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## Stewarding qualitative data: A hermeneutic and relational reframing of qualitative data governance

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### Abstract

Qualitative data governance is increasingly formalised within infrastructures originally designed for quantitative research. These systems rely on tools such as suppression, generalisation and output checking, underpinned by epistemological assumptions that treat data as detachable, stable and decontextualisable. Such logics misalign with qualitative inquiry, where narrative meaning is relational, historically situated and co-constructed through interpretation. As a result, conventional governance practices risk enacting epistemic harms—flattening lived experience, distorting participant voice, and prioritising procedural defensibility over interpretive integrity.

Drawing on hermeneutics, feminist epistemology and theories of epistemic injustice, this paper reframes qualitative data as meaning-bearing and relational rather than fragmentary or object-like. It critically examines how CARE, FAIR, the Five Safes and the Belmont Principles offer valuable ethical resources but require reinterpretation to support qualitative epistemologies. In response, the paper develops the Interpretive and Relational Data Stewardship (IRDS) model, a framework grounded in interpretive awareness, relational accountability, epistemic justice and ethical stewardship. Through worked examples, it demonstrates how governance decisions actively reshape meaning and how over-abstraction can reproduce the very harms governance seeks to prevent. The paper argues that qualitative data governance must shift from logics of containment to practices that preserve the conditions under which meaning, dignity and justice can emerge.

### Keywords

qualitative data governance, hermeneutics, epistemic injustice, relational ethics, disclosure control, interpretive epistemology, CARE principles, Five Safes, IRDS model

### Introduction

In an era of open science and research transparency, the management of qualitative data is increasingly subject to formalised governance processes, including disclosure control and data sharing

frameworks. While these developments offer welcome attention to ethical responsibility, they often emerge from paradigms rooted in quantitative logics—designed to address identifiability in numerical datasets through tools such as k-anonymity, suppression, and data minimisation (Lowthian & Ritchie, 2017; SACRO, 2023). When applied to qualitative data, however, these practices can obscure rather than protect. As qualitative data is interpretive, situated, and co-produced, efforts to render it 'safe' by erasing context may diminish its meaning, distort participant voice, and undermine epistemic integrity (Saunders, Kitzinger, & Kitzinger, 2015; Tilley & Woodthorpe, 2011).

Qualitative research is not a process of passive data collection, but a relational, reflexive engagement between researcher and participant. The 'data' in such contexts often includes fieldnotes, narrative excerpts, analytic memos, and shared meaning-making. It is difficult—if not impossible—to separate the act of data generation from interpretation and presentation (Denzin, 2001; Finlay, 2002). The same sentence may carry layers of ethical, cultural, and narrative significance. Yet many disclosure frameworks treat qualitative excerpts as if they were akin to cells in a table—objects to be stripped of direct identifiers, rendered context-free, and assessed through risk-centric, procedural checklists.

Attempts to sanitise “data” from identifiability can result in loss of meaning and utility of the data, Tilley and Woodthorpe (2011) argue, anonymisation is never a neutral act; it is a representational intervention shaped by power. Brown et al. (2024) further demonstrate how apparently neutral redaction practices can systematically disadvantage already marginalised populations. In contexts involving Indigenous, neurodiverse, or otherwise minoritised communities, such interventions risk becoming a second layer of silencing, enacted under the guise of protection (Kendal, 2023).

This paper is grounded in a Gadamerian hermeneutic approach, which understands interpretation as a historically situated, dialogical process in which meaning emerges through a “fusion of horizons” (Gadamer, 1975). It draws on broader philosophical insights into qualitative inquiry that emphasise its relational, situated and co-constructed nature (Haraway, 1988; Harding, 1992; Smith, Flowers and Larkin, 2009). From this perspective, qualitative data is never a neutral substrate but the outcome of encounters shaped by context, positionality and power. Governance structures—through their rules, thresholds and review practices—therefore do not stand outside the enquiry but operate as interpretive actors in their own right, shaping how narratives are produced, constrained and ultimately understood (Tilley and Woodthorpe, 2011; Fricker, 2007).

These dynamics show that governance is never merely technical but also epistemological and political: decisions about what can be shared, in what form, and by whom are decisions about whose knowledge is recognised as legitimate. Governance failures therefore arise not from negligence but from an epistemological misalignment. When qualitative material is treated as though it were quantitative, meaning becomes destabilised—redaction and generalisation fragment narratives and remove the relational and contextual textures essential for interpretation. At the same time, such practices risk producing epistemic injustice: forms of harm in which people’s accounts are distorted, devalued, or rendered unintelligible because the governance system lacks the conceptual resources to understand them (Fricker, 2007).

The paper proceeds as follows. The literature review outlines key philosophical and epistemological principles underpinning qualitative inquiry, establishing why interpretive and situated knowledge

resist decontextualisation. It then examines the limitations of quantitative-style disclosure control when applied to narrative material, before offering a consolidated overview of existing qualitative governance approaches that highlights both progress and persistent gaps. A worked example demonstrates, in concrete terms, how governance decisions reshape meaning and risk enacting epistemic injustice. Building on this, the paper proposes a new framework—the Interpretive and Relational Data Stewardship (IRDS) as a hermeneutic reorientation of existing models including the Five Safes (Ritchie, 2017), the FAIR and CARE principles (Carroll et al., 2020; Wilkinson et al., 2016), and the Belmont Report’s foundational ethical principles of respect, beneficence, and justice (DHHS, 1979).

