GRIFFITH UNIVERSITY

Guidelines

Research Data Management

1.0 Purpose

This Guidelines document outlines the requirements for the responsible management of research data and information, ensuring compliance with the *Australian Code for the Responsible Conduct of Research, 2018* (the *Australian Code*) and other relevant legal, statutory, ethical, and institutional frameworks. It is to be read in conjunction with the Management of Data and Information in Research guide, supporting the Code.

2.0 Scope

These Guidelines apply to all researchers (including academic, technical and professional staff, students, adjunct, honorary and visiting appointments and academic title holders) who collect, create, curate and/or generate research data, regardless of discipline or scope, that produce research data and regardless of data format. The scope is also subject to the provisions of any relevant contracts or funding/collaboration agreements.

3.0 Guidelines

These Guidelines are a key element of the University's *Research Quality Framework*. Griffith University is committed to the responsible and ethical management of research data generated by its researchers and research higher degree candidates. These Guidelines establish the requirements for managing data throughout the research data lifecycle (Figure 1) to ensure research data management practices are in accordance with:

- the *Australian Code*,
- the FAIR (Findable, Accessible, Interoperable, Reusable) Data Principles, where appropriate,
- and CARE (Collective Benefit, Authority to Control, Responsibility, Ethics) Principles for Indigenous Data Governance.

3.1 Research Data Management Planning

3.1.1 Data management planning from the initiation of a research project is critical to

- Ensure that data is accurate, and reliable to facilitate high quality, high impact research.
- Safeguard data against unintentional loss or unauthorised access.
- Meet the expectations of ethical guidelines and the requirements of privacy legislation, where data includes personal information.

- Meet the requirements of fundings agencies.
- Minimise risks of authorship disputes, data mismanagement complaints and other research integrity matters related to data management and dissemination as delineated in the Code.
- Support researchers (i.e. co-investigators, collaborators, co-authors and research students) with consistent university wide processes and infrastructure required for data management of individual research projects or programs.
- Provide clarity on roles, responsibilities and reporting requirements in relation to data management within a research team, as well as ownership, access and internal and external sharing provisions; and
- Formalise decisions relating to the access, retention, storage and disposal of research data.

3.1.2 A Data Management Plan (DMP) should be developed for **all** research projects (and in some cases, research programs) and as early as possible. This plan is expected to cover regulatory approval, data governance, and data management across all stages of the data lifecycle (as illustrated in Figure 1), including suitable end-of-project plans (retention, dissemination, and archiving) to ensure that other researchers (or the researchers themselves in the future) may benefit from the data. Planning should apply the FAIR Data Principles to the extent possible.

A guide to completion of a research data management plan and templates are accessible here and via the Related Procedure links in Section 6 below, and should be stored with other study documentation for the project pending release of a new online planning tool.

