

## Research Data Management Policy

### 1. Introduction and Purpose

- 1.1 All researchers at the University of Southampton (The University) create some type of data as part of the research workflow. These data represent the evidence that underpins academic endeavours and, in conjunction with publications, form an important aspect of the scholarly record.
- 1.2 The purpose of this policy is to:
  - 1.2.1 create model Research Data management practices for all Researchers (defined below) at the University of Southampton;
  - 1.2.2 foster responsibility for research data management through the promotion of best practice around preparation and use of Research Data management plans; and
  - 1.2.3 ensure that Research Data which is significant (as determined by the Researcher with guidance from the Faculty) is stored, retained, accessed and disposed of securely in accordance with all legal, statutory, ethical, contractual and funding requirements.
- 1.3 A robust Research Data Management Policy is required to demonstrate and ensure:
  - 1.3.1 good research practice and procedures;
  - 1.3.2 protection of intellectual property rights (IPR);
  - 1.3.3 proper recording, maintenance, storage and security of Research Data;
  - 1.3.4 compliance with relevant legislation and regulations regarding data usage and rights in relation to data, as well as common law confidentiality obligations; and
  - 1.3.5 appropriate access to Research Data is maintained.
- 1.4 This policy aims to address the objectives making Research Data accessible to the public or wider academic community where possible whilst recognising that there are circumstances when access to Research Data must be restricted, either to achieve the highest standards for secure Research Data management or to fulfil commercial objectives.

### 2. Scope

- 2.1 This Policy applies to all staff and students of the University of Southampton engaged in research. The Policy also applies to anyone working in the University, including casual workers, visiting or emeritus researchers, associates, honorary contract holders, consultants, agents, volunteers or contractors undertaking research under the auspices of the University, using the University's facilities, on the University's premises anywhere in the world, or elsewhere on behalf of the University.
- 2.2 This Policy also applies in full to undergraduates and taught postgraduates whose research findings are included in published research outputs. Where this is not the case, the retention periods set out in this policy do not apply, although the University of Southampton still expects all students to adhere to the principles of good Research Data management and academic integrity.

### 3. Definitions

In this Policy, unless otherwise indicated:

- 3.1 “Principal Investigator (PI)” means the University employee primarily tasked with delivering a programme of research on behalf of the University, whether or not they are referred to as such in a research grant.
- 3.2 “Researcher” means any person undertaking research or involved in collecting, generating or creating Research Data, for or on behalf of the University which shall include but not be limited to employees, workers, visiting researchers, postgraduate research students and the PI.
- 3.3 “Research Data” means information in digital, computer-readable or paper-based format that:
- 3.3.1 is contained or presented in various ways including notes, facts, figures, tables, images (still and moving), audio or visual recordings; and
  - 3.3.2 which is collected, generated or obtained during the course of or as a result of undertaking research (which includes but is not limited to conducting field or laboratory experiments, conducting trials, surveys, interviews, focus groups or analysis of data); and
  - 3.3.3 which is subsequently used by the Researcher as a basis for making calculations or drawing conclusions to develop, support or revise theories, practices and findings.
- 3.3.4 “Repository” means the repository or repositories which the University owns or controls and makes available to Researchers for the storage of Research Data.

## 4. Responsibilities

In this Policy, unless otherwise indicated:

- 4.1 On behalf of Senate, the Vice-Chancellor will delegate responsibility for the application of this Policy to the Vice President (Research and Enterprise), the Deans and their senior staff.
- 4.2 All Researchers must adhere to their obligations under this Policy.
- 4.3 Researchers

All Researchers must:

- 4.3.1 Adhere to the data management plan submitted as part of the research bid (where applicable) and adhere to the contractual obligations governing Research Data (as defined in the relevant research contract), and the application of this Policy;
- 4.3.2 Be aware of their and the University’s legal obligations and potential liability when processing data relating to people to ensure compliance with handling data protected by the UK Data Protection Act (2018) and the European Union General Data Protection Regulation (2016), together with any other applicable data protection or privacy laws) [LINK TO UNIVERSITY DPIA PROCESS WHEN AVAILABLE];
- 4.3.3 Ensure that the integrity and security of their data is maintained.
- 4.3.4 Researchers are also encouraged to obtain an ORCID identifier or equivalent unique id. Such identifiers helps them record and report their work; they can be used in publications, grant applications, funder reporting and in Southampton’s institutional research repository.

- 4.4 Research Students and Supervisors:

The University believes that embedding Research Data management practice in early career researchers is critical to establishing an effective data management ethos. Good research practice requires research students and their supervisor to plan the collection, storage, security and use of Research Data, in accordance with conventions in their fields of study and obligations from their funder, sponsors and the University.

In addition to the requirements for researchers set out in section 4.3, research students in consultation with their supervisors should:

- 4.4.1 Establish collection and storage procedures for their Research Data, and ensure that data management is planned and documented at the outset of the research project in accordance with their obligations as defined by the relevant funding bodies or sponsors and the University's policies. A generic Data Management Planning template for postgraduate research students is available to help guide this process;
  - 4.4.2 Ensure the Data Management Plan is completed by the student before the first progression review, and regularly reviewed thereafter.
  - 4.4.3 Ensure the student deposits a copy of their significant Research Data in the Repository on completion of their research.
- 4.5 Principal Investigators (PIs)
- The PI should ensure the data management plan or the research proposal upon which the data management plan should be based addresses the matters set out in sections 3 to 7 of this Policy and takes into account the requirements of collaborating parties.