## Literature review

### Interpretation, situatedness and the epistemic nature of qualitative data

Qualitative research is grounded in interpretation rather than extraction. Meaning is not simply uncovered in qualitative data; it is produced through a relationship between the researcher, the participant, and the context in which the encounter takes place. Fieldnotes, coding memos, interview transcripts, and narrative reconstructions are not inert recordings of reality; they are interpretive artefacts shaped by perception, language, memory, and theoretical commitment (Denzin, 2001). Gadamer’s (1975) concept of the fusion of horizons provides a powerful lens for understanding this process. For Gadamer, understanding is not the discovery of an objective truth that exists independently of the interpreter, but an unfolding dialogue between historically and culturally situated perspectives. These perspectives, or “horizons,” are shaped by language, tradition, experience and temporality, and it is through their movement and interaction that new meaning becomes possible. Knowledge emerges in the space where these perspectives meet. The boundary between data, analysis and self is blurred: researchers are not passive instruments of collection but co-constructors of meaning, bringing their histories, values and epistemic frameworks into the interpretive process.

Smith, Flowers and Larkin’s (2009) concept of the double hermeneutic shows that qualitative meaning is already twice interpreted: participants make sense of their experiences, and researchers interpret that sense-making. Methods such as Interpretative Phenomenological Analysis explicitly acknowledge this layered, embodied and context-dependent nature of qualitative data. Feminist epistemologists similarly reject any “view from nowhere,” arguing that all knowledge is situated and requires reflexive engagement (Haraway, 1988; Harding, 1992).

Fricker’s (2007) account of epistemic injustice further clarifies the stakes of such misalignment. She distinguishes between testimonial injustice, where a person’s account is given less credibility due to prejudice, and hermeneutical injustice, where individuals are harmed because the interpretive resources needed to make sense of their experiences are absent or undervalued. In the context of qualitative governance, both forms can arise when narrative detail is sanitised or dismissed as “too sensitive,” “too specific,” or “unnecessary.” Such decisions may reflect not genuine disclosure risk but a lack of institutional capacity to understand the significance of certain experiences—particularly those voiced by marginalised groups. In this way, governance practices risk reproducing the very

silencing that qualitative research often seeks to redress, undermining participants' epistemic agency and the narrative integrity of their accounts.

Haraway's (1988) concept of "situated knowledge" highlights that objectivity stems not from decontextualisation but from accountable positioning. Context—cultural, political, relational—carries the very meaning that qualitative narratives express. Removing contextual markers in the name of safety may unintentionally compromise agency and interpretive integrity. As Tilley and Woodthorpe (2011) note, anonymisation is inherently representational: it reshapes narratives in line with institutional comfort rather than participant experience.

Together, these insights show that qualitative data cannot be governed as if it were stable, divisible or context-independent. Its interpretive and relational dimensions are not peripheral—they are constitutive. Governance that ignores this risks misrepresentation, analytic distortion and epistemic injustice. Qualitative governance must therefore be approached as an ethical, interpretive practice aimed at protecting the conditions under which understanding becomes possible, not merely a technical exercise in disclosure control.

### **The epistemological limits of quantitative governance for qualitative data**

Quantitative governance rests on assumptions of divisibility, stability and measurable risk, treating data as variables that can be suppressed, aggregated or perturbed without altering meaning (Lowthian & Ritchie, 2017; Pascale et al., 2020). When applied to qualitative material, these assumptions unravel because qualitative data is interpretive, situated and embedded in power relations. Statistical disclosure control (SDC) assumes that risk resides in identifiable variables, that context can be stripped away without analytic consequence, and that safety can be engineered through technical manipulation. Such assumptions fit structured, tabular datasets, but they are fundamentally misaligned with qualitative epistemology (Clark, 2006; van den Hoonaard, 2003).

Qualitative meaning is produced through narrative structure, relational positioning, affective tone and socio-historical context. Identifiability may emerge not through explicit identifiers but through the interplay of contextual and relational detail (Tilley & Woodthorpe, 2011; Kaiser, 2009; Saunders, Kitzinger & Kitzinger, 2015). Conventional de-identification can therefore be both insufficient for safety and destructive to meaning. Antes et al. (2018) found that guidance for qualitative material remains highly inconsistent across international repositories, with few providing strategies for managing indirect identifiers, contextual risk or narrative recognisability. A phrase that appears benign to outsiders may be highly identifying within a specific cultural or community context (Myers et al., 2020). Universal thresholds cannot capture such shifting, situated dynamics.

Myers et al. (2020) further show that qualitative de-identification requires continuous interpretive judgement, not mechanical redaction; their protocol relied on anonymisation logs, iterative decision-making and team debates about what counts as identification. Similar findings appear in Hammersley and Traianou (2012), who note that ethical decisions in qualitative work are always context-sensitive and cannot be reduced to technical rules.

These misalignments also produce epistemic harms. In output checking, testimonial injustice arises when narratives are diluted or removed not because participants express concern, but because institutional caution overrides participant intent (Fricker, 2007; Saunders et al., 2015). Some

participants actively seek identification as a form of recognition or political testimony; suppressing this agency constitutes epistemic harm. Myers et al. (2020) likewise show that excessive de-identification can obscure meaning and weaken analytic clarity. Qualitative anonymisation is always representational rather than neutral (Tilley & Woodthorpe, 2011; Tilley, 2014).

