



Australian Government
Australian Research Council

FAIR DATA POLICY

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Contents

ARC FAIR Data Policy.....	3
1. Purpose	3
2. Scope	3
3. Commencement and Application	3
4. Policy Requirements.....	3
4.1 Responsibilities.....	3
4.2 Data Management Plan.....	3
4.3 Requirements for Metadata	5
4.4 Indigenous Cultural and Intellectual Property Rights and CARE Principles	5
4.5 Sensitive Data	6
5. Reporting Requirements.....	7
6. Definitions	8
7. Contact Details.....	10
8. Document Control	10

ARC FAIR Data Policy

1. Purpose

The FAIR Principles provide high-level guidance on making digital research objects *findable*, *accessible*, *interoperable* and *reusable* (FAIR) for both machines and people. The FAIR Principles were developed by the international research community to provide a framework for sharing data that maximises its use and reuse¹. Making research data FAIR contributes to an increase in the transfer of knowledge, helps facilitate new discoveries, supports innovation, and improves trust in research.

The Policy aims to ensure that research data outputs arising from ARC funded research are managed and shared in accordance with the FAIR Principles, that is, in ways that make them findable, accessible, interoperable and reusable for both people and machines, with rich metadata and conditions for access clearly and consistently described.

2. Scope

The Policy applies to all research data arising from ARC funded research.

The Policy does not apply to research outputs such as journal articles, books, monographs, book chapters, conference papers, or creative works which are covered by the ARC's Open Access Policy [10.83116/wx45-pr70](#).

3. Commencement and Application

ARC funded research is required to comply with the Policy as specified in ARC Grant Agreements and Grant Guidelines. This version of the Policy commenced on [Insert date] and applies to grant schemes that open after [Insert date]. Please refer to the relevant Grant Guidelines to confirm specific policy requirements.

4. Policy Requirements

4.1 Responsibilities

The Administering Organisation is responsible for ensuring compliance with the Policy for all ARC funded research it administers.

The Project Lead must work with the Administering Organisation to ensure compliance with this Policy.

4.2 Data Management Plan

All ARC funded research must complete a Data Management Plan prior to commencement which addresses how the project will collect, store and manage related data.

Researchers must consider the appropriate level of access to provide and communicate this clearly in the metadata. The level of access may range from highly restricted (e.g.

¹ Wilkinson, M., Dumontier, M., Aalbersberg, I. et al. The FAIR Guiding Principles for scientific data management and stewardship. Sci Data 3, 160018 (2016). Available from <https://doi.org/10.1038/sdata.2016.18>

commercial in confidence, patient level, culturally sensitive, relevant to national security) to fully open access.

The Data Management Plan must include:

1. What kinds of outputs are anticipated to arise from the project.
2. How data, including metadata, will be ethically and appropriately managed throughout the project while also maximising findability and access, including addressing any institutional policy requirements and requirements such as R22 from the Australian Code for the Responsible Conduct of Research 2018².
3. How the project will ensure the interoperability of all data collected and shared.
4. For research with, by or for Aboriginal and Torres Strait Islander peoples and knowledge, how the project will comply with section 4.4 ('Indigenous Cultural and Intellectual Property Rights and CARE Principles') of this Policy.
5. The repository where the data will be stored and how the repository supports the FAIR principles, including:
 - That it is an appropriate open access data repository
 - That the repository facilitates the minting of a persistent identifier (PID) such as a Digital Object Identifier (DOI) or International Generic Sample Number (IGSN)
 - That the repository can facilitate access to the data, ideally including management of required approvals to meet data sensitivities
 - For data relating to research with, by or for Aboriginal and Torres Strait Islander peoples, the repository must also support compliance with section 4.4.
6. An assessment of risk and sensitivities of datasets including:
 - Assessment of whether the data includes sensitive data (refer to section 4.5)
 - The type of sensitive data
 - The extent to which the data can be shared, and what mitigation measures are required to ethically manage risks.
7. Where data is derived from human research participants, the plan must outline the terms of consent under which the data was collected, any requirements or restrictions from the Human Research Ethics Committee which approved the project, and how data management will ensure these requirements are met.
8. The appropriate open licensing to be applied to all openly available datasets to maximise reuse such as a Creative Commons CC BY licence.

It is recommended that the project consider the following questions when developing a Data Management Plan:

1. *Is my research data findable?* Is there publicly available metadata that ensures that my data can be found both now and in the future? Does the information contained within the metadata provide enough information about the dataset to ensure that the context, sensitivities, and limitations of the data are clear?
2. *Is my research data accessible?* Is there a clear pathway for my data to be shared? This could mean that it is shared openly in an open data repository, or it could mean

² The Australian Code for the Responsible Conduct of Research 2018. Available from <https://www.nhmrc.gov.au/about-us/publications/australian-code-responsible-conduct-research-2018>

that there is mediated access through a clearly documented pathway to request access to the data which is stored in a secure repository.

