



rijksuniversiteit
 groningen

University of Groningen Research Data Policy

1 *Introduction*

This memorandum sets out in more detail University-wide principles that faculties, research institutions and researchers must comply with in relation to data management and the handling of research data. It is a general framework outlining basic principles and responsibilities¹ for handling data that can be used for publishable or exploitable research, in relation to:

- a) data storage
- b) data curation
- c) and data access.

Its purpose is to ensure innovative research and research integrity.² This memorandum is based on general nationwide criteria.

¹ The data policy of University College London served as a model here:

https://www.ucl.ac.uk/isd/staff/research_services/research-data/researchdata/uclresearchdatapolicy.

² See <https://www.knaw.nl/nl/actueel/publicaties/zorgvuldig-en-integer-omgaan-met-wetenschappelijke-onderzoeksgegevens>

2 Background

In 2013 the University of Groningen began contemplating the regulation of storage and management of research data, motivated by the recommendation from KNAW's Schuyt committee on 'Responsible research data management and the prevention of scientific misconduct' (*Zorgvuldig en integer omgaan met wetenschappelijke onderzoeksgegevens*).

In late 2013 a three-pronged approach was initiated, involving: 1. quality control in relation to research data, data management and, where necessary, University-wide regulations for handling research data, 2. setting up a research data office by the library and CIT services, and 3. looking into legal aspects (such as the Collective Labour Agreement/CAO and database rights, see Appendix A).

As a first step, the Faculty boards and directors of the SEP (Standard Evaluation Protocol) institutions were requested to develop a plan of action for a data management plan for their research institutions. The survey of the initial results revealed that there were many misconceptions about ownership and control of research data. It also showed unfamiliarity with specific rules and possibilities. This resulted in further explanation of a number of these issues and misconceptions, which was sent to the faculties and research institutions in February 2014 so that they could press ahead with developing their research data management plans (RDMPs).

It has since emerged that there remained lack of clarity among faculties regarding responsibility for and principles relating to data storage and management. This is partly prompted by national and international developments, including:

- a) The fact that some academic journals have policies on data availability, to ensure that researchers take responsibility for making the relevant research data available when publishing their articles.
- b) The requirement by research funders such as NWO (see Appendix B) that good data management practices are set in place at an early stage of a project in the form of a data management plan. In relation to the control of databases, NWO states in its grant regulations (2014) that the research funder and knowledge institution are jointly regarded as the 'producer of the database'. The knowledge institution can only exercise this control effectively if there are also clear agreements within the institution.
- c) The international call for open access³ to data. The EU pilot on Open Research Data in Horizon 2020 is one such example.⁴
- d) The generally applicable directions for good data management in the latest version of the VSNU Code of Conduct for Academic Practice (2014). Among other things, the Code of Conduct mentions a storage period of ten years in its elaboration of the principle of verifiability (see Appendix C). (N.B. ALLEA's European Code of Conduct for Research Integrity has similar standards).⁵
- e) The new national Standard Evaluation Protocol 2015-2019 contains, in the SEP format for 'research integrity', a question about handling 'raw and processed data' (see Appendix D). Given the significant differences between disciplines, there needs to be a reference to the research data management plan of the individual SEP institution and/or Faculty.
- f) The new Groningen PhD regulations also include a clause that research data remain available for further research (see Appendix E).

Thus there is a need for clarification of the principles and the responsibilities at different levels within the institution in matters concerning research data and data management.

Because the management of research data is a relatively young field, new policies will need to be developed on a regular basis in the years ahead. There is also a need for better infrastructures and resources to support data management. This policy memorandum will also be regularly evaluated and updated.

³ See <http://opendefinition.org/>

⁴ See http://europa.eu/rapid/press-release_IP-13-1257_en.htm

⁵ See http://www.esf.org/fileadmin/Public_documents/Publications/Code_Conduct_ResearchIntegrity.pdf

3 Principles of data management

Definition

Research data are codified and established facts and observations, arising from academic research. They take a wide variety of formats, such as numerical, descriptive or audio-visual. During research processes, we speak of usable raw data, processed data and analysed data of a dynamic nature. Finally, during archiving and curation, data are of a static nature. Non-digitizable artefacts, objects or collections fall outside the scope of this policy.