Hermeneutical injustice occurs when reviewers—often trained in quantitative risk logics—lack the interpretive resources to understand metaphor, affect or culturally embedded meaning. Material is sometimes labelled “risky” not because it is identifiable, but because it exceeds the epistemic assumptions of a quantitative governance system. Antes et al. (2018) note that qualitative decisions often fall to repository curators without qualitative expertise, centralising interpretive authority in institutional hands rather than with researchers familiar with context.

In these moments, anonymisation becomes a representational intervention, reshaping narratives and potentially erasing nuance, agency and lived meaning (Tilley & Woodthorpe, 2011). The CARE Principles (Carroll et al., 2020) challenge such extractive governance by emphasising relational accountability, contextual ethics and collective authority—an orientation far more aligned with qualitative epistemology than rigid anonymisation norms. Viewed through this lens, the central risk in qualitative governance is not identification but epistemic erasure.

Where quantitative data can often be altered without affecting analytic value, qualitative narratives cannot. Meaning inheres in relationships between details; removing a place, illness or relational tie may reduce identifiability but simultaneously collapse interpretive coherence. Meaning and identifiability are entangled. The features that heighten identifiability—specificity, recognisability, relationality—are the very features that make qualitative narratives ethically and analytically indispensable. Governance that treats meaning as liability risks hollowing out qualitative inquiry; governance that treats meaning as something to be protected preserves dignity, agency and analytic integrity.

### **Existing approaches to qualitative data governance**

Although qualitative data has long been recognised as epistemically distinctive, formal governance infrastructures have been slow to adapt. Existing approaches—from the Qualitative Data Repository (QDR) in the United States, to the UK Data Archive (UKDA), to broader international standards produced by CESSDA and the U.S. Census Bureau—represent important advances, yet they remain constrained by procedural logics and assumptions inherited from quantitative traditions.

These approaches are not misguided; each contains genuine ethical insight. However, when they operate without an interpretive foundation, they risk reproducing the very epistemic harms that qualitative research seeks to uncover. This section examines the contributions and limitations of existing models as a means of setting the stage for the more philosophically grounded transformations proposed later in the paper.

### **The qualitative data repository (QDR): Contextual, case-based sensitivity**

The QDR explicitly recognises that qualitative data cannot be governed through universalised rules. Its guidance advocates:

- case-by-case assessment of disclosure risk,
- reflexive judgment by those familiar with the field,

- preservation of narrative coherence, and
- attention to deductive disclosure, not just direct identifiers.

QDR's strength lies in its epistemic humility: it acknowledges that meaning is inseparable from context and that de-identification requires interpretive skill. Its guidance emphasises that removing contextual detail is not epistemically neutral, but a modification that must be justified (QDR, n.d.).

Yet QDR's model depends heavily on researcher discretion and interpretive competence. While this aligns with hermeneutic principles, it also reveals a fragility: repositories often lack the resources to support intensive, dialogical review. Moreover, QDR's recommendations are not universally adopted across institutional infrastructures, which continue to privilege procedural consistency over interpretive adequacy.

#### **UK data archive (UKDA): Procedural control with minimal textual alteration**

The UKDA framework combines limited textual modification with procedural safeguards such as:

- restricted access,
- data use agreements,
- secure settings
- user training and certification

This approach acknowledges that textual redaction alone cannot fully protect qualitative participants, especially those embedded in small or vulnerable communities. By shifting protective emphasis toward access control, the UKDA avoids some of the pitfalls of heavy-handed anonymisation.

However, the framework still assumes that qualitative meaning can be disentangled from context and that narrative segments can be “cleaned” to meet quantitative-inspired disclosure thresholds. It retains an implicit belief in separability: that identifiable features can be removed without altering the ontological status of the narrative. From a hermeneutic perspective, this underestimates the interpretive nature of qualitative meaning and the extent to which access restrictions can compensate for representational distortions introduced by redaction.

#### **CESSDA and international guidelines: Structured, technocratic adaptations**

CESSDA's Expert Guide on qualitative data offers pragmatic advice:

- pseudonymisation,
- relocation of settings,
- removal or alteration of names,
- aggregation of contextual details.

These strategies help mitigate direct identification but rely on a modular view of qualitative data as a set of separable components—an assumption that hermeneutics directly challenges. The result is a tension: CESSDA recognises qualitative complexity, yet offers solutions grounded in a logic of modular control rather than relational interpretation.

Moreover, CESSDA guidance often remains oriented toward data sharing, not meaning preservation. It prioritises repository usability and compliance over the epistemic demands of narrative research.

### **The U.S. census bureau: Applying statistical disclosure control to qualitative data**

The Census Bureau's efforts to adapt disclosure control methods for qualitative research (Pascale et al., 2020; Pascale et al., 2022) represent one of the most technically detailed engagements with the problem. Their guidance recognises:

- ambiguities in identifiability,
- the need for iterative reviewer judgment,
- and the challenge of harmonising safety with analytic relevance.

Their protocol introduces anonymisation logs, team-based review, and reflexive discussion—features that resonate strongly with the interpretive commitments of qualitative epistemology.

Yet the underlying orientation remains technocratic. Identifiability is treated as an attribute of text, rather than a relational property emerging from social networks and contextual knowledge. Output checkers are trained to treat “narrative detail” as a potential risk rather than a potential site of meaning. As a result, the protocols risk steering reviewers towards textual sanitisation even as they acknowledge its limits.

