# HAAGA-HELIA RESEARCH

# DATA POLICY

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# 1 INTRODUCTION

Haaga-Helia's operations are guided by five values: responsibility, collaboration, courage, respect and openness. These values are strongly present in the research, development and innovation (RDI) work that we carry out at Haaga-Helia. For example, the key meaning of the values of openness, responsibility and collaboration is that we have shared rules for the collection, presentation, documentation, description and storage of any research data produced, adapted and used in our projects. The research data policy you are holding in your hands creates the foundation for processing research data during the different phases of its lifespan. The document also helps us confirm the ethical management of research data.

In our data policy, research data refers to two different things: firstly, research data includes the material produced, adapted and used within our RDI projects on which the results of the project are based. Secondly, research data is always part of the material's context, the body of materials or the metadata describing a unit of observation.

Haaga-Helia is committed to the [Declaration for open science and research](#) and any policies in line with it of which one concerns specifically the open access of research data and methods. Our aim is also to promote the wide social impact of research carried out at Haaga-Helia. For the sake of impact, it is important that our research material is as open as possible and as closed as necessary. Opening materials is not always possible for valid reasons – they may include personal data or other confidential information, for example, trade secrets. In such a case, our aim is to collect information on the data on organisational level and, as far as possible, openly publish the material's metadata, i.e. the information about the existence, topic and date of the material and its owner.

## FAIR principles

At Haaga-Helia, we aspire to manage materials in accordance with the FAIR principles. The word FAIR comes from the words Findable, Accessible, Interoperable and Re-usable. In practice, we aim to ensure that as much of the material collected within our projects as possible is findable, accessible, interoperable and re-usable and that only the material for which it is vital to do so is kept closed.

## Objectives of research data policies

At Haaga-Helia, our research data policies describe the principles, guidelines and responsibilities for managing data generated through RDI activities. Their aim and the aim of the data policy-related instructions is to establish clear rules for the management of research data during its lifespan, in other words, its collection, presentation, documentation, description, storing and destruction. Research data policies direct those carrying out research to operate in accordance with the requirements of data management, the responsible conduct of research, open science and research guidelines as well as relevant legislation.

The aim of research data policies is to strengthen the extensive social impact of research carried out at Haaga-Helia and to ensure that the organisation has up-to-date information of the versatile research data generated within our projects. Furthermore, research data policies aspire to clarify the roles and responsibilities of the organisation as well as everyone handling data. Research data policies support the career path of every expert who carries out research work because open or at least openly described material will in the future be an increasingly strong part of becoming a distinguished expert in research. As an organisation, we wish to support our staff members who carry out research.

In addition to the organisation's own strategy, we have also used the national guidelines and recommendations of open science and research and compared the research data policy guidelines of various other organisations carrying out research to form our research data policy.

## Monitoring

We monitor the implementation of data policies as well as national and international research data management recommendations and the up-to-date development of national services linked to the lifespan of research data. Monitoring the implementation of data policies is the responsibility of the RDI management, and the services linked to the management of the lifespan of research data and their development are monitored by the IT services. The RDI management together with the IT services are responsible for updating research data policies when necessary or at least at the start of every strategy period.

# 2. The principles of research data management at Haaga-Helia

## Collection of material and material management plans

Material collection must always be based on the responsible conduct of research as well as the research-ethical principles, and the Ethics Committee of the Helsinki Region Universities of Applied Sciences must be invited to implement an ethical review, when necessary. The need for a review can be checked from the ethical review guidelines of the Finnish Advisory Board on Research Integrity (TENK) to which Haaga-Helia has committed. Furthermore, the responsible conduct of research includes asking a permission for collecting material and its intended use from the object of the research as well as providing a report on the storage of the material.

We also expect that in research and development projects the material management plan for the research data is implemented in accordance with the guidelines of the organisation and any potential funding party. As material management tools, we recommend the use of either the funder's material management plan template or a general material management plan template suited to the research project (see DMPTuuli tool). Implementing a material management plan is the responsibility of the project manager.

## Ownership of and agreement on research data

Research data produced as part of Haaga-Helia's activities belongs to Haaga-Helia, and Haaga-Helia can make the decisions on its use. Research data can contain copyright-protected works, or copyright-protected works can be created based on it. However, to be copyrighted, a piece of work must exceed the threshold of originality, in other words, it has to be sufficiently independent and original. The copyright of a piece of work belongs to its creator.

