Research Data Management Procedure	
Enabling Policy Statement; Executive Owner; Approval Route:	Our Research and Innovation - PVC, Research and Innovation - Executive Board
Is the Procedure for internal use only (Non-disclosable) ?	Disclosable
Associated Policy Statements:	Our Data – Chief Operating Officer – Compliance Committee
Authorised Owner:	Research Data Librarian
Authorised Co-ordinator:	Director of Research, Impact and Innovation
Effective date:	26/02/2025
Due date for full review:	31 December 2026
Sub documentation:	N/A

Approval History

Version	Reason for review	Approval Route	Date
1.0	Migration to POPP. This procedure outlines requirements and responsibilities regarding *research data*. These requirements are aligned with funders' research data policies.	URIC > Executive Board	**26/02/2025**

1. **Purpose**

   1.1. The University of Surrey is committed to openness in research, as articulated in our [Open Research Position Statement](), which serves as an overarching framework for the current procedure. We support the role of open research data in advancing scholarship, demonstrating academic integrity, and increasing transparency in research. This procedure exists to ensure good practices are followed in the management, dissemination, and preservation of research data which are vital to a culture of open research. The University is committed to fulfilling compliance requirements around research data from third parties such as funders, publishers, government agencies, and external sponsors (see5.4 legislative context).

2. **Scope and Exceptions to the Procedure**

   2.1. This procedure applies to all research data regardless of whether the research is funded or unfunded. It applies to all researchers, typically University staff, postgraduate researchers, and those who are conducting research on behalf of the University.

   2.2. The Procedure does not apply to taught postgraduate and undergraduate students, except in exceptional circumstances, including but not limited to, where research findings are included in published research outputs.

3. **Definitions and Terminology**

   Data Management Plan. A document addressing how research data will be captured or sourced, managed, analysed, stored, shared, and published, and how the integrity, security, and confidentiality of data will be maintained, including who is responsible for achieving all this and any anticipated costs for (e.g. software, equipment, storage, etc.). It should be periodically reviewed and updated as necessary throughout active research projects. It should document any ethical, legal and commercial constraints, and describe how and when they will be addressed.

   Metadata. Any documentation and descriptive information relevant to research data and research conclusions can be considered metadata. Some scholarly communities may have formal metadata standards for research data, which researchers should follow when appropriate. Metadata records in this procedure refer to descriptive information about research data that is held by the Library to facilitate discoverability, sharing, retention and potential re-use.

   Open Access repository. An Open Access repository is an online database of research outputs, configured to support the storage, online discovery and machine-readability of its content which is freely available and open to everyone. Institutional repositories, such as the University of Surrey Open Access repository, hold the research outputs of their institution. They can include publications, theses, research data and other research outputs such as software code, models, drawings, surveys, transcripts, videos and sound recordings, etc.; Open Access as well as closed, embargoed or restricted items; and full texts as well as bibliographic records. Subject or disciplinary repositories, such as PubMedCentral, can host outputs from several institutions.

   Research data. The University of Surrey considers research data to be any material collected, measured, observed, processed, or created for the purpose of analysis and on which research findings and outputs are based. This includes data and documentation which is commonly accepted in the scholarly community as necessary for transparency, and also for the validation or replication of research findings (e.g. contextual or background information, data dictionary, user guide, etc.). Research data may be in digital or non-digital formats.

   Researchers. The University of Surrey defines researchers as members of the University, including

all staff, doctoral and postgraduate students, visiting researchers, and those who conduct research on University premises, use University facilities for research, or work on University research projects.

Personal data - 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

4. **Procedural Principles**

4.1. Research data will be managed throughout the research data lifecycle in accordance with other University policies and legal, funder, regulatory, and ethical requirements. Researchers are expected to manage and respect any confidentiality, privacy, national security, indigenous rights, and intellectual property aspects of their research data.

4.1.1. Principal investigators are responsible for ensuring all members of the research team abide by the University's research data management requirements, including making sure all members of the research team are aware of and abide by any applicable data management plans created.

4.2. Any research activity where research data may be created or re-used should include at the outset a data management plan. These plans are to be updated and maintained during the life of the research project.

4.2.1. Researchers, in particular principal investigators, are responsible for creating and updating a research data management plan for research projects in accordance with funder and university expectations.

4.2.2. Where research is undertaken by postgraduate researchers, it is the responsibility of the staff member supervising their project to ensure that the postgraduate researcher has a clear understanding of their research data management responsibilities and engages with training and development as necessary. Supervisors should work with the postgraduate researcher to determine which research data is selected for archiving and sharing and to decide an appropriate route to achieve this.

4.3. For data underpinning published research findings, reasonable efforts should be made to make, if not all of the data, then at least some part of the datasets available for access and re-use with as few restrictions as possible, where legally, ethically and commercially appropriate. This should be done in a timely manner, no later than 12 months after publication or as soon as required by publishers and funders.

