EPSRC Research Data Management Compliance Report

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Report Version Control

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<th>Date</th>
<th>Author</th>
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<tr>
<td>1.0</td>
<td>18 January 2013</td>
<td>Gareth Knight</td>
<td>First version of RDM Roadmap produced, outlining how LSHTM intend to comply with each of the EPSRC Expectations</td>
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<tr>
<td>1.1</td>
<td>30 March 2015</td>
<td>Gareth Knight</td>
<td>Majority of text re-written to reflect current status of RDM support in preparation for EPSRC May 2015 deadline</td>
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<td>1.2</td>
<td>30 April 2015</td>
<td>Gareth Knight</td>
<td>Minor revision based on feedback from RDM Steering Group and other staff consulted.</td>
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Introduction
This report describes the approach taken by the London School of Hygiene & Tropical Medicine to enhance data management practice within the institution and fulfil expectations published by the Engineering and Physical Sciences Research Council (EPSRC). Specifically, it addresses requirements outlined in two documents:

1. EPSRC Policy Framework on Research Data: Expectations
   <http://www.epsrc.ac.uk/about/standards/researchdata/expectations/>
2. Clarification of EPSRC Expectations on Research Data Management
   <http://www.epsrc.ac.uk/files/aboutus/standards/clarificationsofexpectationsresearchdatamanagement/>

The Engineering and Physical Sciences Research Council (EPSRC) ‘Policy Framework on Research Datasets’\(^1\) identifies research data as a ‘public good produced in the public interest’ that should be managed and shared in order to protect and maximise the investment made in its creation. To ensure that adequate resources are allocated to this task, the EPSRC sets out nine ‘expectations’\(^2\) that the host institution must provide to researchers. These requirements are accompanied by a penalty – if an institution is found to be seriously failing to comply with the expectations, or deliberately obstructing their application by the 1\(^{st}\) May 2015 deadline, a decision may be taken to withdraw existing funding, and declare the institution ineligible for future funding until the issues are addressed.

Although the London School of Hygiene & Tropical Medicine currently receives little funding from the EPSRC, it is considered important that it fulfils their stated requirements for two reasons:

1. To ensure that LSHTM researchers are able to seek EPSRC funded research grants in the future
2. To ensure that research data management services operated by the School comply with good practice and remain competitive with similar work performed in the broader academic sector.

Approval Process
This document was reviewed by the LSHTM RDM Steering Group in April 2015.

Review Schedule
This document will be reviewed annually by the RDM Support Service and further details added on new initiatives that address obligations and respond to emergent expectations as required.

Acknowledgement
We would like to acknowledge the influence of several other EPSRC Roadmaps\(^3\) upon the development of LSHTM’s compliance report, most notably the University of Bath’s EPSRC Roadmap\(^4\).

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1 [http://www.epsrc.ac.uk/about/standards/researchdata/](http://www.epsrc.ac.uk/about/standards/researchdata/)
2 [http://www.epsrc.ac.uk/about/standards/researchdata/Pages/expectations.aspx](http://www.epsrc.ac.uk/about/standards/researchdata/Pages/expectations.aspx)
4 [http://www.bath.ac.uk/rdso/University-of-Bath-Roadmap-for-EPSRC.pdf](http://www.bath.ac.uk/rdso/University-of-Bath-Roadmap-for-EPSRC.pdf)
**EPSRC Expectations**

1. **Awareness of EPSRC principles and expectations**

   “Research organisations will promote internal awareness of these principles and expectations and ensure that their researchers and research students have a general awareness of the regulatory environment and of the available exemptions which may be used, should the need arise, to justify the withholding of research data” (EPSRC Expectation 1)

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| 1.1 | **Promote awareness of EPSRC principles & expectations** | The importance data management is promoted in:  
- Guidelines on Good Research Practice  
- Research Degrees Handbook  
- RDM Policy and RDM introduction information  
  LSHTM policy suite covers topics such as Information Management and Security, Data Protection, and Freedom of Information.  
  Individual units, such as Clinical Trials, maintain Standard Operating Procedures (SOPs) that cover the design, management, conduct, oversight, regulatory requirements and completion of research projects within specific environmental contexts.  
  LSHTM RDM Policy incorporates relevant EPSRC principles  
  EPSRC summary guide published on RDM website  
  Tailored guidance on EPSRC requirements provided through RDM modules for staff and students | RDM Service | Green |
|     | The EPSRC expect researchers and students to be aware their requirements |  |  |  |