In concrete terms, data generated by research should have the following characteristics:

- accurate, complete, reliable, authentic and accompanied by metadata
- securely stored with minimum risk of loss
- registered in a Current Research Information System (CRIS)⁶
- traceable
- accessible and citable
- satisfying legal requirements, criteria for ethically sound research,⁷ agreements in partnership agreements and conditions laid down by research funders
- available for verification and further research once the research is complete and/or the researcher has departed
- in principle, a minimum storage period of 10 years.

To ensure that data have these characteristics, the principles below are leading.

1. Verifiability

The VSNU Code of Conduct for Academic Practice is leading for the University of Groningen's data policy. This means that verifiability is an important principle for all presented information. If research results are published, it is clear:

- a) what the data and conclusions are based on
- b) where they originate and
- c) how they can be verified.

Elaboration of this principle calls for effective monitoring of the quality of data collection, data input, data storage, data processing and data access. This means that all parties involved in data management must (be able to) fulfil the requirements of good data management. In order to verify internally whether research data is managed effectively, a concrete proposal for organizing periodic internal audits will be made.

2. Responsibility

There is shared responsibility within the University of Groningen for managing research data. This responsibility must be clearly defined at all levels, both during the research process and in the subsequent archiving and curation (see Section 4 for details). This does not alter the fact that primary responsibility for data management rests with the researchers themselves.

⁶ In this case, Pure: <http://project.etalage.ub.rug.nl/use-pure/>

⁷ Copied from <http://www.rug.nl/about-us/where-do-we-stand/quality-works/research-ethics>

3. Customization

Research data are the result of the research process. This process is highly diverse, depending on the discipline and on how data are collected and managed. Therefore the University of Groningen allows customization in data storage and management within the general frameworks. Consequently research institutions have some degree of freedom when drawing up their data management plans, provided the above principles are elaborated.

4. Open, unless...

To ensure that research results are disseminated as widely as possible following the primary publication process, the University of Groningen has adopted the principle that research data must be made openly available, unless ethical, legal or contractual obligations prevent this.

5. Funding

The data management plans include a budget in which provision is made for appropriate funding of the costs incurred during the minimum storage period. These costs will consist of data management and the required storage capacity.

4 *Responsibilities*

As stated in Section 3, there is shared responsibility for managing research data within the University of Groningen. This responsibility must be clearly defined at all levels. The specific responsibilities at the different levels are set out below.

Researchers

It is the researcher's responsibility to draw up and implement a data management plan in the scope of his or her research. The research institution or the faculty will provide the frameworks for the data management plan.

The following is requested of researchers with regard to data management:

- As of January 2015, to draw up a data management plan for all new research (see for examples of templates the NWO site⁸ and the DANS memorandum Data Management Plan for Scientific Research (Nov. 2013)⁹)
- For ongoing research, the research institution's data management plan is applied or an archiving plan is drawn up
- To develop and adopt appropriate procedures and processes for collecting, storing, processing, using and accessing research data during the research
- To document the agreements made on data management in the case of joint research projects or contract research where responsibility for data management rests in principle with the project coordinator
- To guarantee the integrity and security of their data
- To act in accordance with the Personal Data Protection Act and other legal and ethical rules
- To destroy research data in accordance under the terms of the research institution
- To develop a plan for accessing, reusing and storing research data at the end of the research project in accordance with the research institution's data management plan
- To budget the costs and time investment for data storage and management.