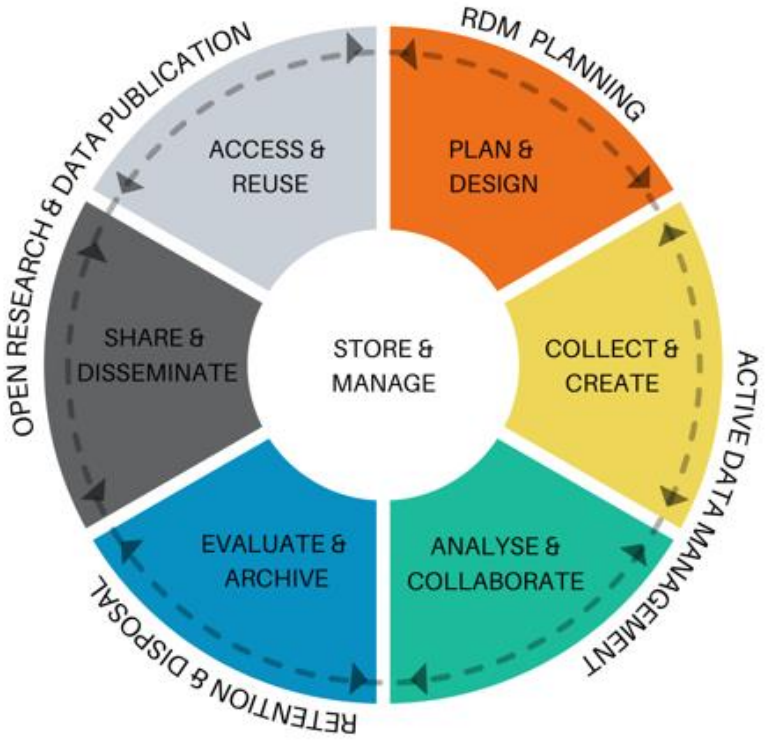

Figure 1 The life cycle of research data

(adapted from the Research Data Lifecycle by Longwood Medical Area (LMA) Research Data Management Working Group)

3.1.3 DMPs are considered to be living documents and should be updated regularly. This may be at each stage of the research data lifecycle, in line with common research milestones or whenever the data management needs of the project evolve from those captured in the existing plan.

Examples of triggers for updating a DMP includes:

- Securing internal or external research funding to support the proposed research activity.
- Commencement research higher degree candidature.
- In preparation for, or in response to conditions for Human Ethics approval, in line with the requirements of the *National Statement on Ethical Conduct in Human Research 2025*.
- In preparation for, or in response to conditions for Animal Ethics approval (in accordance with the *Australian code for the care and use of animals for scientific purposes 8th edition*).
- Planning for research that involves access to sensitive or highly sensitive information (in accordance with the University's *Information Governance and Management Framework*).
- Planning for research that involves data or associated information under regulatory control, such as controlled technologies (e.g. in accordance with Defence Trade Controls) or involving sanctioned regimes (in accordance with Sanctions compliance requirements).
- When changes occur such as when a researcher changes institutions, withdraws from a collaborative project, or when the research program, funding source, or objectives change.

Revised plans need to be shared in a timely manner with relevant members of the research project team and in accordance with relevant contracts or funding/collaboration agreements.

Where the detail of a DMP has been material to gaining Human Ethics approval for a research activity, any proposed variation to that DMP must also receive ethics approval. It is the responsibility of the Principal Investigator to ensure that appropriate approval is obtained for all amendments prior to implementation.

3.1.4 Researchers need to consider possible future uses of their data and ensure that data are collected in a manner that provides flexibility to meet these uses. For example, those with consenting study participants are encouraged to seek permission from respondents to retain data to enable reuse for future research. Assigning an appropriate license will define exactly how others are permitted to use the data. Refer to licencing options for further details. Please consider use of a data sharing agreement if sharing data outside of Griffith University.

3.2 Documentation and Metadata

3.2.1 Researchers should retain clear, accurate and complete records of all research activities including the collection, validation, and analysis of research data and primary materials. For clinical trials, the protocol or other clinical trial specific document outlining data management needs to be followed regarding data collection, analysis and storage. In either case, these records need to be of a sufficient standard and detail to allow verification and/or reproduction of research by others.

3.2.2 Researchers should collect research data and primary materials in accordance with principles and responsibilities of the Code, legal, statutory, and ethical requirements, discipline best practice and University Policy.

3.2.3 Metadata provides essential context about the data, enabling researchers and others to understand, use, and manage the data effectively. Metadata should be captured at the commencement of the project and accompany the research data for as long as it is retained. Metadata should be updated as necessary.

3.2.4 Any process, software program, statistical output files or code used to generate or analyse the research data should be documented and links recorded in the metadata. Where appropriate, code should be stored in a public GitHub with a licence, where the code is public, or on Griffith's GitLab servers where the code is private.

3.2.5 Data should be classified and managed in accordance with Griffith Data Classification Guide.

3.3 Storage and Security of Research Data

3.3.1 The University provides Data Infrastructure for the reliable, safe and secure storage of research data, primary materials and records as well as resources, training and support services for research data management (see also to section 3.8 below).

3.3.2 Researchers should store and back up research data, primary materials and records in the facilities provided by Griffith and/or other Griffith-approved, trusted storage facilities, platforms and services in accordance with the *Australian Code* and any contractual agreements that may apply.

