

# **UCC Records Management Framework**

## **Guidance on Retention of Research Records and Data**

### **Introduction: Context**

#### **Research Data**

“Research data is diverse in format and can be collected using a wide variety of methodologies. In general, it can be described as information generated, collected or observed during a research project. It is evidence used to support research conclusions and will go on to form part of the scholarly record” (UCC Research Data Service, 2020).

#### **Retention of Research Records and Data**

Retention describes how long research records and data must be retained to meet a variety of requirements, including the following:

- to satisfy researcher current and future needs;
- to fulfil regulatory obligations pertaining to legal, audit, policy, funding body and publisher requirements;
- to meet requirements of research contracts;
- to fulfil the obligations set out in relevant UCC research policies, including UCC’s Code of Research Conduct and Research Data Management Policy;
- for academic assessment and evaluation purposes;
- to meet records management requirements.

#### **UCC Code of Research Conduct**

Section 8.9 of UCC’s Code of Research Conduct states “the University expects data and records to be stored securely for a minimum period of ten years after the completion of a research project, in line with general audit requirements, as well as any additional retention requirements”. A footnote to this statement adds the following: “Outputs from undergraduate research projects and taught post-graduate programmes are generally considered as assessment records for records management purposes and, subject to review by the relevant Programme Director/Supervisor/PI, may be retained for a shorter period”.

## **Scope**

This Guidance document is intended to help programme directors/supervisors/principal investigators and schools in applying retention and disposal actions to outputs of undergraduate research projects and postgraduate research programmes, within the wider context of UCC's Records Management framework.

## **Approval**

The requirements to be applied to outputs of undergraduate research projects and taught postgraduate programmes, as set out in this Guidance document, have been approved by Academic Council on 6 November 2020, on foot of a proposal by the University Ethics Committee, and are supported by UCC's Research Data Management Service, the Vice-President for Research and Innovation, the Research Integrity Office, and the University Archives.

## **Benefits**

Effective records retention and research data management helps ensure

- effective use of the Research Data Management Service in the university,
- efficient and effective use of storage resource for data of long-term value,
- reduced volume of data making it easier to manage and to maintain descriptive metadata
- fewer older records and reduced storage costs for the university,
- better and more consistent records management.

## Guidance

### **1: Retention and Disposal of Research Records and Data (Outputs) of Undergraduate Research Projects and Taught Postgraduate Programmes**

- For records management purposes, all undergraduate research projects and all taught postgraduate programme research records are subject to a retention period of 13 months after the appeal period has expired, and are then liable for the disposal action of review by the relevant Programme Director/Supervisor/Principal Investigator, as set out in the template Records Retention Schedule for Schools and Departments (series code RRS3.1.4 Assessment; see Appendix 1).
- On review, such records may in general be regarded as subject to the same retention and disposal requirements as assessment records (e.g. course work, examination scripts), which are destroyed/deleted at the end of their retention period. This is where these records are created primarily for pedagogical and assessment purposes and not as part of a programme of research in the university. Limited retention may therefore be reasonable, in proportion to their secondary significance as research (See Appendix 1).
- Exceptions under which such records may be retained on review are set out in Section 2, below.
- Schools, departments, supervisors, and any other UCC services or units should apply records management retention and disposal actions to such records in their care, subject to disposal procedures, and to Section 2 Exceptions.

### **2: Exceptions to destruction/deletion on foot of review of Outputs of Undergraduate Research Projects and Taught Postgraduate Programmes**

- Any undergraduate or taught postgraduate research work subject to funder or other legal, contractual, or audit requirements including longer retention must be retained in line with those requirements.
- Where such work is carried out as part of a larger research project, its retention in UCC becomes the responsibility of the Programme Director / Supervisor / Principal Investigator, or equivalent person or UCC unit (once assessment-related processes have concluded). The Programme Director / Supervisor / Principal Investigator must judge whether such work may be destroyed/deleted on review, in line with point 1 above, or must be retained to meet the retention and audit requirements applicable to the wider project (See Appendix 1).
- Notwithstanding Section 1 above, the Programme Director / Supervisor / Principal Investigator may decide and declare that some UG and/or Taught Postgraduate work is of

significant research value, and should be retained, e.g., for reference use by other students. In such cases, the work should be reclassified as part of the research records series in the Schools retention schedule, and retained for at least the minimum period set out (currently 10 years; series RRS3.1.6 Theses, and RRS1.2.20 Research Outputs) (see Appendix 1).