Graduate Schools

- Graduate Schools embed the subject of data management in the early phases of a researcher's career as an integral part of academic practice (principles of honesty and scrupulousness in the VSNU Code of Conduct 1.7: good mentorship). This means that compulsory courses will be organized for Research Master's and PhD students.
- Graduate Schools supervise the making of agreements with PhD students about data management and the adoption of these agreements in the students' training and supervision plans.
- Graduate Schools supervise arrangements between a PhD student's primary supervisor, day-to-day supervisor and the PhD student to ensure that the student's research data are made available for further academic research at the end of the PhD programme (University of Groningen PhD Regulations, Art. 4.1.5.).

⁸ <http://www.nwo.nl/en/documents/nwo/data-management/data-management-plan-form>

⁹ <http://www.dans.knaw.nl/sites/default/files/file/Datamanagementplan%20NL%20def%20web.pdf>

Faculty boards and Research directors

The Board of the University has asked the Faculties to draw up a plan of action for devising one or more research data management plans for all Faculty SEP institutions.

Directors of SEP institutions and/or faculty boards are requested to undertake the following:

- The research institution will work out its research data management plan, including discipline-specific protocols where necessary.
- The research institution will provide individual researchers with a format for their personal data management plan.
- For externally funded project research, the research institution will check in good time whether the data management plan for the research project ties in with the research institution's data management plan. In addition, the faculty board will notify the Board of the University whether it agrees with the research proposal on this matter.
- In accordance with the customization principle, the institution will outline in its research data management plan how it will employ the 'open, unless...' principle, in keeping with discipline-specific protocols and developments.
- The research institution will draw up terms for the destruction of research data, where necessary in consultation with the ethics committee.
- The faculty board will adopt the institution's research data management plans after testing them against the set frameworks.
- The faculty board will supervise and monitor compliance with the rules relating to data storage and management within the disciplines and/or institutions at faculty level.¹⁰
- The faculty board will ensure that databases can be checked at the request of the Board of the University if there is reason to do so (e.g. if there are allegations of violations of integrity) and that action is undertaken in accordance with the approved research data management plan.
- Both will cooperate in periodic internal audits to verify actual and continued compliance with relevant rules and procedures.
- The faculty board will establish, in consultation with the research institution, which conditions will apply to the research institution's data management practices in the case of research in which third parties have full or partial control of the data.
- The parties will make more detailed agreements about the control and management of both research data after completion of the research and research data generated by research work carried out by researchers who leave the University of Groningen.

Board of the University

The Board of the University monitors compliance with the legislation, the Netherlands Code of Conduct for Academic Practice, and the Standard Evaluation Protocol. Monitoring and testing of faculty/institution plans and agreements, together with their implementation, are the responsibility of the Board of the University.

- To this end, the Board will arrange for regular, systematic audits and will take care of their funding.
- The Board will facilitate the necessary infrastructures, as well as enter agreements with third parties on infrastructure facilities and see to the development of the requisite expertise in the area of research data management.
- The Board takes the view that in the event of staff departures data must remain available for the purposes of verification and further research and will elaborate on this further.
- The Board will assist at a national and international level with the development of policy that encourages researchers to contribute to open data and in any event to the usability of data for the research community as a whole.

¹⁰ See point 1.a., Board of the University's letter of 8 October, to be implemented, for example, with regard to registration in Pure.

- The Board places legal advice at disposal in order to direct the control of research data and the legal conditions that apply to encouraging the open use and/or reuse of data, at the same time taking into account the importance of knowledge valorization in public-private partnerships.

Research Data Office

In the Board's three-pronged approach, a start has been made on bringing together and further developing existing facilitating bodies and their expertise in order to support research data management. This approach has included the task of making proposals for the establishment of a research data office (RDO). The RDO will function as a centre of expertise and a central hub. The University Library and the ABJZ and R&V departments are part of the RDO. Network relations have also been established with relevant UMCG parties. The RDO:

- takes care of management and external relations with respect to research data management
- contributes to policy development and audits.

Details of the RDO services catalogue will be set out in another memorandum.