| 1.2 | **Ensure researchers & students are aware of regulatory environment** | Relevant LSHTM Policies listed in (among other locations):  
- Funder Data Management Plan (DMP) examples  
- Clinical Trial Data Management SOP  
- LSHTM RDM webpages  
  Domain and country specific regulations outlined in the academic teaching programme, seminar series & staff/student training modules,  
  Many guides are tailored to specific research areas, e.g. clinical trials. | Information Services Directorate and other units | Green |
<p>|     | The EPSRC expect researchers and students to be aware of regulatory and funding environment in which they work |  |  |  |</p>
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<td>1.3.</td>
<td>Awareness of reasons to withhold research data</td>
<td><strong>The EPSRC do not expect researchers to breach regulatory, contractual, or other obligations and expect institutions to guide researchers on the topic.</strong></td>
<td>Guidance published on LSHTM RDM website recommends a measured approach to data sharing that addresses all relevant, but potentially overlapping obligations</td>
<td>RDM Service</td>
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<td></td>
<td></td>
<td>RDM training modules for staff and PhD students offer decision tree for determining ability to share data</td>
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<td>RDM Service</td>
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<td></td>
<td></td>
<td>‘RDM helpdesk’ offers one-to-one support for staff and students seeking to meet journal and funder sharing obligations while addressing other conflicting obligations</td>
<td></td>
<td>RDM Service</td>
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2. Data Access Statement in published papers

“Published research papers should include a short statement describing how and on what terms any supporting research data may be accessed.” (EPSRC Principle 2)

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| 2.1. | Improve awareness of data as a citable object | Researchers should be made aware of the function of data as a distinct data output that may be used for further research | Guidance on reasons to cite data and practice to be applied offered via various resources:  
- RDM training modules for staff & students  
- LSHTM RDM website | RDM Service | Green |
|  |  | Case studies of new models of publication provided through:  
- Lunchtime RDM seminars  
- Regular RDM workshops | | RDM Service | Green |
| 2.2. | Embed understanding of data citation practice | Researchers should be aware of good practice for data citation | The LSHTM RDM website provides:  
- Reasons to cite data  
- Recommendations on best practice (e.g. as recommended by ESRC and others)  
- Practical examples of citing public, restricted access and unpublished data | RDM Service | Green |
|  |  | LSHTM training modules for staff and students outline  
- Reasons to cite data | Information Services Directorate | Green |
2.3. Provide tools for citing research data

Researchers should be aware of tools and services that will help them to cite data

The LSHTM Research Data repository provides:

- A pre-generated Harvard/Vancouver citation for each metadata record
- A plug-in which allows citations to be exported to Endnote and other tools
- Data collections that meet eligibility criteria are assigned a Digital Object Identifier (DOI)

3. Institutional policies and processes for maintaining awareness of research data

“Each research organisation will have specific policies and associated processes to maintain effective internal awareness of their publicly-funded research data holdings and of requests by third parties to access such data; all of their researchers or research students funded by EPSRC will be required to comply with research organisation policies in this area or, in exceptional circumstances, to provide justification of why this is not possible.” (EPSRC Expectation 3)
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| 3.3 | Record details of 3rd party requests to access data | **Ensure consistent processes are in place to record access requests to research data**  
EPSRC-funded projects made aware of need to notify RDM Service of access requests sent directly to project team via:  
- EPSRC summary guide on LSHTM RDM website  
- Contact email sent to projects in first months of project  
RD students funded by EPSRC grant made aware of requirements through:  
- EPSRC summary guide on LSHTM RDM website  
- RDM training modules in TSP programme  
LSHTM Research Data repository configured to notify Project’s ‘Data Contact’ and RDM Service of access requests | RDM Service | Green |
| 3.4 | Conditions for restricting access to content | **Ensure conditions for restricting access to content are understood and applied appropriately**  
The ability to withhold information on data and review access requests is established in the RDM Policy’s 4th principle, which allows projects to request a waiver.  
Deposit guidelines for the LSHTM Research Data repository provide examples of data that should be recorded  
One-to-one advice on research data that should be shared is provided through the RDM Service ‘helpdesk’ | RDM Service | Green |

# 4. Management and sharing of non-digital data

Publicly-funded research data that is not generated in digital format will be stored in a manner to facilitate it being shared in the event of a valid request for access to the data being received (this expectation could be satisfied by implementing a policy to convert and store such data in digital format in a timely manner) (EPSRC Expectation 4)