- The Programme Director / Supervisor / Principal Investigator, or school / unit may recommend to students that they place their research outputs in a data repository where they can be maintained long-term. These outputs are outside the scope of records management.
- Research work produced for assessment purposes constitutes personal data and its ongoing retention by students themselves, in situations where they own the intellectual property, is outside the scope of UCC records management. However, the Programme Director / Supervisor / Principal Investigator should inform students of the University's retention / disposal practices for such work.

### **3. Research Data Ownership and Management Responsibilities**

Depending on the context, the researcher and / or supervisor and / or Principal Investigator, is the custodian of the research data and takes primary responsibility for its management, secure storage and retention. The Programme Director / Supervisor / Principal Investigator should ensure researchers under their supervision are aware of their obligations in relation to research participants and the research data collected. UCC owns data generated by research projects conducted under its auspices unless otherwise stipulated by research contracts / funding agreements. Section 8.2 of the UCC Code of Research Conduct requires that researchers working with data have a responsibility to familiarise themselves and comply with the UCC *Research Data Management Policy* and the *General Data Protection Regulation* (the "GDPR"). The GDPR directly imposes obligations on organisations, bodies and individuals involved in data processing. Section 8.3 of the UCC Code of Research Conduct requires that researchers have a responsibility to ensure access to data is as open as possible, as closed as necessary, and where appropriate in line with the FAIR Principles (Findable, Accessible, Interoperable and Re-usable) for data management. Section 8.9 and 8.10 of the UCC Code of Research Conduct sets out the requirements for principal investigators and postgraduate students, who leave the university prior to expiration of the data retention period of a project.

#### **4. Distinguishing research records and data from administrative records**

- For records management purposes, the UCC research retention schedule (series RRS1.2.20) applies a 10 year minimum retention period of 10 years to ‘published papers or work, research data sets, and other records needed to support or validate a research project’s observations, findings or outputs’.
- For funded research, UCC’s Research Office in Finance retains a master file containing contracts, approvals, and financial records (series RRS1.2.19). There is therefore no need, post project, for PIs and researchers to retain such administrative records with those placed in series RRS1.2.20.
- Administrative records relating to employees on a research project may be retained in UCC’s Human Resources department (for full time staff), or in the relevant hiring school or academic unit (local recruitment and hourly occasional staff). There is therefore no need, post-project, for PIs and researchers to retain such administrative records with those placed in series RRS1.2.20.

#### **5. Further Support for Research Records and Data Management**

- The Research retention schedule contains series relating to records managed by Research Support Services and the Technology Transfer Office, which may provide guidance to PIs and researchers whose research involves engagement with these services (e.g. those involved in clinical trials and patient-focused research).
- Research Support Services and the Technology Transfer Office are available to advise on and support research, from the application stage through to commercial exploitation, as applicable.
- UCC’s Research Data Management Service, based in the Boole Library, is available to advise on the management of research data, from project planning (e.g. preparing a Research Data Management Plan) through to the ongoing management of project outputs.
- The University Ethics Committee and its related committees oversee and advise on meeting the ethical requirements for your research.
- IT Services provides digital storage for the management of records of current research, with supporting protocols and processes.
- The Graduate Studies Office in UCC provides an online submission service for post-graduate theses. The Boole Library maintains copies of submitted theses for ongoing reference purposes.
- The University Archives oversees, and advises on records management in UCC.

