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RESEARCH DATA MANAGEMENT POLICY

1. Introduction
The London School of Hygiene & Tropical Medicine recognises that research data created, collected, generated, or otherwise produced during the research process are a key asset that will continue to have value for the creator, institution, and research community as a whole.

The School regards the management of research data to be an integral part of good research practice that protects the intellectual and financial investment made in its creation and enables it to be shared and validated.

2. Purpose
The Research Data Management Policy (henceforth RDM Policy) describes a set of principles for the management of physical and digital data assets produced as part of the research process. It is intended to perform several functions within the School:

- Recognises research data as a key asset that contributes to the School’s objectives of encouraging rigorous scientific enquiry
- Establishes data management as an activity that must be performed to protect the value of research data over time
- Describes a set of principles that contribute to the management of research data in accordance with good research practice

The Policy forms a component of the School’s research governance strategy, around which systems, processes and procedures may be created to ensure that research data are created, stored, shared, and disposed of, in a secure and responsible manner that complies with relevant obligations and commitments.

Responsibility for ensuring compliance with this Policy rests with the Research Data Management Support Service (RDMSS), which will report to Academic Affairs.

3. Applicability
The Policy specifies the expectations for research data management in the School. Exemption will be granted if compliance will breach legislative, regulatory, contractual, ethical, and/or other obligations. Authorisation can be sought from the Research Data Management Support Service, acting on behalf of Academic Affairs. The decision will be escalated in more complex cases.

The Research Data Management Policy applies to all members of the School conducting research or involved in the creation, collection, or generation of research data. This shall include, but not be limited to, employed staff, research students, honorary staff, and visiting academics. This group will be collectively referenced as ‘Researchers’. Exemptions to specific principles are outlined in the relevant text.

Primary responsibility for data management lies with the senior researcher associated with the project, typically the Principal Investigator. Responsibility for taking action may be delegated to a researcher named in the Data Management Plan.

Where research is conducted with other institutions and independent researchers, School researchers are responsible for the management of research data held by the School that is under their own control.

4. Statement of Principles

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The School defines the following set of principles to be followed by researchers in order to ensure that research data are managed in accordance with relevant legislative, regulatory, contractual, ethical, and other obligations.

i. **Research data must be created, maintained and shared in accordance with contractual, legislative, regulatory, ethical and other relevant requirements**

Research data is created, managed and used in an environment that is often highly regulated, subject to a range of contractual, legislative, regulatory, ethical, and other requirements at the local, national, and international level.

Researchers are expected to maintain awareness of current requirements and obligations set by the school, funder, data supplier, and other relevant bodies, and adopt practices that are appropriate and conform to best practice within the subject domain. These should include the application of appropriate measures to protect research participants throughout the research lifecycle.

ii. **Rights assigned to research data should not unnecessarily restrict its management, sharing, or use**

The ability to store, manage, share and use research data is dependent upon intellectual property rights being understood and allocated from the outset of the research process.

Rights information indicating ownership and permitted use of research data, should be clear and unambiguous, and documented at an appropriate level of granularity. This is particularly important when participating in multi-institution research collaborations and when utilising data obtained from third parties, which will require consideration of the contribution that each party has made to the work.

Exclusive rights to ownership and use of research data should not be handed over to a third party, unless it is a condition imposed by contractual or other obligations. Instead, Researchers are encouraged to apply a licence that enables research data to be accessed and analysed by many parties.

iii. **A Data Management Plan should be produced for all research projects that are creating or capturing data**

A Data Management Plan describing the approach that will be taken to create, manage, and share research data should be produced by all School-led research grants that are creating, capturing, or enhancing data. This expectation covers public and private funded research projects submitted from January 2015 onwards that are subsequently awarded and research undertaken for MPhil/PhD/DrPH degrees. It excludes research projects analysing secondary data only, consultancy work and MSc student projects performed solely in pursuit of a qualification.

The Researcher may provide the Data Management Plan that was submitted to the research funder. If the funder does not request this document, the researcher should complete a Data Management Plan using the School template.

PhD/DrPH students are encouraged to agree a Data Management Plan with their Supervisor and submit this as part of their Upgrading or Review Report.

The information provided in the Data Management Plan will be used by the School RDM Support Service, IT Services, and other units to demonstrate that it complies with third party obligations, such as those imposed by research funders, and identify areas where further research support is required, addressing factors such as advice and guidance, training, and technical infrastructure.
iv. **Research data created or captured by researchers must be registered with the School, irrespective of whether it is hosted at the School or elsewhere**

Principal Investigators are required to provide information that describes the research data produced by new projects from January 2015 onwards. This will include all outputs that are significant to the research activity, irrespective of the storage location (held by the School or elsewhere) and medium (hardcopy, digital, or other). The research data itself does not need to be provided, except in conditions established in Principle vii.

The requirement covers School-led research grants and those in which the School has been assigned formal responsibility for data collection or data management in a contract or sub-contract. Researchers working on consultancy work are encouraged to register details of their research data within the same catalogue, if it does not breach confidentiality, contractual or other obligations imposed by a third party.

Information on research data must be provided prior to the end of the project’s funding period. Longitudinal studies and other long-term research activities should provide information on completion of each unit of work (e.g. every 6 or 12 months).

