



THE UNIVERSITY OF
SYDNEY

Professor Katherine Belov AO FRSN
Interim Deputy Vice-Chancellor (Research)

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Rosie Hicks
CEO, Australian Research Data Commons

Dear Rosie,

Draft Research Data Management Framework for Australian universities

The University of Sydney thanks the Australian Research Data Commons (ARDC) for the opportunity to comment on the draft framework for research data management at Australian universities, which is being developed as part of the Institutional Underpinnings program.

We recognise the importance of this initiative, which brings universities together to address the many research data management challenges that research institutions face, and we are pleased to see excellent progress is being made in this complex area.

Sydney is one of 25 universities participating in this program and has actively supported the participation of key personnel from our Research Portfolio, Library, Office of General Counsel and ICT in various working groups and on the editorial committee. Additionally, the University was awarded project funding under the program and is partnering with UNSW and Bond University to develop training modules for HDR students.

We are currently pursuing an active research data management agenda and see great value in the development of a national framework that will align efforts across all universities.

We have reviewed the draft framework and make the following comments and suggestions:

1. Overall, the guidelines make substantial progress in developing a unified approach to research data management in Australian universities.
2. The proposed framework focuses initially on 8 elements, with an additional 8 second-tier elements that are not planned to be developed in this phase of the project, and it is not certain when these may be addressed. While we recognise that the scope of this project is wide and needs to be constrained somewhat, we think there is value in developing at least some of the second-tier elements further so that they play a more prominent role in the framework. In particular, data ownership, digital preservation and governance are all integral to good research data management and should not be excluded. We recommend that consideration is given to developing these elements further in this phase of the project, while recognising the substantial effort that has been invested to date in fleshing out the top tier elements. Perhaps a less intensive approach could be adopted for these

additional elements, with the aim to provide appropriate recommendations and calls to action, but less in-depth analysis.

3. Throughout the guidelines, there is little mention of Indigenous data and governance mechanisms that apply specifically to data from First Nations' communities. While we recognise that the AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research does address data management in research to some extent, any national framework must reference appropriate Indigenous data management requirements.

We are eagerly anticipating the release of this national framework and look forward to its adoption within our research community. The implementation of nationally-aligned processes, systems and policies will be of substantial value to both researchers and institutions, and will result in better research and data practices across the sector. The University of Sydney continues its support for this process and commits to engage with ARDC and partner institutions during its development.

Yours sincerely,

(signature removed)

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