Guidance for the Implementation of the University of Aberdeen's Research Data Management Policy

The guidance below is provided to further support research staff in implementing the above policy.

Principal Investigator Responsibilities

The Principal Investigator (PI) is responsible for adherence to the RDM Policy and:

1 Compliance

- 1.1 Ensuring compliance with the University Policy on Data Protection which complies fully with the General Data Protection Regulation ((EU) 2016/679) and the UK Data Protection Act 2018, or any successive regulation or legislation.
- 1.2 Research data management practice see Research Data Management Policy for definition.
- 1.3 Recording data management decisions and ensuring their availability for audit purposes.
- 1.4 Ensuring data management practice is carried out in accordance with participant consent.
- 1.5 Ensuring all users (including third parties), who have access to University-owned devices comply with the UoA Data Protection Policy, Information Security Policy, sub-policies, and IT Conditions of Use.
- 1.6 Ensuring transfer or transportation of data, particularly personal, confidential, and commercially-sensitive data, is carried out in accordance with Data Protection legislation, the University of Aberdeen Data Protection Policy, and using approved University transfer mechanisms (e.g. secure file transfer protocols such as Zend.to).

2 Risk Assessment

- 2.1 Assessing and managing risk according to the nature of the research project, its potential to create harm, potential risk to the University's reputation, and financial risk.
- 2.2 To consider all relevant risks and ensure, where possible, mitigations are built into the project design. If not possible, ensuring significant risks are understood and accepted by Head of School.
- 2.3 Where relevant (where research involves personal data), the <u>Data Protection Impact</u> <u>Assessment screening questions</u> should be undertaken to assess risk and, where necessary, a full DPIA should be completed.
- 2.4 In advance of any data sharing, you should consider whether any process or documentation needs to be completed. This could be a SCDA (Supplier Cyber and Data Assessment), where you are planning to share personal or University data with a supplier or allow them a connection to the University network. If the sharing is with a collaborator, then a data sharing agreement is likely needed. There may also be other circumstances such as international transfers of personal data, where you need to work through the International Data Transfer Framework and you should contact the Information Governance Team at dpa@abdn.ac.uk if you have cause to do so.
- 2.5 Where a University research project involves working with partners outside the UK, risk assessment may need to consider the legislative framework of the relevant country/countries.
- 2.6 Where University-owned devices are to be used by third parties to collect, store, or transfer data, ensuring the device set up is discussed with DDIS (Digital and Information Services) and, where data governance issues or risks are identified, enabling appropriate device management to be put in place.

See Annex 1 for further guidance/process for managing risk.

3 Data Management

- 3.1 Managing research data in line with all relevant UoA Policies and guidelines.
- 3.2 Identifying and managing who has access to the data throughout the lifetime of the project, and specifying appropriate levels of access to the data (e.g. Read Only or Read/Write).
- 3.3 Ensuring data collection (regardless of methodology e.g. surveys, questionnaires, interviews etc.) is undertaken using University approved data collection mechanisms and is carried out with the necessary institutional consent, approvals, and data protection in place.
- 3.4 If leaving the organisation, identifying and agreeing the new data custodian.
- 3.5 Consulting relevant third parties in relevant aspects of data management (e.g. research participants; academic and non-academic partners) in making these decisions.

4 Data Management Plans (DMP)

- 4.1 DMPs are required, pre delivery phase, for all research projects where any of the following apply:
 - The funder mandates the completion of a DMP;
 - Relevant ethics review board determines requirement for a DMP;
 - Following review of project design and risk, the PI is advised by any of: the Information Governance Team (which includes the Data Protection Officer), the IT Security Manager, Business Development Officer, Information Champion, or Directorate of Digital & Information Services Digital Research Team.
- 4.2 DMPs will take account of requirement for public access to research data under appropriate safeguards or legitimate restrictions, specified on ethical, legal, or regulatory grounds, or on commercial conditions of funding.
- 4.3 Where a third party or partner organisation is responsible for the compilation of the DMP, the University of Aberdeen upholds the right to negotiate the terms of this document to ensure our institutional practices are reflected and honoured, led by the PI in the first instance.
- 4.4 Where risks are identified or a DMP is explicitly mandated (see Research Data Management Policy for further guidance), projects should include a DMP up-front as an integral part of a research proposal:
 - DMPs should be kept up to date for the lifetime of the project and reflect any changes in practice to the existing plan, e.g. the way data is to be managed, accessed, shared, protected, or stored;
 - The length of time data is to be retained and the related parameters should be set out in the DMP;
 - DMPs will consider appropriate access to research data under appropriate safeguards or legitimate restrictions, specified on ethical, legal or regulatory grounds, or on commercial conditions of funding;
 - DMPs should indicate where data is/will be deposited (e.g. UoA storage facility or outside the University, for example, in a disciplinary or national data repository).