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| 4.1 | Ensure paper-based research are managed and shared appropriately | **Non-digital research data should be managed in compliance with relevant legal, regulatory and contractual obligations**  
Processes for deposit and storage of physical records to LSHTM Archives are published on the LSHTM intranet. A staff role is identified.  
Well documented procedures exist for cataloguing physical records using CALM. Catalogue records are incorporated into aggregation services, such as AIM25. | Archives & Records Management Service | Green |
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<td></td>
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<td>Facility for on-site access available by booking an appointment to visit the LSHTM Archives</td>
<td>ARM Service</td>
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<tr>
<td></td>
<td></td>
<td>Facility for scanning a small amount of paper material available through LSHTM Archives</td>
<td>ARM Service</td>
<td>Green</td>
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<tr>
<td>4.2</td>
<td>Ensure physical samples are managed and shared appropriately</td>
<td>Physical samples produced by LSHTM labs should be managed in compliance with relevant legal, regulatory and contractual obligations</td>
<td>Quality &amp; Governance Manager</td>
<td>Green</td>
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<tr>
<td></td>
<td></td>
<td>Processes for storing physical samples on-site and off-site (e.g. UK BioBank) are well documented.</td>
<td>Quality &amp; Governance Manager</td>
<td>Green</td>
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<td>Register of human tissue samples maintained in compliance with Human Tissue Act.</td>
<td>Quality &amp; Governance Manager</td>
<td>Green</td>
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<td>4.3</td>
<td>Maintain linkages between research outputs held in different forms</td>
<td>Ensure link-up between metadata records for digital and non-digital outputs</td>
<td>RDM Service; ARM Service</td>
<td>Green</td>
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</table>
|     |           | The LSHTM research data repository allows depositors to:  
- Perform a title lookup of papers held in LSHTM ResearchOnline  
- Reference other resources by providing a title and URL                                                                                              | RDM Service; Research Operations | Green   |
|     |           | The CALM system support the ability to link to resources held elsewhere                                                                                                                                         | ARM Service            | Green   |

5. Catalogue of public-funded research data holdings

“Research organisations will ensure that appropriately structured metadata describing the research data they hold is published (normally within 12 months of the data being generated) and made freely accessible on the internet; in each case the metadata must be sufficient to allow others to understand what research data exists, why, when and how it was generated, and how to access it. Where the research data referred to in the metadata is a digital object it is expected that the metadata will include use of a robust digital object identifier (For example as available through the DataCite organization)” (EPSRC Expectation 5)

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| 5.1 | Ensure key data outputs from public funded research are identified and catalogued | Key research outputs should be documented as evidence of research and institutional activity  
Processes exist for acquiring and cataloguing paper records using the archives’ CALM system.  
Processes for liaising with funded projects towards the end of the grant to support data cataloguing and sharing activities are being trialled and will be developed further following the repository’s launch.  
Self-deposit procedures for creating description records of key outputs available through LSHTM Research Data Repository website following launch.  
Research projects that have a funder or journal requirement to catalogue and/or publish data within 1 year of generation are provided with: | ARM Service; RDM Service; LSHTM RDM Service | Green   |
### 5.2. Provide a robust digital object identifier for digital objects

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|     | • Website guidance on choosing an appropriate repository  
|     | • Tutorials on use of the LSHTM research data repository  
|     | • Tailored advice from the RDM Service on request | | | Green |

A persistent identifier should be assigned to key data collections

LSHTM maintain a contract with the British Library, the UK representative of DataCite, that allows it to assign Digital Object Identifiers (DOIs) to Data Collections submitted to the research data repository that meet eligibility criteria.