### **The epistemological blind spot**

Anonymisation is always representational, not neutral (Tilley & Woodthorpe, 2011; Tilley, 2016). Decisions about redaction, paraphrasing or omission inevitably reshape the narrative, performing a form of authorship that determines what is preserved, softened or erased (Clark, 2006; van den Hoonaard, 2003). Such interventions can generate representational harms; narrative flattening, structural sanitisation and loss of affect—that compromise both analytic and ethical integrity (Kaiser, 2009; Hammersley & Traianou, 2012). These harms arise not from procedural failure but from epistemological misalignment: checklist-based guidance and SDC-style rules presuppose that meaning is separable from context, and that safety can be achieved through the removal of discrete “identifiers” (Pascale et al., 2020; Antes et al., 2018). Yet as qualitative scholars repeatedly emphasise, meaning in narrative data is produced relationally, affectively and contextually (Haraway, 1988; Smith, Flowers & Larkin, 2009).

This tension exposes the limitations of current governance guidance, which often relies on stepwise, quantitative-derived checklists (e.g., “remove names,” “generalise places,” “strip sensitive detail”) that cannot account for relational risk, cultural specificity or the interpretive function of narrative detail (Myers et al., 2020; CESSDA, 2018). Applied mechanically, such guidance risks enacting precisely the testimonial and hermeneutical injustices Fricker (2007) warns against—silencing participants through oversanitisation or misinterpreting their accounts due to insufficient conceptual resources.

Reframing governance through stewardship offers a way forward. Stewardship understands governance as the ethical organisation of meaning rather than the technical containment of data (Carroll et al., 2020; Hammersley & Traianou, 2012). It calls for dialogical decision-making between researchers and reviewers, reflexive documentation of interpretive choices, and institutional humility about the power to reshape narratives (Gadamer, 1975; Harding, 1992). The guiding question shifts from “How do we minimise identifiability?” to “Whose truth is being reshaped, through which assumptions, and to what effect?” (Saunders, Kitzinger & Kitzinger, 2015; Fricker, 2007).

Seen this way, output checking becomes a hermeneutic juncture—one in which the possibility of epistemic justice or injustice is actively decided. This recognition makes clear why checklist-based models are insufficient and directly motivates the need for governance frameworks grounded in interpretation, relational accountability and ethical stewardship. It is this conceptual shift that the subsequent section develops, outlining models capable of supporting a more context-sensitive and meaning-preserving approach to qualitative data governance.

## **Toward IRDS: Rethinking CARE, FAIR, the Five Safes and Belmont**

Meaningful governance of qualitative data requires an epistemological shift rather than procedural refinement. Existing frameworks—CARE, FAIR, the Five Safes, and the Belmont Report—offer important ethical resources, yet their potential is limited when interpreted through quantitative assumptions of neutrality, separability and decontextualised risk (van den Hoonaard, 2003; Clark, 2006; Pascale et al., 2020). A hermeneutic perspective instead foregrounds foundational questions: what qualitative data *is*, how meaning emerges through relational and situated interpretation, and what it means to protect narratives whose ethical and analytic value lies in their specificity (Gadamer, 1975; Haraway, 1988). This reorientation shifts governance from control to stewardship, from anonymity as default to relational ethics (Carroll et al., 2020), and from rule-following to epistemic responsibility grounded in attention to justice and context (Fricker, 2007; Hammersley & Traianou, 2012). The following section briefly outlines each framework before demonstrating how the IRDS model integrates and reinterprets them for qualitative research.

### **CARE principles: From collective rights to relational ontology**

The CARE Principles—Collective benefit, Authority to control, Responsibility, Ethics (Carroll et al., 2020)—were developed for Indigenous data sovereignty, yet they articulate an ontological insight with far wider relevance: data is not merely an artefact but a relational extension of people and communities.

This challenges three assumptions underlying quantitative governance:

1. Data as detachable: CARE rejects the idea that information can be separated from the relationships that constitute it. In qualitative research, this maps onto the hermeneutic claim that meaning is inseparable from context.
2. Data as a neutral object: CARE insists that data is always situated within histories of power. Qualitative governance must therefore attend to how redaction, sanitisation or abstraction can reproduce colonial, gendered, or institutional harms.
3. Data as individually owned: CARE positions data as collectively embedded. This helps us understand why relational risk—in small communities, activist networks, or tightly bound social groups—cannot be captured through quantitative thresholds.

By reframing data as relational, the CARE principles help reorient governance towards accountability—not only to participants, but to the communities, histories and power structures that shape the lifeworlds being represented.

### **FAIR principles: A hermeneutic interpretation of findability and reusability**

At first glance, FAIR seems irreducibly technical: Findable, Accessible, Interoperable, Reusable (Wilkinson et al., 2016). Yet the philosophical core of FAIR lies in transparency, which aligns closely with hermeneutic commitments. When reinterpreted through a qualitative lens:

- Findability becomes the traceability of meaning: how contextual and interpretive pathways remain visible to future readers.
- Accessibility becomes epistemic openness: not free availability, but clarity of interpretive framing.
- Interoperability becomes hermeneutic compatibility: not standardisation, but the ability to understand narratives across horizons.
- Reusability becomes interpretive integrity: ensuring that future users can understand the narrative without distortion.

Seen this way, FAIR is not a demand for data extraction but for methodological transparency, supporting the hermeneutic requirement that understanding be grounded in clear articulation of context, positionality, and interpretive choices.