3. *Could my data be integrated with other data, applications, and workflows?* Am I using standardised, clearly documented, and community accepted language, formats, and vocabularies in my data and metadata to facilitate interoperability and machine readability?
4. *Have I ensured that all, or some of my data can be reused?* Is there rich contextual information in the metadata and the dataset to facilitate reuse? Are there ethical considerations for sharing the data? Have I applied an appropriate licence such as CC BY to allow reuse?

4.3 Requirements for Metadata

Publicly available high-quality metadata is critical to ensure that research is findable, and to ensure that there is robust data publicly available about research activity in Australia.

The metadata for all data outputs arising from ARC funded research must include:

5. Author(s) and their ORCIDs
6. Title
7. ARC Grant DOI
8. Type of research data output
9. Date range of data collection
10. DOI or IGSN for the research output
11. A rich description of the research data output
12. Date of publication/public presentation
13. Any conditions required for data access with a description of the mechanism for that access
14. Licence associated with the data output

The metadata should also include any other available Persistent Identifiers (PIDs) relating to the output.

4.4 Indigenous Cultural and Intellectual Property Rights and CARE Principles

Aboriginal and Torres Strait Islander people and communities have the right to assert and retain ownership of the cultural and intellectual property produced through research, consistent with the CARE (Collective benefit Authority to control, Responsibility, Ethics) Principles³ for Indigenous Data Governance, including the authority to control its collection, access, use and governance.

Consistent with section 4.5 of the ARC's Open Access Policy 2026.1⁴, researchers undertaking ARC-funded research with and by Aboriginal and Torres Strait Islander people and communities must undertake key actions, which demonstrate commitment to the values of justice, equity, respect and responsibility, and the principles of Aboriginal and Torres Strait Islander self-determination and leadership, sustainability and accountability.

³ The CARE Principles for Indigenous Data Governance. Available from <https://www.gida-global.org/careprinciples>

⁴ ARC Open Access Policy 2026.1. Available from <https://doi.org/10.83116/wx45-pr70>

This includes alignment to the Maiam Nayri Wingara principles of Indigenous Data Sovereignty⁵ which state that Indigenous peoples have the right to:

1. Exercise control of the data ecosystem including creation, development, stewardship, analysis, dissemination and infrastructure
2. Data that are contextual and disaggregated (available and accessible at individual, community and First Nations levels)
3. Data that are relevant and empowers sustainable self-determination and effective self-governance
4. Data structures that are accountable to Indigenous peoples and First Nations
5. Data that are protective and respects our individual and collective interests.

The ARC also recommends that researchers consider the Framework for the Governance of Indigenous Data⁶ developed for the Australian Research Data Commons (ARDC) led Humanities, Arts, Social Sciences, and Indigenous Research Data Commons. This framework is a practical tool for operationalising Indigenous Data Sovereignty in alignment with the CARE and FAIR principles through Indigenous Data Governance practices that are relational and centred on the right of peoples to self-determination.

4.5 Sensitive Data

Sensitive data refers to information that must be protected to prevent harm to individuals, communities, or organisations. Sensitive information is also a subset of personal information and generally sensitive information has a higher level of privacy protection than other personal information under the *Privacy Act 1988* (Cth). Other examples of sensitivities associated with data include:

1. Cultural – such as data about cultural, spiritual, or community knowledge
2. Vulnerable individuals or groups – such as data about gender identification, sexual orientation, Aboriginal and Torres Strait Islander peoples, ethnic minorities, refugees, people with a disability, children
3. Commercial – such as data about individual businesses, or market considerations
4. Industry or sector – such as data about groups of businesses
5. Information that is considered sensitive by any party who the data is about
6. Sensitive information may also relate to information which may pose a risk to cultural resources, the environment or animals (such as the location of endangered species or threatened archaeological remains), to potentially valuable Intellectual Property, or to national security.

Researchers must ensure the security and privacy measures taken to address the risks of sharing sensitive data are proportionate to the risks or sensitivities associated with the data. Additionally, these privacy and security measures must be recorded in the project's Data Management Plan.

When considering whether to share data, it is important to understand the risks. Evaluating the benefits of sharing the data against the risks and whether those risks can be mitigated is

⁵ Maiam nayri Wingara. (2018). Indigenous Data Sovereignty Communique Indigenous Data Sovereignty Summit 20th June 2018, Canberra, ACT. Available from <https://www.maiamnayriwingara.org/mnw-principles>

⁶ Langton, M., McLellan, R., Fewster, J. & SMITH, K. (2026). Framework for the Governance of Indigenous Data: HASS and Indigenous Research Data Commons (Version 1). Available from <https://doi.org/10.5281/zenodo.11135962>

at the heart of safe data sharing. It is recommended that researchers consider the following when addressing how sensitive data will be managed:

- Using a risk assessment framework such as the Five Safes Framework⁷ to identify ways to appropriately share sensitive data through actions such as mediated access arrangements and anonymisation of data to manage risks
- Considering the National Statement on Ethical Conduct in Human Research⁸ which provides guidance for researchers about sharing sensitive data and should be considered in determining how sensitive data will be managed

5. Reporting Requirements

The Administering Organisation must certify at award that ARC funded projects have a Data Management Plan that meets all requirements set out in the Policy.

