

# GOVERNANCE OF QUALITATIVE DATA SHARING IN AUSTRALIA

A REPORT PREPARED FOR THE CADRE PROJECT



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## Executive Summary

Sharing qualitative data is a complex undertaking requiring attention to epistemological and ethical concerns, as well as technical dimensions including access protocols, resourcing costs, and accessibility beyond the academy. This report focuses on institutional approaches to the governance of qualitative research data. It has been prepared as part of the CADRE (*Coordinated Access for Data, Research and Environments*) Project. It also sets the context for and is a companion to the report *Archiving & Sharing Qualitative Data: Implications for Data Management Platforms* (McLeod et al. 2024), which unpacks the challenges and opportunities CADRE raises for archiving and sharing qualitative research data.

The report maps national legislative settings and frameworks, outlines existing and emerging interests in how research data is accessed and used by diverse stakeholders, and notes associated changes in research cultures and environments. It is informed by established principles and frameworks in research data management, notably FAIR principles (Findable, Accessible, Interoperable, Reusable), and the CARE framework advanced by the movement for Indigenous data governance (Collective Benefit, Authority to Control, Responsibility, Ethics), which emphasises data stewardship rather than data ownership and the importance of overseeing and taking care of data through the research lifecycle.

The report highlights four main findings:

- 1) Concepts of data ownership and data stewardship are fundamental to how data use and access is governed.
- 2) A range of national legislative settings, frameworks and codes govern research data archiving and sharing. Further signposting and guidance are required to assist researchers and data users to effectively navigate this complex policy and compliance ecosystem.
- 3) Across the sectors, there is a need to improve governance policies and procedures so that they are better orientated to facilitate qualitative research data sharing.
- 4) The GLAMR (Galleries, Libraries, Archives, Museums, Records) sector, with its extensive digitisation and sharing of qualitative materials, provides insights and lessons to guide future research practice in sensitive qualitative data governance.

Sharing of research data is increasingly encouraged and supported through national policies and frameworks as well as within research institutions. This is reflected in the policies of research-intensive universities such as the University of Melbourne and University of New South Wales, whose approaches are considered in more detail below. The predominant focus of these policies is on risk management and compliance, with some attention to research co-creation, community engagement and ongoing stewardship of data. Within government departments engaged in qualitative research, current data access infrastructure appears insufficiently robust to allow for ethical and responsible sharing of qualitative data despite the stated support for this in national policies and frameworks. Advice from national professional associations also appears to not be well placed to keep pace with developments at the national level and, apart from the Australian Oral History Association, most do not seem to provide any robust guidance or engagement with issues of data governance.

Institutions in the GLAMR (galleries, libraries, archives, museums, and records) sector regularly collect, store, share, and reuse qualitative data and have progressed much further in developing approaches to qualitative data governance. This sector presents a potential model or guide for ethical and responsible sharing and reuse of such data in government and tertiary research environments. Of note is the orientation to share data and collections as part of an ethical responsibility to foster greater public engagement and community connection. This opens up new epistemological and methodological questions as well as requiring careful and renewed attention to how ethical and fair research practices are imagined and enacted. It shifts attention away from a predominant or exclusive focus on risk, compliance, and data management to a focus that also embraces the social benefits and innovations that sharing data makes possible.

# Table of Contents

Executive Summary .....	1
Introduction .....	3
1. Data Ownership and Stewardship .....	4
Finding 1 .....	5
2. Governance of Qualitative Data: National Settings and Requirements .....	5
2.1 National government data access policies .....	5
2.2 National research codes of conduct and regulatory frameworks.....	7
Finding 2.....	8
3. Sector Responses and Initiatives.....	8
3.1 Governance of research data in universities .....	9
University of Melbourne .....	9
University of New South Wales.....	9
3.2 Government research agencies.....	10
3.3 Requirements of national research bodies and professional associations .....	11
Finding 3.....	13
4. GLAMR Sector Governance of Sensitive Data/Collections.....	13
4.1 GLAMR institutions and governance of data/collection management .....	15
4.2 Facilitating open access to cultural collections .....	15
4.3 Ethics, privacy and sensitive data.....	16
Finding 4.....	17
Conclusion.....	17
References.....	19

## Introduction

The focus of this report is on institutional approaches to the governance of research data, with specific attention to matters of accessing and sharing of qualitative data. Increasing attention to research data governance is partly accelerated by growth in digitisation and, as a result, greater possibilities for data linkage and de-identification. Another contextual factor is concurrent calls from funding agencies, national governments, and researchers worldwide for greater adoption of practices that support accessible research data, informed by open access data principles. Approaches to managing access to datasets, including those deemed to hold sensitive data, are thus under increasing scrutiny and there is a growing urgency to identify ways forward that both appropriately safeguard data and enable wider use of that data by others.

Qualitative or unstructured data has distinctive qualities; for example, in relation to data collection and the details of participant experiences and perspectives. This presents specific governance challenges in managing potential risks for data access as well as for research participants; that is, those whose own experiences contributed to the data collected. Throughout this report, we use ‘governance’ to refer to procedures and principles that support responsible and ethical management of research data across its life course, that is from data generation and collection to access, use, sharing, and re-use of data. Regardless of the topic and content of the research, qualitative data is in many respects inherently sensitive because of potential risks to participant anonymity and confidentiality due to the presence of contextual details that risk identification of persons and places. Hence, while remaining connected to broader national and international agendas regarding the governance of research data in general, the governance of qualitative data requires specific attention and approaches.

This report maps national legislative settings and frameworks, outlines existing and emerging interests in how research data is accessed and used by diverse stakeholders, and notes associated changes in research cultures and environments. In doing so, the report canvasses how different sectors address these issues, identifies common areas of concern, and points to examples from current initiatives that provide insights and lessons to guide future practice. It concludes by summarising the characteristics of what constitute good practices and processes in the institutional governance of qualitative data. The overall orientation is informed by established principles and frameworks to research data management, notably the FAIR (Findable, Accessible, Interoperable, Reusable) principles and, importantly, also draws on the CARE framework advanced by the movement for Indigenous data governance (Collective Benefit, Authority to Control, Responsibility, Ethics) ([GIDA n.d.](#))

The report has been prepared as part of the CADRE (*Coordinated Access for Data, Research and Environments*) Project, which has developed a platform designed to improve Australian researcher access to sensitive data while safeguarding its appropriate use. The present report is prepared as a companion to other CADRE reports, particularly *Archiving & Sharing Qualitative Data: Implications for Data Management Platforms* (McLeod et al. 2024), where we unpack the challenges and opportunities CADRE raises for archiving and sharing qualitative research data, considering practical, epistemological, and ethical questions concerning these practices. This work has also been informed by and influenced the central *CADRE Five Safes Framework*, drafted by the project’s Content Working Group, which operationalises the project and platform.<sup>1</sup>

This report is structured in five sections. This introduction is followed by a brief discussion of concepts of data ownership and stewardship, which are fundamental to how data use and access is governed. These remarks serve as a context for issues raised throughout this report and inform its findings and proposed approaches. The second section provides an overview of relevant national legislative settings,

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<sup>1</sup> Elsewhere we have written about the challenges and possibilities of archiving, sharing and reuse of qualitative data, particularly in HASS (Humanities and Social Sciences) fields, centring on studies of childhood, education and youth (McLeod et al. 2020, 3–5, 21–22; McLeod & O’Connor 2021, 525–527, 530–533; O’Connor et al. 2024). These are also further explored in two other documents developed for the CADRE Project: the companion to this report, *Archiving & Sharing Qualitative Data: Implications for Data Management Platforms* (McLeod et al. 2024), and McEachern [et al.] (2021, 2022, 2024), *Five Safes Framework*.

frameworks and codes. The following section then provides overviews of the governance of qualitative data in government agencies and in academic/scholarly research, including policies and procedures currently in place at tertiary institutions and guidelines provided by national research associations. As an instructive comparison, section four looks at practices of data sharing in the GLAMR (galleries, libraries, archives, museums, and records) sector, including developments in digitisation and open access to collections. Institutions in this sector regularly collect, store, share, and reuse qualitative data. This sector has arguably progressed much further in developing approaches to qualitative data governance and presents a potential model or guide for ethical and responsible sharing and reuse of such data in government and tertiary research environments.<sup>2</sup>

## 1. Data Ownership and Stewardship

There are growing expectations among research stakeholders – collaborators, funders, participants, partners – to have a greater say in data governance and how the data they have provided or facilitated is managed. This represents a significant shift away from a more established view of research data as being ‘owned’ by the researcher who ‘collected’ it. This is particularly significant in the case of people and communities from whom research data has been collected, obtained, or extracted, with calls to have access to their own data, including in some instances input into determining access, use conditions, and governance protocols. These discussions are well advanced in Australia among Indigenous communities and researchers, where stewardship of research data remains a critical issue, as it is for other communities and groups who have often not had control over their own data and how it is used and subsequently managed by others (Walter et al. 2021; ARDC 2022).

In Australia, Indigenous Data Sovereignty principles affirm the need for Indigenous communities to decide what happens to their own data, including how such data is collected, used, stored, and shared.<sup>3</sup> Accordingly, ‘ownership of data can be expressed through the creation, collection, access, analysis, interpretation, management, dissemination and reuse of Indigenous Data’; and Indigenous Data Governance ‘ensures that data on or about Indigenous peoples reflects our priorities, values, cultures, worldviews and diversity’ (IDN 2022).

The principles underpinning Indigenous Data Sovereignty are central to – and an expression of – Australia’s First People’s rights to and capacity for self-determination. They also provide a basis for appropriate and respectful collaborative research between Indigenous and non-Indigenous Australians (Hunt 2013; Lavarreda et al. n.d.). In Australia and internationally there is a long history of extractive research practices, with researchers collecting, holding, and purporting to own Indigenous data. Until relatively recently, researchers have given scant attention to fundamental ethical and epistemological questions regarding data ownership and ongoing stewardship and care. This includes how decisions are made about the ways in which research data (including stories and cultural knowledge and artefacts) are used, shared, managed, or drawn upon in research outputs.

