

UNIVERSITY OF WARWICK

DO NOT USE THIS POLICY IN PRINTED FORM WITHOUT FIRST CHECKING IT IS THE LATEST VERSION
Current versions of University policies are available online. If you are reading this document in printed form, please check that the version number and date match the most recent version. Approved policies are valid for use after their approval date and remain in force beyond any expiry of their review date until a new version is available.

Research Data Management Policy Framework

Contents

1.0 Purpose 3
2.0 Scope 3
3.0 Definitions 4
4.0 Responsibilities 7
5.0 Policy Statement 11
6.0 Implementation/ Communication/ Training 12
7.0 Associated Documents 13
Internal documentation 13
External documentation 14
8.0 Appendix 15
Document Control 15

1.0 Purpose

1.1 The purpose of this policy framework is to set out the basic standards for management and sharing of research data expected of researchers, research students and anyone who supports research at the University of Warwick. In doing so its intent is to support the transparency, trustworthiness, inclusivity and efficiency of research conducted at the University, in support of the University's core values and missions[1]. In particular, open access to research data supports the University's goals to foster a culture of innovation and focus on sustainability in research, education, and our campus operations.

1.2 Content of this policy framework will only be applicable once the policy has been signed off by Research Committee and the Policy Oversight Group, and associated procedures will only apply after this approval date.

2.0 Scope

2.1 This policy framework is designed to enable research data produced or used in the University's research activities to be managed effectively. It covers the registration, storage, access, reuse, and disposal of data according to established guidelines. It aims to guide researchers on best practice data management and provide practical procedures to help apply these practices during their research.

2.2 There are responsibilities on both individual researchers and the University regarding research data management to support the principles mentioned in the section above. These include legal requirements under applicable data protection law, maintaining confidentiality for National Security, ethical or commercial reasons, and meeting the expectations of funders, many of whom emphasise that publicly funded research outputs should be made openly accessible wherever possible.

2.3 This policy applies irrespective of intellectual property (IP) rights regarding the research data of a given project and should be applied in the same way to all research projects at the University.

2.4 This policy framework applies across all areas of Warwick research and to all research staff and post-graduate research students. This includes those undertaking funded or unfunded research. Specific circumstances may apply to commercially funded undergraduate research students, please consult your department if this applies to you.

2.5 These principles apply to all research data generated by university staff and research students and should be complied with irrespective of whether the data will be published or not. Relevant protections on data visibility can be applied regarding confidentiality, competitive disadvantage, library licences and others but effective data management processes should still be followed.

[1] See https://warwick.ac.uk/about/strategy/ for details

2.6 This policy framework acknowledges the dynamic nature of the academic environment. As scholarship evolves, it will be necessary to keep the policy under review and update to address emerging issues, such as responsibilities surrounding the storage and management of research data by postgraduate research students, as well as the appropriate retention periods for research data across different disciplines.

2.7 This policy framework recognises that the nature and type of data produced across the University's research activities varies significantly and aims to provide guidance to meet the needs of these different types. Therefore, depending on your research, some responsibilities may be more or less applicable to your datasets. Please use this policy framework to guide you in finding the most appropriate course of action for your data, based on your own discretion.

3.0 Definitions

Term	Definition
Project Lead	The lead researcher or project director responsible for the overall design, conduct, and management of a research project or grant. The project lead oversees the scientific and technical aspects of the project and ensures that it complies with regulatory requirements and institutional policies. Please see FP14 for more information.
Research Data	Refers to digital or analogue information that is collected, observed, created or reused to produce, validate and enrich research findings and conclusions. Examples of research data include but are not limited to: "statistics, collections of digital images, sound recordings, transcripts of interviews, survey data and fieldwork observations with appropriate annotations, an interpretation, an artwork, archives, found objects, published texts or a manuscript." – UKRI Concordat on Open Research Data (2016). The University of Warwick supports the Concordat and is working to embed best practice across the University. This data is used as the foundation for scientific analysis, interpretation, and reporting. Research data can take many forms depending on the discipline and research methods employed.
Research Project	The University of Warwick's definition of research is set out in the Frascati Manual 2015 available via the R&IS website, which defines research & development as 'creative work undertaken on a systematic basis in order to increase the stock of knowledge, including knowledge of man, culture and society, and the use of this stock of knowledge to devise new applications' within one of