Before using external commercial cloud storage applications, researchers should seek advice on Griffith's approved service providers from the eResearch team.

3.3.3 Research datasets have varying security requirements. Researchers are responsible for the appropriate management of data in situations where commercial sensitivity, confidentiality, and/or privacy issues require data to be encrypted or de-identified. Researchers should evaluate the need for confidentiality, integrity, and availability of their research data and select storage systems and communication technologies that will sufficiently meet their security requirements.

Assistance in evaluating data sensitivity and identifying suitable research data storage solutions can be accessed via the Research Data Storage, Retention and Services webpage.

3.3.4 Researchers should record through a DMP, where research data, primary materials and records for their research are stored for each project, program and research activity.

3.3.5 Griffith does **not** recommend use of removable and temporary storage media (eg. USBs, CDs, memory cards), however acknowledges that in certain circumstances there is no alternative. In this instance, when using removable and temporary storage media, researchers should:

- familiarise themselves with the data management limitations, issues and risks associated with storing research data on such devices.
- assume responsibility for the access control, security, back-up, and disposal processes that are required for appropriate research data management. Consider encrypting the storage media device
- ensure that all significant research data and primary materials are moved to the central storage facilities provided by Griffith as soon as possible.

3.3.6 The following are data-related examples which are considered breaches of the *Australian Code*:

- Failing to appropriately maintain and retain research records, data and/or source material.
- Inappropriate destruction of research records, research data and/or source material.
- Inappropriately disclosing, or accessing Research records, Research data, and/or source material.

Researchers should consult the Integrity team (research.integrity@griffith.edu.au) or a Research Integrity Advisor if they become aware of a potential breach of the Code.

3.4 Ownership, Custodianship and Responsibilities

3.4.1 Griffith respects and upholds Indigenous Cultural and Intellectual Property (ICIP) rights in research activities involving Aboriginal and Torres Strait Islander peoples, in accordance with the Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS) *Code of Ethics for Aboriginal and Torres Strait Islander Research*.

3.4.2 Griffith recognises and supports Indigenous data sovereignty which refers to the rights of Indigenous people to govern data collected about their communities, peoples, lands, and resources. The CARE Principles for Indigenous Data Governance are designed to promote Indigenous data sovereignty by ensuring that data related to Indigenous communities is managed in a way that respects their rights and interests.

3.4.3 The generation of research data and associated intellectual property (IP) is fundamental to the research process and beneficial to the researchers, the community and the University.

3.4.4 Under Policy, research data and associated IP generated under the auspices of Griffith University is owned by the University, unless otherwise specified in relevant contracts or collaboration agreements or agreed in writing by all parties involved in the project, prior to its commencement. The University grants each staff member rights to research data and IP that they have created under the University's *Intellectual Property Policy*.

Where a project spans more than one organisation, it is mandatory that a written agreement be developed, outlining the arrangements for data management, including publication and ownership provisions.

3.4.5 The University's *Intellectual Property Policy* identifies that, unless otherwise indicated (e.g. under the terms of an external sponsorship, scholarship or project), HDR candidates' own and can deal with any IP which they create in the course of their enrolment at the university.

3.4.6 Griffith's declaration of research data ownership does not impede the use of such data by researchers for research and education purposes. Instead, it permits the University to manage the data for long-term preservation and sharing, where appropriate. Nor does it separately establish or override IP rights as described in the University's *Intellectual Property Policy*.

3.4.7 Agreements covering all aspects of primary materials and research data management should be created and retained whenever there is transfer or relocation of primary materials or research data between institutions, including those outside of Australia. Template contracts are available.

3.4.8 Researchers must also ensure that the University has a record of custodianship and responsibility for any research data and records they have created and/or transferred into the University's control (e.g., for storage on University facilities).

Where no custodianship or responsibility has been recorded for any research data and records, or the recorded responsible party is no longer a Griffith University researcher, the relevant Dean Research (or their delegate) will hold the authority to decide on storage, retention, disposal, publication, or licensing arrangements in compliance with legal and regulatory obligations.

