

University of Westminster Research Data Management Policy

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2	April 2022	Holly Ranger	Academic Council, December 2022	Additions: list of key expectations for researchers; clauses on research related records, research data ownership, retention, the preservation of websites created in the course of research, metadata records, and Data Access Statements; cultural and political sensitivities included as valid exceptions to open data; glossary of terms.
1	May 2017	Jenny Evans	Academic Council, June 2017	

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1. Introduction

The University of Westminster recognises that the good management of research data throughout the research lifecycle improves the transparency, integrity, reproducibility, and reach of scholarly research. Good research data management underpins the University's strategic commitment to open research, which, in turn, is a key driver in achieving the [UN's Sustainable Development Goals](#)' call for public access to information for all (Goal 16, Target 10). The University's [Code of Research Good Practice](#) formalises the importance of best practice in the management of research data and research related records to the University's commitment to supporting "a research environment that is underpinned by a culture of integrity".¹ The [University of Westminster's Digital Strategy](#) commits to ensuring that safe, secure, and compliant systems and processes exist for the collection, storage, sharing, and preservation of research data.

In parallel, research funders and sponsors have clear policies relating to research data management and open research data. UKRI's commitment to making publicly funded research data Findable, Accessible, Interoperable, and Reusable in line with the [FAIR Data Principles](#) is affirmed by the [Common principles on research data](#) (RCUK, 2011) and the [Concordat on Open Research Data](#) (HEFCE, UKRI, UUK, and Wellcome, 2016). [Horizon Europe](#) (European Commission, 2022) requires "open access to research data under the principle 'as open as possible, as closed as necessary'".² It is recognised that researchers cannot meet open research data expectations without support from their institution.

Managing research data effectively:

- increases the visibility and integrity of scholarly research;
- maximises the utility and reusability of research data;
- maximises the potential for collaboration;
- mitigates against the risk of accidental loss of research data;
- mitigates against the accidental or inappropriate release of personal data and sensitive information;
- ensures the long-term preservation of and access to research datasets;
- enables research data to be shared as a public good.

This policy outlines the obligations of and key expectations for researchers and the institution in relation to the management and preservation of research data and research related records created at the University of Westminster. This policy clarifies the responsibilities of both individual researchers and the institution in relation to good research data management and support.

2. Purpose

The aims of this policy are to:

1. promote best practice in research data management in accordance with the FAIR Data Principles to ensure that research data and research related records are managed and preserved in a manner that maximises the transparency, integrity, quality, and reproducibility of scholarly research, and ensures the long-term accessibility and reusability of research data;

¹ UUK Concordat to Support Research Integrity, p. 1. The University's [Code of Research Good Practice](#) takes account of the [Universities UK Concordat to Support Research Integrity](#) (2019), the [UK Research Integrity Office's \(UKRIO\) Code of Practice for Research](#) (2021), and the UKRIO ARMA report [Research Ethics Support and Review in Research Organisations](#) (2020).

² Horizon Europe Programme Guide, p. 39.

2. to make research data created at the University of Westminster as open as possible unless there are valid reasons not to do so, in line with the University of Westminster Code of Research Good Practice;
3. to support and encourage data leadership across the University, in line with the University of Westminster's Digital Strategy;
4. to highlight that responsibility for research data management falls within the remit of a range of stakeholders across the institution who must work together to build a cohesive support service that puts researchers at its centre.

3. Scope

This policy covers the management, retention, and preservation of all research data and research related records created, collected, or re-used at the University of Westminster, including the documentation of practice based research. This policy applies to all University colleagues and doctoral researchers who conduct research. This policy does not apply to taught course students; however, taught course students are encouraged to adopt best practice in research data management.

This policy does not cover records created in the course of the University of Westminster's business, which are covered by the [University Records Management Policy](#), the [University Records and Archives Collection & Acquisition Policy](#), and the [University Records and Archives Digital Preservation Policy](#). This policy should be read in conjunction with relevant copyright, data protection, and FOI legislation as well as relevant institutional policies, such as those relating to information security, research ethics and integrity, intellectual property and use, the Human Tissue Act, and Security Sensitive Research. Relevant institutional policies and codes of practice are listed in Appendix B.

4. Institutional responsibilities

4.1 It is recognised that institutional responsibility for research data management (RDM) falls within the remit of a range of stakeholders across the institution, including but not limited to Information Systems and Support, Library & Archives Services, and the Research and Knowledge Exchange Office.