	three categories: basic research, applied research , and experimental development'.
Researcher	All Staff (including where appropriate Emeritus Professors, Supervisors, Honorary Staff and Visiting Staff), Registered post-graduate research students, staff supporting research activity (including technicians and research software engineers) and external research collaborators who are involved with research in connection with or as part of the University. This does not generally include undergraduate or taught postgraduate students or interns, with the exception, where appropriate, of those working through URSS or similar schemes or where the academic supervisor chooses to support formal publication of the work.
Data Steward	A Data Steward is the person responsible for management of a given dataset. This role may be allocated formally or informally depending on the scale, value and risk profile of the dataset concerned. It may be assigned at the level of a single dataset, a research project, a group or lab, a department or a faculty, and the role may be fulfilled by an individual or a team. This responsibility may be transferred over time. While a dataset is being actively developed, its Data Steward will likely be the Research Team Member responsible for collecting, processing or analysing it. In the long term, Data Stewardship may pass to the University Library & Archives or a specialised function within a department or faculty.
Research data management	A set of activities undertaken over the course of the research lifecycle which address the collection, organisation, storage, documentation, preservation and sharing of research data. Good research data management will help ensure that data is kept safe and secure, that it is handled in accordance with legislative and funder requirements. It refers to the organisation, storage and preservation of data created during a research project. It covers initial planning, day-to-day processes and long-term archiving and sharing, or deletion.
Data management plan	A document outlining how data will be managed from the point of collection at the start of a research project to what will happen to the data once the project finishes. A data management plan (DMP) typically covers areas such as collection strategy, backup and storage of data, ethical/legal requirements related to data, data sharing and data archiving.
Open Data	Data made publicly available under a license agreement allowing sharing and reuse by anyone for any purpose.
Open Research	Open research, also widely referred to as open science, relates to how research is performed and how knowledge is shared based on the principle that research should be as open as possible. It

	also enables research to take advantage of digital technology. This includes research data, publication and other techniques.
Open Access	The practice of making peer-reviewed scholarly research and literature freely available online to anyone interested in reading it. This is usually in the form of digital, online, free of charge, and free of most copyright and licensing restrictions
Data citation	A reference to a publish dataset, cited as any other source (book chapter, journal article, personal communication, etc.) would be cited. For example: Institute for Social and Economic Research. (2020). 'Understanding Society: Waves 1-10, 2009-2019 and Harmonised BHPS: Waves 1-18, 1991-2009'. Available at: 10.5255/UKDA-SN-6614-14.
Data access statement	A short statement included with publications to describe where associated data is held, and under what conditions it can be accessed. Where data is not openly shared, it should include contact details which allow data access requests to be considered independently of the paper's authors. Data citations are preferred, but where this is not possible a data access statement is an acceptable substitute.
Data License Agreement	A data license agreement is a contract between an individual or company and another party when that party wants to gain access and use some types of data. The agreement describes what kind of data are being shared with recipients and clearly states the purpose and duration of access being provided, along with restrictions and security protocols that the recipient of the data must follow. This type of agreement includes licensing to a secondary data provider.
Data Sharing Agreement	A data sharing agreement is a contract between an individual or company and another party when that party wants to gain access and use some type of data. The agreement describes what kind of data being shared with recipients and clearly states the purpose and duration of access being provided, along with restrictions and security protocols that the recipient of the data must follow.
Active data	Defined by the UKRI Concordat on Open Research Data as "Research data files that are in the process of continuous change and/or development. Files containing this data are accessed, amended and/or updated as new data are gathered and/or processed. Some datasets may never be 'finished'. A 'snapshot' of active research data can be archived to create a version that is fixed and can be cited."

Metadata	Data about data: the information needed to discover, understand and reuse a dataset. Often standardised using a schema, vocabulary or minimal information standard.
Repository	A centralised place to hold data, make data available for use, and organise data in a logical manner. It is a subtype of a sustainable information infrastructure that provides long-term storage and access to research data. Research data repositories are large database infrastructures set up to manage, share, access, and archive researchers' datasets.
Current Research Information System (CRIS)	As part of the University's repositories available for storing data, the University has a Current Research Information System (CRIS)[2]. This system provides a central store of information explaining the purpose, location and requirements around the data stored from projects in other institutional repositories. This may include the data management plan (DMP).

