



## Data Management Framework for Anthropological Research Discussion Paper of the Swiss Anthropological Association (SAA)

### 1. Overall aims and framework of this paper

Anthropologists are increasingly confronted with requests from funding agencies and the public to plan and justify data management based on principles of transparency, accessibility, sharing and reuse. The SAA sees the push towards open data as a welcome occasion to rethink disciplinary guidelines of data management and collaborative work within our discipline. It is also aware of the complex issues raised by making data available to various publics. Data must be made available without violating ethical or legal norms (such as informed consent, privacy, copyright and data security). The centerpiece of professional ethics in relation to open data is, on the one hand, the protection of the people anthropologists work with (protection of private interests) and, on the other hand, careful reflection on the social and political contexts anthropologists work in (service to the public interest).

#### *Procedure*

In the spring of 2018, the SAA Board launched a debate on the issues of open data and data management, catalyzed by the Swiss National Science Foundations new requirement that researchers provide data management plans (DMP) with all funding requests. As a first step, we identified key topics that we submitted in question format to the governing institutions that are central to the Swiss approach to open science policy: swissuniversities, the SNSF, and the Swiss Academy for the Humanities and Social Sciences (SAGW/ASSH). The present discussion paper represents a first summary of these exchanges, with the aim to inform our members about the state of the art and thus to initiate further discussions. We are submitting it to the Swiss anthropological community for comments, suggestions and criticism.<sup>1</sup>

As a second step and based on reactions from our members, the SAA aims to develop a position paper: 1) to outline how ethnographic research can comply with, and even benefit from, the new and complex open data framework (including data protection) and 2) to provide principles and templates with which applicants may address SNSF's DMP requirements. Rethinking the economy and governance of data for anthropologists includes reflecting on collaborations across disciplines and national borders<sup>2</sup> as well as close exchange with the

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<sup>1</sup> This discussion paper was drafted by Ellen Hertz and Sabine Strasser, with the help of Martine Stoffel and Irina Wenk (commissioned by the SAA) and is based on exchanges with swissuniversities, the SNSF and the SAGW/ASSH.

<sup>2</sup> See examples of statements and position papers by the European Association of Social Anthropology (EASA, <https://www.easaonline.org/downloads/support/EASA%20statement%20on%20data%20governance.pdf>), German Association of Social and Cultural Anthropology (DGSKA, accepted DGSKA conference 2019; to be published soon), International Society for Ethnology and Folklore (SIEF, <https://www.siefhome.org>).

governing institutions responsible for developing data management in Switzerland in order to develop practical, trans/disciplinary and process-based guidelines for SAA members.

### *Background*

The open data initiative in Switzerland is broadly based on the **Berlin Declaration** on Open Access to Knowledge in the Sciences and Humanities of 2003, jointly signed by the SNFS, swissuniversities and the Swiss Academies on January 23, 2006<sup>3</sup>. This declaration contains the main arguments for openness to scientific knowledge and provides a legal basis for introducing policies such as the open access to data.

The **SNSF**, as Switzerland's national funding institution, has the right and the duty to set forth a framework and regulatory prerequisites for their funding activities in conformity with the Berlin Declaration. As of 2001, these principles were incorporated into SNSF funding regulations at the general level, and as of 2016, they were defined by Article 47 of its Funding Regulation as follows: "the data collected with the aid of an SNSF grant must also be made available to other researchers for further research and integrated into recognised scientific data pools"<sup>4</sup>. In addition, in 2017 the SNSF defined an "Open Research Data" (henceforth ORD) policy. In this context, sharable data should be deposited onto existing repositories that comply with the FAIR principles (findable, accessible, interpretable, reusable)<sup>5</sup>.

In late 2018, the Swiss Federal Council adopted the "**Strategy Digital Switzerland**". This strategy addresses the challenges caused by the digital turn, including a "coherent legal basis regarding the legal rights relating to data, access to data and data handling"<sup>6</sup>. This document includes the national initiatives to harmonize data accessibility in the context of the ongoing revision of the Federal Data Protection Act.

**Swissuniversities** established a Project Group in early 2019 to prepare a national strategy and an "Open Science Action Plan" for the period 2021-2024, with a focus on open data, or more precisely on **FAIR and managed data**.