5 *Appendices*

- A. Selection of relevant passages on data management from the Collective Labour Agreement (CAO) for Dutch Universities 2011-2013
- B. Selection of relevant passages from the NWO grants regulations
- C. Selection of relevant passages on data management from the VSNU Code of Conduct for Academic Practice 2014
- D. Selection of relevant passages from the SEP protocol
- E. Relevant passages from the PhD regulations

Appendix A

Selection of relevant passages on data management from the Collective Labour Agreement (CAO) for Dutch Universities 2011-2013.¹¹

The current CAO contains no provisions on the control of research data. For other intellectual property rights, it stipulates that employees must comply with an employer's instructions. Sui generis database rights regulate a form of control for those who make a substantial investment in creating a database. These rights contain a form of investment protection, with the exception of research from databases that are made public. However, the CAO was not written with the interests of research collaboration in mind.¹² NWO policy seeks to tie in with the CAO by stating in its grant conditions that both NWO and the knowledge institution can be regarded as the 'producer of the database'. It could be argued that, even without being regulated in the CAO, this also applies to data collections where the institution makes a substantial investment in creating the database. Together with database rights, copyright can play a role in decisions to make data public, if the data comprise works that are subject to copyright.

Section 3 Patent right and copyright

Article 1.20 General

1. The employee is obliged to comply with provisions reasonably laid down by the employer with regard to patent right and copyright, with due observance of the legal provisions.
2. The employer may impose more detailed rules with regard to the provisions referred to in Articles 1.21 and 1.22.

Article 1.21 Obligation to report

1. An employee who, during or otherwise coinciding with the performance of his duties, creates a possibly patentable invention or, by means of plant selection work, isolates a new variety for which plant breeder's rights may be obtained, is obliged to report this in writing to the employer and must submit sufficient data to enable the employer to assess the nature of the invention or variety.
2. The obligation referred to in paragraph 1 arises the moment the employee is reasonably able to conclude that there is a question of such an invention or such a variety. In any event, the employee shall be considered to have been able to reach such a conclusion the moment the invention is completed or the variety has been isolated.
3. The provisions in this article apply by analogy as far as possible if the employee creates work that is protected by copyright, if and insofar the employer has not determined otherwise.

Article 1.22 Transfer and retention of rights

1. Without prejudice to the provisions in Article 12 of the State Patents Act, Bulletin of Acts & Decrees 1995, 51, Article 31 of the Seeds and Planting Materials Act, Bulletin of Acts & Decrees 1966, 455 and Article 7 of the Copyright Act, Bulletin of Acts & Decrees 1912, 308, the employee, if and insofar he is entitled to other than moral rights to the invention, the variety or the work, for which the obligation to report in Article 1.21 exists, shall transfer these rights to the employer in whole or in part if so requested, in order to enable it to make use of them in the context of fulfilling its statutory duties within a term to be established later.
2. As soon as the term referred to in paragraph 1 has expired without the employer actually having made use of the rights that were transferred to it, the employee is entitled to reclaim them. If the employee subsequently decides in favour of exploitation, the second sentence of paragraph 3 applies by analogy.
3. Except in cases contrary to the substantial interests of the university, the employee is entitled not to comply with the request as referred to in paragraph 1. In that case, the employer may decide that the costs it has invested are at the employee's expense, including salary, the costs of the facilities made available to the employee, insofar as they are directly related to the creation of

¹¹ The applicable CAO is available on the VSNU website.

¹² See http://wetten.overheid.nl/BWBR0010591/geldigheidsdatum_22-09-2014

the rights the employee now wishes to keep for himself, plus the interest accrued. The term 'substantial interests of the university' shall be interpreted to include interests arising from agreements entered into with third parties by or on behalf of the employer.

Article 1.23 Reimbursements

1. In the event the employer makes use of the rights transferred to it, the employee is entitled to fair reimbursement. Article 1.4 paragraph 5 is not applicable.
2. When determining this compensation, consideration shall be given to the financial interests of the employer in the assigned rights and to the circumstances under which the result was achieved.
3. When rights are transferred, the employee is eligible for reimbursement of the costs borne by him personally which costs are demonstrably linked directly to the invention, the isolation of the variety or the creation of the work.