3.5 Access to Research Data and Records

3.5.1 Research data and primary materials must be easily identified and quickly retrievable by authorised users unless restricted access applies due to specific circumstances.

3.5.2 Researchers given access to confidential information must maintain that confidentiality. Confidential information must only be used in ways agreed with those who provided it.

3.5.3 For research involving Indigenous peoples including Aboriginal and Torres Strait Islander peoples, researchers must provide access to Indigenous data owners to uphold Indigenous intellectual and cultural property rights, in accordance with the *AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research*.

3.5.4 Final state research data from publicly funded research projects (such as ARC and NHMRC funded projects) should be published with a persistent identifier (PID) in a Griffith University or other trusted data repository. The Griffith Library can provide advice about PIDs.

3.5.5 Griffith University is committed to open, equitable and worldwide access to its research in line with the open research statement. Researchers are encouraged to make their research datasets available under open licence for use by others, unless this is prevented by legislation, ethical, confidentiality, privacy or contractual requirements, or Griffith Policy. If research datasets cannot be made openly available, it is recommended that research metadata be made available. Metadata should conform to any relevant discipline specific guidelines or practices and include appropriate descriptive, technical, methodological, and access information.

Open research resources and support services are available through the Griffith Library.

3.6 Retention and Archiving of Research Data and Records

3.6.1 Research data and primary materials should be retained in an accessible form for as long as they have continuing value, in accordance with periods specified by legislation, funding bodies, ethics approval processes, patent law, regulatory requirements and discipline convention.

Sufficient data should be retained to justify the outcomes of research. Refer to the *Schedule of Retention Periods for Research Data and Primary Materials* (the '*Retention Schedule*') for general information on the retention and disposal of Griffith University records.

Where research data are required to be permanently archived, they must be saved in a format that will enable them to be accessible in the future.

3.6.2 When a researcher leaves the University, any agreements concerning the ongoing management of the research data (i.e. custodianship, ownership, retention, access etc.) must be reviewed by the direct supervisor in consultation with the relevant Dean Research, if needed, taking into account the confidentiality and sensitivity of the data, as well as any conditions applied to the use of the data by the researcher after leaving Griffith.

3.6.3 In cases where the outcomes from research and/or the conduct of research are challenged, all relevant research data and primary materials must be retained and remain unmodified, at least until notification from the University that the matter is resolved.

3.6.4 Failure by researchers to retain research records, research data and/or source material in accordance with periods specified by legislation, funding bodies, ethics protocols and/or regulatory requirements is a departure from *the Australian Code* and the *Griffith Code of Conduct*, and may constitute misconduct.

For further information about archiving and storage solutions, refer to the eResearch research data storage website.

3.7 Disposal of Research Data and Records

3.7.1 Data may be disposed of after the designated retention period, if considered to no longer be of significance or value.

3.7.2 A guiding principle for retention beyond the designated period is that research data should be retained for sufficient time to allow reference to them by other researchers and interested parties; this may be for as long as interest and discussion persist following dissemination. The University may continue to store research data beyond the minimum period as long as they are of continuing value to the University and that value is worth the significant ongoing costs of data storage and management.

3.7.3 Other circumstances in which the retention period should be extended include:

- In cases where the outcomes from research are challenged, all relevant research data and primary materials must be retained and not modified at least until notification from the University that the matter is resolved.
- In cases where allegations of research misconduct are raised, records that may be relevant to the case must not be modified or destroyed, as addressed in the *Research Integrity Breach Investigation Procedure*.
- In cases where that data has highly significant community or heritage value, as outlined in the *Retention Schedule*.
- In cases where the data collected are related to incidents, allegations, disclosures, and investigations of abuse of vulnerable persons, as outlined in the *Retention Schedule*.

3.7.4 Where disposal of research data is necessary, it must be planned, auditable, deliberate and irreversible, using secure disposal mechanisms so that the data cannot be retrieved. Refer to the *Retention Schedule* for general information on the retention and disposal of Griffith University records.

3.7.5 Inappropriate destruction of research records, research data and/or source material is a breach of the Code.

3.8 Resources, Training and Support

Internal resources, training and services to support responsible and appropriate data management practices are available through eResearch, the University Library, and the Office for Research.