The copyright for works created or produced as part of RDI activities and other copyright protected materials must be transferred to Haaga-Helia. Thus, Haaga-Helia can fulfil its obligations towards the funders of a research project and promote openness and the further use of research data in accordance with open science and research guidelines.

People who participate in RDI activities must make an agreement with Haaga-Helia using Haaga-Helia's template regarding the transfer of their copyrights before starting their research work. If

Haaga-Helia's employee has a clause in their agreement regarding the transfer of copyrights, a separate agreement defines in more detail what has been agreed in the employment contract.

## Protected material

Research data may include protected materials that cannot be openly published. Protected material refers to materials that contain personal information or confidential information such as trade secrets. The openness of research data takes into account the need to respect data protection and confidentiality regulations. Haaga-Helia expects that before research work commences, the use of protected materials is recognised and planned. It is important to assess whether research that includes protected materials requires an ethical review.

So that research data can be opened whenever possible, the primary aim should be that protected materials are not collected or they are collected based on the minimisation of data principle if the data in question is vital for the research being carried out. If the research cannot be implemented without using protected material, the research data will never be openly published for this part. Research data that contains personal information can, in some situations, be anonymised, thus, allowing it to be opened.

Some protected materials can be sensitive, which must be taken into account in processing research data. Sensitive material includes data within special categories of personal information, personal identity codes and confidential information.

## Other material and documents produced in RDI projects

For the handling and archiving of other than research data, we at Haaga-Helia comply with RDI projects' Records Management Plan and its guidelines. RDI projects' other material includes agreements, documents, reports, budgets, meeting minutes and other documents defined in the Records Management Plan.

## Storing research data

The storing location for research data must be defined in the material management plan.

Research data must not be stored in the user's personal home directory; instead, it is to be stored in the storage locations determined by Haaga-Helia. The storage location depends on at least the following factors:

- Data content of material (does it contain protected materials or sensitive information)
- The research group's cooperation needs (are there any external partners who must be able to get hold of the original or modified data).
- Funders' or potential other parties' data protection requirements etc.

Protected materials must not be stored in external storage devices (memory sticks, external hard drives etc.) The most secure storage and handling location for material that contains sensitive information is a disk allocation/folder establish for the project in Haaga-Helia's own storage system.

If the research group includes members outside Haaga-Helia who must be able to get hold of the data, then cloud services, such as Teams or Sharepoint, are considerably more practical than Haaga-Helia's own storage system. If necessary, CSC material management services can also be used for storing materials. Consumer services (e.g. Dropbox) must, however, not be used even for temporary research data handling.

Research funders or other influential parties may have demands or views on the management of material, and these must be taken into account, but legal aspects always come before other considerations with regards to, for example, protected material.

## Metadata

Metadata refers to the documentation and description of the content, collection, variables and other important issues regarding research data. We aim to open the metadata of our research materials.

Whenever research data is stored, it is important to attend to descriptions of material to ensure that the material is findable and re-usable when possible, in accordance with the FAIR principles. The FAIR principles guide the practices of describing research data at Haaga-Helia. All research data collected in our projects is described in the project database guide and supported by the organisation. Metadata is important so that the organisation has information on the data we handle and on what data can be opened. The project manager or the researcher in charge of research data are responsible for storing metadata. In connection to storing metadata, it is determined whether the data can be opened or if it is important to keep it protected.

## Publishing research data

At Haaga-Helia, we offer support and guidance to publishing complete research data and any metadata connected to it. Haaga-Helia must have the necessary rights for publishing data, and there must be no obstacles for the publication with regards to data protection, legislation or agreements. We primarily recommend the Fairdata services provided by CSC or the data publication services agreed in the project and approved by the funder.

## Licences

We recommend the Creative Commons license 4.0 as the license for opening the material for further use. In some cases, it is necessary to discuss the license and come to an agreement with the RDI project funder or partners. In that case, Haaga-Helia's proposal for a license is CC 4.0. If the research utilises existing openly distributed research data, the data must be cited in accordance with the responsible conduct of research regarding source and author citations as when citing publications. The citations must include a mention at least of the author, material name, publication date, publisher, version and availability i.e. the persistent digital identifier for the data.

## Preservation and potential destruction of data

In principle, the data storage solutions offered by Haaga-Helia (see Chapter Storing research data) work as the data storage locations also after RDI projects have been completed for as long as determined for each project. However, when necessary, we utilise the Digital Preservation Service for Research Data provided by CSC.