Other identifier schemes, such as grant code identifiers and ORCIDS, are captured in the research data repository as optional fields

Library and Archives Service; RDM Service

Library and Archives Service; RDM Service

### 6. Barriers to data sharing

“Where access to the data is restricted the published metadata should also give the reason and summarise the conditions which must be satisfied for access to be granted. For example ‘commercially confidential’ data, in which a business organisation has a legitimate interest, might be made available to others subject to a suitable legally enforceable non-disclosure agreement.” (EPSRC Expectation 6)

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| 6.1 | Embed understanding of good practice for responsible data sharing | Guidance on data sharing is provided through:  
| | • The LSHTM RDM website  
| | • RDM training modules for staff and students  
| | • The RDM ‘helpdesk’ maintained by the RDM Service | RDM Service | Green |

Researchers should be made aware of the benefits of data sharing, obligations to be met, and reasons that some data can be shared

| 6.2 | Personal & sensitive information should be handled appropriately | Guidance on data sharing will provide:  
| | • A decision tree outlining steps to be taken to archive data  
| | • Advice on ‘de-identifying’ data and reference to relevant resources  
| | • Pointers to country, domain and resource specific guidance | Research ethics  
| | The LSHTM Data Repository Collection Policy and deposit guidelines | Research ethics; RDM Service | Green |

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5 [http://www.lshtm.ac.uk/research/researchdataman/share/index.html](http://www.lshtm.ac.uk/research/researchdataman/share/index.html)
explicitly state that it is intended for non-personal/non-sensitive data only.

### 6.3. Enhance awareness of embargo periods

The EPSRC recognise that delays in publication of research findings and data may be appropriate, e.g. in order to protect Intellectual Property.

Guidance on embargo periods are available on the RDM website through:
- Funder RDM profiles
- Journal specific guidance, such as that published for PLOS

Tailored advice on legitimate and illegitimate reasons for withholding data are available through
- Data sharing training for staff and students
- One-to-one support available through the RDM Service

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<th>RDM Service; Open Access team</th>
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### 6.4. Published metadata should state the reason for data restrictions & how access may be granted

The EPSRC state that published metadata that describes restricted data should outline the restriction reason and conditions under which access may be granted.

Each file published through the data repository is accompanied by:
- A statement on who can access the data
- A request form for use by non-authorised users

LSHTM data repository deposit guidance states that Data Transfer Agreements (or other legal documents that an end user must sign before gaining data access) must be made public to provide an indication of access conditions to be met.

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### 6.5. 3rd party collaborators should be made aware of the need to validate published findings

Public funded research involving 3rd parties must be planned and executed in a way that enables published findings to be scrutinised and validated by others.

The PI is responsible for ensuring team members and collaborators are aware of obligations to be met

LSHTM’s default position is to publish RDM guidance and data repository policies on the public website, unless there is a reason that it cannot be made more widely available.

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<th>Project PI</th>
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<td>RDM Service</td>
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7. **Data retention**

“Research organisations will ensure that EPSRC-funded research data is securely preserved for a minimum of 10-years from the date that any researcher ‘privileged access’ period expires or, if others have accessed the data, from last date on which access to the data was requested by a third party; all reasonable steps will be to ensure that publicly-funded data is not held in any jurisdiction where the available legal safeguards provide lower levels of protection than are available in the UK.”

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| 7.1. | **Ensure awareness of retention obligations** | Generic guidance is provided on the following topics:  
- *Selecting data to be preserved:* Described in retention guidance on the RDM website, as well as in the LSHTM Retention and Disposal Schedule.  
- *Selecting data to be shared:* Described in Data Sharing guidelines on the RDM website.  
Retention obligations for Clinical Trials are outlined in the LSHTM Data Management SOP (held on the LSHTM intranet) | RDM Service; Archives & Records Management; Quality and Governance Manager | Green |
|       |             | Guidance on EPSRC retention requirements are provided through:  
- The EPSRC funder summary, retention guidelines and data sharing guidelines on the LSHTM RDM website  
- RDM training offered to LSHTM staff and students | RDM Service; Archives & Records Management | Green |
|       |             | Specific advice on identifying data of value to the project is available through several sources:  
- *Non-digital:* Archives & Records Management Service  
- *Digital data:* RDM Service  
- *Clinical Trials:* LSHTM Quality and Governance Manager | RDM Service; ARM Service; Quality and Governance Manager | Green |

7.2. **Ensure data is held for full retention period**

*To ensure data is kept for the required period, a record must be maintained on notable dates in its lifecycle*

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using the following:
- **Open data**: The IRStats plug-in records downloads of publicly available files
- **Restricted data**: Records of controlled access requests submitted to the data repository are captured.
In addition, the EPrints alt metrics plugin is used to monitor wider interest in the data.

### 7.3. Ensure an Exit strategy is in place

The EPSRC expect institutions to make arrangements for the preservation and continued accessibility of data, in the event of mergers, acquisitions and closures.