4.4. Where it can be made accessible, research data should be deposited in a data service, disciplinary data repository, or the University of Surrey Open Research Repository as appropriate.

4.4.1. Researchers are responsible for identifying, preparing, versioning and transferring data for sharing and/or preservation to appropriate repositories, including the University's repository. In special cases, Library and IT Services may facilitate transfer and dissemination (e.g. very large datasets or sensitive data).

4.5. Unless explicitly stated in a collaborative contract where Intellectual Property Right (IPR) or data responsibility is retained by another institution, all research data must be registered with the University by creating a metadata record in the University of Surrey Open Research Repository, even if the data is hosted elsewhere (e.g., in a third-party repository).

4.5.1. Researchers are responsible for registering their research data by creating a metadata record in the University's repository or by sending a link to an existing repository record to the

Library's Open Research team. Metadata and data records created in the University repository are considered registered. The Library will be responsible for holding and making publicly available these metadata records.

4.5.2. If no Digital Object Indicators (DOIs) for datasets deposited at the University is available, Researchers are responsible to require one from the Library.

4.5.3. Researchers are responsible for assigning Access Rights (e.g. Open, Restricted) and applying a Licence (e.g. CCBY_V4.0, CC BY-NC-SA V4.0) to their data.

4.6. Research data that substantiate research findings or is of long-term value should be preserved in a widely accessible and preservation friendly format with adequate documentation for ensuring transparency and possible verification and reuse for a minimum of 10 years from project end or as long as is mandated by funder, ethical, legal, or regulatory requirements.

4.7. A Data Access or Availability Statement (DAS) must be included in published papers. It should describe how, where and on what terms (i.e. licence) supporting research data may be accessed. Alternatively, the DAS should state that there is no underpinning data, or all data is included in the article as tables and figures, or give reasons why the data cannot be shared e.g. for ethical reasons because it contains personal information or consent/permission has not been granted, or due to Intellectual Property limitations, etc.

4.7.1. Technicians, professional and support staff instrumental in contributing to the collection and/or generation of research data should be acknowledged and their contribution specified in descriptive metadata and in data access statements.

4.8. Researchers must securely dispose of research data identified for deletion or destruction, in accordance with legal, ethical, research funder and collaborator requirements and with particular concern for the confidentiality and security of the data.

5. Governance Requirements

5.1. Implementation: Communication Plan

5.1.1. The procedure will be publicly available on the University of Surrey's website (Policies and Procedures). It will also be promoted via news posts, presentations, and direct communication with relevant staff.

5.1.2. Implementation of the procedure will be supported by procedure specific guidance on the Library's Open Research website, including links to other relevant guidance, e.g. Research Integrity and Governance Office, Data Protection, IT Services, funders policies, etc.

5.1.3. The Open Research team, based in the Library, will provide advice, guidance, support, and training on all elements of research data management and open data before, during, and after research is undertaken. The Library also offers a Data Management Plan review service and weekly drop-in sessions for all data-related enquiries.

5.1.4. Heads of Departments/Schools and others responsible for research staff and students are responsible for ensuring that researchers in their areas are aware of the University's policy and supporting guidelines and procedures, and also when and where customised help can be sought, regarding research data management.

5.1.5. IT Services are responsible for providing technical infrastructure, advice and support for the storage and backup of research data during active research as appropriate

5.2. Implementation: Training Plan

5.2.1. The Open Research team, based in the Library, offers training to staff and students on all elements of research data management, including the production of data management plans, in the form of various workshops which are run twice year, in collaboration with the Doctoral

College.

5.2.2. The Library's Open Research website also offers numerous on-line resources such as templates, checklists, handbook, user guides, videos, etc.

5.2.3. For new staff and postgraduates, it is recommended they undertake the Open Research in Practice Module available on Surrey Learn which also includes a section on Research Data Management.

5.3. Review

5.3.1. This procedure should be reviewed every 2 years, unless changes in regulations, other policies or improvements to its implementation require an interim update. Minor interim changes such as change of a role title or other titles or names or typos, which do not change the meaning of the procedure will be handled by the Authorised Owner and subject to Chairs' Action by the Executive Owner. Major changes, i.e. anything that alters the meaning of the procedure or are substantial, and the biennial review will be submitted via the full approval route.

5.4. Legislative Context and Higher Education Sector Guidance or Requirements

5.4.1. Many funders and charities have policies that apply to universities and researchers. UK Research and Innovation (UKRI) expects researchers to comply with a set of principles surrounding research data management and open data. This includes the Concordant on Open Research Data (https://www.ukri.org/files/legacy/documents/concordatonopenresearchdatapdf/). UKRI also has a Common Principles on Research Data (https://www.ukri.org/wpcontent/uploads/2020/10/UKRI-020920-GuidanceBestPracticeManagementResearchData.pdf)

5.4.2. Individual research councils have published clear expectations of organisations in receipt of research funding regarding research data management. These individual policies are meant to be understood in conjunction with the Concordant on Open Research Data, UKRI's Common Principles on Data Policy and the UK Data Protection Regulation. Similarly, Wellcome Trust is a signatory of the Concordant on Open Data and has its own outputs policy.