Among qualitative researchers, the idea that research and data collection/creation is a collaborative process between researcher and participants (McLeod et al. 2020) is relatively well-established. In recent years, the idea of participants as co-researchers with equal intellectual property rights has also gained some traction (e.g., McLeod & Thomson 2024). Yet this has not always translated into genuine practices of data co-ownership or shared responsibility for ongoing care, curation and stewardship of data once collected. Again, insights and practice-based knowledge derived from Indigenous data

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<sup>2</sup> The Academy of the Social Sciences in Australia’s newly developed *Decadal Plan for Social Science Research Infrastructure 2024–33* (2024) ‘seeks to build sector-wide consensus around the research data and analytics capabilities, resources and infrastructures’ (2) required by social science researchers. Its goals and priority actions to support those goals will have an impact on data sharing in the future. Particularly relevant is the Goal 2. ‘Social science data and analytics are easily found and reused by researchers nationwide, in ways that maximise the value of existing assets and infrastructures and allow urgent research questions and societal challenges to be addressed by researchers’ (5).

<sup>3</sup> In Australia, ‘Indigenous Data’ refers to information or knowledge, in any format or medium, which is about and may affect Indigenous peoples both collectively and individually. ‘Indigenous Data Sovereignty’ refers to the right of Indigenous peoples to exercise ownership over Indigenous Data (AIATSIS, 2020).

governance processes can provide guidance for fruitful ways forward, as indicated above with the CARE framework and its focus on Collective Benefit, Authority to Control, Responsibility, Ethics (Wilson & Barrowcliffe 2022; Faulkhead et al. 2023). It is imperative these considerations are kept front of mind when determining ethical and appropriate approaches to sharing and re-using qualitative data.

Much of the legislative and governance discussions to date have proceeded along parallel yet different lines, with arguably greater attention given to data owners, custodians, and users as discrete categories. There are, however, strong arguments for looking at the intersections of these stakeholders as a way of addressing data governance more holistically. This is particularly the case in reference to qualitative data. The concept of data stewardship – rather than data ownership – is helpful here as it refers to overseeing and taking care of data throughout the whole research lifecycle (Informatica n.d. See also, Atlan 2023), again reflecting the principles underpinning the CARE framework. We now turn to consider relevant data governance frameworks and policies developed in the government sector.

**Finding 1: Concepts of data ownership and data stewardship are fundamental to how data use and access is governed.**

Principles such as FAIR and CARE, and conceptual frameworks considering data stewardship, rather than ownership, provide vital context for issues raised throughout this report, inform its findings and proposed approaches, and have a broader application to policies, procedures, and ethical considerations surrounding data governance.

## 2. Governance of Qualitative Data: National Settings and Requirements

### 2.1 National government data access policies

In recent years, access to research data has been the focus of new Australian government assessments and legislation. From 2016 to 2017, the federal Productivity Commission conducted an enquiry ‘into ways to improve the availability and use of public and private sector data’ ([Productivity Commission n.d.](#)). The Commission’s brief was to:

- look at the benefits and costs of making public and private datasets more available
- examine options for collection, sharing and release of data
- identify ways consumers can use and benefit from access to data, particularly data about themselves
- consider how to preserve individual privacy and control over data use ([Productivity Commission n.d.](#))

One of the findings of the report ([Productivity Commission 2017](#)) was the identification of ‘barriers inhibiting the better use of data ... [and the recommendation for] a legislative pathway to modernise Australia’s regulatory framework governing data availability and use’ ([PM & C n.d., 2019](#)).

This led to the drafting of the *Data Availability and Transparency Bill 2020* [DAT Bill] (Parliament of Australia, 2020, n.d.; [Markham 2021](#)), resulting in the *Data Availability and Transparency Act 2022* (*DAT Act*), which ‘establishe[d] the DATA Scheme under which Commonwealth bodies are authorised to share their public sector data with Accredited Users. Accredited Users are authorised to collect and use the data’. Its aims are to:

- serve the public interest by promoting better availability of public sector data
- enable the sharing of public sector data consistently with the [Privacy Act 1988](#) and use of appropriate security safeguards

- enhance integrity and transparency in sharing public sector data
- build confidence in the use of public sector data, and
- establish institutional arrangements for sharing public sector data. ([Data Commissioner n.d.](#))

Participants in the scheme include Commonwealth Government Bodies (Data Custodians), Commonwealth, state and territory government bodies, and Australian universities (Accredited Users/Accredited Data Service Providers). Users and Providers must apply to be accredited and they are required to ‘provide complex data integration, de-identification and secure data access services to support data sharing’ (Data Commissioner n.d.). Unlike the original Bill, the *DAT Act* does not currently allow for sharing of government data to private sector entities (Markham 2021).

The *DAT Act* is part of a suite of legislation that directs the use of Commonwealth public sector data and informs the framework of data governance for Commonwealth organisations. The *Intergovernmental Agreement on Data Sharing* (2021), signed between the Commonwealth, states and territories, also allows for sharing between agencies in these jurisdictions. Commonwealth government entities also follow the Protective Security Policy Framework, which includes policies on personnel and information Security ([Home Affairs, n.d.](#)).

Five data-sharing principles underpin the *DAT Act*:

- The **project principle** is that the project is an appropriate project or program of work. This goes to *why* the data is being used.
- The **people principle** is that data is made available only to appropriate persons. This goes to *who* is using the data.
- The **setting principle** is that data is shared, collected and used in an appropriately controlled environment. This goes to *where* the data is being used.
- The **data principle** is that appropriate protections are applied to the data. This goes to *what* data is being shared.
- The **output principle** is that the only output of the project is the final output and output the creation of which is reasonably necessary or incidental to creation of the final output. This goes to *how* the results of the project are used. ([ONDC n.d.](#)).

These principles are based on the data release framework known as the **Five Safes** (Desai et al. 2016; [McEachern \[et al.\] 2021, 2022, 2024](#)), the model underpinning the CADRE platform ([CADRE n.d.](#)). These five data sharing principles

must be applied in such a way that, when viewed as a whole the risks of the sharing, collection and use of data are appropriately mitigated. Guidance about the application of the data sharing principles is provided in the [Data Availability and Transparency Code 2022](#). (ONDC n.d.)

The federal government has also adopted infrastructure to allow for searching of and requesting such data via the Dataplace platform ([Dataplace n.d.](#)). This platform is also the means through which to apply for accreditation as a User or Service Provider (although it can only be searched by researchers whose organisation or institution has onboarded them). The ONDC also provides extensive advice about other ways of finding, as well as requesting and sharing data, on its website (ONDC n.d.).

The [Privacy Act 1988](#), as well as state and territory privacy legislation (e.g., [Privacy and Data Protection Act 2014](#) [Vic]), are also relevant to the use of qualitative and unstructured data. The *Privacy Act 1988*

was introduced to promote and protect the privacy of individuals and to regulate how Australian Government agencies and organisations with an annual turnover of more than \$3 million, and [some other organisations](#), handle [personal information](#) (OAIC n.d.).

The *Australian Privacy Principles* (APP) assist application of the *Privacy Act 1988*. APP 2 ‘Anonymity and Pseudonymity’ provides ‘that individuals must have the option of dealing anonymously or by pseudonym with an APP entity’ (OAIC 2019, Chapter 2, 3), which ‘enable[s them] [in order]... to

exercise greater control over their personal information and decide how much personal information will be shared or revealed to others' (OAIC 2019, Chapter 2, 4). This allows for personal information to be revealed in qualitative/unstructured research, subject to the informed consent of the participants and any requests for anonymisation made by them.

## 2.2 National research codes of conduct and regulatory frameworks

Alongside these developments, Australian researchers and research institutions are subject to a range of national legislation, codes and regulatory frameworks that govern their research activities in general and, thus, inform research data use, access and sharing.

The *Australian Code for the Responsible Conduct of Research* (NHMRC 2018) (henceforth, *Australian Code*) and the *National Statement on the Ethical Conduct of Human Research* (NHMRC 2023) (henceforth, *National Statement*) are two key regulatory frameworks for ensuring the quality and integrity of academic research activity and outputs. These statements were developed by the two principal national research funding councils – the National Health and Medical Research Council (NHMRC) and the Australian Research Council (ARC) – and Universities Australia, the peak body representing all Australian universities. These codes are compulsory for any research funded by the NHMRC or the ARC and highly recommended for other research activity (NHMRC 2018, 1). Universities also incorporate adherence to them in their own research policies. In addition to any potential findings in relation to individual researchers, failure to comply with these national guidelines puts at risk institutional and individual researcher eligibility for funding from the two sponsoring national research funding agencies.

The *Australian Code* is accompanied by a series of guides on its implementation and determining breaches, such as authorship concerns or data fabrication or misuse, while the *National Statement* provides detailed guidance on how to adhere to its requirements. In relation to data sharing, the *Code* expects universities to '[p]rovide access to facilities for the safe and secure storage and management of research data, records and primary materials and, where possible and appropriate, allow access and reference'. The *National Statement* includes details on the sharing and reuse of data. It proposes that 'researchers should be aware of expectations and policies regarding the sharing or re-use of participant data or information in any form and should consider the value of the data or information for future research' (37). It also recommends the use of a Data Management Plan for all researchers, with key considerations for the handling of data therein comprising:

- a) physical, network, system security and any other technological security measures;
- b) policies and procedures;
- c) contractual and licensing arrangements and confidentiality agreements;
- d) training for members of the project team and others, as appropriate;
- e) the form in which the data or information will be stored;
- f) the purposes for which the data or information will be used and/or disclosed;
- g) the conditions under which access to the data or information may be granted to others; and
- h) what information from the data management plan, if any, needs to be communicated to potential participants. (NHMRC 2018, s.3.1.46)

The *National Statement* also mandates that all research involving Aboriginal and Torres Strait Islander peoples must follow the advice of key policies produced by the Australian Institute of Torres Strait Islander Studies (AIATSIS). This includes *The AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research* (AIATSIS, 2020), which confirms the rights of Indigenous peoples and communities to determine how their data is collected, used, stored, and shared.

The Australian Research Council funds a wide range of scholarship (excepting medical research, funded by the NHMRC). The ARC remains the main agency providing research funding for research in the Humanities, Arts and Social Sciences (HASS) disciplines. These are fields of research in which a significant volume and diversity of qualitative data is generated. The ARC adheres to a range of legislation, codes and policies in order to 'ensure that ... research is conducted according to appropriate

ethical, legal and professional frameworks, obligations and standards; as well as the development of a research environment that is underpinned by a culture of integrity'. Accordingly, all 'proposals and ARC-funded research projects are either recommended or required to conform to the principles outlined' (ARC n.d.).

