

Research data policy and the *Australian Code for the Responsible Conduct of Research*

Who should read this?

This guide is designed as an introduction for academic administrators who have responsibility for policy making and/or the provision of research data infrastructure. Others associated with the creation and management of research data may also find it relevant.

What is the *Australian Code for the Responsible Conduct of Research*?

The *Code* was developed by the National Health and Medical Research Council (NH&MRC), the Australian Research Council (ARC) and Universities Australia. Published in 2007, it replaced an older version and introduced the importance of data management for the first time. The *Code* provides a guide to responsible research practice and covers a wide range of topics associated with research: the management of research data and associated materials, the publication and dissemination of research findings, peer review, conflict of interest, collaboration, research misconduct and breaches of the *Code*. The *Code* can be found at <http://www.nhmrc.gov.au/guidelines/publications/r39>.

While the *Code* covers all activities related to research, this guide is limited only to those aspects related to the creation, sharing and management of data. These include:

- Institutions are to retain research data, provide secure data storage, identify ownership, and ensure security and confidentiality of research data
- Researchers are to retain research data and primary materials, manage storage of research data and primary materials, maintain confidentiality of research data and primary materials.

First steps in responding to the *Code*

The following list of activities is provided as a basis for assessing the readiness and capability of the institution (as opposed to the individual researcher) to respond to the *Code*.

- an assessment of institutional commitment and priorities
- a review of all existing relevant policies and responsibilities, especially information management policies, practices, planning and responsibilities
- a review of data storage capacity, including possible use of cloud services
- an assessment of capability of individual researchers to respond to the *Code*, through, for example, a survey of data management practices
- an audit of data currently held within the institution
- consideration of the financial implications.

The policy response to the *Code*

Institutions already have policies and procedures covering research, records management, intellectual property and other research-related activities. In responding to the *Code*, however, institutions may find it necessary to review all relevant policies to ensure that they align with the *Code* and with each other. These include:

1. Intellectual property — covering copyright, moral rights, patents



2. Data management, including:
 - Storage — how to provide appropriate storage and under what conditions
 - Retention — how long data is to be stored
 - Disposal — how this is to be recorded and managed
 - Access — how to make data available to those engaged in the research project; how data is to be “published” and made available more widely; how the institution is to keep a record of its data assets; the institutional position on open access of both data and publications
3. Conflict of interest — do all parties have the same understanding about the use of the data
4. Collaboration and contractual agreements — do these include provision for data sharing after the research is complete and agreement on who will host and store the data
5. Ethics and privacy — how these affect of the length of data storage and the ability to share
6. Compliance — what measures are in place to track this.

Each of these needs to be considered in terms of both institutional and researcher responsibilities. Not all are specific to data management, but each should have a data management component and requires a procedure translating policy into practice.

Key considerations

1. Recognising that the *Code* is about culture change as well as research practice.
2. Ensuring an appropriate governance framework with representation from all interested parts of the institution — research office, library, IT, archives & researchers.
3. Ensuring buy-in from senior academic administrators.
4. Providing both data management infrastructure and services to support compliance.

The Strategic Response to the *Code*

Once an appropriate policy framework is in place, there will be a need to develop strategies to cover:

1. publicising the policies within the community
2. providing appropriate infrastructure to support researcher requirements and training in data management and use of infrastructure
3. establishing support services related to the infrastructure
4. establishing record-keeping procedures
5. demonstrating compliance through review or audit frameworks.

Further reading

ANDS Guides and other Resources: www.ands.org.au/guides

Some existing policies you may find helpful.

University of Newcastle, *Responsible Conduct of Research Policy*,
<http://www.newcastle.edu.au/policy/000873.html>

University of Melbourne, *Regulation 17.1.R8 - Code of Conduct for Research*,
<http://www.unimelb.edu.au/ExecServ/Statutes/r171r8.html>, and *Policy on the Management of Research Data and Records*, <http://www.unimelb.edu.au/records/research.html>

University of South Australia, *Australian Code: What you need to do*,
<http://www.unisa.edu.au/res/ethics/resources/australiancode.asp>