4.0 Responsibilities

Role	Responsible for
University of Warwick	Provide: • Information amongst its academics about the requirements under this policy framework and under policies of the University's funders in relation to research data. • Means and services enabling registration, deposit, storage, retention of and access to research data; • Advice, training and guidance on issues connected with good data management, such as data protection, research integrity, research ethics and Intellectual Property rights. This includes maintenance of a webpage to support this. Update and maintain the Research sections of the University Records Retention Schedule. Where requests are received for access to restricted primary data sets, the University will apply the relevant governance process to assess the request and decide if access is granted. The University will be responsible for the reuse agreement and for the secure delivery of data sets where access is agreed.

[2] At time of writing, CRIS functions are provided by Worktribe and Symplectic Elements, managed by R&IS

Academic Centres, Departments, Schools and Faculties	Academic Heads of Department are expected to be proactive in disseminating these requirements within their communities and encouraging and facilitating compliance.
Research Leads /Principal Investigators	Ensure that research data management requirements are observed during a research project or programme, and that physical data/samples/artefacts and digital data are managed in line with local rules, funder and government requirements. Where appropriate, delegate responsibilities below to members of the research team, with a particular focus on Data Stewardship. Manage information in line with the Information Management Policy Framework (IMPF) in particular: ▪ IMP 07 Data Protection Policy ▪ IMP 09 Acceptable Use Policy ▪ IMST 01: Information Classification Standard ▪ IMST 03: Handling Information Standard Plan for Research Data Management as early as possible in the research process and complete a Data Management Plan (DMP) within a reasonable timeframe of the start of a new project. DMPs should be proportionate to the scale of the work they apply to and meet the expectations of project funders. Maintain and update the DMP as a living reference for as long as it remains applicable. Lab, group and department-level policies and standard operating procedures are an efficient way of reducing duplication in DMPs. Consider legal, ethical and commercial constraints on release of research data at the initiation of the research process and throughout the research data life cycles. Allocate appropriate resources (personnel and financial) for data management and stewardship in any grant proposal, throughout the duration of the project and at its close, as part of the project budget. In collaborative projects, communicate University policy on Intellectual Property (IP) and information management matters from the outset to partners, ensuring they align with institutional agreements. Seek advice from R&IS where appropriate. Plan for any other forms of data that may be created during the project, for example software data, and consider whether it will be made openly available, e.g. as open-source software, and if so, what licence is appropriate.

	To the extent reasonable, make data underlying published research available for scrutiny and reuse in a responsible manner. This must be balanced against the risk of disclosing sensitive information, and methods such as anonymisation, synthetic data and access restriction should be considered to enable transparency. Data held and made available by third parties may be referred to instead of directly shared. Properly cite third- and first-party data supporting publications or include a Data Access Statement where citation is not possible. Direct citation of a published dataset is preferred. This can be enabled by depositing the dataset in a data repository[3] suitable for the data type, or in the University's research repository, WRAP. Appraise, curate, retain and dispose of data in line with University[4], funder and publisher policy. Be aware of, and ensure compliance with, export control restrictions. Apply an appropriate data licence or data sharing agreement for any shared data. Where possible, consider providing links to relevant software repositories or tools and, where feasible, share data in widely accessible formats that reduce the need for specialised resources.
Data Stewards	Day-to-day implementation of the policy for data falling under their remit, as delegated by the relevant Research Lead. Maintain professional knowledge of Research Data Management as it applies to their own field of research and, where appropriate, engage with and contribute to a Data Stewardship Community of Practice.
All Researchers	Maintain an awareness and understanding of good Research Data Management practice as it applies to their own field of research and research activities.
Library and Archives	Provide the first point of contact for enquiries relating to Research Data Management and co-ordinate responses with other experts within the University, including IDG, R&IS, Legal and Compliance and faculty-/department-level specialists. Facilitate a Community of Practice for Data Stewards, with the goals of sharing of good practice and effective communication.