Information on research data (as distinct from the data itself) will under normal circumstances be made available openly in appropriate locations (e.g. via the LSHTM Research Data Repository). A Principal Investigator may request it is withheld for a designated time period, for example, to allow time to obtain a patent, prepare and publish research findings, protect third party confidentiality, or comply with contractual obligations. Decisions on whether to authorise requests will be made based on criteria specified by Academic Affairs, acting on behalf of the Senior Leadership Team.

v. **Research data must be held in a managed storage environment throughout the period of retention**

Research data must be stored in a managed environment that protects against data loss and corruption, unauthorised access and modification, and complies with relevant legal, regulatory, contractual, and other obligations for the period that it needs to be kept. The managed facility may be operated by the School and/or a trusted third party.

The School’s Records Retention and Disposal Schedule states that research data must be kept for a minimum of 10 years following project completion, with the recognition that a longer retention period may be specified by third parties.

In circumstances where institutional storage is not available (e.g. when working in the field), the researcher should take steps to maintain the integrity of the data, and ensure that appropriate security measures are in place to prevent unauthorised access. The research data must be transferred into a managed storage environment at the earliest opportunity.

vi. **Research data created or captured by LSHTM researchers should be offered to an appropriate data repository or enclave designated by the School or Funder, except in circumstances that would breach IPR, ethical, confidentiality, or other obligations**

Research data should be curated and preserved for the full period of retention, in conformance with the LSHTM Records Retention & Disposal Schedule and other relevant legislative, regulatory, or contractual obligations. To ensure that research data are managed appropriately, a copy should be offered to an appropriate Data Repository or Data Enclave designated by the School or Funder following completion of the work, and held for a period that meets relevant requirements.

The School will provide a Data Repository that may be used to manage research data over time. Research data that cannot be made available or are already shared through an existing system (e.g. a system operated by the project team or a partner institution) may be deposited with the School’s Research Data Repository for preservation purposes and withheld from release.
The location of each copy of the research data should be registered with the Research Data Management Service, in line with Principle iv.

vii. Research data that substantiate research findings should be made available for access and use in a timely manner, within the boundaries of conditions established by contractual, legislative, ethical, or other requirements.

Data sharing represents a key component of good research practice that contributes to the School’s strategic objectives of advancing research and education in public health. The School encourages researchers that have created or captured data to make it available for access and use in a timely manner, in conditions where it is feasible under contractual, legislative, regulatory, ethical, and other obligations.

Where necessary, appropriate safeguards should be put in place to protect participants and ensure that access conditions are met (e.g. anonymisation, access passwords, inclusion of rights statement) in compliance with the LSHTM Guidelines on Good Research Practice.

On project completion, the researcher should submit a short statement to the Research Data Management Support Service indicating if it is feasible to make the data available for access.

viii. Research data produced and/or used during research must be cited in research outputs.

Good research practice is built upon the recognition of all source material that contributes to the performance of research activities. Researchers must ensure that research data used during the research process is cited in conference papers, journal articles and other research outputs.

Journal publications that report on publicly funded research should include an access statement that indicates how research data may be accessed and any associated conditions. A persistent identifier, such as a Digital Object Identifier (DOI), should be included when one is available.

ix. Management and sharing of research data should be supported through the allocation of research funding, where permitted.

The storage, management and sharing of research data carries a cost, particularly if there is a need for long-term curation and dissemination, requiring the provision of staff and system resources. Costs for data management and sharing activities should be written into research grant applications and research degree fellowship applications, unless explicitly forbidden by the funder.

5. Contacts
Questions related to the Research Data Management Policy should be directed to the Research Data Management Support Service (researchdatamanagement@lshtm.ac.uk).

6. Definitions
• Data Enclave: A secure environment used for storage of confidential data that can be accessed by authorised users only.

• Data Repository: A system for storing, managing and, in some cases, sharing data. Data repositories commonly publish collection policies that state the data that they are willing to accept and that which they are not. For example, a LSHTM Research Data Repository may only accept data produced by researchers working with the School.

• Designated User Community: The user community that is served by the Research Data Repository and/or researcher. The Designated User Community may represent a subset of the total user community that may potentially use the data.
• **Non-Exclusive Licence**: A licence that grants the same rights to an intellectual property to several licensees. This differs from an exclusive licence, which assigns rights to a specific licensee, to the exclusion of others.

• **Principal Investigator**: The lead researcher or scientist for a project.

• **Researcher**: Any person conducting research or involved in the creation, collection, or generation of Research Data, for or on behalf of the School. This may include, but not be limited to employed staff, research students, and honorary staff.

• **Research Project**: A unit of work performed by one or more researchers that has been established for the purpose of addressing specific aims and objectives.

• **Retention Period**: The time period for which the research data must be kept. The time period is influenced by several factors, including institutional, legislative, regulatory, and contractual obligations. The LSHTM RR&D Schedule state that research data must be retained for a minimum of 10 years following project completion, with the recognition that third party requirements that have a longer retention period will take precedent.

• **Research Funder**: An agency responsible for the financial support of research activities.

7. **Review Schedule and Responsibility**
Approved by LSHTM Senior Leadership team. June 2014.

This policy will be reviewed annually by Academic Affairs.

**References**

- **LSHTM Data Protection Policy**  
  <http://intra.lshtm.ac.uk/infoman/data/index.html>

- **Guidelines on Good Research Practice**  
  <http://www.lshtm.ac.uk/research/about/guidelines_on_good_research_practice.pdf>

- **LSHTM Information Management and Security Policy**  
  <http://intra.lshtm.ac.uk/infoman/security/index.html>

- **LSHTM Records Retention & Disposal Schedule**  
  <http://intra.lshtm.ac.uk/infoman/records/retention.html>

- **LSHTM Research Data Management Steering Group – Terms of Reference**  
  <http://blogs.lshtm.ac.uk/rdmss/outputs/>