It is good research practice to plan data management before commencing any research. Where a Plan is not a requirement of the funder, it is recommended that PIs nevertheless generate, execute and update one when necessary by keeping it under review throughout the Research Data life cycle. Templates, guidance and examples to create such Plans are available from the University Library's Research Data Management website.

In addition to requirements for researchers set out in section 2.3, PIs should:

- 4.5.1 Include in research grant proposals appropriate consideration of the cost and time implication of data storage and management;
  - 4.5.2 Develop and record appropriate procedures and processes for collection, storage, usage (including any re-uses), access, and retention of the Research Data associated with their research programme;
  - 4.5.3 Ensure where research is conducted in collaboration with external research partners that suitable agreements for the ownership and use of Research Data are prepared following advice on the University's potential legal liability and agreed in writing by the parties concerned before the project starts. Help and guidance is available from Research & Innovation Services;
  - 4.5.4 Define the requirements for the selection of significant Research Data suitable for deposit at the conclusion of the research project;
  - 4.5.5 Plan for the ongoing custodial responsibilities for the Research Data at the conclusion of the research project or on departure from the University;
  - 4.5.6 Include recommendations for the destruction of the Research Data (if required) to the designated Faculty data steward.
  - 4.5.7 Create a record of their significant research datasets in the Repository (see clauses 6.1.4 and 6.2.3.).
- 4.6 Faculty Deans
- The Dean of each Faculty should promote good practice in all aspects of research governance and integrity including Research Data Management. They should ensure that staff and students are aware of their responsibilities and obligations in effective management of Research Data and identify or promote training where gaps in these skills are identified.

Deans of Faculty assume stewardship of data once the researchers involved in compiling the data leave the University. This role may be delegated to a dedicated data steward or stewards to act as custodian of such data on the University's behalf until it is destroyed.

The Dean of each Faculty shall:

- 4.6.1 Nominate people to undertake the tasks in 8.3;
- 4.6.2 Establish procedures to ensure that prior to leaving the University, Researchers store all significant Research Data in accordance with clause 6.
- 4.6.3 Ensure that staff conducting human research, and any student(s) under their supervision, are aware of and appropriately trained in all of their responsibilities and obligations relating to the management of Research Data collected or otherwise processed in any way in the course of their research.

#### 4.7 University

The University is responsible for:

- 4.7.1 Developing infrastructure and training to promote best practice in data management amongst its researchers;
- 4.7.2 Supporting researchers to plan for data management and write data management plans for grant applications;
- 4.7.3 Managing a dedicated website providing guidance for the University's researchers in good data management practice, including data deposition and related metadata description, and good data governance in compliance with relevant legal and ethical obligations;
- 4.7.4 Maintaining an institutional metadata catalogue of research datasets for publically funded research in line with funder requirements;
- 4.7.5 Providing Digital Object Indicators (DOIs) for datasets deposited at the University as per the DOI policy.

## 5. Ownership and IPR

- 5.1 Where intellectual property rights exist (for non-registrable rights) or could exist (for registrable rights) over Research Data which is collected, created or generated by Researchers, then the first owner of the intellectual property right(s) (as between the University and the Researcher) will be determined in accordance with the University's Intellectual Property Regulations.
- 5.2 Subject to clause 5.1 or if no intellectual property rights exist in the Research Data or subset thereof, the University is the owner (as between the University and the Researcher) of all legal rights in relation to the Research Data which is collected, created or generated by Researchers. Accordingly the University shall be entitled to enter into agreements governing amongst other things the sale, supply, transfer, access to or use of the Research Data in question. These agreements will be subject to the intellectual property rights of third parties (if any) and the contractual obligations of the University.
- 5.3 Where research involves external funding and/or collaboration with other institutions or external parties, intellectual property rights ownership and rights of use should be dealt with in the relevant contract prior to commencement of the project and adhered to by the Researchers. It is recommended that where possible, the contract identify a process for Research Data management which is consistent with the broad objectives of this Policy.
- 5.4 Where a research project involves usage of data (which may include Research Data) owned or controlled by a third party (who is not a collaborating party), each Researcher must abide by the

terms of contract governing the use of that data and ensure that the use of this data will not place the University in breach of its contractual or funding obligations arising under clause 5.3.

- 5.5 Further useful guidance with regard to the University's IPR and research related policies can be found through Research & Innovation Services.

