

Research Data Management Policy

Good research data management practices allow Bates College and its researchers to meet funder, ethical, legal, and other obligations. This Policy describes the shared responsibilities and expectations for the retention, disposal, and access of research data generated at Bates College regardless of funding or external collaborations.

This policy **must** be followed by anyone whose research project is Bates-sponsored or supported, including external funding via a grant or gift. However, we strongly encourage everyone to follow the policy for every project because, by doing so, you ensure that your research data are properly protected during the life of the project and into the future.

Ownership

The ownership of research data generated by researchers is governed by Bates' [Intellectual Property Policy](#). Bates College has a functional interest in works for which the college has a contractual or legal obligation, and data resulting from a Bates-sponsored award remains the responsibility of the College until all legal and award-stipulated data management issues have been fully resolved.

Responsibilities

General Considerations

All Bates faculty, staff, and students who engage in research or conduct research on behalf of the College are responsible for ensuring that the data they collect and/or generate are managed using methods consistent with Federal and State law and college policies. The lead researcher of any project or the supervising faculty member of student research is responsible for ensuring this policy is followed.

Research Data Management and Sharing (RDMS) Plan

Researchers planning to engage in externally- or internally-sponsored or supported projects that will collect and/or generate research data must, *before initiating their project*, coordinate with the Office of Sponsored Programs and Research Compliance (SPaRC) and Information & Library Services (ILS) to develop a Research Data Management and Sharing Plan by completing a [Research Data Management and Sharing Plan \(RDMS\) Worksheet](#). The RDMS Worksheet will document all anticipated data and scholarly products, expectations for location and timeline of storage, and plans for sharing data. Projects sponsored for the primary purpose of student education, including student supply funds, CUREs, and fellowship stipends, or non-research activities (e.g. travel) are not considered research projects and are not subject to this Data Management Policy. Research data generated from these types of projects should be managed as part of the faculty mentor's RDMS plan.

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If researchers have data management needs from unsponsored projects, completion of the RDMS worksheet is recommended to ensure adequate retention of valuable research data. Research data not tied to RDMS plans will be deleted immediately when the researcher's employment is terminated.

Annual RDMS Plan Review

Researchers who have an established RDMS plan are required to complete the [RDMS Annual Review form](#) annually, within 30 days of the research project start date anniversary, to accommodate and record any necessary changes. Researchers will be contacted by SPaRC prior to the anniversary date with directions for completing this update. Annual updates will be reviewed by SPaRC and ILS jointly and are subject to SPaRC approval. This review will continue each year until it is explicitly communicated and understood by the researcher, SPaRC, and ILS that all data management compliance issues have been fully satisfied.

Retention & Disposal

To ensure effective handling, curation, and archiving of research data, Bates requires that data be retained for a minimum of three (3) years following the completion of the research project and any applicable report submission (see [Record Retention Schedule](#)). Research data generated and/or collected in whole or in part from a sponsored project are maintained according to applicable State and Federal laws and regulations, funding agency requirements, and College policies. Barring any legal constraints, sponsored project data must be retained for a minimum of three (3) years after the project's final financial report has been submitted, or the period required by the applicable sponsor, whichever is longer, with original data retained wherever possible.

An approved IRB protocol is required for the storage of all human subjects research data (including exempt and non-exempt) from any externally funded project. All research data from human participant research studies must be maintained in a manner consistent with the approved IRB protocol. All research data from exempt human participant research studies must follow the requirements outlined in this Research Data Management Policy. Any directory containing human subjects data must include the IRB protocol number in its name, and ILS will treat all data within IRB number-labeled directories as human subjects data. For externally funded projects, if data are stored in a manner preventing access by Bates ILS (i.e. with encryption) it is the responsibility of the researcher to provide the encryption key to the Research Integrity Officer at the time of data encryption.

Audit and Investigation Considerations

All research data that includes intellectual property, ongoing or pending audits, investigations, or lawsuits (including reasonably anticipated lawsuits) should not be destroyed, damaged, or

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altered (even if the records retention date has expired) until the matter has been resolved and the lead researchers have been specifically advised in writing by the Dean of Faculty's office or the Office of Sponsored Programs and Research Compliance, as appropriate, that such data may be destroyed.

Data Disposal Requirements

If the records retention period has expired, the research data is not appropriate for long-term storage or official archiving by Bates, and the data is not subject to additional sponsored project or legal obligations, the data must be disposed of in a secure and timely manner. Before disposal, researchers should consult with the Bates Archivist.

Research data maintained with Bates IT infrastructure (including but not limited to Google Drive, Bates-controlled network storage, personal computers, and equipment-associated computers, etc.) and not subject to additional sponsored project retention requirements will be deleted no later than six months following termination of an employee by Human Resources.

Sharing and Transfer of Research Data

When an externally funded researcher plans to leave Bates, the Dean of Faculty office will inform SPaRC to ensure compliance with data maintenance, access, retention, and disposition responsibilities and requirements.

Data resulting from a Bates-sponsored award remains the responsibility of the college until all legal and award-stipulated data management issues have been fully resolved. Lead researchers of a Bates-sponsored award who are leaving the College and desire to transfer a copy of these research data must contact SPaRC to coordinate an explicit data transfer agreement with the Dean of Faculty.

Data wholly owned by a researcher leaving the College will be deleted from all Bates IT infrastructure no later than six (6) months after employment termination by Human Resources. Transfer of these data from Bates IT infrastructure is the sole responsibility and at the discretion of the departing researcher.

Storage Resources

Data must be maintained within the faculty member's scholarship section of Etna. A folder should be created for each project and named using the following convention: Last name of Bates PI_Grant # (if applicable)_Shortened Project Title. If the Bates PI needs to share any of the data with a non-Bates collaborator, a shared drive should be created within Google Drive and that shared drive should be named exactly as the Etna folder is named.

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Research data may also reside in storage resources maintained by third parties, such as cloud-based network storage (e.g. Dropbox, GIT) or discipline-specific archives (e.g. Dryad, PDB), however, the College must maintain access to those resources. Use of a third party must be detailed in the RDMS Annual Review Form, including necessary access information.

When research data includes physical materials that need to be retained before the start of the project researchers are required to consult with their department chair to determine adequate storage locations for the materials. This information should be included as part of their RDMS plan.

Definitions

Research Data, for this Policy, is information collected, generated, or derived in physical or electronic form during the course of research conducted at Bates, under the auspices of Bates, or using Bates resources. Examples of research data can be found [here](#).

Research Data Management and Sharing Plan is a concise cradle-to-grave “life cycle” narrative for the products of your scholarship that describes how the research data will be collected, stored, analyzed, preserved, and shared.

Sponsored Projects are those funded by external funding sources and/or designated specifically to support research and scholarly work.

Un-sponsored Projects are those not supported by external funding sources and/or designated specifically to support research and scholarly work.