[3] See https://re3data.org for a comprehensive database of repositories
[4] See the University's Records Retention Schedule (pages 18-21)

	Develop, deliver and maintain guidance and training on current good practice in Research Data Management, and signpost such resources maintained by other experts within and beyond the University. Assist researchers in depositing their datasets into the institutional repository promptly, following funders' requirements, and respecting the copyright terms and conditions. The Library team will also manage any embargo periods as appropriate. Advocate for Open and Reproducible Research to the academic community and communicate with them the services offered by the University supporting researchers to adopt and access the benefits for their research and personal profile. Provide R&IS with data to support and monitor compliance with funder RDM policies, and information on information management good practice to aid interpretation of those policies. Facilitate IDG in determining researcher requirements for infrastructure and providing integrated support services for RDM.
Information and Digital Group	Develop and maintain policies, technical infrastructure, guidance and support on data storage and transfer. Provide and support platforms for general-purpose research data publication and sharing according to the needs of researchers.
Governance Assurance and Risk Group	Develop and maintain policies, standards, SOPs, guidance and support on records management and information security.
Research and Impact Services	Monitor research funder policies relating to Research Data Management and provide pre- and post-award support for funded research in collaboration with the Library and Archives.

RACI MATRIX	
Responsible – *for ensuring the policy is fit for purpose*	Research Data Manager, Library (Policy Author)
Accountable – *for ensuring the policy is implemented effectively*	University Librarian (Policy Owner)
Consulted – *when the policy is review*	Research & Impact Services Legal and Compliance Academic Heads of Department Research Leads

Informed – *of the policy principles they must follow and changes over time*	All researchers
Supporting – *with development and implementation of the policy*	Data Stewards Information & Digital Group Library & Archives

5.0 Policy Statement

5.1 As a leading research institution, the University of Warwick places high value on the research carried out under its aegis, whether produced independently or in collaboration with others.

5.2 Good research data management ensures that data are accessible at the appropriate time and in a form that allows others to validate research findings. Effective research data management practices include documenting, preserving, and sharing data in a way that ensures their longevity and usability, while also meeting legal, ethical, and funder obligations. See Regulation 28 for more details.

5.3 Effective data management enhances academic reputation with funders and partners, building career-long relationships that support future research. It helps to protect researchers from legal implications of research data mismanagement and improves research efficiency by enabling easier data retrieval and reuse, reducing duplication of effort. It promotes collaboration by making research outputs more transparent and accessible, increasing opportunities for interdisciplinary engagement and broader impact. Robust data stewardship supports long-term preservation, ensuring valuable research assets can be accessible for future generations.

5.4 The University understands the importance of research data management and its role in wider Research Security policies such as the NPSA's Trusted Research Evaluation Framework and aligns itself to the G7 Common Values and Principles on Research Security and Research Integrity.

5.5 University of Warwick research data will be managed in accordance with the University's policies, guidelines, and standards and funder, legislative, and ethical requirements. Research Data will be managed in alignment with the University's Information Management Policy Framework. Any necessary deviations from the IMPF, for example due to regulatory requirements or contractual obligations to third parties, will follow the process for exceptions as detailed in each of the policies in this framework. The University also recognises that such third parties' policies are evolving and that they may require higher levels of data accessibility and dissemination in the future. For the avoidance of doubt, in the case of conflicts between this policy and external contractual or statutory obligations the latter have priority.

5.6 Proper management includes registering, storing, making data accessible for use and reuse, whenever possible, and appropriately handling or disposing of it in accordance with legal, ethical and funder requirements.

5.7 Exclusive rights to host, reuse or publish research data should not be given to other bodies without retaining the rights to make the data openly available for re-use, unless this is a condition of funding or is stipulated otherwise within terms and conditions. This includes using collaboration agreements and Intellectual Property (IP) protection.

5.8 The University actively promotes best practices in research data management, including the adoption of the FAIR principles – Findable, Accessible, Interoperable, and Reusable. By encouraging these standards, the university ensures that research data is of the highest quality, well-organized, and properly documented, which enhances its visibility, accessibility, and potential for reuse. This commitment to excellence in data management not only supports compliance with legal and ethical requirements but also fosters greater collaboration and innovation within the research community.

5.9 The University encourages research data to be made openly accessible whenever possible and appropriate, as it enhances the transparency, reproducibility, and impact of work, benefiting the broader academic community and society at large. However, the University acknowledges that open access to data is not always feasible, particularly when dealing with sensitive, confidential, or personal data. In such cases, researchers must carefully consider ethical, legal, and regulatory requirements to ensure responsible data sharing.