5 Open Access and Preservation

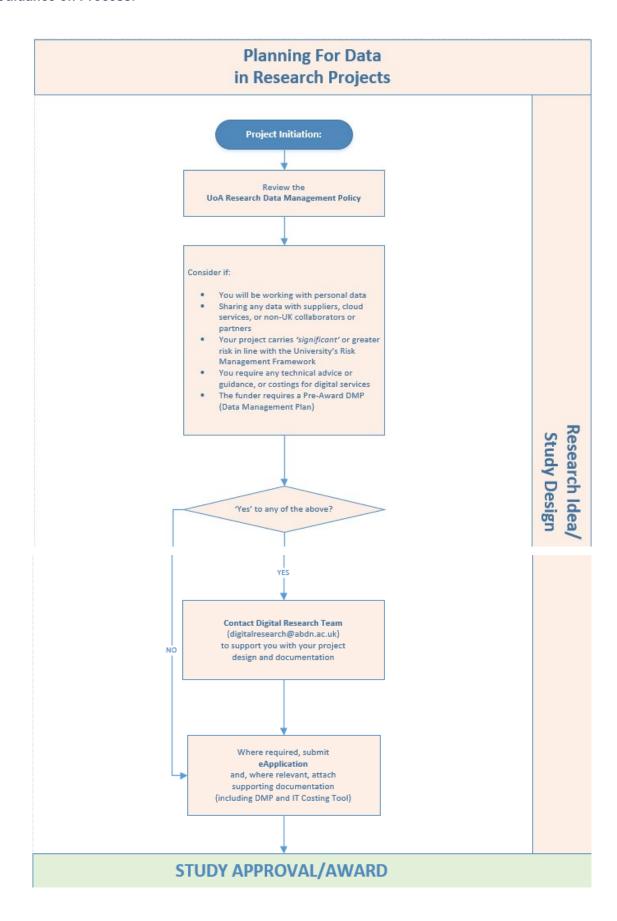
- 5.1 Supporting and responding appropriately to the University's aims in respect of open access publishing of data.
- 5.2 Assessing and identifying longer term storage and open access opportunities, and ensuring these are costed appropriately in funding applications.
- 5.3 Ensuring that intellectual property rights are retained in line with University, funder, data supplier, and third-party requirements and rights.
- 5.4 Researchers should identify the most appropriate repository based on relevant legislation, polices, contractual obligations and consent obtained from research participants.
- 5.5 Options for consideration include:
 - 5.5.1 National Archives
 - 5.5.2 Funder Repositories

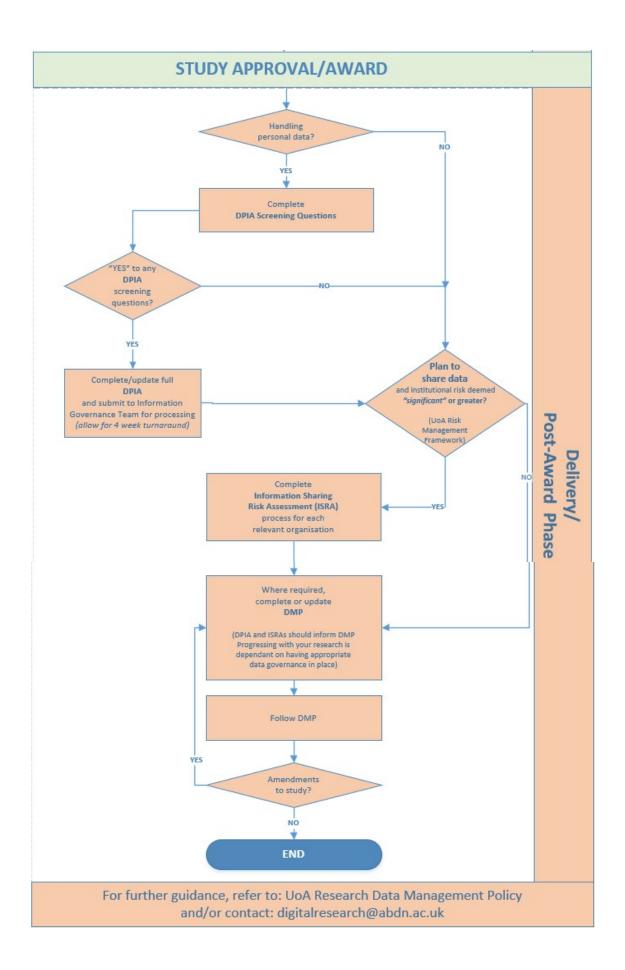
- 5.5.3 Discipline Specific Repositories
- 5.5.4 Other External Repositories
- 5.5.5 AURA
- 5.5.6 Data Catalogue (PURE)
- 5.5.7 Other UoA Managed Storage (for consideration where none of the above are deemed appropriate)
- 5.6 All data sets should be listed in PURE with relevant metadata, data location, and where applicable the DOI listed.

For further information or support, please contact digitalresearch@abdn.ac.uk

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