



NORTHWESTERN
UNIVERSITY

Responsible University Official:
Vice President for Research
Responsible Offices: Office for Sponsored
Research; Office for Research Integrity
Origination Date: December 18, 2012

RESEARCH DATA: OWNERSHIP, RETENTION AND ACCESS

Policy Statement

Individual researchers and the University have rights and responsibilities with respect to research data. This Policy describes the basis of data ownership and the standards for the collection and retention of data, in addition to requirements for data access. This Policy also provides guidance with respect to transfer of research data in the event a researcher leaves Northwestern University.

Reason for Policy/Purpose

This Policy assures that research data are appropriately recorded and archived, and available for review under appropriate circumstances.

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Who Approved This Policy

Vice President for Research

Who Needs to Know This Policy

Faculty, students, other trainees, staff, and all other members of Northwestern University's research community.

Website Address for this Policy

http://www.research.northwestern.edu/policies/documents/research_data.pdf

Contacts

If you have any questions about this policy, you may contact:

1. Executive Director, Office for Sponsored Research – (312) 503-7955, osr-chicago@northwestern.edu (Chicago) or (847) 491-3003, osr-evanston@northwestern.edu (Evanston)
 2. Director, Office for Research Integrity – (312) 503-0054 or nu-ori@northwestern.edu
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Definitions

For the purpose of this Policy, “research data” means all information in whatever form (*e.g.*, both physical and electronic) collected and/or generated in the course of a sponsored research project conducted at the University, under the auspices of the University or with University resources. This includes original and derivatives of research data, including recordings of such data. Examples of research data include, but are not limited to:

- Records necessary for the reconstruction and evaluation of the results of research;
- Data contained in laboratory notebooks;
- Data collected using instrumentation or systems and stored in an electronic format;
- Case report forms and source documentation for human subject research studies.

Pursuant to Northwestern's [Policy on Retention of University Records](#), “Records” include “recorded information of any kind and in any form including writings, drawings, graphs, charts, images, prints, photographs, microfilms, audio and video recordings, data and data compilations, and electronic media, including e-mail.”

This Policy does not address ownership of intellectual property, which is governed by Northwestern's [Patent and Invention Policy](#) and [Copyright Policy](#).

Policy/Procedures

1.0 Ownership and Responsibilities

As a federally funded research institution, the University, in order to meet the requirements of research sponsors, asserts ownership over the research data for projects conducted at the

University, under the auspices of the University or with University resources. Although the University as owner of the research data must meet the requirements of sponsors, good management practice and practical considerations necessitate that the University and researchers act in partnership to fulfill these obligations.

As custodians of research data, Principal Investigators (PIs) and other researchers are stewards of research data. At the same time, no matter how such responsibilities are delegated, the flow of accountability runs from the PI being responsible to the institution for the stewardship of research data, just as the institution is ultimately responsible to the research sponsor.

Research data are to be accessible to members of the University community, external collaborators and others as appropriate (*e.g.*, for patent applications or journal submissions). Where necessary to assure needed and appropriate access (*e.g.*, for research misconduct investigations), the University may take custody of research data in a manner specified by the Vice President for Research.

Northwestern's responsibilities with respect to research data include, but are not limited to:

1. complying with the terms of sponsored project agreements;
2. ensuring the appropriate use of project resources, *e.g.*, animals, human subjects, recombinant DNA, biological agents, radioactive materials, etc.;
3. protecting the rights of researchers, including, but not limited to, their rights to access to data from research in which they participated;
4. securing intellectual property rights;
5. facilitating the investigation of charges, such as research misconduct or conflict of interest;
6. maintaining confidentiality of research data, where appropriate; and
7. complying with applicable state and federal laws and regulations.

The PI's responsibilities with respect to research data include, but are not limited to:

1. ensuring proper management and retention of research data in accordance with this Policy;
2. establishing and maintaining appropriate procedures for the protection of research data and other essential records, particularly for long-term research projects;
3. ensuring compliance with program requirements;
4. maintaining confidentiality of research data, where appropriate; and
5. complying with applicable state and federal laws and regulations.

2.0 Data Retention

Research data must be retained for a minimum of three years after the financial report for the project period has been submitted. In addition, any of the following circumstances may justify longer periods of retention:

1. research data must be kept for as long as may be necessary to protect any intellectual property resulting from the work;
2. if litigation or other dispute resolution, claim, financial management review or audit related to the research project is started before the expiration of the three year period, or commenced after the three year period but the relevant data and records have not been destroyed, the research data and other project records must be retained until all

- litigation/dispute resolution, claims, financial management review or audit findings involving the records have been resolved and final action taken;
3. if any charges regarding the research arise, such as allegations of research misconduct, research data must be retained consistent with the Northwestern University *Policy on Retention of University Records*, or as otherwise instructed by Northwestern's Office for Research Integrity or Office of General Counsel;
 4. if a student is involved, research data must be retained at least until the student's degree is awarded (or the student otherwise leaves Northwestern University) and any resulting papers are published;
 5. when research is funded by an award to or contract with Northwestern that includes specific provision(s) regarding ownership, retention of and access to technical data, the provision(s) of that agreement will supersede this Policy;
 6. research data from human subject research studies must be maintained consistent with the [Human Subjects Protection Program Policy Manual](#) and the *Policy on Retention of University Records*;
 7. if other regulations, federal oversight, sponsor policies or guidelines, journal publication guidelines or other University policies require longer retention, all applicable sources must be reviewed and the research data must be kept for the longest period of time applicable.

Beyond the period of retention specified here, the destruction of research data is at the discretion of the PI. Destruction of research data must follow applicable federal regulations, Northwestern policies on record retention and data disposal, sponsor requirements and other applicable guidelines.

Research data will normally be retained in the unit where they are produced. Please refer to the *Policy on Retention of University Records* for additional guidance on responsibilities related to the retention of research data and records.

3.0 Transfer in the Event a Researcher Leaves Northwestern

When individuals other than the PI involved in research projects at Northwestern leave the University, they may take copies of research data for projects on which they have worked, subject to relevant confidentiality restrictions. Original data, however, must be retained at Northwestern by the PI.

If the PI leaves Northwestern, and a project is to be moved to another institution, ownership of the original data may be transferred from Northwestern to the PI's new institution upon request from the PI subject to: (a) the prior written approval of the Vice President for Research; (b) written agreement from the PI's new institution that guarantees (1) its acceptance of ongoing custodial responsibilities for the data and (2) Northwestern having access to the original data, should such access become necessary for any reason; and (c) relevant confidentiality restrictions, where appropriate.

Forms / Instructions

N/A

Appendices

N/A

Related Information

Northwestern University Policy on Retention of University Records

[Northwestern University Policy for Reviewing Alleged Research Misconduct](#)

Northwestern University Human Subject Protection Program Policy Manual

Northwestern University Patent and Invention Policy

Northwestern University Copyright Policy

[OMB Circular A-110, Sec. 53, Retention and access requirements for records](#)

History/Revision Dates

Origination Date: December 18, 2012

Last Amended Date: NA

Next Review Date: December 2014