### **The Five Safes: A detachment from technical minimalism**

The Five Safes framework (Safe People, Safe Projects, Safe Settings, Safe Data, Safe Outputs) is widely used within administrative and statistical data environments (Ritchie, 2017). While deeply valuable in those contexts, its quantitative assumptions require adaptation for qualitative governance (Green & Ritchie, 2023; Ritchie, 2022).

When interpreted hermeneutically:

- Safe Projects ask whether research is ethically meaningful, not merely procedurally compliant.
- Safe People foreground epistemic competence: do reviewers possess the interpretive resources needed to recognise meaning and risk?
- Safe Settings become relational spaces where understanding can occur without harm.
- Safe Data shifts from “data sanitised to neutrality” to “data stewarded with interpretive responsibility.”
- Safe Outputs require attention to justice, context, and narrative integrity—not just identifiability.

Rather than functioning as a purely operational model, the Five Safes can be reimagined as an ethical infrastructure that treats interpretation as a key site of risk, responsibility, and care (Ritchie, 2022; Green & Ritchie, 2023).

### **The Belmont Principles: Respect, beneficence and justice revisited**

The Belmont Report (DHHS, 1979) remains foundational to research ethics, but its principles—Respect for Persons, Beneficence, and Justice—were conceived largely with biomedical and experimental research in mind. Within qualitative inquiry, each principle requires reinterpretation through the lens of meaning-making and representation:

- Respect demands recognition of participants as epistemic agents, not data sources. It requires honouring the meaning they ascribe to events, including their desires regarding anonymity or testimony.

- Beneficence extends beyond avoiding harm to include preserving the conditions under which understanding can emerge. Redaction that empties a narrative of meaning may violate beneficence by producing epistemic harm.
- Justice requires attention to the structural dimensions of representation. When governance procedures silence or dilute accounts of institutional harm, they reproduce injustice under the guise of protection.

When viewed through an interpretive lens, Belmont does not disappear—it deepens. It demands that qualitative governance attend not only to physical or psychological risk, but to the politics of representation, voice, and meaning (DHHS, 1979; Fricker, 2007).

### **From frameworks to philosophy: The need for hermeneutic integration**

Each framework—CARE, FAIR, Five Safes, Belmont—offers valuable ethical commitments. Yet each lacks an explicit epistemological foundation capable of addressing qualitative meaning. They remain fragmented, partly incompatible, and vulnerable to reductive interpretations.

A hermeneutic integration achieves three things:

1. It restores the narrative as the site of ethical value. The narrative is not a risk-object but a meaning-bearing expression of lived experience.
2. It positions governance as interpretive stewardship. Reviewers become co-interpreters responsible for maintaining epistemic fidelity.
3. It clarifies that disclosure control is not merely protection but representation. Every redaction is an interpretive act. Every generalisation is a philosophical choice. Governance therefore becomes a moral practice rather than a technical one.

These insights motivate the need for a coherent model—one that explicitly centres interpretation, relationality, stewardship and epistemic justice. This is the foundation upon which the Interpretive and Relational Data Stewardship (IRDS) framework is built.

### **The Interpretive and Relational Data Stewardship (IRDS) framework**

The Interpretive and Relational Data Stewardship (IRDS) model (Figure 1) draws on hermeneutics (Gadamer, 1975), feminist epistemology (Haraway, 1988; Fricker, 2007) and contemporary governance practice to provide a meaning-preserving alternative to checklist-based approaches. Rather than a technical protocol or abstract ethic, IRDS offers a structured way of organising judgement, accountability and meaning across qualitative data infrastructures. It reinterprets existing frameworks—CARE, FAIR, the Five Safes and the Belmont Principles—through an interpretive lens to protect not only privacy but narrative coherence, dignity and epistemic justice.

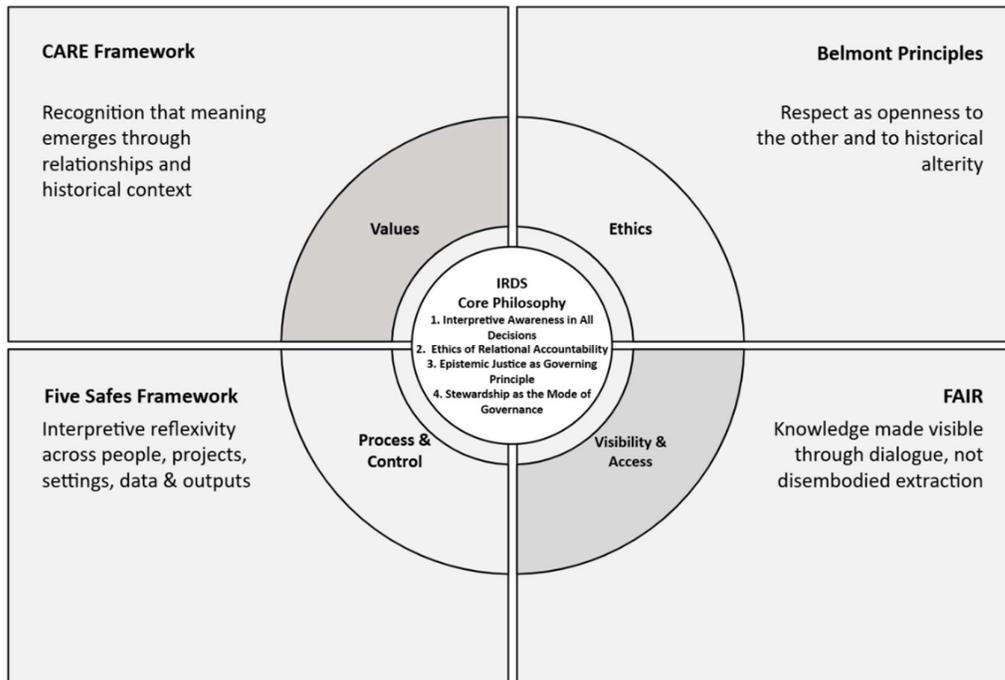


Figure 1 The Interpretive and Relational Data Stewardship (IRDS) a hermeneutic re-orientation of existing data governance frameworks for qualitative research.

