

**Friday, 25 September 2015**

## **GuildHE Response to Concordat on Open Research Data**

GuildHE<sup>1</sup> and its research network CREST – Consortium for Research Excellence Support and Training<sup>2</sup> - support the aims and principles of the drafted Concordat on Open Research Data (dated 17th July 2015).

We welcome the inclusivity of the concordat, applying the principles to all research areas, whilst recognising researchers' autonomy and the differences between disciplines. We are also encouraged to see a broad base of accountability for the application of such principles, extending the responsibility to enable open data to all stakeholders in research, and the impetus to complement existing frameworks. We are especially pleased to report considerable engagement in the issues surrounding research data amongst the network; in February 2015 CREST was awarded a scoping grant from Jisc as a part of a consortium to develop research data management services for smaller and specialist institutions. The consortium has subsequently been awarded a follow on grant to build and implement a shared solution for RDM amongst such institutions.<sup>3</sup>

The concordat will be useful to ROs as a clear statement of what a university / institution should be doing with regard to open research data, and also what researchers' responsibilities are and how those are best supported. Such support and responsibilities come with attendant costs and development needs. The concordat explores many of these; we outline our particular areas of concern below.

- Our primary concern is the potential burden the concordat places on institutions to develop the necessary infrastructure and support systems / capacity to meet the goals it sets out. Whilst this is recognised throughout the document, we would like to highlight the particular pressure this will exert on smaller and more specialist institutions with more constrained operational budgets for such expenditure. It is likely that, in most cases, such institutions will be establishing infrastructure, not simply upgrading existing systems, and as indicated in the draft concordat, these will need to be supplemented by skilled personnel, bespoke subject-specific training on data skills for research support staff and researchers, as well as advocacy for the principles for open research data.
- Whilst 'research data' is an established term in many STEM and related disciplines, this is not the case for many others. The lack of definition of what constitutes research 'data' in these disciplines, such as creative and visual arts, may result in inefficiencies as ROs attempt to plan for unknowns, e.g. potential size of datasets,

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<sup>1</sup> GuildHE is one of the two officially recognised representative bodies for Higher Education in the UK.

<sup>2</sup> CREST is a sub-association of GuildHE, bringing together 22 smaller and specialist research active higher education institutions in the UK: [www.crest.ac.uk](http://www.crest.ac.uk)

<sup>3</sup> A Consortial Approach to Research Data Management Systems (RDMS) is led by CREST, University for the Creative Arts, Leeds Trinity University, Arkivum and ULCC and is supported by Jisc as part of the Research Data Spring initiative. Full details are available on the CREST website: <http://crest.ac.uk/stage-2-a-consortial-approach-to-rdm/>

relevancy, omissions of data due to misunderstanding the terminology. Individual researchers may not recognise the parts of their work which may be defined as data, and may not comprehend the benefits or, conversely, the negative consequences, of moving to an 'open' model of practice. We would be looking to other actors in the research community, such as funders and learned societies, to assist in guiding ROs and researchers in realising the potential of their data and understanding how the terms relate to their outputs. We would welcome a clear vision of where best-practice is considered to be currently, and how it shall be harnessed, translated, and disseminated to other disciplines and ROs. Here we recognise the usefulness of the Research Integrity Office's scenario modelling to enable institutions to reflect upon case studies as a route to understanding their own institution-specific approach.

- With regard to discipline diversity we would also urge for caution in the application of citation metrics to datasets where there has not been a tradition in taking such factors into account, particularly in the case of measuring research excellence or researchers' professional profiles. This notwithstanding, we welcome the recognition of the value of researchers' data, in addition to and as a complement to other research outputs, in principle.
- Overall, we would urge for a reasonable and generous timeframe for the adoption of open research data standards and compliance with such standards. As we are sure the working group have considered, a period of transition will be required to align ROs processes and accommodate those researchers who will not have had open research data as an impetus for their research design 'from the outset'. There are certain factors we as an organisation are most aware of, such as; the time needed to advocate for, 'bed in', and translate the terminology into discipline areas that are not currently using it as a matter of course; the pressure on resources for smaller institutions; the time required to establish sustainable, effective infrastructure solutions for all ROs; and the establishment of consistent and accessible guidance for ROs and researchers.

Through CREST, GuildHE has already identified and recognised the need for specific solutions for research data management amongst smaller and specialist institutions, and as detailed above, we have live projects funded by Jisc to explore a viable shared service. We would welcome the opportunity to share the insights of this work with the UK Open Data Forum. GuildHE are not currently represented in the forum and could provide useful insights regarding the implications of open research data for the full diversity of higher education institutions in the UK.