6.0 Implementation/ Communication/ Training

6.1 This policy will be reviewed quarterly for the first year and then biannually thereafter to ensure it remains up-to-date with legal, ethical, and technological developments. Library will be responsible for ongoing monitoring and maintenance of the policy, in line with the Compliance & Assurance Framework and sector best practice.

6.2 IDG is in the process of developing additional data management guidance tools to support researchers to identify the most appropriate data management format and storage options depending on project.

6.3 The University provides support and guidance at all stages of the research data lifecycle:

6.4 The Library's Research Data Team forms the key hub of support, including technical assistance, offering group sessions and one-to-one guidance on data management plans, active research data, ethics, sharing, storage, publishing, depositing and preservation;

6.5 Research and Impact Services provide guidance on support for funder applications and requirements, research integrity and ethics applications, contracts and data licence and data sharing agreements (please note that RIS may contact Legal and Compliance for advice and support as required from a data protection perspective); and

6.6 The Information and Digital Group provide policies, technical infrastructure, guidance and support on data storage and transfer;

6.7 The Governance Assurance and Risk Group provide policies, standards, SOPs, guidance and support on records management and information security; and

6.8 Legal and Compliance can provide specialist advice, support and training on all aspects related to the processing of personal data, to the extent this is relevant to a project, including (without limitation) in relation to the sharing of personal data outside of the UK/EEA, and the early evaluation of projects which are likely to result in a high risk to individuals' rights and freedoms from a privacy point of view. Please refer to the University Data Protection pages for further guidance.

6.9 Online resources with worked examples will be available through the Library team along with advice on developing discipline-specific resources where appropriate

6.10 The Library is the first point of contact for enquiries about Research Data Management practice. Departments, research groups, labs or other organisational units should consider whether their specific needs justify additional support at a local level, and are encouraged to designate a single point of contact to co-ordinate with the Library, R&IS and IDG on departmental RDM matters.

7.0 Associated Documents

Internal documentation

- University of Warwick (2023) *Open Access Policy* *Open Access Policy*
- University of Warwick (2023) Rights Retention (Annex B of the Open Access Policy)
- University of Warwick (2024) *Research Code of Practice*
- University of Warwick *Information Policy Framework*
- University of Warwick Regulation 31: Information Management, Security and Records Management
- University of Warwick *Do I need ethical approval? | Research at Warwick*
- *Instructions for depositing your research data* *Deposit research data (warwick.ac.uk)*

- Summary of the support available for managing research data *Managing your research data - University of Warwick Library*
- Access to subject specialist librarian support *Research & Academic Support Librarians (warwick.ac.uk)*
- How to create files to store your data *Creating Your Files (warwick.ac.uk)*
- IDG guidance on backup and security *Guidance (warwick.ac.uk)*
- List of repositories *OSF | Badges to Acknowledge Open Practices Wiki* / *Home | re3data.org*
- List of standard operating procedures for information security Standard Operating Procedures (SOPs) (warwick.ac.uk)

External documentation

- UKRI (Updated 8 August 2024) *Making your work Open Access*
- *UK Concordat on Open Research Data* (28/07/2016)
- Wellcome Trust (10/07/17) *Data, software and materials management and sharing policy*
- European Commission (01/04/2024) *Horizon Europe Open Data, Software and Code Guidelines*
- CoARA – Coalition for Advancing Research Assessment
- UK Data Council - Research data management — UK Data Service
- UK Data Council on managing your metadata Metadata — UK Data Service
- FAIR Guiding Principles The FAIR Guiding Principles for scientific data management and stewardship | Scientific Data (nature.com) / The FAIR Guiding Principles for scientific data management and stewardship | Scientific Data (nature.com)
- UK Government Research Security paper, 2024 G7 research security and integrity papers and G7 Virtual Academy - GOV.UK (www.gov.uk)
- NPSA's Trusted Research Evaluation Framework NPSA's Trusted Research Evaluation Framework
- Russell Group Briefing Paper on Research Security, Briefing - Research Security (russellgroup.ac.uk)

8.0 Appendix

Document Control

Policy Owner:	Anna O'Neill, University Librarian
Policy Author(s):	Jez Cope, Research Data Manager Dr Gabriel Clarke, Research Data Officer
Effective Date:	24th September 2026
Approving Body:	University Research Committee > Digital Operations Group > Policy Oversight Group
Equality Impact Assessment Date:	26/05/2026
Version Number:	V8.3
Date of Next Review:	June 2029