4.2 The University (data controller) is responsible for:

1. ensuring that researchers have access to the necessary infrastructure and skills to manage their research data appropriately;
2. providing appropriate systems and infrastructure, supporting documentation, and services;
3. providing, maintaining, and updating relevant online guidance to support researchers and doctoral researchers to appropriately manage their research data before, during, and after the completion of research projects;
4. maintaining a programme of training;
5. maintaining an RDM support service;
6. promoting the RDM Policy and raising awareness of best practice in research data management.

4.3 The University will develop an associated communications strategy to identify channels for and deliver a programme of advocacy and awareness-raising, in consultation with relevant stakeholders.

4.4 The University will continue to engage with all stakeholders in the ongoing development of the RDM service via the Research Data Management Working Group to ensure that strategic priorities for the RDM service are aligned with institutional goals and stakeholder needs.

4.5 The University will maintain an associated RDM Roadmap to identify priorities and associated milestones for the ongoing development and implementation of the RDM service.

5. Researcher responsibilities

5.1 Researchers are responsible for familiarising themselves and complying with the relevant RDM, record-keeping, open data, and retention requirements of research funders, sponsors, publishers, and other relevant external stakeholders, as well as the relevant legal, ethical, and regulatory frameworks governing the processing of personal data and sensitive research data.

5.2 At a minimum, researchers should recognise the importance of research data planning and management in research design, research and knowledge exchange ethics review processes, and active post-award management.

5.3 Individual researchers, or, the Principal Investigator in the case of collaborative research projects (data creators) are responsible for making appropriate decisions and applying best practice in relation to the management of their research data and research related records.

5.4 Doctoral supervisors are responsible for ensuring that doctoral researchers (data creators) have access to the necessary skills and infrastructure to manage their research data appropriately.

5.5 Researchers should ensure at the beginning of any research project that there is clarity about data ownership and data management responsibilities and that these are documented in any associated data management plan and/or collaboration agreement.

5.6 Researchers are responsible for making appropriate appraisal decisions in relation to the retention, transference of ownership, or destruction of research data held in the University's storage environments if/ when they leave the University, as per the HR Leavers Checklist. Responsibility for curatorial decisions thereafter (such as those relating to the deletion or migration of data) lies with the line manager or Director of Studies (in the case of doctoral researchers). Ultimate responsibility lies with the Head of School.

6. Key expectations

6.1 Researchers must complete a data management plan (DMP) for all research projects where a research funder or sponsor requires a DMP. All research would benefit from research data management planning, and researchers are strongly encouraged to complete a DMP before the commencement of any research activity.

6.2 Researchers should familiarise themselves with University RDM solutions in order to make appropriate decisions in relation to the storage and management of active research data and research related records.

6.3 Researchers should identify research data and research related records for preservation beyond the lifetime of research projects by engaging in an appropriate selection and appraisal process.

6.4 Researchers who create websites to gather, process, or disseminate research data, activities, or outputs must plan how they will preserve the website at the end of the research project. The University cannot guarantee the long-term sustainability of a project website and reserves the right to take websites that pose a security or regulatory compliance risk offline, as per the IT Acceptable Use Policy.

6.5 Researchers should deposit research data selected for preservation in an appropriate research data or software repository, in line with the FAIR Data Principles, and normally no later than the publication of any associated research outputs. Researchers are encouraged to deposit research data from funded projects, practice based outputs, doctoral theses, and orphan datasets not preserved elsewhere in WestminsterResearch via the VRE.

6.6 Researchers must transfer research related records selected for retention to University Records & Archives on completion of the research project.

6.7 Researchers are strongly encouraged to make research data metadata records publicly accessible, even when the research data are not available, or no longer available.

6.8 Researchers should register all research data or software preserved in external repositories as an output in WestminsterResearch via the VRE as soon as practicable. Researchers are strongly encouraged to link preserved datasets to their publication record using their author ORCID.

6.9 Researchers should make research data as open as possible, except in circumstances where there are valid reasons not to do so. Doctoral researchers are encouraged to share research data as openly as possible alongside their open access doctoral theses, except in circumstances where there are valid reasons not to do so. It is recognised that there may be legal, ethical, commercial, political, environmental, or cultural reasons for not sharing data, including but not restricted to personal data protection, copyright/ IP, and the protection of marginalised communities. It is also recognised, in line with [The CARE Principles](#), that Indigenous Peoples hold the authority to make decisions about sharing Indigenous data.

