



**UNIVERSITAT POLITÈCNICA
DE CATALUNYA
BARCELONATECH**

Normativa de gestió de dades de recerca de la UPC

**Acord CG/2025/06/28, de 17 de desembre de 2025, del
Consell de Govern, pel qual s'aprova la normativa de
gestió de dades de recerca de la UPC**

Vicectorat de Recerca

- Document amb l'informe favorable de la Comissió de Recerca de 27/11/2025

English version

APPROVAL OF THE RESEARCH DATA MANAGEMENT REGULATIONS OF THE UNIVERSITAT POLITÈCNICA DE CATALUNYA

FACTUAL AND LEGAL BASIS

In recent years, the international scientific community has recognised the importance of managing research data during the research process and the need to follow [FAIR](#) principles for data that are findable, accessible, interoperable and reusable.

The UPC has the [Code of Research Integrity](#) (Decision CG/2023/02/09, of 21 February 2023), which covers data management in research practice.

The [2025 Open Science Roadmap](#) of the UPC (Decision CG/2023/07/08, of 5 July 2023) aims to provide infrastructure and tools for the management of FAIR research data, offer support and training to research staff and introduce an institutional research data management policy.

In this context, the [Academic Regulations of the Doctoral School](#) of the UPC (Decision CG/2023/09/08, of 19 December 2023) require doctoral students to include a data management plan in the research plan.

The [UPC CoARA Action Plan](#) (Decision CG/2024/06/35, of 17 December 2024) includes, among its pledges, updating the [Regulations on Research Activity Points \(PAR\) for Open Access Publications](#) (Governing Council Decision 177/2014) so that more types of research activities are recognised, including publishing datasets.

The UPC recognises the importance of research data and justifies drafting and adopting regulations to support the management, preservation, visibility and reuse of these data.

By virtue of the above, the Governing Council, by the powers granted to it in articles 58 and 59 of the UPC Statutes, and Article 46 of Organic Law 2/2023, on the University System, takes the following

DECISION

ONE. To approve the Research Data Management Regulations of the Universitat Politècnica de Catalunya.

Barcelona, 27 November 2025

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PREAMBLE

The UPC recognises the importance of research data and justifies drafting and adopting regulations to support the management, preservation, visibility and reuse of these data.

The entry into force of Law 37/2007, of 16 November, on the reuse of public sector information incorporated the provision of adopting measures to support publicly funded research data being fully reusable, interoperable and open access, taking into account the limitations that may arise from intellectual and industrial property rights, the protection of personal data and confidentiality, security and legitimate commercial interests.

The management of research data at the University:

- is one of the principles included in the UPC Code of Research Integrity (Decision CG/2023/02/09, of 21 February 2023),
- is one of the objectives of the UPC's 2025 Open Science Roadmap (Decision CG/2023/07/08, of 5 July 2023) and
- allows the results published in scientific articles to be validated and, when possible, facilitates the reuse of data in new research.

It is worth highlighting the approval of the [Academic Regulations of the Doctoral School](#) of the UPC (Decision CG/2023/09/08, of 19 December 2023), which require doctoral students to include a data management plan in the research plan.

The inclusion of the "open science" concept involves a change in the research model. It is about conceiving research in a more collaborative, transparent and accessible way. It implies a more open vision at all stages of research: project design, data collection, publication of results and evaluation. It is characterised by the openness not only of publications but also of research data, methods and processes, as well as the involvement of citizens in an environment of responsible research and innovation.

The European Commission considers open science to be a fundamental practice and a requirement in its research and innovation funding programmes, as it improves the quality, efficiency and responsiveness of research. International associations such as [CESAER](#), the [EUA](#) and the Unite! alliance, of which the UPC is a member, support the need for the appropriate management of research data during their life cycle to ensure their preservation in the medium and long term.

Research data management that follows FAIR principles, that is, findable, accessible, interoperable and reusable data, is widely accepted by the international community.

