

Research and Innovation Portfolio

16 September 2026

Australian Research Council
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Re: Submission on the draft FAIR Data Policy

The University of Queensland (UQ) welcomes the opportunity to contribute to the FAIR Data Policy Consultation.

Overall, UQ supports the draft FAIR Data Policy as an important step in strengthening research data governance, accountability and implementation across the National Competitive Grants Program. UQ particularly welcomes the stronger recognition of Indigenous data governance, Indigenous Cultural and Intellectual Property (ICIP) rights and the CARE Principles.

UQ provides the following key recommendations for refinement of the Policy, informed by expertise from across the University. We recommend the ARC:

- Establish a clear trigger and timeframe for research data deposit and access.
- Define repository and preservation requirements, clarify Data Management Plan responsibilities, and confirm that reasonable data management costs are eligible project costs.
- Clarify metadata and persistent identifier requirements, including their application to datasets, research samples and final reporting.
- Provide practical guidance for implementing, monitoring and reporting Indigenous data governance requirements, while protecting Indigenous Cultural and Intellectual Property rights, Indigenous Data Sovereignty and community control of culturally sensitive information.

Recommendation: Deposit and Access of Data

UQ recommends that the ARC establish a clear trigger and timeframe for research data to be deposited and made accessible.

Without a defined trigger, the expectations outlined in Section 4 risk remaining largely aspirational, while the requirements in Section 5 provide only retrospective reporting on data management practices.

Recommendation: Repositories, Preservation and Data Management Plans

UQ recommends that the policy establish clear criteria for assessing and validating repositories, together with expectations for data preservation periods, appraisal and succession planning. The policy should also explicitly confirm that reasonable data management costs are eligible project costs.

The policy should provide greater clarity on the structure and use of Data Management Plans (DMPs), including how they will be made visible to the ARC and how institutional systems and processes can support compliance. It should clearly distinguish between the responsibilities of individual researchers and institutions, particularly where requirements relate to institutional systems, policies or capabilities. Researchers should be accountable for planning and documenting the management of project data, while institutions should be responsible for the systems, infrastructure, policies and support services within their control. Further practical guidance and supporting infrastructure should be provided for the management of sensitive data.

Recommendation: Metadata and Persistent Identifiers

UQ considers the proposed mandatory metadata requirements generally appropriate but recommends further clarification in several areas. Digital Object Identifiers (DOIs) and International Generic Sample Numbers should not be treated as interchangeable, given the different purposes and characteristics of datasets and research samples. Distinct metadata requirements should therefore be established for datasets and samples.

The policy should also clarify whether metadata fields such as collection date ranges, duration, geographic range and other forms of coverage are mandatory. The relationship between DOI requirements and final reporting should be clarified to ensure researchers are not encouraged to assign DOIs before datasets are sufficiently complete or ready for publication and access.

Recommendation: Indigenous Data Governance

UQ recommends that the ARC provide clear operational guidance on implementing, monitoring and reporting compliance with Indigenous data governance requirements. UQ strongly supports the draft policy's recognition of Indigenous data governance, Indigenous Cultural and Intellectual Property rights and the CARE Principles, including the expectation that repositories support compliance with these requirements. The policy should explicitly state that open access and FAIR principles do not override Indigenous Cultural and Intellectual Property rights, Indigenous Data Sovereignty, or the rights of Aboriginal and Torres Strait Islander communities to control culturally sensitive information.

UQ also recommends that Indigenous Data Sovereignty, ICIP, and Indigenous governance considerations be distinguished from the broader category of 'vulnerable individuals or groups' within the sensitive data requirements, recognising that these matters relate to the distinct rights of Aboriginal and Torres Strait Islander peoples, including self-determination, governance, and cultural knowledge.

Overall, UQ appreciates the ARC's stronger focus on Indigenous data governance and considers that further operational guidance would strengthen the policy and support its effective implementation for both Indigenous and non-Indigenous researchers.

UQ welcomes the ARC's work to strengthen expectations for FAIR research data and supports the draft policy as a key step towards enabling consistent and effective research data management across the sector.

Addressing the recommendations identified above would further reinforce the policy by providing greater clarity for researchers and institutions and supporting practical implementation. Clearer expectations around data deposit and access, repository standards, preservation, metadata, and Indigenous data governance are key mechanisms by which the ARC can ensure the policy's principles are translated into effective and sustainable practice for the sector as it relates to NCGP schemes.

Thank you again for the opportunity to comment on the draft FAIR Data Policy; the University would be pleased to be involved in further consultation opportunities as they may arise.

Kind regards,



Professor Sue Harrison
Deputy Vice-Chancellor (Research and Innovation)