## **2. Principles of ethnographic fieldwork and key questions**

Ethnography's open-ended nature, its processual (versus procedural) relation to informed consent, its co-production of embodied knowledge, its long-term collaboration (often) with vulnerable subjects and its work (also) in non-Western contexts raises specific issues for the principles of open research. Ethical and legal considerations precede and guide data management requirements. A thoughtful and pragmatic review of these issues has been provided by the SAA's Ethical and Deontological Think Tank (EDTT) in two position papers<sup>7</sup>.

These methodological specificities formed the basis for the questionnaire that we sent to swissuniversities, the SNSF and the SAGW/ASSH for consultations and exchange. What follows are the preliminary responses represented in **Q+A** format. These exchanges are reproduced here in order to invite further exchange from our members.

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<sup>3</sup> See <https://openaccess.mpg.de/Berlin-Declaration>.

<sup>4</sup> See <http://www.snf.ch/en/funding/documents-downloads/Pages/regulations-funding-regulations.aspx>.

<sup>5</sup> See [http://www.snf.ch/SiteCollectionDocuments/FAIR\\_principles\\_translation\\_SNSF\\_logo.pdf](http://www.snf.ch/SiteCollectionDocuments/FAIR_principles_translation_SNSF_logo.pdf).

<sup>6</sup> See <https://strategy.digitaldialog.swiss/en/>

<sup>7</sup> See [https://tsantsa.ch/content/4-aed/2-stellungnahme/Ethical\\_Statement\\_of\\_the\\_SES\\_2011.pdf](https://tsantsa.ch/content/4-aed/2-stellungnahme/Ethical_Statement_of_the_SES_2011.pdf)

### **Definition of “open data” in Social Science and Humanities (SSH)**

Compliance with data management requires clarification of what is meant by “open data” and why it is seen as a broad principle that should guide thinking about research data in the future. It appears that open data obligations must always be subordinated to the legal principles of privacy and data protection, but current formulations often appear to pull in the opposite direction.

**Q:** What specifically are the aims of an open data framework as applied to the social sciences and humanities (SSH)? SSH research does not produce raw data that can be anonymized and shared for analysis nor does it use experimental methods, where replication is the principal form of validation. Does this specificity of SSH modify the importance of objectives underlying “open data” in these disciplines?

**A:** *The governing institutions<sup>8</sup> emphasize FAIR (findable, accessible, interpretable, reusable) data management. Swissuniversities explicitly focus on FAIR rather than on “open” data. “Open data” represents a best practice but poses serious challenges for the researchers and more generally the research community, for instance with respect to data protection, confidentiality, intellectual property rights, etc. The data management plan (DMP) is a tool to encourage the researchers to engage in a first reflection on how their data will be collected and stored. The overall objective is based on the principle: “as open as possible, as closed as necessary”.*

**Q:** Will the specificities of the different disciplines be taken into account in SNSF procedures or on their website (for an example of this approach, see the German Research Council’s website<sup>9</sup>). Will disciplines define data accessibility policies themselves?

**A:** *Disciplines should design their own practices, in collaboration with neighboring disciplines. The Open Science Program of swissuniversities will support cross and trans-disciplinary collaborations in this respect. There is a need to develop practices and reflections on how data will be collected, stored and preserved and to what extent SSH data are shareable.*

### **Coordination of norms and infrastructure**

Currently in Switzerland many legal frameworks (international, national and cantonal) treat questions of data storage and management of infrastructures, creating a blurred picture for researchers. Governing institutions must clarify what will be the relevant data infrastructures as a precondition for compliance in data management plans.

**Q:** Are there plans to develop secured data management infrastructure? Is there/will there be technical support for researchers and users? Which institutions are/will be responsible? What is the timeframe for data storage, accessibility and erasure? How is the interface between individual researchers or institutions (PIs or universities) and infrastructure providers to be guaranteed and financed?

**A:** *For the SSH in Switzerland, the SNSF works closely with FORS (<https://forsbase.unil.ch>) and DaSCH (Data and Service Center for the Humanities; SAGW/ASSH: [www.dasch.swiss](http://www.dasch.swiss))*

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<sup>8</sup> If not inserted otherwise the answers (A:) are quotes from the written responses by the three governing institutions (swissuniversities, SNSF and SAGW/ASSH).