The University has taken into account the legislation that is applicable in the matter and other documents that are related to it, such as the following:

- Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information
- [CRUE: open science commitments of universities](#) (2019)
- [European Commission and Open Science](#) (2021)
- [UNESCO Recommendation on Open Science](#) (2021)
- [Unite! Strategic Open Science and Innovation Roadmap](#) (2021)
- [EUA Open Science Agenda](#) (2022)
- [Law 9/2022, of 21 December 2022, on Science](#) (2022)
- [Law on Science, Technology and Innovation](#) (2022)
- [Agreement on Reforming Research Assessment](#) (2022)
- [Organic Law on the University System](#) (2023)
- [National Open Science Strategy](#) (2023)
- [Catalan Open Science Strategy: Sharing Knowledge](#) (2023)

Internally, the University has the following regulations:

- [Regulations on Research Activity Points \(PAR\) for Open Access Publications](#) (2014)
- [Code of Research Integrity of the Universitat Politècnica de Catalunya](#) (2022)
- [UPC 2025 Open Science Roadmap](#) (2023)
- [Academic Regulations of the Doctoral School](#) (2023)
- [UPC CoARA Action Plan](#) (2024)

In recent years, the incorporation of data-based technologies, the desire to conduct research with data and the need to make the data generated in the research that is carried out available and accessible have led to the adoption of regulations along these lines at European and national levels. Examples include Law 37/2007, of 16 November, on the reuse of public sector information; Regulation (EU) 2022/868 of the European Parliament and of the Council of 30 May 2022 on European data governance, which amends Regulation (EU) 2018/1724 (Data Governance Regulation); and Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules for fair access to and use of data, which amends Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Regulation).

Given the University's commitment to open science and in line with the regulations that have already been approved, the UPC recognises the importance of research data and the advisability of developing and adopting regulations to provide support when managing them.

PART I. General provisions

Article 1. Object

The purpose of these regulations is to establish a general framework for the management of research data at the Universitat Politècnica de Catalunya (UPC). The regulations establish guidelines for the management, preservation, visibility and reuse of research data, in accordance with FAIR principles (findable, accessible, interoperable and reusable), and an institutional commitment to open science.

Article 2. Scope

2.1 These regulations are applicable to the entire UPC university community within the framework of research activities and any related activity that involves the management of research data, regardless of whether the activity is carried out totally or partially at the UPC.

It also applies to external persons, including UPC Group staff and other collaborators or institutions that participate in UPC research projects, through contracts, agreements or other formalised forms of collaboration.

2.2 These regulations do not apply in the following cases:

- When research activities are regulated by specific conditions imposed by external funding bodies, in which case the provisions of the call, contract or regulatory agreement prevail.
- When the UPC participates in projects with other bodies and these have established their own data management policy or regulations that prevail over these regulations.
- When members of the UPC community participate in research at other institutions, in which case the regulations of the body responsible for the project apply.

However, persons subject to these regulations must ensure that, within the framework of these exceptions, the provisions of these regulations are taken into account.

PART II. Research data

Article 3. Concept

Research data are understood to be any record in numerical or textual format that is used for scientific research and that is commonly accepted by the scientific community to validate the conclusions and results of research.

Research data may be experimental, observational and simulation data; data obtained from public or private sources; data processed or stemming from scientific analyses; or datasets reused from previous research.

Article 4. FAIR principles of research data

In recent years, the European Commission has adopted FAIR (findable, accessible, interoperable and reusable) principles in their research funding programmes as guiding elements of research data management.

These principles are based on the fact that research data should be:

- Findable: through unique and persistent identifiers (DOI, handles) and standard metadata that makes them easy to find.
- Accessible: establishing the groups that can access the data throughout the research life cycle, the software and methodologies for using the data and the legal or contractual reasons that may prevent the data from being accessible.
- Interoperable: encouraging the use of standard and interoperable data and metadata formats.
- Reusable: using licences for the reuse of content, establishing embargo periods that are as short as possible and giving the reasons why the reuse of the data is restricted.

The UPC must ensure that research data are managed in accordance with these principles.

Article 5. Ownership of research data

5.1. The ownership of research data corresponds to the natural or legal person who has the right or obligation to make them available to third parties, in accordance with applicable regulations and the established research contracts and agreements. Ownership entails responsibility for the custody, access and dissemination of the data, without prejudice to restrictions arising from data protection regulations, intellectual and industrial property rights or agreements with third parties.

5.2. The UPC is responsible for the ownership of the research data generated by the University's staff in the exercise of their duties, in accordance with current regulations. In the case of research carried out with the participation of personnel external to the UPC, the rights and obligations regarding the research data generated are those established in the contract and/or formalised agreement, which must expressly include the terms of use, access and exploitation of the data.