The ARC requires researchers to create a data management plan from the beginning of the research project, outlining 'how data will be collected, formatted, described, stored and shared throughout, and beyond, the project lifecycle.' This requirement is consistent with the *Australian Code* and guided by the *OECD Principles and Guidelines for Access to Research Data from Public Funding* (2007, 2021a, 2021b).

The ARC's requirement is designed to encourage researchers to consider the ways in which they can best manage, store, disseminate and reuse data. Researchers, in consultation with institutions, have a responsibility to consider the management and future potential of their research data, taking into account the particular approaches, standards and uses for data that may exist in different institutions, disciplines and research projects. (ARC n.d.)

It should be noted that while there is a requirement to create the plan, there are few mechanisms to monitor its implementation, generating a potential disconnect between, planning, intent and practice.

The ARC Open Access Policy (2017) stipulates: 'Any Research Outputs arising from an ARC supported research Project must be made openly accessible within a twelve (12) month period from the date of publication'. Importantly, while the ARC does not currently mandate open data for researchers, consideration of the possibilities of sharing and re-use of data is encouraged in order to 'maximise the benefits from funded research by ensuring greater access to ... research data' (ARC n.d.).

The landscape of open access requirements in research funding is a dynamic one, as demonstrated in recent updates to both the *National Statement on Ethical Conduct* in 2023 (effective from 1 January 2024) and the NHMRC policy on open access data in 2022, which altered requirements for open access publishing. Together with advocacy for open science and data, including by Australia's Chief Scientist (Foley 2021), these updates to the NHMRC policies and frameworks signal that important changes are likely to be forthcoming across the research sector, including potentially being followed by the ARC. In the short term, while changes to open access requirements for research outputs do not directly affect the governance of qualitative data, they nevertheless speak to the changing national research and funding environment in which considerations of access to data and governance of 'open data' is being work out and implemented.

**Finding 2: A range of national legislative settings, frameworks, and codes govern research data archiving and sharing. Further signposting and guidance are required to assist researchers and data users to effectively navigate this complex policy and compliance ecosystem.**

This includes federal and state legislation, as well as national research codes of conduct and regulatory frameworks. In the field of qualitative HASS research data (on which our work focuses), guidelines of both NHMRC and ARC are considered best practice both for research funded by these bodies but also as guiding tenets for other researchers. This is a changing space, where expectations of and discussions surrounding open access and sharing of data are increasingly coming to the fore.

### 3. Sector Responses and Initiatives

In order to canvass how these national policies and frameworks are being implemented and navigated by research institutions and individual researchers, we have taken a closeup look at the policies and processes in place at two major Australian universities, government departments involved in the CADRE project and select national research bodies and professional associations. The two universities, the University of Melbourne and the University of New South Wales, were selected as our primary case

studies to provide insight into current practices at two large research-intensive Australian universities ([Group of Eight, n.d.](#)).

### 3.1 Governance of research data in universities

#### University of Melbourne

The chief data governance policy for researchers (including staff, students and honouraries) at the University of Melbourne is the *Management of Research Data and Records Policy* ([MPF1242](#)). Its overarching purpose is to: ‘(a) Preserve the value of research data and records for researchers, research students, research participants, the University and wider community by defining expected standards for their management; and (b) Facilitate effective research practices’ (1.1). Under the policy, ‘Researchers must ensure the safe and secure management of research data and records to comply with ethical and legal obligations over the life of the research data and records, with consideration given to research data and records with sensitivities’ (5.9), including personal information, and sensitive cultural information. The policy is not only concerned with safety and security of research and other data but also from a need for ‘the curation, storage, retention, sharing and publication of research data and records’ (6).

The policy is linked to the university’s participation in the ‘ARDC Institutional Underpinnings program [which united] ... 25 Australian universities to develop a framework for managing research data’ ([ARDC n.d.b](#)) in 2021–2022. Part of the University of Melbourne program of work included investigating management and storage of sensitive data, as well as its correlation with current University data, research management and ethics policies and training (Davis & Neish 2022). The University Research Data Classification Framework ([MPF1242](#), 5.12) also establishes a scaffold for sensitive data management, and assists researchers to manage their data and their obligations in managing that data, including aiding with understanding of relevant legislation and policies, as well as a classification system for sensitive data ([University of Melbourne n.d.a.](#)). Concomitantly, the University also adheres to Open Access Principles, which ‘articulate the University’s preferred pathways to open access: using repositories, publishing in open access venues, using institutional open access publishing agreements, and publishing in journals transitioning to full open access’ (Blaher 2023).

Data management is also central to a number of other University of Melbourne research policies, including the Research Integrity and Misconduct Policy ([MPF1318](#)), which includes the responsibility of the researcher to maintain their records in a manner that allows ‘independent verification of research outcomes and facilitate access and sharing of research data’ (5.2.b) and ‘allow validation and verification of research process and outputs’ (5.2.d), as well as ensuring the confidentiality and security of research data where required or its ethically informed release and sharing(5.2.g).

Also related to these policies is the Research Ethics and Biorisk Management Policy ([MPF1341](#)), which governs ethical practice including data management such as administrative retention and management of data, as well as protection and privacy of participants’ data. Research training, policies and procedures also support these policies and the capacity for researchers to manage their data, including sharing and storing that data ([University of Melbourne, n.d.c, n.d.d, MPF1321](#)).

#### University of New South Wales

Like the University of Melbourne, the University of New South Wales has developed policies, frameworks and tools for their researchers surrounding data management and release. This includes a Data Classification Standard (UNSW [2021a, 2019a](#)), which provides a tool through which data sensitivity can be assessed. The motivation for the standard is stated in terms of risk aversion, as opposed to either protection of information or incentives or assistance in sharing research data (in some contrast to the University of Melbourne Data Classification Framework):

The UNSW Data Classification Standard is a framework for assessing data sensitivity, measured by the adverse business impact a breach of the data would have upon the University. This

Standard has been created for the University community to help effectively manage information in daily mission-related activities. (UNSW 2021a)

Despite the risk averse language of this Classification Standard, UNSW has robust policies and frameworks that support research data sharing. This includes the Research Data Governance & Materials Handling Policy. The policy introduction emphasises that:

Research data and material *allow research findings to be validated and have long-term value as a potential resource for future research and teaching*. Good practice in research data governance and materials handling benefits the wider research community by enabling future researchers to publish, share, cite and reuse the research data and material by reducing the risk of loss and corruption [emphasis added]. (UNSW 2019b, 1)

The policy clearly outlines what materials are considered research data and, although the term is not specifically used, includes multiple genres of qualitative data, including video, audio, text, images, documentation of research journeys, notes, interviews, transcripts and more. The University also supports data sharing through its Open Access Policy, where it notes its commitment ‘to enabling open access to published Research Outputs produced at UNSW and initiatives to improve access to publicly funded research. UNSW adopts the FAIR principles in its approach to open access’ (UNSW 2021b).

Such support for data sharing and open access comes through initiatives of the UNSW Library (UNSW n.d.c), the Research Data Management team (UNSW n.d.a, n.d.e) and data archiving and sharing platforms, including Erica (UNSW n.d.a, n.d.b).

### 3.2 Government research agencies

In terms of the broader CADRE project, the work of Commonwealth departments and federally funded projects that hold research data offer interesting test cases for assessing the adoption of national frameworks and requirements for data governance. We highlight here the approaches adopted by research agencies which are also partners in the CADRE project – the Australian Institute of Health & Welfare (AIHW) and the Australian Longitudinal Study on Women’s Health (ALSWH.) funded by the Department of Health and Aged Care. These agencies are required to apply the Five Safes framework to manage data sharing within their data governance procedures under the DATA Scheme (AIHW 2022, 48–50, 2023a; 2023b; ALSWH n.d.). The Five Safes model has also been adopted by some state governments for data governance, including in South Australia (Government of South Australia n.d., New South Wales (Data.NSW 2020) and Victoria (Victorian Government, 2024).

AIHW (2023a; 2023b), ALSWH and other Commonwealth departments such as the Australian Institute for Family Studies (AIFS – also a CADRE partner) hold significant collections of potentially shareable qualitative research data (including that collected by consultants and in conjunction with university researchers).<sup>4</sup> Often the data governance frameworks of these organisations do not specifically differentiate between qualitative and quantitative data but might describe such data or suggest that qualitative data is in its purview. For example, the AIHW Governance Data Framework notes that data encompasses: ‘measurements and observations, including facts, figures, records, statistics or opinions, whether true or not, that have been collected directly or obtained as a by-product of a compliance, regulatory or service-delivery process. Data includes information about persons, businesses and other organisations and their characteristics, practices and activities (AIHW 2022).

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<sup>4</sup> This includes projects such as the mixed-methods *Ten to Men: The Australian Longitudinal Study on Male Health*, commissioned by Department of Health, initially conducted by University of Melbourne (Ten to Men 2022) and managed by the AIFS, with data held on the ADA Dataverse (ADA Dataverse n.d.). AIFS holds a large number of qualitative and mixed-mode studies: 22% of assets are qualitative, with another 25% mixed-mode studies. Some notable research funded by Attorney General’s Department, including Independent Children’s Lawyer (ICL) Study; The Children and Young People in Separated Families project; Elder Abuse Prevalence Study; Legal Partnerships Evaluation (Pilot A): Qualitative studies of staff from FRCs and Legal Services and clients participating in the Legal Partnerships Program (email with Jatender Mohal, 16 November 2021).

While the *DAT Act* and DATA Scheme allow for the sharing of government data, it is unclear whether in the short term this will prove feasible for many government departments in reference to qualitative data. Appropriate systems and infrastructure, as well as consent and permissions from participants, may not be in place, or sufficient or designed to allow such sharing. This might particularly be the case where older studies have not anticipated such sharing needs or interests and have not established protocols for such sharing. The intertwined issues of funding and staffing might also limit government departments' capacity to respond to or initiate sharing and reuse of qualitative data.<sup>5</sup>

### 3.3 Requirements of national research bodies and professional associations

Specific approaches to the management of data also often differ between disciplines. National research bodies and organisations for individual disciplines have ethical guidelines regarding research data and codes of conduct to which members are expected to conform (and also guide non-members in the field). These members not only include researchers based in Higher Education but in other organisations (such as government, NGO) or independent researchers.