Appendix B

Selection of relevant passages from the NWO grants regulations May 2011 (version 22 January 2014).¹³

The basic idea in NWO's grants regulations is that the grant recipient agrees to the conditions imposed by NWO in terms of copyright and database rights. The regulations also outline NWO's authority to impose further conditions. In essence, the conditions stipulate that databases with accompanying explanation will at the very least be made available for the purpose of further academic research. The data collected during a research project should therefore be stored and documented in a thorough and accessible manner. ZonMW has a similar provision in its grants regulations.¹⁴ Alongside the grants criteria, ZonMW encourages the 'Access to data' pilot scheme¹⁵ for discipline-specific initiatives.

Publications and other research results

25. Research results that have been produced with the aid of NWO funds should be made accessible to the general public and for further research as much and as soon as possible. With a view to expected exploitation rights on research results, the project leader, or alternatively the knowledge institution, can postpone the publication of research results up to a maximum of 9 months after these were obtained.

26. With a view to an optimal dissemination, respectively application, of results from publicly funded research the project leader, or alternatively the knowledge institution, shall ensure prior to the execution of the research that in the event that the research will entirely or partly be conducted by persons not employed by the knowledge institution, these persons waive in writing any possible intellectual property rights derived from the research results.

28. NWO tries to ensure access to publications that have arisen from the research it funds. Publications supported by NWO funds should therefore, irrespective of other publication possibilities, be made accessible to the general public as quickly as possible via Open Access. Copyrights may only be assigned to a third party insofar as this does not block the option to publish via Open Access. Deviation from this rule is only possible with the explicit prior approval of NWO.

29. In the case of databases NWO and the knowledge institution where the research was performed are together considered to be the 'producer of the database' as meant in the Database Act.

30. By accepting a grant for research that results in copyrighted work and/or databases, the copyright holder or the producer of the database(s) respectively grant permission for the following:

To facilitate knowledge transfer from research results, NWO can impose further conditions on the copyrights and extraction rights on databases that are created within the framework of the research.

Databases with the associated explanation should at the very least be made available for use and for the purpose of further academic research in a manner indicated by NWO. The data collected during a research project should therefore be stored and documented in a thorough and accessible manner.

¹³ See <http://www.nwo.nl/documents/nwo/juridisch/regeling-subsidieverlening-nwo>

¹⁴ See http://www.zonmw.nl/fileadmin/documenten/Corporate/Algemene-subsidiebepalingen-ZonMw_per_1_juli_2013.pdf

¹⁵ See <http://www.zonmw.nl/nl/programmas/programma-detail/toegang-tot-data-ttdata/pilot/>

Exploitation rights and utilization

32. Without prejudice to Article 25, NWO may claim the intellectual property rights to research results that are eligible for exploitation as long as the specific objectives of the funding instrument require this and the brochure states how the patent rights will be distributed in such cases and, where relevant, what the means of exploitation and the associated preconditions are.

In such a case, prior to the realisation of the research concerned, the concrete agreements concerned are recorded in a written agreement as meant in Article 4:36, para, of the General Administrative Law Act under the grant allocation decision. This is concluded between the organisations where the research will be realised and NWO, unless the entire of the research project takes place abroad under the responsibility of a knowledge institution located in that country where the research is performed.

In the event that the entire research project is carried out abroad under the responsibility of a knowledge institution located in that country then this knowledge institution may apply the patent legislation applicable in this country as long as this patent legislation, compared to its Dutch counterpart, is not to the detriment of the involved Dutch party (parties) and/or research results.

Such an agreement is usually drawn up on an individual basis. In this agreement, the parties concerned should make all necessary agreements about the relevant background knowledge needed for executing the research and its utilisation to which not all parties have free access. In the case of a public-private partnership this agreement should also contain arrangements about the consequences of stopping the research project before its completion.