IRDS rests on four commitments—Interpretation, Relational Accountability, Epistemic Justice and Stewardship—which underpin four operational dimensions: Values, Visibility & Access, Process & Control, and Ethics. Together, these shift governance from containment to stewardship; from neutrality to situated understanding; and from rule-following to dialogue. The four commitments are outlined:

1. Interpretive Awareness: Qualitative data never exists outside interpretation. Every act of transcription, coding or anonymisation is an interpretive intervention (Gadamer, 1975). Governance therefore participates in meaning-making rather than merely regulating it. Seemingly minor changes—such as removing metaphors—reshape affect, nuance and narrative resonance. IRDS requires that such transformations be recognised, justified and ethically scrutinised.
2. Relational Accountability: Governance is fundamentally relational. In line with CARE’s emphasis on contextual ethics (Carroll et al., 2020), IRDS treats disclosure as a shared responsibility among participants, researchers, reviewers and institutions. This entails understanding narratives in context, articulating the interpretive stakes of excerpts, and using layered access-preserving detail in secure environments while offering context-sensitive summaries for wider release.
3. Epistemic Justice: IRDS places epistemic justice (Fricker, 2007) at the centre of governance. Testimonial injustice occurs when narratives are diluted “for protection” despite participant intent; hermeneutical injustice arises when institutions lack the interpretive resources to recognise meaning, particularly in accounts of harm or inequality. IRDS therefore asks: What

meanings risk erasure? Whose epistemic agency is diminished? Does redaction reproduce structural injustice? Its ethical focus shifts from anonymity to meaning and narrative dignity.

4. Stewardship: Stewardship reframes governance as preserving interpretive integrity across time and contexts. It reflects hermeneutic openness (Gadamer, 1975), embodied relational knowledge (Merleau-Ponty, 1962) and a beneficence focused on enabling understanding (DHHS, 1979). Stewardship entails reflexive documentation, dialogical decision-making and institutional humility, alongside protective measures such as controlled access or composite reconstruction without unnecessary flattening.

IRDS operationalises its commitments through four dimensions that reinterpret existing frameworks:

<b>IRDS Dimension</b>	<b>Hermeneutic Framing</b>	<b>Mapped Frameworks</b>	<b>Core Practical Questions</b>
<b>Values</b>	What meanings matter? What relational obligations exist?	CARE	What interpretive value does this narrative carry?
<b>Visibility &amp; Access</b>	How should the narrative appear? To whom? In what form?	FAIR	What level of visibility preserves meaning while managing risk?
<b>Process &amp; Control</b>	How is interpretive judgment made transparent?	The Five Safes	What reasoning supports this redaction, retention, or generalisation?
<b>Ethics</b>	How do we avoid epistemic injustice and narrative erasure?	Belmont Principles	Does this choice honour dignity, agency, and justice?

These dimensions transform governance from a rule-bound procedure into an interpretive practice, without abandoning structure or accountability.

### **Output checking through the Interpretive and Relational Data Stewardship (IRDS) model**

For data services, the central task is distinguishing necessary redaction from excessive precaution-mitigating harm without muting meaning. The following examples illustrate these grey zones, where disclosure risk is ambiguous, interpretive integrity is contested and ethical stewardship requires judgment rather than rule-following. They are not prescriptive templates but prompts to reconsider qualitative risk, authorship and accountability. Under IRDS, output checking becomes a site of negotiated interpretation structured around four governance dimensions—Values, Visibility & Access, Process & Control and Ethics—showing how qualitative meaning is actively shaped by the choices and assumptions of those charged with safeguarding it.

#### **Example 1: A case of simple identification?**

Fictional qualitative transcript excerpt:

“When I first got to HMP Westland, Governor Hill personally told me I’d never get parole. That was in March 2022.”

Under conventional disclosure logic, this excerpt would likely be rejected: it contains a named institution, an identifiable individual, and a precise date. Within the IRDS framework, however, the starting point is not the removal of identifiers but an examination of what this sentence is doing in the narrative, how it generates meaning, and what would be lost if it were abstracted.

This excerpt is not merely descriptive. It is performative: a moment in which institutional authority is enacted, futurity is denied, and power is made visible through language. The specificity of actor, place, and time is part of the mechanism of domination being narrated.

Values (Interpretive and relational significance): The value of this excerpt lies in how it reveals the lived experience of institutional power—fear, humiliation and the internalisation of authority. Removing names and dates may reduce identifiability but risks flattening the narrative into a generic account of imprisonment. Under IRDS, value is assessed not only in terms of legal risk but epistemic worth: what human, social or political truth the excerpt conveys, and who benefits if it is softened or removed.

Editing the passage to “When I first arrived at a prison, a senior member of staff told me I wouldn’t be eligible for early release” radically alters its meaning. The encounter becomes procedural rather than personal; power becomes diffuse; the voice of authority disappears. What is lost is precisely what makes the account socially, ethically and politically significant.