4.0 Definitions

For the purposes of this policy and related policy documents, the following definitions apply:

Data Infrastructure: the architectural framework, hardware, software, and processes that facilitate the collection, storage, management, and analysis of data.

Data Management Plan (DMP): A data management plan documents how researchers plan to collect, store, secure, and share their research data.

Metadata: Research metadata refers to information that describes and provides context to the primary data collected during research activities. Metadata is essential for understanding, finding, and using the primary data effectively. It helps researchers and other users to comprehend the origins, purpose, structure, and context of the data, thereby facilitating data discovery, sharing, and reuse.

Persistent identifier: Persistent identifiers (PIDs) are long-lasting references to digital objects including publications, data sets, researchers and institutions. An identifier is a label used to name an object uniquely, making them citable, enduring and easier to find.

Primary materials: Primary materials include but is not limited to ore, core samples, minerals and rocks; biological materials; the products of a process where the material is stable and can be stored for the requisite time; questionnaires; recordings; films; test responses; photographs; models; videotapes; audiotapes; or any other materials acquired through research from which research data are derived.

Research: The concept of research is broad and includes the creation of new knowledge and/or the use of existing knowledge in a new and creative way so as to generate new concepts, methodologies, inventions and understandings. This could include synthesis and analysis of previous research to the extent that it is new and creative.

Research data: Research data are defined as factual records, which may take the form of numbers, symbols, texts, images or sounds, used as primary sources for research, and that are commonly accepted in the research community as necessary to validate research findings. Research data may be:

- numerical, descriptive or visual,
- durable records derived from primary materials such as assays, test results, transcripts, laboratory and field notes, visual diaries, journals, audio and visual recordings, oral history sound files, performance recordings, archival data and metadata, websites, photographs and images,
- raw or analysed, experimental or observational,
- other documents or media containing information associated with the research process,
- digital and non-digital.

Researcher: Any University staff member, student, HDR candidate or affiliate including adjunct appointments, academic title holders, visiting appointments and contractors, whether funded or unfunded. who conducts, or assists with the conduct of research at, or on behalf of, the University.

Sensitive data: Sensitive data are data that can be used to identify an individual, species, object, or location that introduces a risk of discrimination, harm, or unwanted attention. It includes culturally sensitive data, such as data from or about Aboriginal and Torres Strait Islander peoples.

5.0 Information

Title	Research Data Management Guidelines
Document number	2025/0000996
Purpose	This Guideline is designed to provide clear guidance for researchers at Griffith University on good practices for handling research data, ensuring compliance with policies and fostering collaboration. It aims to promote integrity, security, and accessibility of research data while empowering researchers to navigate data management effectively.

Audience	Staff Students Public
Category	Academic
Subcategory	Research
UN Sustainable Development Goals (SDGs)	This document aligns with Sustainable Development Goal/s: 9: Industry, Innovation and Infrastructure 4: Quality Education
Approval date	16 September 2025
Effective date	16 September 2025
Review date	June 2027
Policy advisor	Senior Manager, Research Ethics Integrity and Governance
Approving authority	Deputy Vice Chancellor (Research)

6.0 Related Policy Documents and Supporting Documents

Legislation	Public Records Act 2002 Right to Information Act 2009 Right to Information Regulation 2009 Information Privacy Act 2009 Information Privacy Regulation 2009 Privacy Act 1988 (Cth) Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)
Policy	Griffith University Responsible Conduct of Research Policy Australian Code for the Responsible Conduct of Research 2018 Management of Data and Information in Research - *A guide supporting the Australian Code for the Responsible Conduct of Research*

	Information Technology Code of Practice
	Cloud Hosting Policy
	Information Security Policy
Procedures	Clinical Trials Procedure
	Griffith Research Online
	Guide for Managing your Research Data
	Information and Data Protection Standards
	Information Governance and Management Framework
	Information Security Classification
	Privacy Plan
	Research and Innovation Plan
	Research Data Management Templates
	Research Integrity Breach Investigation Procedure
	Retention Periods for Research Data and Primary Materials