In preparing this report, we examined four associations where members often deal with or utilise qualitative data extensively in their research. We deliberately confined our review to associations representing researchers in the HASS (Humanities and Social Sciences) disciplines: Australian Historical Association (AHA), The Australian Sociological Association (TASA), Oral History Australia (OHA) and Australian Association for Research in Education (AARE).<sup>6</sup>

Some of the guidelines we reviewed specifically refer to the management of data, while others comment in less specific terms in relation to research results or understanding the application of research methodologies. The idea of re-use of data is usually not specifically referred to but could be encompassed in the generic descriptor of 'research results'. Likewise, these guidelines do not necessarily refer to legislation that might cover the sharing and reuse of data, such as the privacy or data legislation but do usually specify that members must understand and apply relevant legislation, particularly in relation to ethics and integrity.

Overall, these four bodies encourage the sharing of research outputs while utilising methodologies appropriate to their fields, particularly regarding the preservation of participant privacy. Of the four, the OHA has the most detailed guidance for their members on the collection, storage, sharing and re-use of data in the future, where it mandates its members to always be cognisant of preservation and future use of the data collected. This is considered at the heart of best practice for oral historians and as being consistent with an ethos of listening to and documenting the voices of those whose experiences have not usually been captured in written records.

The OHA has a number of detailed guidelines for the ethical practice of oral history ([OHA n.d.a](#)), available on its website. These include: Guidelines of Ethical Practice ([OHA 2007](#)); Ethics and University Research ([OHA 2021](#)); Practising Oral History ([OHA n.d.c](#)); and Oral History Training ([OHA n.d.b](#)), all of which detail best-practice for oral historians.

Practising Oral History (OHA n.d.c) itemises four key considerations for best practice, all of which relate to data management (including collection, storage, and suggestions for re-use in the future):

- ethical conduct and informed consent in interviews and post-production
- high quality recording
- well planned and executed oral history projects
- archiving oral history interviews for longevity and accessibility.

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<sup>5</sup> A number of these issues were discussed with AIFS researchers as part of consultations for this report and project.

<sup>6</sup> There are numerous other professional organisations and bodies with ethical guidelines that might be informative, including [Australian Political Studies Association](#) and [Australian Population Association](#).

Guidelines for Ethical Practice in Oral History (OHA 2007) provides further information on best practice in oral history, including data governance, including:

Oral history involves recording, preserving and making available candid information that may be sensitive or confidential. All interviewers are asked to act to preserve the rights and responsibilities of the different parties involved and to refuse to work in any other way.

The OHA details other aspects of data management, including within the University Ethical Approval of a Project involving Humans document (OHA 2017), also refers to the ethics of oral history and its methodologies, including the management of data (largely related to oral history interviews).

There are five sections: Archival Aims, Anonymity, Copyright, Sensitive Topics, and Home Settings. The first four specifically centre around the collection, storage, sharing and re-use of data. OHA considers the preservation of the data as key to the practice of oral history:

A primary aim of oral history is to add previously unrecorded voices to the historical record, and oral history ethical guidelines stress the researcher's responsibility to ensure the secure and permanent preservation of the interview, subject to the interviewee's wishes. Oral history interviews are therefore usually recorded with a permanent archive status in mind.

It should be noted that, for the OHA, 'data' is usually the interviews conducted rather than other data associated with the interview, such as photographs or other artefacts and ephemera – although this would likely be considered implicit in these guidelines.

The AHA Code of Ethics ([AHA n.d.](#)) incorporates a code of conduct but is surprisingly brief without a clear data sharing policy. The specific pieces of legislation to which the AHA code refers are anti-discrimination and human rights related legislation rather than privacy or data legislation, although the latter is intimated in section 13. While not specifically referred to in the AHA code, the topic of privacy and governance or management of research data might be considered inherent in some of the provisions that mention research and outputs, including 'not refuse any reasonable request to share their knowledge or expertise, and shall as far as possible make available the sources to which they have had access' (section 3) and those that mention the broader term 'sources'. The AHA has, however, provided feedback and submissions on past and present research data sharing initiatives ([AHA 2021](#)).

TASA Members follow a [Code of Ethics \(n.d.\)](#), which in some sections relates or refers to data governance, particularly regarding ethical treatment of research participants, chiefly maintenance of their confidentiality/anonymity. These include gaining informed consent from participants; de-identification of data where appropriate; 'careful and secure storage of research data'; maintenance of confidentiality; critical examination of research practices that might cause harm; and, in sections on 'Contractual Research, Clients and Sponsors', discussing rights and responsibilities of researchers and rights of clients. The code does not refer to privacy legislation nor directly mention the future re-use of data but sharing of research *findings* is encouraged in the code: 'Unless there are compelling reasons, research findings should be publicly accessible, especially to the participants'. Specific legislation is not addressed but members must have awareness of 'statutory obligations to reveal information against the misuse of these results and where possible, take reasonable steps to correct any misuse or misrepresentation received in the course of research'.

The Australian Association for Research in Education (AARE) Code of Ethics ([n.d.](#)) primarily focuses on data in terms of protecting privacy of and preventing harm to those involved in the research, including participants. There is no overt discussion of data management, governance, preservation, access, or future use but does state that researchers

should keep themselves informed on the methodology of research, including disputes about appropriate methodology. They should regularly reform their own methodology in the light of that discussion, and be rigorous in its application to their work'. (AARE n.d., 9)

The code also specifies that those in the field should have appropriate training in research ethics, which also might apply to research data management methods and ethics. Sharing of research with colleagues or in publications is mentioned in general terms but does not specifically discuss sharing of original datasets.

The rapidly changing environment for data sharing is perhaps not so well reflected in these documents, other than in the example of OHA. None of these guidance documents make specific reference to privacy or data legislation, although the AHA and TASA do require members to be aware of all relevant legislation. Updated guidelines that refer more explicitly to data governance, legislation and practices and ethics surrounding data archiving, reuse and sharing, particularly open access practices, would bring these more in step with current debates in this area.

It is understandable, however, that there is a possible lag between the responses of research associations (largely run by volunteers) and a rapidly changing research environment in terms of data governance. While academic and government researchers are already going to be subject to the formal requirements and policies of their own research institutions and national legislation, this brief overview points to some of the challenges in socialising data sharing and re-use practices. This further suggests the need for a targeted and nuanced communication strategy to ensure that data governance processes – and approaches relevant to qualitative data sharing – are more widely understood by the research community.

**Finding 3: Across the sectors, there is a need to improve governance policies and procedures so that they are better orientated to facilitate qualitative research data sharing.**

Further work is needed across sectors to facilitate sharing of qualitative research data. Research-intensive institutions such as University of Melbourne and UNSW strongly reflect national agendas around data sharing, encouraging and aiming to support researchers to share their research data. However, the predominant focus on risk management and compliance, with little that speaks to research co-creation, community engagement and ongoing stewardship of data. In government departments, current data access infrastructure appears insufficiently robust to allow for ethical and responsible sharing of qualitative data. Advice from national professional associations where research regularly encompasses qualitative data and its related practices are not currently well placed to keep pace with developments at the national level and most organisations do not provide any robust guidance or engagement with issues of data governance.

## 4. GLAMR Sector Governance of Sensitive Data/Collections

The GLAMR (Galleries, Libraries, Archives, Museums & Records) is a blanket term for a range of organisations that fall under the umbrella of the ‘cultural’ sector. GLAMR organisations exist both within government, university, and non-government contexts. They are all beholden to relevant legislation, government policy, codes of conduct, and ethical frameworks, including those discussed above. Guidelines and policies can differ immensely for individual organisations depending on their context and funding. Government-run institutions, for example, are usually subject to overarching federal, state and municipal policies on data governance, while they might have individual policies that operate under this.

These institutions often hold large and diverse collections, much of which would be considered as a form of or related to qualitative data, such as visual and textual records. These include both material culture objects or analogue data but also significant (and increasing) amounts of born-digital and digitised data. There is also often overlap in the types of material held. Museums might hold archival documents, while archives hold ephemera and material cultural collections, libraries might have archival repositories, storing a wide range of material including photographs, plans, business minutes, interviews and more.

As institutions that often do research (either for their own exhibitions and collections or in conjunction with academics, tertiary institutions, and government organisations), they hold extensive qualitative data on individuals, groups, communities and locations; these might also be considered as part of material culture/collections. Recently, indeed, there has been a growing movement in this sector to view collections as data, and not make that data more readily available for research, education and public engagement but to consider the ethical responses to the potential uses of this data (ARDC 2023).

Perspectives and practices from the sector can be of interest to and influence wider data curation and governance practices, including for qualitative, quantitative and mixed-mode research in HASS and beyond (McLeod 2017). There are some important differences between these types of institutions, despite any intersecting purposes and collections. State and national archives, for instance, usually have a legislative responsibility for recordkeeping and the retention of government records as well as establishing or contributing to that legislation and the governance of recordkeeping in various government organisations.

Museums have large collections of material culture that might also be considered or intersect with qualitative data. The Museums Victoria Collections Online, fully available to the public, holds over [114,000 items](#) ‘things made and used by people’ at the time of writing, with a diverse array of photographs, diaries, books, pamphlets, maps, plans, oral histories, scrapbooks, banners and many other objects that would be considered or contain rich qualitative data. There are also [2,340 Articles](#) that provide detailed stories of ‘people, places, events and ... collections’ ([MV n.d.b](#)). Further qualitative information is also held in the museums’ collection management database from which this online metadata is drawn but the full extent of which is not available to the public.

Libraries hold similar collections. Theirs are in the majority paper-based but they also collect ephemera (collection objects) relevant to areas of study. The National Library of Australia for example holds books, pictures, music, journals, microforms, manuscripts, audio and video recordings, newspapers and more. In its online catalogue, a majority of e-resources are drawn from various databases but it also includes over [330,000 digitised items](#) from the library’s own collection ([NLA n.d.a](#)). State Public Record Offices, like museums and libraries, hold large collections of qualitative data, such as images, maps, plans, government documents such as inquests, city council minutes, court, bankruptcy, land, immigration, hospital, asylum, and Indigenous records, and many more. ([PROV n.d.](#)).

Galleries hold mainly art-based collections ranging from drawings to paintings to photographs, all of which might have large amounts of qualitative data and metadata about people attached to them. They also hold other items such as video and audio recordings (such as oral histories of artists), manuscripts, and other materials relating to their collections (e.g., [AGNSW n.d.a](#)).