<sup>9</sup> [https://www.dfg.de/en/research\\_funding/proposal\\_review\\_decision/applicants/research\\_data/index.html](https://www.dfg.de/en/research_funding/proposal_review_decision/applicants/research_data/index.html).

*by exchanging information concerning the needs and the challenges of researchers related to data management. Both data repositories are considered as FAIR by the SNSF, which allows the Swiss SSH community to deposit their data on these repositories.*

*SNSF is currently discussing the issues of data infrastructures (from an administrative, managerial and financial viewpoint) at the national but also at the international level with different stakeholders (to be followed).*

*Swissuniversities is currently working on a national Open Science Strategy 2021-2024, including discussion and financial support in the field of research and SSH.*

*In terms of funding, the Open Science Program (45 million CHF over 4 years) will serve to impulse/initiate joint activities (or shared services) among different Higher Education Institutions (HEIs). The SNSF will support researchers getting grants from them with assuming costs for APC/BPCs (Author/Book Processing Charges) or other costs linked to open science implementation, and the remaining effort in empowering open science will be under the responsibility of HEIs themselves.*

*There will be further information about infrastructure on the website of the SNSF in the next months.*

### **Data protection regulations**

Open data and data protection frameworks must be addressed simultaneously and their legal, ethical or practical contradictions have to be discussed in more detail.

**Q:** Who determines policies of confidentiality? If infrastructure insufficiencies lead to violations of data security for persons or institutions, who will be held responsible, researchers, universities or infrastructure providers?

**A:** *Swissuniversities confirms that this question requires detailed study, a mandate that they foresee giving to a group of experts. The European Union has recommended to HEI to hire a DPO (Data protection officer). These kinds of questions can be very specific in different cantonal regulatory settings and include the question of responsibility in case of violation of data protection.*

### **Training and Education**

All institutions questioned recognized that education and training on data governance, access to data and data protection is needed. Nonetheless, the question of who will be trained and how knowledge about these new practices can be stored and made accessible as well as funding for these new initiatives is still under negotiation.

**Q:** How will PIs be informed about their options? How will applicants be trained to deal with these new challenges? Who will finance these additional costs? The current DMP framework at the SNSF allows for some money to be allocated during the period of the research subsidy; our questions apply to the “before” and “after” of the actual research period, as researchers are preparing research projects, and as they are managing data after the grant period.

**A:** *There is a need to constantly develop and strengthen communication on this topic. The SNSF provides financial support for data management of max. 10'000 CHF. Furthermore, the repositories will be provided by the institutions and information presented at the SNSF*

*website and DMPs will be available. As confirmed in the mandate to swissuniversities, this is mainly the role of institutions/libraries and some of them already propose their help, for instance by reading/examining applicants' DMPs before the submission of their application. Some data repositories like FORS provide guidance on questions related to the management of research data before and after a research project. For instance, they support the researchers for the issues related to writing a consent form and to data preservation and accessibility.<sup>10</sup>*

*One possibility offered by the SNSF is to organise workshops on the topic of ORD via the instrument "Scientific Exchange". This allows scholars (from the same or different disciplines) to discuss open data and data accessibility issues. The "before" and "after" have to be taken care of mostly by institutional funding by HEIs themselves.*

### **National or transnational solutions?**

Comparing Swiss policy developments to those in Germany and Austria has raised questions on transnational practices in relation to data governance at different levels (within Switzerland and in collaboration with EU member states and the UK).

**Q:** Do Swiss authorities plan to develop cantonal, national, EU or international collaborations in this area? Since data are collected at a global level, should they be accessible at this level? How will Swiss research and academic institutions support transnational projects in this area?

**A:** *This is the objective of the National Action Plan on Open Science currently being elaborated at national level by swissuniversities. The Action Plan will contain top-down and bottom-up opportunities for HEIs to collaborate on necessary infrastructures. FAIR principles require accessibility at the global level. Transnational projects in this area are principally funded by Horizon Europe in the future (and H2020 currently) and EUCloud.*

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<sup>10</sup> <https://forscenter.ch/fors-guides/fg-2019-00007>