Visibility & Access (Who sees what, and in what form?): IRDS reframes visibility not as a binary publish/withhold decision but as a graduated, interpretive judgment. Key questions include: Should the institution be generalised while retaining the region? Can the individual be anonymised but the role preserved (“the governor”)? Is the date essential, or can it be widened (“early 2022”) without distorting meaning?

Instead of stripping the excerpt to neutrality, IRDS supports layered visibility: a context-preserving, partially generalised version for publication and a metadata note explaining modifications. The aim is neither full exposure nor full concealment, but calibrated disclosure that preserves meaning while managing risk contextually rather than mechanically.

Process & Control (How is the decision made?): Under IRDS, the output checker is an interpretive actor, not a neutral technician. Their task is to engage the researcher in focused dialogue:

- What does this sentence contribute analytically?
- Would altering it change the truth you are trying to convey?
- Are there safer alternatives that still preserve relational meaning?
- Would controlled access be better than redaction?

Decisions must be documented, not assumed. IRDS requires brief records explaining:

- Why specificity was retained or reduced
- What meanings were prioritised
- What risks were accepted—and on what rationale

Process therefore becomes a transparent act of interpretive stewardship rather than checklist compliance.

Ethics (from identity protection to meaning protection): Ethically, the issue is not only identifiability but whether the speaker's experience can remain intact. Sanitising language may protect identity but distort moral and emotional truth, producing a second form of silencing through governance.

IRDS reframes the core ethical questions:

- What needs protection here—anonymity, or the integrity of lived meaning?
- Whose truth risks being disfigured by redaction?
- Who benefits from softening this account?

Drawing on Fricker's (2007) concept of epistemic injustice, IRDS recognises that over-redaction diminishes a participant's status as a knower. The imperative is therefore to protect interpretive integrity—ensuring the story remains recognisable as itself, even when adapted to manage risk.

### **Example 2: Indirect identification of person and sensitive characteristics**

Fictional composite qualitative output:

“Social services said my mother was emotionally unavailable. I was 5. No one asked me why I spent nights outside or why my uncle's friends kept giving me money. Then I got moved, again. Fourth placement. At 15, I was arrested carrying passports.”

This excerpt is not a direct quotation but a narrative synthesis constructed from fragmented case notes, social work reports, and institutional records. It represents what the system documented, failed to document, and actively misinterpreted. The language is carefully chosen by the researcher to capture an experience that was never fully voiced by the participant themselves.

Under conventional governance logic, such a composite would be immediately questioned: Is it too specific? Is it misleading? Does it imply unverified abuse? Does it allow indirect identification? Yet in IRDS, the purpose is not to collapse complexity into safety but to examine the ethical, epistemic, and interpretive work the narrative is doing.

Values (Interpretive, social, and epistemic significance): The value of this excerpt lies in what it reveals about institutional failure, systemic misrecognition, and the long shadow of neglected childhood trauma. The narrative traces a trajectory from emotional abandonment to displacement, to criminalisation. It shows how structural violence is sedimented in fragmented records and normalised through bureaucratic language. In IRDS terms, the key value here is not simply descriptive — it is critical and interpretive. This is not a list of events; it is an indictment of silences, of absent questions, of a child whose experiences were never recognised as meaningful. To sanitise this account by removing phrases such as “my uncle's friends kept giving me money” would be to erase the subtle, disturbing implication of exploitation that the records themselves failed to name. From a values perspective, IRDS therefore asks:

- What form of truth is this narrative trying to surface?
- What histories of silencing does it resist?
- Whose realities are endangered if this is made more presentable?

If transformed into a procedural version such as: “Social services recorded concerns relating to neglect. Multiple placements followed. At 15, the individual was arrested for involvement in illegal activity.” the meaning becomes institutional rather than lived. The pain is translated into administrative language. The child disappears; only “the individual” remains. Under IRDS, value is inseparable from voice, implication, and discomfort. These are not grounds for removal; they are indicators of importance.

Visibility & Access (managing exposure without erasure): Narrative is sensitive not only because it risks identification, but because it risks harm to the very person it is trying to honour. This does not mean it should disappear. It means its visibility must be carefully shaped. Visibility & Access questions could include:

- Which details are essential to preserve narrative coherence?
- Can life events be slightly generalised without breaking the story?
- Should there be layered access—one version public, one restricted?
- Does the composite nature need explicit acknowledgement to avoid misreading?

Under IRDS, the sentence “Fourth placement. At 15, I was arrested carrying passports” might be recalibrated to “After multiple placements, I was arrested as a teenager for an offence linked to organised exploitation.” Here, recognisability is reduced, but meaning is preserved. The storyline remains intact. The harm is named. The systems failure remains visible. Visibility is therefore not about hiding, but about ethically staging the narrative’s appearance—allowing it to speak without unnecessarily exposing the individual.

Process & Control (negotiating interpretation, not enforcing deletion): Traditional output checking would likely reject this passage due to indirect identifiers, vulnerable content, and third-party implication. Under IRDS, the process is deliberately different. The checker, instead of marking “Remove / Unsafe” engages in a reflective exchange:

- This is clearly a composite—is that made sufficiently explicit?
- What risks of re-identification remain, and are they contextual or local?
- Which phrases serve symbolic meaning, and which could shift without loss to the researcher?