Projects must also report all data outputs arising from ARC funding in the project final report, including:

- A description of the research data output
- Date of publication/public presentation
- The DOI or equivalent PID
- The repository where the data is stored and/or published
- How to access the data.

In addition, the Administering Organisation must:

- Retain and store a copy of the Data Management Plan
- Provide the ARC with a copy of the Data Management Plan if requested.

⁷Five Safes Framework. Available from: <https://www.abs.gov.au/statistics/understanding-statistics/data-confidentiality-guide/five-safes-framework>

⁸ National Statement on Ethical Conduct in Human Research. Available from: <https://www.nhmrc.gov.au/about-us/publications/national-statement-ethical-conduct-human-research-2025>

6. Definitions

Term	Definition
Aboriginal and/or Torres Strait Islander	A person of Australian Aboriginal and/or Torres Strait Islander descent who identifies as an Australian Aboriginal and/or Torres Strait Islander person and is accepted as such by the community in which they live or have lived.
Administering Organisation	The organisation responsible for administering the ARC Funded Research Project, Fellowship or Award.
ARC Funded Research	Research funded, either wholly or partially, under the <i>Australian Research Council Act 2001</i> .
ARC Grant Agreement	A Grant Agreement is an agreement between the ARC and the Administering Organisation.
ARC Grant Guidelines	A document which provides applicants with information about a grant scheme, eligibility requirements, the application, selection and approval processes, and requirements for the administration of funding.
Creative Works	Examples include original creative works, live performances of creative works, recorded/rendered creative works, substantial public exhibitions and events.
Digital Object Identifier (DOI)	A unique persistent identifier for a published digital object, such as an article or a report, issued by the DOI Foundation and its registration agencies such as Crossref and DataCite.
Final Report	A report submitted at the completion of an ARC Funded Research Project, Fellowship or Award as required by the applicable ARC Grant Agreement.
Indigenous Data Sovereignty	The right of Indigenous people to exercise ownership over Indigenous data. Ownership of data can be expressed through the creation, collection, access, analysis, interpretation, management, dissemination and reuse of Indigenous data.
Institutional Repository	An online publicly accessible repository hosted at an academic institution, in which publicly funded Research Outputs and the Metadata for those Outputs can be stored and preserved.
Metadata	Information about a Research Output including author(s), organisation(s), publisher(s), funding information, research project, licence, and other relevant details.
Open Access or Openly Accessible	The availability of Research Outputs to the public via the internet so they can be freely accessed and used, subject to attribution and licensing. Sharing and reuse is facilitated through open licensing.
Open Researcher and Contributor ID (ORCID)	A unique persistent identifier for an individual researcher issued by the ORCID organisation.
Persistent Identifiers (PIDs)	A globally unique and long-lasting reference to an entity with human and machine-readable metadata that can contain qualified relationships to

other entities, underpinned by open standards, governance and infrastructure.

Personal information As defined in the Privacy Act 1988 (Cth): personal information includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether an individual can be identified or is reasonably identifiable in the circumstances. Personal information is defined in the Privacy Act to mean:

Information or an opinion about an identified individual, or an individual who is reasonably identifiable:

(a) whether the information or opinion is true or not; and

(b) whether the information or opinion is recorded in a material form or not.

For more details on personal information, refer to the OAIC website:

Project / Fellowship / Award As used in the applicable ARC Grant Agreement.

Project Leader / Fellow / Awardee / Director As used in the applicable ARC Grant Agreement.

Preprint or comparable resource A scholarly output that precedes publication and is uploaded to a recognised publicly accessible archive or repository, with varying degrees of peer review.

Author Accepted Manuscript The version of an article that has been accepted for publication in a journal, including all changes made as a result of the peer review process, but excluding any editing, typesetting or other changes made by the journal or publisher.

Published / Publication The form of public presentation of a Research Output specific to the relevant discipline.

Publisher's Version The version of the Research Output published on the publisher's website, professionally typeset.

Publication Date The date of publication or public presentation of the Research Output.

Research The creation of new knowledge or the use of existing knowledge in a new and creative way to generate new concepts, methodologies, inventions, and understandings.

Research Data Physical or digital data object partially or entirely generated by, collected or accessed for, or used in ARC funded research.

These include, but are not limited to, digital and analogue data, both raw and processed, numerical scores, textual records, images and sounds used as a primary source in research, protocols, analysis code and workflows.

Research Organization Registry ID (ROR ID) A unique persistent identifier for research organisations issued by the Research Organization Registry.

7. Contact Details

Stakeholder Relations

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8. Document Control

Number	Date Approved	Approved By	Brief Description
2026.1		CEO	This Policy has been established to align with the ARC's PID Action Plan, and Research Data Framework. It aims to ensure that the data generated by, and data about, all projects funded by the ARC consider the FAIR principles.