The RDM Service maintains an Exit Plan that will be enacted in the event that institutional funding ceases. Arrangements for management of LSHTM Data Collections is one component of this plan.

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### 7.4. Management & preservation of 3\(^{rd}\) party data

*Institutions are not expected to preserve & manage 3\(^{rd}\) party data, but may wish to do so if their research results depend upon the continued availability of the data*

Decisions on the need to curate, preserve and share 3\(^{rd}\) party research data will be made on a case-by-case basis, in conjunction with individual researchers or project teams. If the 3\(^{rd}\) party data relates to a specific project, the Principal Investigator may be specified as the designated data contact.

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### 8. Curation throughout the data lifecycle

“Research organisations will ensure that effective data curation is provided throughout the full data lifecycle, with ‘data curation’ and ‘data lifecycle’ being as defined by the Digital Curation Centre. The full range of responsibilities associated with data curation over the data lifecycle will be clearly allocated within the research organisation, and where research data is subject to restricted access the research organisation will implement and manage appropriate security controls; research organisations will particularly ensure that the quality assurance of their data curation processes is a specifically assigned responsibility”;

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<td>8.1</td>
<td>Ensure awareness of relevant research lifecycle models</td>
<td><strong>Research often involves performance of several common activities, irrespective of the objectives methodology and outcomes. To effectively plan data management activities, it is essential that they apply a holistic approach.</strong></td>
<td>LSHTM’s RDM website is structured to reflect key stages of the research lifecycle and the activities to be performed</td>
<td>RDM Service</td>
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<td>A Data Management Plan is mandated for all LSHTM research projects and recommended for student projects from January 2015, as part of the RDM Policy</td>
<td>The research and data lifecycle are used as a starting point to frame data management discussion in Data Management Planning modules offered to staff and students</td>
<td>RDM Service</td>
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8.2. Ensure research data is curated and preserved following project completion

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<th>Research data serves as evidence of research activity and institutional investment. There is a need to ensure data management processes address all stages of its lifecycle, from its creation to (potential) destruction</th>
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<tr>
<td>A research data repository will be available to LSHTM staff from May 2015 onwards. Policies and processes for ingesting, curating, preserving and removing data submitted to the data repository are in place. Secure storage suitable for holding personal and sensitive data is available in-house and procedures for obtaining an account are available on the LSHTM intranet.</td>
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<td>RDM Service</td>
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<tr>
<td>RDM Service</td>
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<td>IT Services/Archives</td>
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9. Funding for curation activities

“Research organisations will ensure adequate resources are provided to support the curation of publicly-funded research data; these resources will be allocated from within their existing public funding streams, whether received from Research Councils as direct or indirect support for specific projects or from higher education Funding Councils as block grants.”

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| 9.1. | Build awareness of data management costing | The LSHTM RDM website offers guidance on:  
- Funder positions on data management costs  
- Rules and models to be followed  
Training on Data Management Plans cover funder positions and RDM costing rules. Uptake of training is monitored on an ongoing basis  
Research projects are provided with support at the bid stage as part of the ‘Helpdesk’ function to ensure they understand costs of short and long-term data management.  
All LSHTM-led funded projects are required to write a Data Management Plan on confirmation of funding from January 2015, even if one is not required by their funder. Oversight of this activity is provided by the RDM Service.  
MPhil/PhD/DrPH degree students encouraged to write a Data Management Plan and include it in a Upgrade/review report for review by their supervisor. | RDM Service | Green |
<p>| 9.2. | Ensure institutional Data Management services are sustainable | The curation and preservation of data collections is dependent upon the allocation of An itemised list of operation costs for the RDM Service have been identified and submitted to the relevant committee for approval each year. | RDM Service | Green |</p>
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<th>appropriate funds</th>
<th>Cost recovery mechanisms for use of IT Services are being explored within the School.</th>
<th>IT Services</th>
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<tr>
<td>9.3.</td>
<td>Embed data management infrastructure into institutional processes</td>
<td>There is a need to encourage uptake of RDM Services across the institution, in order to ensure the longevity of the service</td>
<td>RDM Service</td>
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<td></td>
<td>The functions provided by the RDM Service are promoted at department meetings, marketplace events and on the RDM website, among other places.</td>
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<td>Tailored advice on use of LSHTM’s data management facilities is available on request. Further resources will be developed on an ongoing basis.</td>
<td>RDM Service</td>
<td>Green</td>
<td></td>
</tr>
</tbody>
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