The project leader, or alternatively the knowledge institution, will ensure that employees or others who can claim exploitation rights on the research results transfer these rights to those who, according to the aforementioned, are entitled to the research results.

Appendix C

Selection of relevant passages for data management from the VSNU Code of Conduct for Academic Practice 2014.¹⁶

The Code of Conduct for Academic Practice contains six principles of sound academic practice. The preamble to the new 2014 version expressly states that the standards are not only intended for researchers, but that the board of the institution also has an obligation to promote compliance with the code. Details of monitoring the quality of data collection, input, storage and processing can be found under the principle of verifiability. This principle means that others are able to verify whether the presented information satisfies the relevant criteria of quality or reliability, for example.

The other principles also provide details that are relevant for good data management. For example, the elaboration of the principle of scrupulousness calls for proper acknowledgement of sources. The principle of reliability means that research results must be based on actual collected data. The principle of independence requires that agreements with external funders always contain a guarantee that the researcher is at liberty to publish the results within a specified, reasonable period. The elaboration of this principle means that future agreements with private parties must also contain agreements about the management and control of research data.

From the preamble:

8. Academic practitioners must comply with the Code of Conduct and have a duty to promote the best practices amongst their peers. University administrative bodies are under an obligation to promote and enforce compliance with the Code. Universities have public and binding regulations governing the independent resolution of complaints regarding violations of academic integrity.

1. Honesty and scrupulousness

Principle

Academic practitioners are honest and forthright about their research and its applications. Scientific and scholarly activities are performed scrupulously and should remain unaffected by the pressure to achieve.

Definition

Researchers are called upon to be open and nuanced about margins of uncertainty and other limits on the interpretation and applicability of their own research and that of their fellow practitioners. Communication regarding research results should be dispassionate and realistic. The actions of an academic practitioner are scrupulous when they are performed with the dedication and precision that a proper exercise of the profession requires.

Elaboration

1.1. Academic practitioners know that the ultimate aim of science is to establish facts and they therefore must present the nature and scope of their results with the greatest possible precision. Accordingly, they do not prevaricate about their findings or about attendant uncertainties. Scrupulousness also entails the presentation of doubts and contraindications.

1.2. Every academic practitioner demonstrates respect for the people and animals involved in scientific teaching and research. Research on human subjects is exclusively permitted if the persons concerned have freely given informed consent, the risks are minimal and their privacy is sufficiently safeguarded. Research involving animals is only permitted if the statutory permits have been granted and in conformity with the relevant legislation.

1.4. Authorship is acknowledged. Rules common to the academic discipline are observed.

¹⁶ The new version the Code of Conduct for Academic Practice will be available shortly on the VSNU website.

2. Reliability

Principle

Every academic practitioner supports and strengthens the fundamental reliability of science and scholarship through their own conduct. Academic practitioners conduct and report on their research and transfer their knowledge through teaching and publishing in a reliable manner.

Definition

Academic practitioners act reliably when they perform their research in a conscientious manner and provide a full account of the research conducted. This ensures that scientific and scholarly research can be traced, verified and re-tested. Reliability applies both to the conduct of academic practitioners and to their written work. Research publications should make mention of the statistical uncertainty of research results and the margins of error.

Elaboration

2.1. Research data have indeed been collected. The statistical methods used are in accordance with the methodological standards for the type of data used. The selective omission of research results is reported and justified.

3. Verifiability

Principle

Presented information is verifiable. Whenever research results are published, it is made clear what the data and conclusions are based on, from where they originate and how they can be verified.

Definition

Conduct is verifiable when it is possible for others to assess whether it complies with relevant standards (for instance of quality or reliability).

Elaboration

3.1. Research must be replicable in order to verify its accuracy. The choice of research question, the research set-up, the choice of method and the references to sources used are accurately documented in a form that allows for verification of all steps in the research process.