Is the phrase “carrying passports” essential, or could the nature of exploitation be stated more abstractly? Rather than applying a predetermined threshold, the reviewer and researcher work together to negotiate meaning, risk, and responsibility. The key point is that the decision is not reduced to a binary (pass/fail), but documented as a reasoned, interpretive judgement linked to the four governance dimensions.

Ethics (protecting meaning, not merely identity): The greatest ethical risk in this example is not that a specific person may be identified. It is that their life is again flattened into a system-friendly narrative of neglect and delinquency. If the story is stripped down to avoid discomfort, then the governance system repeats the very violence it claims to prevent: the removal of complexity, the silencing of implication, the erasure of lived reality.

This is where Fricker’s concept of hermeneutical injustice is most visible. The individual did not have a framework available to name what was happening to them. Years later, the risk is that the governance system will again refuse language to that experience. IRDS therefore reframes the ethical obligation:

- Ethical governance does not simply prevent harm — it prevents erasure.
- It does not merely anonymise — it dignifies.
- It does not only protect bodies — it protects meaning.

The central question becomes:

- Does this version allow the experience to remain intelligible, situated, and honoured — even in the face of risk? If the answer is yes, and the risks have been thoughtfully managed, then the narrative has been ethically stewarded rather than suppressed.

These examples make visible what the diagram indicates in abstraction: governance is not the management of data as an object, but the ethical organisation of meaning as a relational and interpretive practice. Each act of redaction, disclosure, or release constitutes a small fusion of horizons, in which institutional priorities meet individual stories, and where the possibility of epistemic justice or injustice is decided.

By placing interpretation at the centre and shifting from containment to stewardship, the IRDS model reframes output checking as a site of responsibility rather than restriction. What must be protected, finally, is not simply identity, but interpretive integrity: the fragile, contested, and necessary capacity for qualitative data to speak truthfully to human experience.

### **Conclusion: Towards qualitative data governance**

The central claim of this paper is that qualitative governance cannot succeed if it is framed as the containment of data rather than the stewardship of meaning. In qualitative research, what is at stake is not only the management of identifiable information but the preservation of interpretive integrity, relational nuance and the lived realities expressed through narrative forms (Tilley & Woodthorpe, 2011; Kaiser, 2009). Governance tools imported from quantitative traditions—however rigorous—remain misaligned with these epistemic demands (Clark, 2006; van den Hoonaard, 2003). When applied mechanically, they risk producing epistemic violence through the erosion of context, the flattening of experience and the silencing of already marginalised voices (Fricker, 2007; Hammersley & Traianou, 2012).

Drawing on hermeneutics, feminist epistemology and critical phenomenology, this paper has emphasised that qualitative data is never a neutral artefact awaiting extraction. It is always co-constituted through historically situated encounters, reflexive positioning and interpretive labour (Gadamer, 1975; Haraway, 1988; Smith, Flowers & Larkin, 2009). Governing such material responsibly therefore requires more than procedural safeguards: it requires an ethic attentive to the fragility, relationality and situatedness of meaning. The Interpretive and Relational Data Stewardship (IRDS) model provides such an ethic by grounding governance in four commitments—interpretation, relational accountability, epistemic justice and stewardship.

Importantly, IRDS does not discard existing frameworks—CARE, FAIR, the Five Safes or Belmont. Rather, it draws out their philosophical traction when read through a qualitative lens. CARE becomes a framework for relational and community accountability (Carroll et al., 2020); FAIR becomes a commitment to contextual visibility rather than maximal openness; the Five Safes become scaffolding for interpretive rather than merely technical judgement (Lowthian & Ritchie, 2017); Belmont becomes a basis for protecting not only persons but the integrity of their voices and meanings (DHHS, 1979). Reframed through IRDS, these frameworks operate coherently as components of a broader hermeneutic orientation.

The applied examples in this paper demonstrate how IRDS reshapes practical decision-making. Under IRDS, output checking becomes a dialogical and interpretive process, not an extraction procedure. Reviewers and researchers collaborate to examine what identifiers do within a narrative, which metaphors carry epistemic value, and how meaning can be preserved while managing risk (Myers et

al., 2020; Antes et al., 2018). In this reframing, the output checker is not merely a technician but a steward, expert and guardian of meaning: someone who must exercise contextual judgement, interpretive sensitivity and ethical discernment. IRDS thus broadens checklist-based governance by replacing rule application with transparent reasoning, documented justification and accountable interpretation.

Institutionally, IRDS signals a culture shift:

- from risk aversion to ethical courage;
- from rigid compliance to reflexive accountability;
- from equating safety with erasure to recognising that understanding itself can be protective (Hammersley & Traianou, 2012).

As open science infrastructures expand and pressures for standardisation intensify, qualitative research increasingly confronts governance systems designed around quantifiable, decontextualised data. Yet qualitative inquiry resists such reduction because it reveals the complexities of human lives in ways that cannot be flattened without epistemic loss. The challenge is therefore not to force qualitative research into quantitative moulds but to let governance meet qualitative knowledge on its own terms.

Ultimately, IRDS affirms a simple but profound proposition: protecting qualitative data means protecting the conditions under which human meaning can be truthfully expressed, interpreted and understood. This requires humility, relational sensitivity and interpretive openness. Governance is not merely a boundary placed around research; it is a constitutive part of what research becomes. For this reason, qualitative governance must move beyond the logic of containment toward a model of stewardship—one that safeguards privacy and meaning, protects individuals and their voices, and empowers reviewers not to fear complexity but to engage with it skilfully and ethically.

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## Endnotes

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