provide guidance on the development of an research data management toolkit, building on the information available at http://www.itstrategy.its.qmul.ac.uk/research/researchdatamanagement/guidancenotes/index.html;

- Prepare a list of approved external data repositories, and a recovery plan if the repository closes or loses the data through misadventure;

- Develop a process to approve requests for access to research data;

- Advise on raising awareness about the policy, training and other resources;

- Consider whether a separate policy/service agreement from ITS or guidelines are needed relating to the secure management of research data (to cover security sensitive data risks; and the ability of QM to demonstrate that research data is kept securely, backed up etc. in line with the UUK guidelines "Oversight of security-sensitive research material in UK universities").

The proposed membership of the Research Data Management Group is:

- Chair: academic member of staff
- Academic staff members, one each from S&E, HSS and SMD
- Library Services Research Support
- Assistant Director for Research, ITS
- ITS Data Management/Curation Officer (new role)
- Executive Officer (Research) to represent the VP-Research and co-ordinate reporting to VPRAG and the Ethics of Research Committee
- A representative from JRMO
- Secretariat: ITS

Mary Childs ARCS and Carol Rennie Principals' Office
October 2013

NEW DRAFT POLICY

QMUL Research Data Access and Management Policy

If approved this policy will be incorporated into the QM and Barts Health NHS Trust Research Management Policies managed by the Joint Research Management Office, replacing the existing policy in section D.11, available at
http://www.bartshealth.nhs.uk/research/strategy-and-policy/research-policies/

Open Data: Guidelines for researchers

1. In general, access to the data underlying research has a range of advantages - it promotes the progress of research as a whole, allows for the validation and reproduction of research findings, and enables the efficient and cost-effective creation of additional social and economic value.

2. Queen Mary University of London (QMUL) is committed to the general principle of open access (OA) to research, and the data underlying such research, subject to the necessary constraints of any funder, legal and ethical requirements, and following QMUL policies, guidelines and standards. For OA please see the QMUL Guidelines on Open Access, and for research data, please see the Research Data Access and Management Policy.

3. The process of fully implementing appropriate repositories and resources for implementing OA to research data within QMUL will take a number of years, and it is expected that researchers will gradually increase the use of such resources over such a period.

4. Data identified for open access will be offered for deposit either in a QMUL or an appropriate external repository, in accordance with relevant standards and community best practice, which may be determined by the area of research activity.

5. Links to repositories and descriptions of the means of access are expected to be made via the QMUL Publists system as this evolves.

6. The Research Data Management Group will set up and manage the necessary resources for the implementation of the research data access and management policy, and will be issuing further guidance as this project continues.

QMUL Research Data Access and Management Policy

Background

A 2008 HEFCE-funded report defines research data as "the evidence base on which academic researchers build their analytic or other work." Data management, including planning for long-term storage and sharing, is an increasingly important aspect of the UK Research funding environment. Most grant applications for research which will generate digital data sets require a data management plan that meets the 2011 Research Councils UK (RCUK) policy; this 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:'
http://www.rcuk.ac.uk/research/Pages/DataPolicy.aspx.

As of May 2012, RCUK required all funded universities to have a data management policy and road map in place, that will be fully implemented by 2015 to meet their expectations for data sharing, as follows:

- publicly funded research data should be made openly available in a timely manner;
- data with acknowledged long term value should be made accessible;
- RCUK recognises that there are legal, ethical and commercial constraints on release of research data. To ensure that the research process is not damaged by inappropriate release of data, research organisation policies and practices should ensure that these are considered at all stages in the research process;
- Research Council funded work may be entitled to a limited period of privileged use of the data.

A summary of funder data management/sharing requirements can be found here: http://www.dcc.ac.uk/resources/data-management-plans/funders-requirements

QMUL Research Data Access and Management Policy

1. Queen Mary University of London (QMUL) is committed to the general principle of Open Access to research, including to research data[i] within the necessary constraints of any funder, legal and ethical requirements, and following QMUL policies, guidelines and standards.

2. Due to the particular concerns around access to medical-related data, access to data that is associated with medical research will be governed by the relevant funder's policies on datasharing. If a funder does not have such a policy, then the MRC's policy on data-sharing should be the default policy [ii]

3. Where reasonably practicable, publicly funded research data should be made available for access, subject to such conditions as are necessary to ensure compliance with legal, data protection, ethical, confidentiality, IP protection, security or funder obligations.

4. Data identified for open access will be offered for deposit either in a QMUL or an appropriate external repository, in accordance with relevant standards and community best practice, which may be determined by the area of research activity.

5. Data must be retained intact in an appropriate format and storage facility according to funder requirements and consonant with any data management plans approved as part of any funding.

6. The rights of researchers to the exclusive use of research data that they generate as part of a well-defined research project will be protected up until the point of publication or public availability.

7. Where data is made available on request rather than via straightforward open access the rationale for this must be made public, and such availability should not be unreasonably withheld.

8. Data arising from research involving human subjects can only be made accessible if those subjects give their informed consent in advance in writing for the future public release of their data, with clear and study- specific explanations of how the data will be anonymised so that it will not be possible for those in receipt of the data to identify any individuals. Where it has been determined that it would be inappropriate to make such data accessible, for example because it might lead to identification of research subjects or because seeking consent would make it unlikely that subjects would participate in the research, then the data will remain confidential.

9. For research collaborations, any open access arrangements can only take place with the agreement of all research partners.

10. Where retention is not specified as a condition of funding, data storage and disposal will be determined by the nature of the research activity and would normally be retained for a period of at least 10 years for non clinical and at least 20 years for all clinical based activities from the date of any publication which is based upon it, as specified in the QMUL Records Retention schedule.

11. Protocols for research in which data will be generated or reused should include data management plans that explicitly address data capture, management, integrity, confidentiality, retention, sharing and publication. These plans will be retained by QMUL to guide future management of the data.

12. The Principal Investigator, or most senior QMUL researcher, in a research project, has responsibility for ensuring that research data management requirements are observed during a research project or programme that they are undertaking.

13. Those responsible for research staff and students should ensure that researchers in their areas are aware of this policy and any associated guidelines and procedures.

14. All researchers are expected to familiarise themselves with and act in accordance with this and other QMUL policies relating to research practice. This information will be made accessible from the QMUL research webpages, both external and internal.

15. QMUL will provide advice, training and support regarding research data management.

16. The Research Data Management Group will set up and manage the necessary resources for the implementation of this policy.

17. Any queries on the application of this policy should be directed to the Vice-Principal (Research).

18. Appeals against the withholding of data may be made in writing to the Vice-Principal (Research), who will review the case from the researcher or their representative for withholding data, and the appeal case, in the light of this policy and other relevant policies, and make a final decision.

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[i] QMUL research data here refers to the final forms of information which are essential to the understanding of the published or otherwise publicly available final research output that represents the completion of a well-defined research project. This information is generated by Queen Mary researchers for the purposes of the research project, for example via experimentation, observation or interview. It may include samples and related material used or created in the course of the research. Published materials, bibliographies, and data acquired from third parties (generated outside QM) are not included in this definition.

[ii]http://www.mrc.ac.uk/Ourresearch/Ethicsresearchguidance/datasharing/Policy/index.htm