5.3 Ownership of research data does not, by itself, grant ownership of other rights that may accrue to it. People subject to these regulations must respect the ownership and rights associated with research data, such as intellectual and industrial property, business secrets, the protection of personal data or contractual confidentiality.

5.4. The personal data processed within the framework of research do not belong to the UPC or to the people carrying out the research, but to the individuals to whom they refer. The management of this data must be carried out in accordance with personal data protection regulations.

5.5. The ownership of research results is governed by the UPC's own regulations on industrial and intellectual property rights, as well as by what is established by the funding body and the agreements between the parties involved in the research.

TITLE III. Research data management

Article 6. Data management plans

At the beginning of research activities, staff subject to these regulations must develop a data management plan to ensure good practice in research activities.

A data management plan (DMP) is a methodological document that describes the entire data life cycle of research. It ensures that research data are traceable, available, authentic, citable and appropriately stored, and that they adhere to legal parameters and appropriate security measures for subsequent use.

A DMP is a living document that is prepared at the beginning of a research project and updated as often as necessary.

The DMP must contain information on:

1. What data will be obtained to carry out the research.
2. How they will be collected and processed.
3. What standards and methodology will be followed.
4. Who will be able to access the data.
5. How they will be preserved when the research is completed.

The DMP must be published in the UPC's institutional repository, UPCommons, in open access, by default, unless there are reasons that justify its restriction.

6.1. Content

The DMP must describe the procedures related to the data that are established in each of the stages of the research.

a) Work plan

Before the project starts, how the data will be managed must be planned and the type of data to be used must be described.

b) Data collection

The origin of the data and all processes that may be linked to them must be stated: whether they are from public or private databases, whether they are collected directly from natural persons who own the data, whether anonymisation or pseudonymisation techniques will be

used, and how they will be stored and safeguarded, as well as whether or not the risks associated with the data must be assessed, among other issues.

c) Organisation

Data files must be organised in such a way that research staff participating in the research can identify, locate and use them efficiently and effectively throughout the project.

To the extent possible, the standards, formats and vocabularies of the data and metadata specific to each discipline must be followed.

d) Analysis

The analysis stage includes the scientific and technological procedures (application of algorithms, data crossing, computations, simulations of results, etc.) that the research staff apply directly to the project data and the results stemming from them.

e) Secure storage

Research data should be stored as soon as possible in a secure space with access restricted to the research staff working there. Data must be stored in a correct, complete, unadulterated and responsible manner.

Data storage must comply with the current regulations that apply at all times, and accessibility policies (roles, types of access, etc.) must be clearly defined.

f) Data protection

It is necessary to guarantee at all times the protection of data and their appropriate use. When personal data are processed, the provisions of Article 8 must be taken into account, since personal data protection is a special consideration. In the event that a storage service provided by the University is not used, conditions that guarantee similar protection must be contractually established with the parties involved.

g) Publication

Once the research is completed, when the data are made public they must be easy to find, accessible, interoperable and reusable. Except in cases where access to data needs to be restricted for reasons of confidentiality, security or privacy or due to agreements with third parties, the data must be published openly, that is, with a licence that allows for wide reuse. Creative Commons CC0 or CC BY licences are recommended.

If the research has been financed with public funds, appropriate measures must be taken to ensure that the data are reusable, interoperable and open access.

In any case, before publishing them, it must be verified that no restrictions stemming from intellectual and industrial property rights, the protection of personal data, confidentiality, security and legitimate commercial interests apply. In this sense, to publish the data, it is necessary to consider repositories that have options for embargo and restriction of access to the datasets.

In addition to publishing them, the datasets must be registered as research activity in the UPC's information systems, associating them with the publications or research projects that are related to them.

Article 7. Data reuse

7.1. Reuse of third-party data

If, at the time of collecting the data, the reuse of preexisting data from public and/or private bodies is planned, it is necessary to comply with the terms and conditions of the databases. In the event that the database does not state the use that can be made of them, the people responsible for the research must contact the person who owns the data or the natural or legal person who has the power to manage their use, and request authorisation and/or the formalisation of a licence to use, a data transfer or sharing agreement, or a similar document to this effect.

To reuse data generated in previous research, it is necessary to correctly cite the datasets that have been used.

7.2. Reuse of research data

Once the research is completed, when the datasets are published the people responsible for the research must state, through licences and metadata, the possible uses of the datasets in subsequent research.