Online GLAMR collection items also often have detailed metadata attached to them, which reveals information about people, places, groups, and communities. They also often conduct detailed provenance ([AGNSW n.d.b](#)) research and contextual research for understanding and exhibiting their collection items. Through this process they might collect significant qualitative data, such as information about individual lives (an artist or owner of an object), communities and groups, and stories about them, which are then held by the institution (although not necessarily publicly available).

Each of these institutions explores their collections and stories about people, groups, communities, and places through online engagement, including sometimes detailed descriptions of the collection item, including through blog posts, journals, information sheets/pages, and their websites more broadly. In combination, this reveals large volumes of diverse qualitative data about individuals, communities, groups, and places online to a wide audience.

With this range of functions as context, a key question for this report is:

## What can we learn from the GLAMR sector to inform best practice in the governance of qualitative data, including access and ongoing sharing and use by others?

### 4.1 GLAMR institutions and governance of data/collection management

GLAMR institutions must follow relevant federal and state laws governing data, but they also operate under a range of codes and guidelines established by various peak bodies and the peak body for the sector overall is GLAM Peak ([GLAMPeak n.d.](#)). Members (which might be individual or institutional) must follow the peak body codes of ethics, as well as international frameworks, guidelines, and federal and state legislation relevant to the cultural sector. This includes the *Museums Australia Code of Ethics (1999)* (currently under review), built on ICOM's (International Council of Museum) Statutes of 1974 ([Museums Australia 1999](#)) and [Code of Ethics for Museums \(2017\)](#), and the *National Standards for Australian Museums and Galleries 2.0* ([National Standards Taskforce 2023](#)).

In many cases, these include the governance of data, a large amount of which would be qualitative or unstructured in nature. The data itself might be generated in diverse ways, including qualitative research, crowdsourcing, organisational recordkeeping and more that might be differentiated from numerical or 'big data'. In the GLAMR sector, what social scientists would describe as 'qualitative data' would more likely be referred to as 'collections' and considered distinct from sensitive or other data held by these organisations (e.g., mailing lists, statistical data on visitation, etc.).

In this regard, it is best practice and usually required by peak bodies at GLAMR organisations to have 'formal, written policies and procedures that cover [their] management, responsibilities, programs and services' (*National Standard*, 23–24). An essential component of these is a collection management plan or policy. A cultural institution's collection management policy might include a range of other policies that relate to the governance of their collections and other data, including conservation, access, information management, privacy, and research policies. Each institution is different, and the range and detail of these policies might depend on aspects such as its size and whether it is a government- or university-run or independent organisation.

These standards, ethical frameworks and collection policies include procedures and policies for open data and online sharing of data, including collection items and metadata, which will be discussed further in 5.4. First, we turn to briefly consider how and why GLAMR organisation are facilitating access to their collections more than ever before.

### 4.2 Facilitating open access to cultural collections

In the last two decades, GLAMR organisations, particularly those that are publicly funded, have increasingly seen the benefit in making their collections and research more open and available to the wider community. This has been facilitated by the digitisation of objects/items and their display in freely accessible online collections, together with other online initiatives such as websites, blog posts and detailed contextual information about specific items, collections, people, places, groups and communities. Global heritage and museum bodies have also mandated or suggested open access policy frameworks to their member organisations. These shifts have been associated with other movements such as history from below, changes in oral history practices and the emphasis on history as a domain for social change, as well as the broader democratisation of history over the past forty to fifty years (Chenier, 2014).

For museums and collecting institution, greater access facilitates a wider interest in and engagement with their collections and going online is part of broader strategies and policies to reach out to the wider community. This contrasts with a more traditional approach that relies on visitors physically attending cultural institutions or a small group of curators and researchers holding the information for their own use. And, more practically, GLAMR organisations have large collections with only a fraction able to be physically displayed at one time.

These shifts are reflected in institutional policies, mission statements and collection management plans. For example, Public Record Office Victoria's statement on Open Data affirms its commitment 'to ensuring that its archival collection is discoverable and accessible to as many people as possible' through 'making information (metadata) about the vast quantity of physical records in its collection easily available to researchers through different online sites and channels' ([PROV, 2023](#)). For Museums Victoria, greater access to and engagement with the collections is a vital part of its *Strategic Plan 2017–2025*. A main 'Transformational Theme' is to 'Develop a Digital Life for Museums Victoria that takes the wonder and inspiration of our collections, knowledge and expertise beyond our walls through audience-centred experiences that connect with hearts and minds' ([MV 2020](#), 7). This underpins its Vision of 'People enriched by wondrous discovery and trusted knowledge', which is delivered in part by through its digital platforms (MV, n.d.c, 6). This includes the museum's significant Collections Online platform which encourages and partly facilitates access, sharing and reuse of content through the application of a Creative Commons licence to over 100,000 images, audio and video material ([MV n.d.a](#)) and the creation of an API that allows researchers, developers and others to agglomerate data. The museum's website code is also freely available through GitHub.

Many collection items are also fragile and easily damaged or may have a shortened life through regular use or display. Digitising is therefore not only an engagement strategy but also a significant preventive conservation measure, with the two concerns intertwined. For example, the National Library of Australia sees part of its role as about preservation and digitisation and online collections as an integral part of this ([NLA, n.d.c](#)). The Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS) similarly states, 'by digitising, we can preserve the original collection item as it was deposited and also allow it to be accessible to more people', including the diverse Indigenous communities, as well as other clients and visitors across a geographically diverse area that wish to access collection items ([AIATSIS n.d.](#)). Archives and libraries are also expending enormous effort in digitising their materials, including oral history collections, and either placing them online or providing metadata and information online that assists with locating the information and access.

One of the most well-known and largest projects to facilitate access to collections in Australia is the National Library of Australia's *Trove* website, which has facilitated digitisation of millions of Australian newspapers and made them, unlike some international repositories, available for free online. It is best known for these newspaper archives, but it is also a powerful platform for searching collection items, including images, from GLAMR institutions Australia wide, in addition to government gazettes and archived websites. The platform harvests metadata from participating institutions and displays it (often including a thumbnail image), making it easily searchable. This is a model, which has considerable synchronicity with the CADRE platform, which will also similarly harvest metadata from the institutions and organisations that participate and direct researchers to the data collections on these organisations' websites. The platform has been an overwhelming success due to significant support of and buy in from the cultural community as well as the broader public.

#### 4.3 Ethics, privacy and sensitive data

Like other research institutions, GLAMR organisations must follow national legislation and Codes on data and privacy, and they often subscribe to broader ethical and integrity frameworks, such as the Australian Code for the Responsible Conduct of Research. They are also beholden to national and international copyright laws when reproducing images and other material as a third party and must follow industry guidelines and ethical frameworks on collections management.

Some of the same concerns about ethics that we see in research discussions of qualitative data also arise in the cultural field. GLAMPeak's report *Digital Access to Collections* ([2016](#)), many comments touched on the ethical issues in the digitisation of heritage, including:

- the potential for Indigenous communities to regain control over cultural knowledge but the concomitant hazards of this being beholden to Western cultural normative frameworks and potential appropriation of this knowledge by others (3–6).

- labour and monetary costs associated with preparation of materials for digitisation and online presentation (6–7)
- potential manipulation of digital content and misuse through sharing (7–12)

Others have identified the complications of understanding and ascribing copyright to collection items when a GLAMR organisation is presenting the material of third parties, legal risk to institutions presenting this material online and the risk for artists and makers of content itself ([Hudson & Kenyon 2007](#); [Bandle et al. 2020](#)). Extension of the *Copyright Act 1968* with the proposed *Copyright Amendment (Access Reform) Bill*, would allow organisations to have greater flexibility to release copyrighted materials to be used in a digital environment, increasing public access and equitable provision of those materials, but may increase risk for copyright holders to some extent ([Commonwealth of Australia 2021](#), 22).

Other intersecting concerns that are, however, little discussed in relation to digitisation and release of cultural collections are those of privacy, ethics and the sensitivity of information. This has recently become a topic of greater interest, partially spurred on by the increased access to information about individuals, communities and groups through online collections, such as in online museums and archives and family history aggregate sites such as Ancestry. Using the example of inquests, May et al. (2020) discussed this predicament in historical research, which extends to online presentation of sensitive data. Inquest records, which were created with government recordkeeping, at their heart contain rich detail about past lives, including details that are sometimes traumatic in nature. These archival records sit ‘within competing imperatives of open and transparent justice on the one hand, and personal sensitivity and private trauma on the other’. As such, they point to a ‘moral purpose and ethical responsibility ... , both in seeking the voice of victims ... and in ensuring that we remain attuned to the agency of the individual and the actualities of their existence’ ([May et al. 2020](#)).

These dilemmas regarding how we address sensitive data, even in historic documents, also speaks to such concerns in wider research contexts and with other data types where open access is championed.

**Finding 4: The GLAMR (Galleries, Libraries, Archives, Museums, Records) sector, with its extensive digitisation and sharing of qualitative materials, provides insights and lessons to guide future research practice in sensitive qualitative data governance.**

Digitisation and public release of materials considered as or likened to sensitive qualitative have a relatively long history in comparison to that within HASS-focused tertiary and government research environments. Key driving factors for GLAMR institutions include enabling public access to engagement with these materials, facilitating their use and reuse in education and research, and facilitating communities or individuals steward materials that derive from their lives and practices in an appropriate manner. The strong synergies between GLAMR institutions and the tertiary and government research sector in their aspirations to archive, share and reuse qualitative research data provides a highly beneficial model for the latter in developing approaches to the treatment of qualitative research data.

## Conclusion

The initiatives and issues discussed above in relation to the GLAMR sector point to practices that could be adapted to facilitate ethical processes for public and researcher access to qualitative data in other fields, including the social sciences. Of note is the orientation to share data and collections as part of an ethical responsibility to greater public engagement and community connection. This opens up new epistemological and methodological questions as well as requiring careful and renewed attention to how ethical and FAIR research practices are imagined and enacted (Moore et al 2021).

It shifts attention away from a predominant or exclusive focus on risk, compliance and data management to a focus that also embraces the social benefits and innovations that sharing data makes possible. This is not to deny the very real need to provide protections for qualitative data – for researchers and participants – and to manage risks responsibly and with care. But it also opens up fresh ways of thinking about the ethical responsibility to share data and the productive methodological challenges this creates.

At the same time, and returning to the CARE principles, governance of qualitative data brings questions about how to and when to involve participants and other stakeholders in decisions about the stewardship of data and conditions regarding access and re-use.

