



Research Data Management Policy

1. Preamble

The definitions of “research data” and of “affiliates of the University of Milan” that are considered for the purposes of this Policy are specified in the attached document N.1.

The University of Milan acknowledges the fundamental importance of research data as valuable scientific results. Therefore, the University recognizes the relevance of records management for supporting the principles of quality and integrity in scientific research and is committed to pursuing the highest standards of data collection, storage and preservation.

The University of Milan acknowledges that reliable and easily retrievable research data are the foundation of every research project and that they are necessary for the verification of the soundness and reliability of research methods and results as well as for their reproducibility.

The University of Milan recognizes that research data are the heritage of universities also beyond the duration of a research project and represent – in the long term as well – a precious resource for research, teaching and, in turn, the progression of society.

2. Scope

This policy applies to all research projects at the University of Milan, limited to the sections of the projects, which, through the affiliates, are under the university responsibility. If research is funded by a third party and an agreement is made which specifically outlines rights concerning ownership, access and storage of research data, such an agreement takes precedent over this policy. It is maintained that the agreement must comply with existing legal and contractual provisions.

3. Handling research data

Within the framework of existing legislation on personal data protection and on intellectual property as well as in compliance with the provisions included in the University of Milan Statute and regulations, research data, once published, are stored and made freely available for use for the purposes of scientific and historical research or public interest. This does not apply when specific research funding agreements with third parties are in place.

Once published, research data must be stored in the University of Milan Digital Archive AIR – *Archivio Istituzionale della Ricerca* or in a digital archive based on international standards and hosted by non-profit academic or research institutions, state agencies or intergovernmental institutions.

Research data linked to publications in which they are referred to must be stored in a correct, complete, reliable and unadulterated manner. Furthermore, they must be accessible, findable, traceable, interoperable, and whenever possible, available for subsequent use (FAIR principles).

If no third party rights, legal requirements or property laws prohibit it, research data can receive a free license for open use (for instance Creative Commons) granting traceability and credit to the original source.

The minimum archive duration for research data and records is 10 years after publication or public release of the results. At the end of this period, research data and records can be deleted, unless the purposes mentioned in the preamble are still valid or relevant research interests endures.

In the event that research data and records are to be deleted or destroyed (either after expiration of the required archive duration or for legal or ethical reasons), such action should be determined only after considering all legal and ethical aspects. Data deletion or destruction must be traceable and documented through accessible records. At the same time, the interests of third-party funders and other stakeholders, employees and partner participants in particular, as well as elements of confidentiality and security, must be considered.

4. Responsibilities, Rights, Duties

The responsibility for research data collection, handling and maintenance is shared by the affiliates to the University of Milan and the University itself, each within its competence and jurisdiction and in compliance with the Ethical Code.

4.1 Affiliates of the University of Milan are responsible for the management of research data and datasets, that is:

- Collection, documentation, archiving, access, use and storage (or proper destruction) of research data and research-related records. This comprises the definition of protocols and responsibilities within a joint research project that must be included in a *Data Management Plan* (DMP)¹, when the drafting of a DMP is foreseen by contracts with research funding agencies or other legal entities starting from the initial phase of a project.
- Drafting and updating of the DMP (see Guidelines on and models of DMP provided by the University of Milan) and definition of the use of data rights after project completion.
- Backup in compliance with all organisational and regulatory, institutional and other contractual and legal requirements, both with regard to research data, as well as to the management of research records.
- In general, all data – positive and negative - that are relevant for a research must be archived and stored on adequate repositories following the above-mentioned criteria, even if they are not structured in specific DMPs, with access restricted to the person(s) responsible for the project(s).

The person responsible for the research project is in charge for the selection of the data that must be stored. This considering the duties deriving from contracts with third parties.

4.2 The University of Milan is responsible for:

- Appointing support staff and providing affiliates with adequate resources, tools and infrastructures both, in terms of software and hardware for data storage and in compliance with this policy.

¹ A data management plan (DMP) is a document, which depicts the entire lifecycle of research data and can be updated if needed. Data management plans assures that research data are accessible, traceable, available, authentic, citable, and that they adhere to clearly defined legal parameters and appropriate safety measures governing subsequent use. In their ideal form, DMPs will be in a machine actionable format.

- Providing for assistance and support in the drafting of DMPs.
- Developing and providing mechanisms and services for projects' registration, storage, archiving and safekeeping of research data in support of current and future access to research data during and after the completion of research projects. Allowing affiliates to the University of Milan to exercise their responsibilities and to comply with the duties foreseen by contracts with third-party funders or other legal entities.

5. Validity Date

The Research Data Management Policy entered into force on the 1^o of December and will be updated every two years.

The Academic Senate approved the policy on the 14th of November 2017.

Attached document 1

Definition of research data

“Research data are factual records, which may take the form of numbers, symbols, text, images or sounds, which are used as primary sources for research, which are commonly accepted in the research community as necessary to validate research findings.”

Definition of affiliates to the University of Milan to whom this policy applies

Professors, researchers, PhDs, research fellows, interns, technical and administrative personnel involved in research activities.

In support of the definition of research data employed in the Policy, three references are mentioned:

- a) **LERU Roadmap for Research Data** (LERU Research Data Working Group, Advice Paper No. 14 – December 2014):

“Research data, from the point of view of the institution with a responsibility for managing the data, includes: All data which is created by researchers in the course of their work, and for which the institution has a curatorial responsibility for at least as long as the code and relevant archives/ record keeping acts require, and third-party data which have originated within the institution or come from elsewhere.”

- b) The Australian **Griffith University**:

“Research data are factual records, which may take the form of numbers, symbols, text, images or sounds, which are used as primary sources for research, which are commonly accepted in the research community as necessary to validate research findings.”

- c) The **University of Minnesota**:

“Research data are data in any format or medium that relate to or support research, scholarship, or artistic activity. They can be classified as:

- *Raw or primary data: information recorded as notes, images, video footage, paper surveys, computer files, etc.*
- *Processed data: analyses, descriptions, and conclusions prepared as reports or papers*
- *Published data: information distributed to people beyond those involved in data acquisition and administration*