## 6. Storage and Management

- 6.1 All Researchers must ensure that all Research Data in digital and computer-readable form:
- 6.1.1 is stored securely in a durable format appropriate for the type of Research Data in question;
  - 6.1.2 is stored with adequate metadata and/or documentation to facilitate identification and support effective reuse of Research Data where this is appropriate;
  - 6.1.3 is backed-up regularly in accordance with best practice in the relevant field of research;
  - 6.1.4 subject to clause 9.2, deposited in the Repository or an appropriate national or international repository where it is more appropriate to do so. Where Research Data is stored in another repository, an entry must be made in the Repository indicating where the Research Data has been stored
  - 6.1.5 is referenced in associated research papers which should include a short statement describing how the supporting Research Data may be accessed, including a DOI for datasets held in the Repository
- 6.2 Non-digital Research Data unsuitable for digitisation but which is significant should be:
- 6.2.1 stored securely;
  - 6.2.2 labelled, indexed or categorised appropriately in order to identify the Research Data in question and support effective reuse of Research Data where this is appropriate; and
  - 6.2.3 subject to clause 9.2, an entry must be made in the Repository identifying that the Research Data in question is held by the University.
- 6.3 Please consult the University's current guidelines on [Storage Options](#).

## 7. Retention

- 7.1 Subject to clause 7.2, all Research Data which is stored in accordance with section 6 of this Policy should be held for a minimum period of 10 years from collection, creation or generation of the Research Data or publication of the research results (whichever is the later) provided appropriate safeguards are in place to protect any personal data necessary to achieve the research objectives contained within it..
- 7.2 Research Data shall be retained for longer than this 10 year period:
- 7.2.1 where an increased retention period is required to meet the University's statutory obligations, contractual obligations or the guidelines of the body funding the relevant research project;
  - 7.2.2 where the results of the research have resulted in a patent application;
  - 7.2.3 where the results of the research become contentious or subject to challenge at any time during the initial 10 year retention period, in which case Research Data should be retained pending review and not destroyed or otherwise disposed of until the matter is fully resolved.
- 7.3 Research Data may be retained for longer than this 10 year period where the research has a public interest or heritage value.
- 7.4 Please consult Guidance on Retention Periods for a summary of the current retention periods from funding bodies.

- 7.5 Research data that is not deemed 'significant' data need not be retained beyond the end of the research project. Guidance on how to determine what is significant is available from the Library. Non-significant data could include early research notes, early versions of later documents or material which is expensive to store but quick and easy to collect again. Unless a publication is planned from the research, all Research Data resulting from work undertaken by taught undergraduate and postgraduate students towards their dissertations would fall into this category and need not be retained after the degree has been awarded.

## 8. Disposal and Destruction

- 8.1 Subject to clause 8.3 and 8.4, the disposal and destruction of Research Data must be undertaken in accordance with the University's Recommended Practices for Destruction of Data.
- 8.2 The agreed processes for the timing, manner and recording of Research Data disposal and destruction should be included in data planning and stored with other project information and documentation.
- 8.3 Prior to any scheduled disposal and destruction, the relevant Research Data records which have been stored and retained in accordance with section 6 and 7 of this policy should:
- 8.3.1 be reviewed with a view to their suitability for destruction by the appropriate University Faculty; and
  - 8.3.2 where found to be suitable for destruction and disposal, the process shall be managed in line with any legal, regulatory and contractual obligations, and as appropriate relative to with the sensitivity of the data in question.
- 8.4 A record of the disposal or deletion of Research Data originally stored and retained in accordance with section 4 and 5 of this policy, should be logged in the Repository which should include the reason for deletion.

## 9. Access

- 9.1 Subject to clause 9.2, the University recognises the benefits of making Research Data accessible to the public or wider academic community.
- 9.2 Before sharing Research Data during or after a project it is essential to consider whether this is permissible in light of IPR ownership, ethical, privacy, confidentiality requirements or any legal, regulatory or funding restrictions. In addition, Researchers must consider whether Research Data has commercial potential and in consultation with the University's Research & Innovation Services consider if it is suitable for protection and/or transfer under the University's Intellectual Property Regulations.
- 9.3 Access to Research Data during the course of a research project should be restricted to the collaborators on the research project in the first instance and only made available to other parties if none of the issues in clause 9.2 are present (or have been managed, such as through anonymisation of the Research Data and the preparation of a data access agreement for signing by the potential recipient of the Research Data) and with the permission of the research collaborators.
- 9.4 To assist in complying with the University's obligations set out in Clause 9.2, access to Research Data which is deposited in the Repository may be restricted or embargoed by technical means.
- 9.5 Researchers who deposit Research Data in a national or international repository must only do so if the matters set out in clause 9.2 have been addressed and there are no restrictions in place governing the sharing of data.
- 9.6 Please consult the document Restricting Access to Research Data for guidance in meeting the University's obligations under clause 9.2.
- 9.7 Researchers who receive requests for access to Research Data should forward these requests to Legal Services.

## 10. Guidance Documents

- [Storage Options](#)
- [Guidance on Retention Periods](#)
- [Recommended Practices for Destruction of Data](#)
- [Restricting Access to Research Data](#)
- [Data plan for Your PhD](#)

## 11. Related Regulations and Policies

- [Intellectual Property Regulations](#)
- [Procedures for Investigating Cases of Alleged Misconduct in Research](#)
- [Policy for Registration of DOIs via DataCite](#)
- [Ethics Policy on Cultural Heritage](#)
- [Human participant policy](#)

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