This report was primarily concerned with research data in the tertiary sector, bookended by relevant legislation and practice in government and cultural contexts. It is intended as a contribution to informed consideration of ethical and methodological concerns surrounding the storage, archiving, access and re-use of qualitative data, particularly its management, sharing and reuse, but can also be extended out to thinking about other types of data.

In it we presented four main findings:

- 1) Concepts of data ownership and data stewardship are fundamental to how data use and access is governed.
- 2) A range of national legislative settings, frameworks and codes govern research data archiving and sharing. Further signposting and guidance are required to assist researchers and data users to effectively navigate this complex policy and compliance ecosystem.
- 3) Across the sectors, there is a need to improve governance policies and procedures so that they are better orientated to facilitate qualitative research data sharing.
- 4) The GLAMR (Galleries, Libraries, Archives, Museums, Records) sector, with its extensive digitisation and sharing of qualitative materials, provides insights and lessons to guide future research practice in sensitive qualitative data governance.

While we must remain aware of the special needs and sensitivities of qualitative data, consideration of this type of data and its rich detail also highlights the need for proper governance and stewardship of all types of data that is attuned to the information that can be gleaned or mined from it. Research data is diverse, and we must attend to the possibilities that it holds, while also remaining cognisant of the sensitivities surrounding it and the details that it might reveal about individuals, groups and communities.

## References

- Academy of the Social Sciences in Australia. 2024. *Connected, Innovative and Responsive: Decadal Plan for Social Science Research Infrastructure 2024–33*. DOI: [10.60651/90pr-cz87](https://doi.org/10.60651/90pr-cz87)
- Art Gallery NSW (AGNSW). n.d.a. Collection. *Art Gallery NSW*. <https://www.artgallery.nsw.gov.au/collection/>
- Art Gallery NSW (AGNSW). n.d.b. Provenance. *Art Gallery NSW*. <https://www.artgallery.nsw.gov.au/art/collection/provenance/>
- Atlan. 2023. Data governance vs data stewardship: 5 key differences. <https://atlan.com/data-governance-vs-data-stewardship/#what-is-the-difference-between-data-governance-and-data-stewardship>
- Attorney-General's Department. n.d. Protective Security Policy framework: policies. <https://www.protectivesecurity.gov.au/policies>
- Australian Association for Research in Education (AARE). n.d. *AARE Code of Ethics*. <https://www.aare.edu.au/assets/documents/policies/AARE-Code-of-Ethics.pdf>
- ADA (Australian Data Archive) Dataverse. n.d. *The Australian Longitudinal Study on Male Health Dataverse*. <https://dataverse.ada.edu.au/dataverse/tentomen>
- Australian Historical Association (AHA). 2021. *HASS Research Data Commons: Australian Historical Association Submission*. <https://theaha.org.au/wp-content/uploads/2021/09/HASS-Research-Data-Commons-AHA-Submission-FINAL.27-Sept.pdf>
- Australian Historical Association (AHA). n.d. AHA Code of ethics. <https://theaha.org.au/about-the-aha/aha-code-of-ethics/>
- Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS). 2020. *AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research*. <https://aiatsis.gov.au/sites/default/files/2020-10/aiatsis-code-ethics.pdf>
- Australian Institute of Health & Welfare (AIHW). 2022. *Data Governance Framework 2022 (Public Edition)*. <https://www.aihw.gov.au/getmedia/3117bc9c-46ee-4891-a423-2ec0d66e12e7/aihw-data-governance-framework-2022.pdf.aspx>
- Australian Institute of Health & Welfare (AIHW). 2023a. Data governance. <https://www.aihw.gov.au/about-our-data/data-governance>
- Australian Institute of Health & Welfare (AIHW). 2023b. Data sharing. <https://www.aihw.gov.au/about-our-data/accessing-data-through-the-aihw/data-sharing-under-the-data-scheme>
- Australian Research Council (ARC). n.d.a. Codes and guidelines. <https://www.arc.gov.au/policies-strategies/policy/codes-and-guidelines>
- Australian Research Council (ARC). 2019. Research data management. <https://www.arc.gov.au/policies-strategies/strategy/research-data-management>
- Australian Research Data Commons (ARDC). 2022. CARE Principles. <https://ardc.edu.au/resource/the-care-principles/>

Australian Research Data Commons (ARDC). 2023. Collections as data in Australia.  
<https://ardc.edu.au/article/collections-as-data-in-australia>

Australian Research Data Commons (ARDC). n.d.a. HASS and Indigenous Research Data Commons.  
<https://ardc.edu.au/program/hass-rdc-indigenous-research-capability/>

Australian Research Data Commons (ARDC). n.d.b. Institutional Underpinnings.  
<https://ardc.edu.au/collaborations/strategic-activities/national-data-assets/institutional-underpinnings/>

Australian Society of Archivists. n.d. Digital archives.  
<https://www.archivists.org.au/community/digital-archives>

Bandle, A.L., Y. Benhamou, S. Burkhalter, J. Ferland, L. Guibault, M. Heaton, E. Logeais, M-A. Renold, S. Sykora & V. Vuille, Vanessa. 2020. *Policy Paper on the Digitization of Museum Collections*.  
<https://www.digitizationpolicies.com/medias/Policy-Paper-on-Digitization-of-Collections.pdf>

Blaher, B. 2023. What Melbourne’s Principles for Open Access Mean for You – Open Access Update for Academics, Supervisors & GRs. *MERI and Faculty of Education Research News*, 24 August (University of Melbourne). <https://meri-news.education.unimelb.edu.au/2023/08/24/what-melbournes-principals-for-open-access-mean-for-you-open-access-update-for-academics-supervisors-grs/>

Bromley, T. & L. Warnock. 2021. The practice of the development of researchers: the ‘state-of-the-art’, *Studies in Graduate and Postdoctoral Education* 12(2). ISSN: 2398-4686. DOI: [10.1108/SGPE-12-2019-0084/full/html](https://doi.org/10.1108/SGPE-12-2019-0084/full/html)

Chenier, E. 2014. Oral history and open access: fulfilling the promise of democratizing knowledge, *New American Notes Online, Issue 5: Digital Humanities, Public Humanities*.  
<https://nanocrit.com/issues/issue5/oral-history-and-open-access-fulfilling-promise-democratizing-knowledge>

Department of Infrastructure, Transport, Regional Development & Communications (Commonwealth). 2021. *Discussion paper—Exposure Draft Copyright Amendment (Access Reform) Bill 2021 & Review of Technological Protection Measures Exceptions*.  
<https://www.infrastructure.gov.au/sites/default/files/documents/discussion-paper--exposure-draft-copyright-amendment--access-reform--bill2021.pdf>

Coordinated Access for Data, Research and Environments (CADRE). n.d.  
<https://cadre5safes.org.au/>. Project DOI: [10.47486/PL106](https://doi.org/10.47486/PL106)

Crossen-White, H. 2015. Using digital archives in historical research: what are the ethical concerns for a ‘forgotten’ individual? *Research Ethics* 11(2): 108–119. DOI:[10.1177/1747016115581724](https://doi.org/10.1177/1747016115581724)

Data.NSW. 2020. Data Sharing Principles. <https://data.nsw.gov.au/data-sharing-principles>

Dataplace. n.d. <https://www.dataplace.gov.au/articles/KA-01031>

Davis, N. & Neish, P. 2022. *Institutional Underpinnings – Ethics and Data Discussion Paper*. University of Melbourne. DOI: [10.26188/20500101](https://doi.org/10.26188/20500101)

Department of Home Affairs (Home Affairs) (Commonwealth). n.d. *Protective Security Policy Framework*.  
<https://www.protectivesecurity.gov.au/policies>

Department of Prime Minister and Cabinet (PM & C) (Commonwealth). 2019. *Best Practice Guide to Applying Data Sharing Principles*. <https://apo.org.au/sites/default/files/resource-files/2019-03/apo-nid225841.pdf>

Department of Premier and Cabinet (South Australia). n.d. Sharing Public Sector Data. <https://www.dpc.sa.gov.au/responsibilities/data-sharing/information-sharing-in-south-australia/sharing-public-sector-data>

Department of Prime Minister and Cabinet (PM & C) (Commonwealth). n.d. New laws to improve access to data and use of data: a data sharing and release legislative package. <https://dataavailability.pmc.gov.au/new-laws-improve-access-data-use.html>

Desai, T., F. Ritchie & R. Welpton. 2016. *Five Safes: Designing Data Access for Research*. Economics Working Papers in Economics, No. 1601. University of the West of England, Bristol. DOI: 10.13140/RG.2.1.3661.1604; <https://www2.uwe.ac.uk/faculties/bbs/Documents/1601.pdf>

Digital Preservation Coalition. n.d. About. <https://www.dpconline.org/about>

Faulkhead, S., K. Thorpe, N. Sentence & L. Booker, Lauren. 2023. *Indigenous referencing guidance for Indigenous Knowledges*. CAVAL & The Indigenous Archives Collective, Jumbunna Institute for Indigenous Education and Research. <https://apo.org.au/node/323523>

Foley, C. 2021. *An Australian Model for Open Access*. [https://oa2020.org/wp-content/uploads/POSTER\\_12\\_OpenAccessForAustralia\\_poster\\_DrCathyFoley.pdf](https://oa2020.org/wp-content/uploads/POSTER_12_OpenAccessForAustralia_poster_DrCathyFoley.pdf)

Global Indigenous Data Alliance (GIDA). n.d. CARE principles for Indigenous data governance. <https://www.gida-global.org/care>

GLAMPeak. 2016. *Digital Access to Collections: Stage 1 Project Report*. <https://apo.org.au/sites/default/files/resource-files/2016-12/apo-nid76281.pdf>

GLAMPeak. n.d. <https://glampeak.org.au/>

Government of Victoria. n.d. Navigating Legislation and Sharing Safely. <https://www.vic.gov.au/navigating-legislation-sharing-safely>

Group of Eight. n.d. About the Go8. <https://go8.edu.au/about/the-go8>

*Intergovernmental Agreement on Data Sharing between Commonwealth and State and Territory Governments*. 2021. <https://federation.gov.au/sites/default/files/about/agreements/iga-on-data-sharing-signed.pdf>

Health Direct. n.d. NHMRC – National Health and Medical Research Council. <https://www.healthdirect.gov.au/partners/nhmrc-national-health-and-medical-research-council>

Hudson, E. & A. T. Kenyon. 2007. Digital access: the impact of copyright on digitization practices in Australian museums, galleries, libraries and archives, *The University of New South Wales Law Journal* 30(1): 12–52.

