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RESEARCH DATA MANAGEMENT POLICY

# st george’s principles on data management

St George’s, University of London (hereafter referred to as ‘the University’) recognises that good research data management

1. demonstrates the quality of our research and the integrity of our scientific practices
2. produces research outputs that are reliable and reproducible
3. demonstrates regard for data protection and security and protects intellectual property
4. complies with funder, publisher and community policies, standards and expectations
5. ensures that research data can be shared, reused and preserved in the long term

The University is committed to enabling good practice in research data management and recognises that there is a balance between openness and duties under professional codes and legal obligations.

# responsibilities

Principal Investigators (PIs) and student research supervisors will hold primary responsibility for compliance with this policy. Computing Services will provide resilient storage, backup and technical advice in support of this policy. The RDM Service will provide information and advice on scientific data management and stewardship. The Joint Research and Enterprise Services (JRES) will be responsible for research contracts, regulatory support and intellectual property.

# Definitions

Research data are any evidence that underpins research and that can be used to support or validate research findings. For the purpose of this policy ‘data’ includes digital information: (1) created directly from research activities such as experiments, analysis, surveys, measurements, instrumentation and observations and (2) resulting from automated or manual data processing including the inputs and outputs of simulations and models.

# Policy statements

This policy should be read in conjunction with the following University policies: [Intellectual Property Policy](https://www.sgul.ac.uk/about/our-professional-services/joint-research-and-enterprise-services/enterprise-innovation/strategy-policy-documents), [Information Security Policy](https://www.sgul.ac.uk/about/our-professional-services/information-services/it-services/regulations-and-policies/it-security-policies), [Data Protection Policy](https://www.sgul.ac.uk/about/governance/policies/data-protection-policy), [Research Misconduct Procedure](https://www.sgul.ac.uk/about/governance/policies/research-misconduct-procedure), [Freedom of Information Policy](https://www.sgul.ac.uk/about/governance/policies/freedom-of-information), [Digital Preservation Policy](https://www.sgul.ac.uk/about/governance/policies/staff-only-policies/digital-preservation) and [Open Access Publications Policy](https://www.sgul.ac.uk/about/governance/policies/open-access-publications).

1. This policy applies to all research conducted by members of the university, including clinical researchers.

1. Research data handled at the University should be managed in compliance with UKRI’s [Common Principles on Research Data](https://www.ukri.org/manage-your-award/publishing-your-research-findings/making-your-research-data-open/) and other funder and community standards. Researchers should seek guidance from the JRES on funder requirements for data management.

1. All researchers and supervisors (including postgraduate and undergraduate students who participate in research projects at the University) are responsible for familiarising themselves with and adhering to legislation, regulatory requirements, contractual and ethical obligations, funder policies and good practice that pertain to their research data.
2. Where research is funded by a third party, any agreements made with that party concerning intellectual property rights, access rights and the storage and ownership of data take precedence over this policy.
3. Where research involves the use of data owned by a third party, researchers must abide by licences or terms of use governing the data.
4. Where required, research proposals for funded research should include a data management plan.
5. Where possible, researchers should seek to recover direct costs of managing research data from their funder(s).
6. Researchers are responsible for ensuring that research data are stored securely and protected from loss and unauthorised access.
7. Researchers are responsible for providing sufficient descriptive information about their research and data to ensure that data can be discovered, understood and responsibly reused.
8. Research data managed by SGUL staff should be appropriately passed on to line managers or PIs upon leaving the University.
9. Where required, research data should be made available with as few restrictions as possible and with appropriate safeguards where necessary, unless this would breach legislative, regulatory, contractual, ethical, or other obligations.
10. St George’s is a public authority under the Freedom of Information Act (FOIA) 2000 and the Environmental Information Regulations (EIRs) 2004. St George's is obliged to disclose information when requested, including research information, unless it is subject to exemption/exception clauses under FOIA/EIRs.
11. All project teams handling personal data should record their data with the University. Personal data should always be handled in accordance with university information governance policies.
12. 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. Researchers must also consider whether Research Data has commercial potential and in consultation with JRES consider if it is suitable for protection and/or transfer under the University's Intellectual Property Regulations.
13. 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 14 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.
14. Unless legal or funder requirements specify otherwise, research data must be preserved after the completion of a project in line with University [Retention Schedules](https://www.sgul.ac.uk/about/governance/policies/records-management) if they substantiate research findings, support a patent application, are of acknowledged long-term value, or if there are other legal or regulatory requirements for data retention.