3.2. The quality of data collection, data input, data storage and data processing is closely guarded. All steps taken must be properly reported and their execution must be properly monitored (lab journals, progress reports, documentation of arrangements and decisions, etc.).

3.3. Raw research data are stored for at least ten years. These data are made available to other academic practitioners upon request, unless legal provisions dictate otherwise.

3.4. Raw research data are archived in such a way that they can be consulted at all times and with a minimum expense of time and effort.

5. Independence

Principle

Academic practitioners operate in a context of academic freedom and independence. Where restriction of that freedom cannot be avoided, this is clearly stated.

Definition

When presenting insights as correct and relevant, academic practitioners are independent when they only allow themselves to be influenced by others' judgements to the degree that such judgements are based on scientific or scholarly authority. They do not allow themselves to be influenced on other grounds.

Elaboration

5.4. The option to publish academic research results is assured. Arrangements with external research funders always stipulate that the academic practitioner is at liberty to publish the results within a specified, reasonable period.

Appendix D

Selection of relevant passages from the SEP (Standard Evaluation Protocol) 2015-2021.¹⁷

(p.9) Research integrity

The assessment committee considers the research unit's policy on research integrity and the way in which violations of such integrity are prevented. It is interested in how the unit deals with research data, data management and integrity, and in the extent to which an independent and critical pursuit of science is made possible within the unit.

The assessment committee bases its assessment on how the research unit itself describes its internal research culture. The research unit undergoing assessment responds to a number of questions in the self-assessment, described in the format provided in Appendix D. The unit should use these questions to reflect on its own data management practices, the level of internal research integrity, and the transparency of its research culture. The assessment committee discusses these points during the site visit, comments on this in its report, and makes recommendations for improvement.

(p. 23) Appendix D Format self-assessment report

– Research integrity:

A general reflection covering the following aspects:

- a. The degree of attention given to integrity, ethics, and self-reflection on actions (including in the supervision of PhD candidates)
- b. The prevailing research culture and manner of interaction
- c. How the unit deals with and stores raw and processed data
- d. The unit's policy on research results that deviate flagrantly from the prevailing scientific context
- e. any dilemmas (for example of an ethical nature) that have arisen and how the unit has dealt with them.

Table D1 Table with output indicators.

¹⁷ See <http://www.vsnu.nl/files/documenten/Domeinen/Onderzoek/SEP2015-2021.pdf>

Appendix E

Relevant passages from the PhD regulations.¹⁸

The new PhD regulations stipulate that the data must be made available for further academic research. The degree of availability is not specified, nor how it is to be achieved. However, other articles in the PhD regulations do indicate a framework for this. PhD students confirm that they will adhere to the Code of Conduct for Academic Practice and they set out agreements with their supervisors and co-supervisors in a training and supervision plan at an early stage. The policy memorandum suggests that the training and supervision plan should also include agreements about data management.

2.3.5. As soon as the application for admission to the PhD programme has been approved, the PhD student and the supervisors and co-supervisors will, in accordance with the requirements of the Graduate School, submit a fully completed training and supervision plan to the Graduate School for approval by the director of the Graduate School, at the latest at the beginning of the PhD programme, stating the subject of the PhD thesis and the names of the supervisors and co-supervisors the PhD student wants appointed or approved, and if possible the dates on which the result and development meetings will take place. After the training and supervision plan has been approved by the director, it will be signed by the Dean. The Dean is responsible for registering the training and supervision plan in Hora Finita.

2.3.6. PhD students will confirm in Hora Finita that they will adhere to the Dutch Code of Conduct for Academic Practice issued by the Association of Universities in the Netherlands (VSNU) and the University of Groningen's Regulations for the Protection of Academic Integrity.

4.1.5. Data (such as databases) with accompanying explanatory notes will certainly be made available for further academic research. The Rector Magnificus may grant a full or partial exemption from this requirement for a certain period if there are compelling reasons to do so.

¹⁸ See <http://www.rug.nl/education/phd-programme/promotieregeling/promotiereglement-2014.pdf>