Hunt, J. 2013. Engaging with Indigenous Australia – Exploring the Conditions for Effective Relationships with Aboriginal and Torres Strait Islander Communities [https://www.academia.edu/70454743/Engaging\\_with\\_Indigenous\\_Australia\\_exploring\\_the\\_conditions\\_for\\_effective\\_relationships\\_with\\_Aboriginal\\_and\\_Torres\\_Strait\\_Islander\\_communities](https://www.academia.edu/70454743/Engaging_with_Indigenous_Australia_exploring_the_conditions_for_effective_relationships_with_Aboriginal_and_Torres_Strait_Islander_communities)

Indigenous Data Network (IDN). 2022. Indigenous Data Governance. <https://idnau.org/#/resources/indigenoustagovernance>

- Indigenous Data Network (IDN). n.d.a. Improving Indigenous Research Capabilities: An Aboriginal and Torres Strait Islander Research Data Commons, *Melbourne School of Population and Global Health*. University of Melbourne. <https://mbspgh.unimelb.edu.au/centres-institutes/centre-for-health-equity/research-group/indigenous-studies/research/indigenous-data-network/improving-indigenous-research-capabilities-an-aboriginal-and-torres-strait-islander-research-data-commons>
- Indigenous Data Network (IDN). n.d.b. *Melbourne School of Population and Global Health*. University of Melbourne. <https://mbspgh.unimelb.edu.au/centres-institutes/centre-for-health-equity/research-group/indigenous-studies/research/indigenous-data-network>
- Indigenous Knowledge Institute. 2020. *Charter for Research with Indigenous Knowledge Holders*. University of Melbourne. [https://indigenouknowledge.unimelb.edu.au/\\_data/assets/pdf\\_file/0004/3557785/Charter-for-research-with-Indigenous-Knowledge-Holders.pdf](https://indigenouknowledge.unimelb.edu.au/_data/assets/pdf_file/0004/3557785/Charter-for-research-with-Indigenous-Knowledge-Holders.pdf)
- Informatica. n.d. What is data stewardship? <https://www.informatica.com/au/resources/articles/what-is-data-stewardship.html>
- International Council of Museums (ICOM). 2017. *ICOM Code of Ethics for Museums*. <https://icom.museum/wp-content/uploads/2018/07/ICOM-code-En-web.pdf>
- Jennerich, A. L. 2021. Unplanned admission to the ICU: a qualitative study examining family member experiences. *Qualitative Data Repository*. <https://doi.org/10.5064/F6GXXBVD>. Palliative Care Research Cooperative QDR-EOLPC. V1
- Jones, M. & Verhoeven, D. 2016. Treasure Trove: why defunding trove leaves Australia poorer, *The Conversation*, 26 February. <https://theconversation.com/treasure-trove-why-defunding-trove-leaves-australia-poorer-55217>
- Kirolova, D. & S. Karcher. 2017. Rethinking data sharing and human participant protection in social science research: applications from the qualitative realm, *Data Science Journal* 16(43). DOI: [10.5334/dsj-2017-043](https://doi.org/10.5334/dsj-2017-043)
- Lavarreda, C. & co-researchers, D. Sanzhieva, M. Taitano, A. McClellan-Ufugusuku, M. J. Pérez Sián, Y. J. Waliya & C. Denali Montoya. 2023. *How We Remember*. <https://howweremember.com/s/homepage/page/welcome>
- Manžuch, Z. 2017. ethical issues in digitization of cultural heritage, *Journal of Contemporary Archival Studies* 4(2): Article 4. <http://elischolar.library.yale.edu/jcas/vol4/iss2/4>
- Markham, D. 2021. Data Availability and Transparency Bill 2020 [and] Data Availability and Transparency (Consequential Amendments) Bill 2020. [https://www.aph.gov.au/Parliamentary\\_Business/Bills\\_Legislation/bd/bd2122a/22bd018](https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/bd/bd2122a/22bd018)
- May, A. J., H. Morgan, N. Davis, S. Silberberg & R. Wettenhall. 2020. Untimely ends: place, kin and culture in coronial inquests, *Provenance: The Journal of Public Record Office Victoria* 18. <https://prov.vic.gov.au/explore-collection/provenance-journal/provenance-2020/untimely-ends>
- McEachern [et al.]/CADRE. 2021. *CADRE Five Safes Framework v.1.0*. DOI: [10.5281/zenodo.5748611](https://doi.org/10.5281/zenodo.5748611)
- McEachern [et al.]/CADRE. 2022. *CADRE Five Safes Framework v.1.1*. DOI: [10.5281/zenodo.5748610](https://doi.org/10.5281/zenodo.5748610)
- McEachern [et al.]/CADRE. 2024. *CADRE Five Safes Framework v.1.2*. DOI: [10.5281/zenodo.5748610](https://doi.org/10.5281/zenodo.5748610)

- McLeod, J. 2017. Social science archives and lessons from history: a view from Australia on research governance and practices in the age of data sharing. *Re-visioning the Regulation of Data Archiving and Sharing in the Social Sciences*, Linköping University, Sweden, 23–24 March.
- McLeod, J., K. O'Connor & N. Davis. 2020. *Doing Research Differently: Archiving & Sharing Qualitative Data in Studies of Childhood, Education and Youth*. University of Melbourne. DOI: [10.25916/5e9e28eec21a1](https://doi.org/10.25916/5e9e28eec21a1)
- McLeod, J. & K. O'Connor. 2020. Ethics, archives and data sharing in qualitative research, *Educational Philosophy & Theory* 53(5). DOI: [10.1080/00131857.2020.1805310](https://doi.org/10.1080/00131857.2020.1805310)
- McLeod, J., K. O'Connor & N. Davis. 2024. *Archiving & Sharing Qualitative Data: Implications for Data Management Platforms*. DOI: TBA
- McLeod, J. and R. Thomson. 2024. Gaining a perspective on ethics: looking back at longitudinal methods. In J. Cook, Q. Maire & J. Wyn (eds), *Longitudinal Methods in Youth Research: Understanding Young Lives Across Time and Space*. Springer Nature. DOI: [10.1007/978-981-97-2332-4\\_11](https://doi.org/10.1007/978-981-97-2332-4_11)
- Museums & Galleries NSW (MGNSW). n.d. Digital Access to Collections Toolkit. <https://mgnsw.org.au/sector/resources/online-resources/digital/digital-access-collections-toolkit/>
- Museums Australia. 1999. *Museums Australia Code of Ethics (1999)*. [https://www.amaga.org.au/sites/default/files/uploaded-content/website-content/SubmissionsPolicies/ma\\_code\\_of\\_ethics\\_1999.pdf](https://www.amaga.org.au/sites/default/files/uploaded-content/website-content/SubmissionsPolicies/ma_code_of_ethics_1999.pdf)
- Museums Victoria. 2020. *Strategic Plan: 2017–2025*. [https://museums victoria.com.au/media/6663/museums victoria\\_strategicplan\\_2017-2025\\_accessible.pdf](https://museums victoria.com.au/media/6663/museums victoria_strategicplan_2017-2025_accessible.pdf)
- Museums Victoria (MV). n.d.a. About. *Museum Victoria Collections*. <https://collections.museums victoria.com.au/about>
- Museums Victoria (MV). n.d.b. *Museum Victoria Collections*. <https://collections.museums victoria.com.au/>
- National Archives of Australia (NAA). 2021. Information and data governance framework. <https://www.naa.gov.au/about-us/our-organisation/accountability-and-reporting/information-and-data-governance-framework>
- National Archives of Australia (NAA). n.d. Information management standard for Australian Government. <https://www.naa.gov.au/information-management/information-management-standards/information-management-standard-australian-government>
- National Health and Medical Research Council (NHMRC). n.d. Legislative basis to NHMRC. <https://www.nhmrc.gov.au/about-us/leadership-and-governance/legislative-basis-nhmrc>
- National Health and Medical Research Council, Australian Research Council and Universities Australia (NHMRC) (2007/2018). *National Statement on Ethical Conduct in Human Research (2007)*. <https://www.nhmrc.gov.au/about-us/publications/national-statement-ethical-conduct-human-research-2007-updated-2018>
- National Health and Medical Research Council, Australian Research Council and Universities Australia (NHMRC) (2018). *Australian Code for the Responsible Conduct of Research*. <https://www.nhmrc.gov.au/about-us/publications/australian-code-responsible-conduct-research-2018>

National Health and Medical Research Council, Australian Research Council and Universities Australia. (2019). *Management of Data and Information in Research: A Guide Supporting the Australian Code for the Responsible Conduct of Research*.  
<https://www.nhmrc.gov.au/sites/default/files/documents/attachments/Management-of-Data-and-Information-in-Research.pdf>

National Library of Australia. n.d.a. Catalogue. <https://catalogue.nla.gov.au/catalog>

National Library of Australia. n.d.b. Preservation. <https://www.nla.gov.au/collections/preserving-our-collections/preservation>

National Library of Australia. n.d.c. Preserving our collections. <https://www.nla.gov.au/content/preserving-our-collections>

National Standards Taskforce. 2023. *National Standards for Australian Museums and Galleries 2.0*.  
<https://mgsw.org.au/wp-content/uploads/2023/03/Nationals-Standards-for-Australian-Museums-and-Galleries-2.0.pdf>

Neish, P. 2022. Open Research, *Library Guides*, University of Melbourne, 8 February.  
<https://unimelb.libguides.com/openresearch/data>

New South Wales Government. 2021. *Data.NSW*. <https://data.nsw.gov.au/>

NSW State Archives & Records. 2014/2018. Summary of provisions.  
<https://www.records.nsw.gov.au/recordkeeping/rules/legislation/summary-of-provisions>

O'Connor, K., J. McLeod. & N. Davis. 2024. The ethics of archiving and sharing qualitative data. In B.M. Smyth, M.A. Martin, & M. Downing (eds), *The Routledge Handbook of Human Research and Integrity in Australia*. Routledge. Forthcoming, October.