If a licence is granted, this licence must reflect, at a minimum, information related to the specific purpose for which reuse is granted; the duration of the licence, if applicable; the obligations of the parties; and the responsibilities of use, and it must be stated whether it is free of charge or not.

In general terms, licences are non-exclusive, unless they are necessary to provide a service in the public interest or are duly justified.

Article 8. Personal data protection

8.1. Before the research starts, prior to the processing of personal data, risk analysis must be carried out to determine the appropriate organisational and technical measures that must be adopted to guarantee compliance with the provisions of the applicable current regulations on the protection of personal data. This analysis must be documented in the data management plan.

8.2. Although personal data can be processed for scientific research purposes, the processing must always be lawful and based on one of the conditions of legitimation provided for by data protection regulations. The people responsible for the research must document and retain evidence of the legal basis that legitimises each of the processes carried out.

8.3. When the risk analysis concludes that, due to the nature, scope, context or purpose of the intended processing, such processing may entail a high risk to the rights and freedoms of natural persons, such as the use of new technologies, data protection impact assessment (DPIA) is compulsory.

In any case, a DPIA is compulsory when the processing involves:

- A systematic and exhaustive evaluation of personal aspects of natural persons that is based on automated processing, such as profiling, and on the basis of which decisions are made that produce legal effects for natural persons or that significantly affect them in a similar way.
- The large-scale processing of special categories of data (personal data revealing ethnic or racial origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sex life or sexual orientation) or personal data relating to criminal convictions and offences.
- The systematic, large-scale observation of a publicly accessible area.

To assess whether a DPIA is necessary, the list published by the Catalan Data Protection Authority (APDCAT) or by the competent supervisory authority must also be consulted.

The DPIA must be drawn up under the responsibility of the people at the UPC in charge of data processing, who must have prior advice from the University's data protection officer.

The DPIA must be carried out before initiating any processing of personal data. Consequently, all necessary and appropriate measures that have been determined in the DPIA must be established to mitigate or reduce the risks detected. The DMP must record that the DPIA has been carried out, but this evaluation cannot be published with the DMP, given that the dissemination of the information it contains may harm the rights and freedoms of the natural persons to whom the processed data refer.

8.4. For the processing of data related to health and genetic data, and for research purposes in the fields of health and biomedicine, a favourable prior report from a research ethics committee or a drug research ethics committee (CEIm) is required.

8.5. Personal data or data that could identify or make an individual identifiable may not be published. The publication of research results must be made after anonymisation of personal data and in accordance with the principle of data minimisation.

If it is not possible to publish the data in an anonymised manner, it may be published in a pseudonymised manner, provided that compliance with the applicable data protection regulations is guaranteed.

The use of pseudonymised personal data for research purposes in the fields of health and biomedicine requires technical and functional separation between the research team and the people who carry out the pseudonymisation and retain the information that enables reidentification.

In all cases, the people responsible for the research must guarantee that, throughout the process and while the published data are maintained, their anonymisation and/or pseudonymisation are maintained. In the event that this is not possible, appropriate additional technical and organisational measures must be adopted to avoid the risk of reidentification of the affected individuals.

Article 9. Ethics Committee

9.1. When research involves the use of personal data, the University's Ethics Committee must evaluate the research project and issue a favourable opinion on the appropriateness of conducting the research and the adequacy of the techniques used to process the data.

9.2. Ethical review of research projects must always be carried out before they begin (ex ante review). The Ethics Committee does not evaluate projects, studies or experiments that have already been initiated.

9.3. The previous requirement must be taken into account when scientific journals and conferences require the favourable opinion of the Ethics Committee for the publication of results, especially when the research involves experimentation with people or personal data.

TITLE IV. Rights and obligations

Article 10. Rights

The rights stemming from the generation and use of data resulting from research are governed by current legislation, by the applicable internal regulations of the UPC and by the conditions established by the bodies that fund the research.

The responsibility for managing the data and how they are published lies with the members of the UPC university community who carry out the research.

When the data are published, the rights granted to third parties to reuse them later must be clearly specified.