In some cases, it is necessary to destroy the data immediately once it is no longer used. This is the case, for example, when Haaga-Helia does not act as the data controller. In such a case, the project manager or the researcher in charge of the data is responsible for the appropriate destruction of the data.

The preservation and availability of nationally and internationally valuable material for future use by researchers must be ensured. For such materials, we use Fairdata's Digital Preservation Service for Research Data maintained by CSC.

# 3. Research data management responsibilities

The research and development project's project manager and experts working in different roles in the project attend to the appropriate management of data in accordance with the responsible conduct of research and the instructions of the university and the funding party throughout the lifespan of the research data. Thus, the management of data takes into account the data management plan, data protection and research-ethical principles as well as existing agreements and legislation.

## Project manager's responsibilities

A project manager has the main responsibility for the management of data within the project throughout its lifespan. The project manager:

- Ensures that the project complies with the responsible conduct of research and research-ethical principles.
- Ensures that s/he has sufficient skills for the responsible management of data and if necessary, further develops his/her competence.
- Complies with the university's general requirements for the management of research material and those placed by the funder. Carefully observes that the university's guidelines and data protection regulations are complied with especially with regards to the management of research data containing personal information throughout the lifespan of the material.
- Ensures that all the required material management resources are taken into account in project planning and the application and that they are designated to the project and material management within it at the implementation phase of the project.
- Is responsible for producing the material management plan before the implementation of the project or research and updating the plan as needed during the project.
- Stores the material collected in the project in a way that is data protected. The university provides sufficient data systems for this.
- Is responsible for describing the research data collected in the project in the research database designated by Haaga-Helia.
- Ensures that the material is appropriately cited when it is presented and used.

- Is responsible for determining which material can be opened to the public outside Haaga-Helia. With regards to the materials that are opened, the project manager is responsible for ensuring that there is no confidential information within it.
- Ensures the appropriate storage of material, its user rights and further use after the project has finished and/or when transferring to other duties within or outwith the university.
- Is responsible for archiving or destroying the material after the project in accordance with the guidelines.

## Responsibilities of an expert in the project

- Complies with the responsible conduct of research and research-ethical principles.
- Ensures that s/he has sufficient skills for the responsible management of data and if necessary, further develops his/her competence.
- Complies with the university's general requirements for the management of research material and those placed by the funder. Carefully observes that the university's guidelines and data protection regulations are complied with especially in the management of research data containing personal information throughout the lifespan of the material.
- Stores the material collected in the project in a way that is data protected. The university provides sufficient data systems for this.
- Ensures that the material is appropriately cited when it is presented and used.
- Ensures the appropriate storage of material, its user rights and further use after the project has finished and/or when transferred to other duties within or outwith the university.

## Responsibilities of a research area director

The responsibilities of a research area director are:

- To ensure that the project members have sufficient resources and competence to execute the project in accordance with the responsible conduct of research and research ethical principles as well as the current requirements for material management, open science and research guidelines as well as up-to-date legislation.
- To offer support for complying with the implementation of research data policies and material management.

## University's responsibilities

The university's responsibilities are:

- To ensure that the research data policies are up to date and to update the research data policies when necessary and at the start of a new strategy period.
- To monitor the implementation of the research data policies and intervene if any deviations occur.
- To maintain and develop the data management infrastructure and solutions and their compatibility with the key external service providers (e.g. tiedejatutkimus.fi).
- To support, instruct and educate researchers with regards to material management, description, data protection, licenses and material management tools.
- To offer agreement templates and support for agreements on rights.
- To maintain other instructions on data and information processing (e.g. data security policies and terms and conditions).
- To ensure that data is appropriately destroyed at the end of its lifespan in accordance with the material management plan.

## Appendix 1: Research data policy instructions and additional reading

1. [Declaration for open science](#)
2. [Policy for Open Access to Scholarly Publications](#)
3. Responsible conduct of research and open science and research at Haaga-Helia
4. Ethical review ([TENK](#) & [Haaga-Helia's instructions](#))
5. Producing a material management plan
6. Transferring copyrights in RDI projects
7. [Using CC licenses](#)
8. Handling protected materials
9. Protecting material, anonymisation and pseudonymisation
10. Data storage
11. Data description

12. Data publication

13. Data destruction