

## The Royal Statistical Society's response to the UK Open Research Data Forum's *Draft Concordat on Open Research Data*

The UK's standing in science and innovation is shaped by data and by our capability to work with, analyse and understand it. Access to data is crucial for underpinning this. The Royal Society's report, *Science as an open enterprise* (which the Royal Statistical Society also gave input to), was important in laying the foundations for further progress on opening up research data, including the creation of the Open Research Data Forum in the UK.<sup>1, 2</sup> We strongly support the Forum's *Draft Concordat on Open Research Data*, which we consider to be well thought through, and comprehensive with regard to its remit. To RCUK we would like to offer some brief comments on aspects that we particularly welcome. The Concordat's ten principles are listed in an Appendix on page 2 for reference.

The [RSS' Data Manifesto](#) calls for progress to be made more quickly on opening up data, in particular for the boost this can bring to innovation: "open data can be a rich source of innovation at relatively little cost – particularly if it is effectively marked with standard codes for geography, time and other attributes".<sup>3</sup> In our further positioning on UK science and research, we recognise that progress on public sharing of research data for wider analysis needs investment and commitment.<sup>4</sup> We therefore welcome that the draft includes respect for the cost of implementing open access to research data as one of its key principles, but also recognises that sustained commitment to implement these principles will bring great benefits. As we achieve greater ease of access and the ability to find the right data, this will lead to efficiency and multiplier effects for our knowledge economy.<sup>5</sup> Open data and access to research needs to be prioritised by the government and by our academic and research industries, especially public access to research that is supported by public funding. Progress in these areas should also help to address the 'reproducibility crisis', where advances in science are limited by a lack of collaboration on the underlying data.

Elsewhere in our *Data Manifesto*, we call for progress on access to data from the private sector, for the purpose of strengthening research and statistics. For example, open access to data on clinical trials that are reported by pharmaceutical companies. As European data protection law is refreshed, we need also to ensure that this does not contain new, arduous requirements for personal consent that would constrain the production of open-access research and statistics in the public interest.

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<sup>1</sup> The Royal Society (2012) *Science as an open enterprise* (PDF), available from: [https://royalsociety.org/~media/Royal\\_Society\\_Content/policy/projects/sape/2012-06-20-SAOE.pdf](https://royalsociety.org/~media/Royal_Society_Content/policy/projects/sape/2012-06-20-SAOE.pdf) (accessed September 2015).

<sup>2</sup> Research Information Network (2014) 'Open data research forum' (webpage), available at: <http://www.researchinfonet.org/research-data/open-research-data-forum/> (accessed September 2015)

<sup>3</sup> The Royal Statistical Society (2014) *The Data Manifesto* (PDF), available from: <http://www.rss.org.uk/Images/PDF/influencing-change/rss-data-manifesto-2014.pdf> (accessed September 2015)

<sup>4</sup> The Royal Statistical Society (2015) *Data Manifesto Briefing Note 7: Investment in research, science and innovation* (PDF), Available from: <http://www.rss.org.uk/Images/PDF/influencing-change/2015/data-manifesto7-investment-in-research-science-and-innovation.pdf> (accessed September 2015)

<sup>5</sup> Research Data Alliance Europe (2014) *The Data Harvest: How sharing research data can yield knowledge, jobs and growth* (PDF), European Union. Available from: [https://europe.rd-alliance.org/sites/default/files/report/TheDataHarvestReport\\_%20Final.pdf](https://europe.rd-alliance.org/sites/default/files/report/TheDataHarvestReport_%20Final.pdf) (accessed September 2015)

In our *Manifesto* and elsewhere, we have cautioned that where data access requires the implementation of new systems and new reporting standards, it is clear that risks arise. New systems should not be implemented too hastily. We welcome that the Forum's Principles 7 and 9 highlight that the use of data should conform to legal, ethical and regulatory frameworks, and that the development of data skills should be recognised as a responsibility for all stakeholders. As changes are made, the needs of data users across the research sector must also be well considered, so that valuable data are not lost and disruption to services is minimised. Research data projects require good governance to assess ethical concerns, such as any risks to privacy for research participants. Implementation must therefore be well considered so that the benefits of open access are widely seen to outweigh any risks.

*Submitted by RSS' Policy and Research Manager, 30 September 2015*

#### Appendix

##### Principles – Draft Concordat on Open Research Data

- Principle #1: Open access to research data is an enabler of high quality research, a facilitator of innovation and safeguards good research practice.
- Principle #2: Good data management is fundamental to all stages of the research process and should be established at the outset.
- Principle #3: Data must be curated so that they are accessible, discoverable and useable.
- Principle #4: Open access to research data carries a significant cost, which should be respected by all parties.
- Principle #5: There are sound reasons why the openness of research data may need to be restricted but any restrictions must be justified and justifiable.
- Principle #6: The right of the creators of research data to reasonable first use is recognised.
- Principle #7: Use of others' data should always conform to legal, ethical and regulatory frameworks including appropriate acknowledgement.
- Principle #8: Data supporting publications should be accessible by the publication date and should be in a citeable form.
- Principle #9: Support for the development of appropriate data skills is recognised as a responsibility for all stakeholders.
- Principle #10: Regular reviews of progress towards open access to research data should be undertaken.