6.10 Researchers must include a data access statement in research outputs where mandated by a research funder, sponsor, or publisher, even where there are no research data associated with the output or the research data are inaccessible. Researchers are strongly recommended to include a data access statement in all research outputs, even where there are no research data associated with the output or the research data are inaccessible.

6.11 Researchers should establish an appropriate date (x -years post-project) at which to review preserved research data for further retention or destruction.

7. Policy implementation and review

This policy updates the University of Westminster Research Data Management Policy 2017.

This policy was written in April 2022 and was approved by Academic Council on 07/12/2022 after consultation with the following committees and working groups:

- Research Data Management Working Group (April 2022)
- Graduate School Board (May 2022)
- University Research & Knowledge Exchange Ethics Committee (June 2022)
- Research Committee (June 2022)
- Research & Knowledge Exchange Steering Committee (September 2022).

This policy comes into effect 08/12/2022. This policy should be reviewed in 2025.

Appendix A: Glossary

A **Data Access Statement**, or Data Availability Statement, is a statement appended to a research publication that describes where the underlying research materials associated with a paper are available, and how they can be accessed, including any restrictions on access and reuse.

A **Data Management Plan (DMP)** is a formal document that describes how research data and materials will be managed or curated during and beyond the lifetime of a research project.

Digital preservation refers to the series of managed activities necessary to ensure continued access to digital materials. These actions include but are not limited to the appropriate selection and appraisal of research data and research related records for preservation.

FAIR data are those research data which are Findable, Accessible, Interoperable, and Reusable. FAIR data are not equivalent to open data, as research data can be FAIR even when access is restricted.

Metadata are information that describes data. Metadata provide context and meaning to your research data or research materials and enable you and others to make sense of and reuse your data in the future. At a minimum, your documentation or metadata should clearly tell the story of how you created, gathered, and used your research data or research materials and for what purpose.

Open data are those research data that are discoverable, publicly accessible, and reusable.

A **Persistent Identifier (PID)** is a unique, stable, permanent reference to a digital object. PIDs include ORCIDiDs for authors, and DOIs for journal articles and datasets. They provide a reliable way to track citations and reuse, facilitating the discoverability and citation of research.

Research data management (RDM) concerns the organisation of research data and materials throughout the research lifecycle. It includes “data collection or acquisition, organisation, curation, storage, (long-term) preservation, security, quality assurance, allocation of persistent identifiers (PIDs), provision of metadata in line with disciplinary requirements, licencing, and rules and procedures for sharing of data. RDM is an essential element in any project that generates, collects or re-uses data”.³

Research data are any digital object created or collected during the course of research. These might include documents, still images, video and audio files, spreadsheets, software, computer code, databases or websites, in addition to physical objects such as sketchbooks, diaries, lab notebooks, portfolios, models, other artefacts, and includes the documentation of practice based research.

Research related records are physical or digital records created by a researcher in the course of research and relating to the administration, management, and delivery of research projects, activities and outputs. These may include consent forms, procedures, protocols, approvals, provenance information, laboratory notebooks, project reports, administrative or financial records, data management plans, primary datasets, databases, or samples.

³ Horizon Europe Programme Guide, p. 43.

Appendix B: relevant internal policies, codes of practice, and frameworks

[Being Westminster: Our Strategy 2022-2029](#)

University of Westminster Research Strategy

University of Westminster Knowledge Exchange Strategy

University of Westminster Digital Strategy - 'Digital Westminster'

[University of Westminster Strategy for Research Development and Support 2020-2023](#)

[University of Westminster Code of Research Good Practice 2020-2021](#)

[University of Westminster Code of Practice Governing the Ethical Conduct of Research 2020-21](#)

Human Tissue Act SOP

Security Sensitive Research SOP

[Open Access Policy](#)

[University of Westminster Records Management Policy](#)

[University Records and Archives Digital Preservation Policy](#)

[University Records and Archives Collections & Acquisition Policy](#)

[Intellectual Property Policy](#)

[Information Security Policy](#)

[IT Acceptable Use Policy](#)

[IT Asset Management Policy](#)

University of Westminster Data Protection Impact Assessment (DPIA) Policy

[University personal data protection policy](#)

[HR Leavers Checklist](#) for Managers