- A range of policies, some referred to above, may apply to a research project. The above services, and the school or academic unit hosting the research and the programme director / supervisor / principal investigator can advise you on these policies and other requirements and considerations.
- If the research data is for long-term retention, researchers are advised to plan for costs pertaining to secure storage, metadata maintenance and human ethics requirements as early as possible in the research data management planning process. Guidance should be sought from the Research Data Service in UCC and a Data Management Plan Prepared.

## 6. Relevant Policies, Standards and Procedures

UCC Acceptable Usage Policy available at: <https://www.ucc.ie/en/it-policies/policies/au-pol/>

UCC Code of Research Conduct 2018 available at:

<https://www.ucc.ie/en/media/support/academicsecretariat/policies/researchpolicies/ResearchDataManagementPolicy.pdf>

UCC Data Protection Policy available at:

<https://www.ucc.ie/en/ocla/comp/data/dataprotection/>

UCC Intellectual Property Policy available at:

<https://www.ucc.ie/en/media/support/techtransfer/UCCIPPolicy01102019-Word.pdf>

UCC IT Security Policy available at: <https://www.ucc.ie/en/it-policies/policies/security/>

UCC Records Management Policy. Available at:

<https://www.ucc.ie/en/media/support/ocla/universityarchives/documents/RecordsManagementPolicyDocument.pdf>

UCC Research Data Management Policy (2016)

<https://www.ucc.ie/en/media/research/researchatucc/documents/UCCCodeofResearchConductV2.3FINAL281119.pdf>

UCC Research Data Service available at <https://libguides.ucc.ie/researchdataservice>

### Other Useful Resources / References:

CESSDA Data Management Expert Guide <https://www.cessda.eu/Training/Training-Resources/Library/Data-Management-Expert-Guide>

HRB Policy on Management and Sharing of Research Data:

[https://www.hrb.ie/fileadmin/user\\_upload/HRB\\_Policy\\_on\\_sharing\\_of\\_research\\_data.pdf](https://www.hrb.ie/fileadmin/user_upload/HRB_Policy_on_sharing_of_research_data.pdf)

**Appendix 1: UCC Research Data Retention and Disposal Provisions, based on Research Retention Schedule (RRS1) and Schools Retention Schedule Template (SCH)**

<https://www.ucc.ie/en/ocla/archives-and-records/records-management/retention-schedules/>

Record Series Ref	Record	Retention Period	Action	Citation
SCH1.6	Short-term Projects /Dissertations undertaken by taught Undergraduate and Taught Masters' Students for predominantly learning and assessment purposes.	Completion of Study, end of appeal period + 13 months (if it does not need to be held to comply with any other requirements) (e.g. School / Unit policy / Funders etc.).	Supervisor /PI / Programme Director / Head of School or Unit review for archival value.	Destroy safely, unless retained on review [ in the latter case, place in next series below]
SCH1.6 RRS1.2.20	Research projects undertaken as part of a programme of research leading to a degree by research (e.g., MA by research, M.Phil., PhD); such research forming part of a larger project: see below	Minimum of 10 years, or other longer retention requirements (e.g. School / Unit Policy, funders etc.).	A justification for a longer term than 10 years be provided after review by the Researcher / Supervisor / Principal Investigator / programme Director / Head of School / Unit.	Destroy safely after the data retention period has elapsed [unless retained for archival or declared ongoing scientific purposes]

<p>SCH1.6</p> <p>RRS1.2.20</p>	<p>Clinical Trials, Research with long-term impact in a particular field of research; data deemed to be of significant interest to other researchers / members of the public or having archival value; data key to the establishment of property rights such as patents, trademarks of copyright.</p>	<p>10 years minimum, or funder or other requirements, plus review.</p>	<p>Review by principal investigator and relevant stakeholders (e.g., sponsoring school of unit) to determine ongoing scientific and/or archival value. Data Management Plan prepared at the outset.</p>	<p>Retention / Deletion based on Data Management Plan and final review.</p>
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