Office of the Australian Information Commissioner (OAIC). 2019. *Australian Privacy Principles Guidelines: Privacy Act 1988*. [https://www.oaic.gov.au/data/assets/pdf\\_file/0009/1125/app-guidelines-july-2019.pdf](https://www.oaic.gov.au/data/assets/pdf_file/0009/1125/app-guidelines-july-2019.pdf)

Office of the Australian Information Commissioner (OAIC) n.d. The Privacy Act.  
<https://www.oaic.gov.au/privacy/the-privacy-act>

Office of the National Data Commissioner (ONDC). n.d. Share data.  
<https://www.datacommissioner.gov.au/share-data>

Oral History Australia (OHA). 2007. *Guidelines of Ethical Practice*. [https://oralhistoryaustralia.org.au/wp-content/uploads/Guide\\_ethical\\_practice\\_2007.pdf](https://oralhistoryaustralia.org.au/wp-content/uploads/Guide_ethical_practice_2007.pdf)

Oral History Australia (OHA). 2021. University ethical approval of a project involving humans.  
<https://oralhistoryaustralia.org.au/guide-ethics-and-university-research/>

Oral History Australia (OHA). n.d.a. Guidance. <https://oralhistoryaustralia.org.au/guidance/>

Oral History Australia (OHA). n.d.b. Oral history training.  
<https://oralhistoryaustralia.org.au/guidance/training/>

Oral History Australia (OHA). n.d.c. Practising oral history.  
<https://oralhistoryaustralia.org.au/guidance/practise/>

Organisation for Economic Co-Operation and Development (OECD). 2007. *OECD Principles and Guidelines for Access to Research Data from Public Funding*. OECD Publishing. [https://www.oecd-ilibrary.org/science-and-technology/oecd-principles-and-guidelines-for-access-to-research-data-from-public-funding\\_9789264034020-en-fr](https://www.oecd-ilibrary.org/science-and-technology/oecd-principles-and-guidelines-for-access-to-research-data-from-public-funding_9789264034020-en-fr)

Organisation for Economic Co-Operation and Development (OECD). 2021a. *Enhanced Access to Publicly Funded Data for Science, Technology and Innovation*. OECD Publishing. DOI: [10.1787/947717bc-en](https://doi.org/10.1787/947717bc-en)

Organisation for Economic Co-Operation and Development (OECD) [via Wayback Machine]. 2021b. Recommendation of the Council concerning access to research data from public funding. <https://web.archive.org/web/20240522142941/https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0347>

Parliament of Australia. 2020. *Data Availability and Transparency Bill 2020*. [https://parlinfo.aph.gov.au/parlInfo/download/legislation/bills/r6649\\_first-reps/toc\\_pdf/20174b01.pdf;fileType=application%2Fpdf](https://parlinfo.aph.gov.au/parlInfo/download/legislation/bills/r6649_first-reps/toc_pdf/20174b01.pdf;fileType=application%2Fpdf)

Parliament of Australia. n.d.. *Data Availability and Transparency Bill 2020*. [https://www.aph.gov.au/Parliamentary\\_Business/Bills\\_Legislation/Bills\\_Search\\_Results/Result?bID=r6649](https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bID=r6649)

Productivity Commission. 2017. *Data Availability and Use: Productivity Commission Inquiry Report*. <https://www.pc.gov.au/inquiries/completed/data-access/report/data-access.pdf>

Productivity Commission. n.d. Data availability and use. <https://www.pc.gov.au/inquiries/completed/data-access#report>

Public Record Office Victoria (PROV). 2023. Open data: Australian National Data Service and Trove. <https://prov.vic.gov.au/about-us/partnerships-and-collaborations/open-data>

Public Record Office Victoria (PROV). n.d. About us. <https://prov.vic.gov.au/about-us>

Qualitative Data Repository (QDR). n.d.a. QDR main collection. <https://data.qdr.syr.edu/>

Qualitative Data Repository (QDR). n.d.b. Types of qualitative data. <https://qdr.syr.edu/deposit/data>

Shaw, P. 2011. Conservators and digitisation: when we conserve the window, how should we preserve the view?, AICCM National Conference, Canberra, 19–21 October 2011. [https://aiccm.org.au/wp-content/uploads/2019/11/SHAW\\_NatConf2011.pdf](https://aiccm.org.au/wp-content/uploads/2019/11/SHAW_NatConf2011.pdf)

Stainforth, L. 2018. Treasuring Trove: why Australia's digital heritage platform is so special, *Pursuit*, 26 October. <https://pursuit.unimelb.edu.au/articles/treasuring-trove-why-australia-s-digital-heritage-platform-is-so-special>

The Australian Sociological Association (TASA). n.d. *Code of Ethics*. [https://www.tasa.org.au/content.aspx?page\\_id=22&club\\_id=671860&module\\_id=357739](https://www.tasa.org.au/content.aspx?page_id=22&club_id=671860&module_id=357739)

Ten to Men. The Australian Longitudinal Study on Male Health. 2022. About the study. <https://tentomen.org.au/about-study>

UNESCO. 2003. *Charter on the Preservation of Digital Heritage*. [http://portal.unesco.org/en/ev.php-URL\\_ID=17721&URL\\_DO=DO\\_TOPIC&URL\\_SECTION=201.html](http://portal.unesco.org/en/ev.php-URL_ID=17721&URL_DO=DO_TOPIC&URL_SECTION=201.html)

UNESCO (2021). *UNESCO Recommendation on Open Science*. <https://unesdoc.unesco.org/ark:/48223/pf0000379949.locale=en>

UNESCO. n.d.a. Museums. <https://en.unesco.org/themes/museums>

UNESCO. n.d.b. Museums for intercultural dialogue. <http://www.unesco.org/culture/museum-for-dialogue/museums-for-intercultural-dialog/en/>

University of Melbourne. 2013. *Management of Research Data and Records Policy* (MPF1242). <https://policy.unimelb.edu.au/MPF1242>

University of Melbourne. 2018. *Research Ethics and Biorisk Management Policy* (MPF1341). <https://policy.unimelb.edu.au/MPF1341>

University of Melbourne. 2022. *Graduate Research Training Policy* (MPF1321). <https://policy.unimelb.edu.au/MPF1321>

University of Melbourne. 2023. Principles for Open Access to Research Outputs at Melbourne. <https://library.unimelb.edu.au/open-scholarship/principles-on-open-access-to-research-outputs>

University of Melbourne. 2024. *Research Integrity and Misconduct Policy* (MPF1318). <https://policy.unimelb.edu.au/MPF1318>

University of Melbourne. n.d.a. Research data management. <https://gateway.research.unimelb.edu.au/resources/data-and-computation/research-data-management> [only accessible to University of Melbourne staff, students and affiliates].

University of Melbourne. n.d.b. Research ethics advisors and human research ethics committees. <https://gateway.research.unimelb.edu.au/resources/ethics-and-integrity/human-ethics/rea-and-hrec> [only accessible to University of Melbourne staff, students and affiliates].

University of Melbourne. n.d.c. Research integrity online training. <https://catalog.lms.unimelb.edu.au/browse/communities/courses/research-integrity-online-training-riot> [only accessible to University of Melbourne staff, students and affiliates]

University of Melbourne. n.d.d. Responsible research. <https://gradresearch.unimelb.edu.au/roles-and-responsibilities/responsible-research>

University of Newcastle. 2017. *Information Security Data Classification Procedure*. <https://policies.newcastle.edu.au/document/view-current.php?id=256&version=1>

University of New South Wales (UNSW). 2019a. Classifying your research data. <https://research.unsw.edu.au/classifying-your-research-data>

University of New South Wales (UNSW). 2019b. *Research Data Governance & Materials Handling Policy* <https://www.unsw.edu.au/content/dam/pdfs/governance/policy/2022-01-policies/researchdatagovernancepolicy.pdf>

University of New South Wales (UNSW). 2021a. Data classification standard. <https://www.unsw.edu.au/content/dam/pdfs/governance/policy/2022-01-policies/datastandard.pdf>

University of New South Wales (UNSW). 2021b. *Open Access Policy*. <https://www.unsw.edu.au/content/dam/pdfs/governance/policy/2022-01-policies/openaccesspolicy.pdf>

University of New South Wales (UNSW). n.d.a. Data storage and tools. <https://research.unsw.edu.au/data-storage-and-tools>

University of New South Wales (UNSW). n.d.b. ERICA – E-Research Institutional Cloud Architecture. <https://research.unsw.edu.au/erica>

University of New South Wales (UNSW). n.d.c. Open access <https://www.library.unsw.edu.au/research/publishing-and-sharing-your-research/open-access>

University of New South Wales (UNSW). n.d.d. Processes: data classification. <https://www.unsw.edu.au/information-governance/processes#:~:text=The%20UNSW%20Data%20Classification%20Standard,in%20daily%20mission%2Drelated%20activities.>

University of New South Wales (UNSW). n.d.e. Research Data Management (RDM) at UNSW. <https://research.unsw.edu.au/research-data-management>

University of Southampton, School of Electronic and Computer Science. n.d. *Registry of Open Access Repository Mandates and Policies (ROARMAP)*. <http://roarmap.eprints.org/>

VandeVusse, A. & J. Mueller. 2021. Data for: Qualitative Data Sharing: Participant Understanding, Motivation, and Consent'. *Qualitative Data Repository*. DOI: [10.5064/F6YYA3O3](https://doi.org/10.5064/F6YYA3O3)

Victorian Government. 2024. Victorian Public Sector Data Sharing Policy. <https://www.vic.gov.au/victorian-public-sector-data-sharing-policy>

Walter, M., R. Lovett, B. Maher, B. Williamson, J. Prehn, G. Bodkin-Andrews & V. Lee. 2021. Indigenous Data Sovereignty in the era of big data and open data, *Australian Journal of Social Issues* 56: 143–156. DOI: [10.1002/ajs4.141](https://doi.org/10.1002/ajs4.141)

Weitzenboeck, E.M., P. Lison, M. Cyndecka & M. Langford. 2022. The GDPR and unstructured data: is anonymization possible? *International Data Privacy Law* 12(3): 184–206. DOI: [10.1093/idpl/ipac008](https://doi.org/10.1093/idpl/ipac008)

Wilson L. & R. Barrowcliffe. 2023. Green ribbon and blue ribbon stories: applying a Bidjara way of knowing to understanding records, *Archives & Manuscripts* 50(2): 43–59. DOI: [10.37683/asa.v50.10921](https://doi.org/10.37683/asa.v50.10921)





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