Article 11. Obligations and responsibilities

11.1 Persons subject to these regulations must:

- a) Manage the data generated in each research activity in accordance with these regulations, the UPC's internal regulations, current legislation, ethical principles, good research practices and any other requirements that may apply. When personal data are processed, the UPC protocol must be specifically followed.
- b) Take responsibility for the use they make of datasets within the framework of their research.
- c) Prepare a DMP at the beginning of each research activity, keep it updated throughout the research and present it to funding bodies within the established deadlines.
- d) Publish the DMP in the institutional repository UPCommons or in the space set up by the University, during the first six months from the start of the research activity, and update it whenever necessary. If applicable, a DMP embargo period may be established for part or all of the research.
- e) Collect, document, store and publish research data following FAIR principles, providing the necessary information so that the data are understandable, interpretable and

reusable, preferably in open formats. Publication of the datasets in the CORA institutional repository (CORA.RDR) or trusted thematic repositories must be prioritised. Data must be published in open access by default, in accordance with the principle promoted by the European Commission: “as open as possible, as closed as necessary”.

- f) Guarantee the sustainability of data storage, especially considering the volume, the type of storage used, the making of backup copies and long-term preservation.
- g) Record the datasets published in repositories in the Research and Academic Activity Database (DRAC) until mechanisms are enabled that do this automatically.

11.2. The University undertakes to:

- a) Provide resources and support services to develop data management plans aimed at the university community that carries out research activities.
- b) Offer training, support and advice to the university community on research data management, ensuring compliance with regulations, the requirements of funding institutions and any other relevant regulations.
- c) Facilitate and provide information on existing infrastructure for the secure and appropriate storage of research data.
- d) Facilitate and provide information on the infrastructure available to publish research data in accordance with applicable national and European regulations, and ensure its preservation in the medium and long term.
- e) Ensure visibility of datasets in the University's corporate information systems.
- f) Generate recognition mechanisms to generate and publish research data in the University's teaching and research staff evaluation processes.
- g) Define in a clear and coordinated manner the specific participation of each area or unit of the UPC that supports the management of research data.

12. Compensation

The UPC will not be held responsible for the use that people subject to these regulations make of the datasets nor for the damages suffered or the economic losses that, directly or indirectly, they produce or may cause.

PROVISIONS

First final provision. Interpretation

It is the responsibility of the person in charge of open science in the University's governance team, with the technical support of the UPC's Libraries, Publications and Archives Service, to interpret and solve any doubts that may arise in the application of these regulations.

Second final provision. Revisions and updates

These regulations must be adapted to regulatory modifications that directly affect them, as well as to advances or technical requirements that occur. In any case, they must be reviewed at least every two years.

Third final provision. Entry into force

These regulations come into force the day after their approval by the Governing Council of the Universitat Politècnica de Catalunya.

Appendix I. Definitions

For the purposes of these regulations, a **dataset** is understood to be the data or objects in computer format that are generated or collected by research staff in the course of research, regardless of their form or the means by which they were collected, and that are the subject on which the researchers test a hypothesis. This includes a full range of data: raw, unprocessed datasets; data generated and processed by the person who owns them; and secondary data obtained from third parties. The presentation of data in the application is enabled through metadata (CODATA RDM Terminology).

Definitions that are not established in these regulations must comply with the provisions of the prevailing regulations that are applicable in this matter.

Appendix II. Resources, infrastructure and support units for research data management

Development of data management plans

- [CORA. eiNa DMP](#)

Storage infrastructure

- [Research data storage](#)

Recommended repositories for data publishing

- [CORA. Research Data Repository \(CORA.RDR\)](#)
- Thematic repositories registered in the [Re3data](#) directory

Registration and visibility of datasets in corporate information systems

- [DRAC. UPC Research and Academic Activity Database](#)
- [FUTUR. Portal for the Scientific Output of UPC Researchers](#)

Web resources

- [Dadesrecerca.upc.edu](#)
- [Biblioteca - Data management plans](#)
- [Biblioteca - FAIR research data](#)

Appendix III. Research data management support units

Units and services lending support to research data management

- **UPC Libraries, Publications and Archives Service (SBPA):** data management plans and publication of datasets.
- **UPC Ethics Committee (CEUPC):** responsible for advising and evaluating, where appropriate, the ethics of research activity, as well as reviewing research projects that need to be evaluated.
- **UPC data protection officer:** responsible for advising and providing support in risk analysis and/or impact assessment in matters of data protection.
- **ICT area of the UPC:** storage infrastructure.