AHRC

https://www.ukri.org/publications/ahrc-research-funding-guide/#updates

BBSRC

https://bbsrc.ukri.org/about/policies-standards/data-sharing-policy/

CRUK

Data Sharing and Preservation strategy: https://www.cancerresearchuk.org/funding-for-researchers/applying-for-funding/policiesthat-affect-your-grant/submission-of-a-data-sharing-and-preservation-strategy

EPSRC

Principles: https://www.ukri.org/who-we-are/epsrc/our-policies-and-standards/policy-framework-on-research-data/principles/

Expectations: https://www.ukri.org/who-we-are/epsrc/our-policies-and-standards/policy-framework-on-research-data/expectations/#contents-list

ESRC

https://www.ukri.org/councils/esrc/guidance-for-applicants/research-ethics-guidance/data-requirements/

European Commission

All Horizon 2020 projects are subject to the Guidelines on FAIR Data Management:
https://ec.europa.eu/research/participants/data/ref/h2020/grants_manual/hi/oa_pilot/h202
0-hi-oa-data-mgt_en.pdf

MRC

Good Research Practice Guidance: https://www.ukri.org/who-we-are/mrc/our-policies-and-standards/research/

Sharing of Research Data from Population and Patient Studies:
https://www.ukri.org/publications/mrc-guidance-on-sharing-research-data-from-population-and-patient-studies/

Data from Clinical Trials and Public Health Intervention Studies: https://www.ukri.org/who-we-are/mrc/our-policies-and-standards/research/open-research-data-clinical-trials-and-public-health-interventions/

NERC

Data Policy Guidance: https://www.ukri.org/who-we-are/nerc/our-policies-and-standards/nerc-data-policy/

Data Value Checklist: https://www.ukri.org/publications/nerc-data-value-checklist/

STFC

https://www.ukri.org/wp-content/uploads/2022/06/STFC-230622-STFCScientificDataPolicy2016.pdf

Wellcome

Trust Data, Software and Materials Management and Sharing policy:
https://wellcome.org/grant-funding/guidance/policies-grant-conditions/data-software-materials-management-and-sharing-policy

Data Protection Act 2018

UK General Data Protection Regulation 2016/679

Freedom of Information Act 2000

5.5. Sustainability

5.5.1. The environmental impact that this Procedure will have on energy consumption and/or associated carbon emissions stems from the university's need to increase its digital holding and output. This has arisen primarily from the increasing demands made by funders and governments to conduct, share, and publish (and hence also to store, archive and preserve) any underpinning research data that substantiates research findings or is of long-term value.

5.5.2. However, this increase in energy consumption should be offset, at least partially, by their expectation that such research is also transparent and is built on underpinning data, which is openly available, has contextual documentation, and is of sufficient quality to be re-used. This being the case, energy consumption savings should be made through good research data management practices, as outlined in this Policy, leading to reductions in data error, bias and duplication; increased efficiency allowing timely peer review, decision making and project handovers; decreased risk from data loss and corruption; and enhanced creativity, innovation and productivity generated through more, faster and wider collaboration.

5.5.3. The storage of data should be in energy efficient facilities. For existing storage, process owners should consider cost effective ways to reduce energy consumption such as replacement of servers with high efficiency units or migration to energy efficient ones, as

well as regular data cleansing to reduce non-essential storage of data. For new facilities, process owners should work with IT services, estates and 3rd party suppliers to ensure facilities are low energy.

6. **Stakeholder Engagement and Equality Impact Assessment**

6.1. An Equality Impact Assessment was completed on **21/11/2024** and is held by the Authorised Co-ordinator.

6.2. Stakeholder Consultation was completed, as follows:

Stakeholder	Nature of Engagement	Request EB Approval (Y/N)	Date	Name of Contact
Governance	Review of procedure draft; confirmation that it adheres to the policy framework	N	22/11/2024	Kelley Padley, Governance Officer
H&S	Review of procedure draft, confirmation there is no implication for H&S	N	27/11/2024	Matt Purcell
Sustainability	Review of procedure draft; confirmation that it adheres to University Sustainability policy	N	27/11/2024	Martin Wiles Head of Sustainability
Academic Freedom of Speech	Review of procedure draft; confirmation that it adheres to the policy framework	N	22/11/2024	Abi Bradbeer AFFE Project Manager
Governance	Review of procedure draft; confirmation that it adheres to Our Data policy	N	03/02/2025	Sarah Litchfield, University Secretary and General Counsel & Ewan Robson, Information Governance Manager and Data Protection Officer