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***CIET Policy on security, storage and destruction of records***

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# CIET Policy on security, storage and destruction of records

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## INTRODUCTION

This document covers research project records and financial records. It also directs the reader to CIET policies regarding other types of records.

## 1. RESEARCH PROJECT RECORDS

As a general policy, CIET does not record names, addresses, telephone numbers or other such information that might enable a third party to identify individuals, households or communities that participate in its surveys. Where the research objectives make it necessary to record any such information (for example, to be able to return results of children's blood or saliva sample analyses to their parents) project managers must develop special procedures for protecting privacy and implement them only after clearance from the relevant ethical review panel or panels.

### 1.1 Electronic survey records

#### 1.1.1 *Database creation*

All information related to specific individuals, households or communities in CIET project databases must be coded. The codes must be kept separately and be accessible only to persons designated by the Executive Director as needing them for purposes of data analysis.

When data are entered by hand from paper records to computers the data entry process should take place in a closed, supervised space. Data entry operators should be supervised at all times and not be allowed to take away any notes or copies of the data. Once data entry is finished, all data must be deleted from any computers that are not under CIET's direct and permanent control.

Final, cleaned databases should receive a unique code name and be backed-up immediately on a different computer from the one being backed-up . A backup copy should be sent in a secure fashion to the Executive Director. Only the Executive Director may authorise sharing of project databases with any third party.

#### 1.1.2 *Database preservation*

A secure library of all project databases is maintained by the Executive Director. Field offices with the requisite external security also maintain copies of databases relevant to their work. These libraries are kept in lockable drawers. Codes for identifying and recovering these databases must be kept separately from the databases themselves. When there is danger of data obsolescence due to changes in hardware or software the databases should be converted to a more recent format and backed up in that format as well.

### **1.1.3 Hardware**

CIET data may be kept only on closed-terminal computers and not on any computer connected to a LAN. As CIET researchers work frequently with portable laptop computers, there is need for special care to keep their computers and any data-containing peripherals in their possession at all times, backed up, protected against viruses and other malware and password-protected.

## **1.2. Paper survey records**

Currently there are two main types of paper records of surveys: Bhopal books and paper questionnaires (most, but not all, in a scannable format).

### **1.2.1. Security of paper documents in the field**

Bhopal books and questionnaires, once completed and before they reach the place where their contents are to be recorded electronically, should be kept in the possession of field supervisors whose responsibility it is to:

- a) assure that field workers do not share the documents' contents in any way with unauthorized persons,
- b) keep completed questionnaires in their possession at all times.

In cases requiring the transport of the completed documents by public conveyances (road, rail or air) to a central place for electronic recording, the documents should be carefully wrapped and sealed in such a way as to prohibit or prevent tampering. The documents should always be shipped by some means that permits them to be traced in case they get lost or misdirected and under the name of the individual (field supervisor, field coordinator, etc.) whose responsibility it is to see that they reach their destination intact.

Once they reach the place of electronic recording, their security becomes the responsibility of the data entry coordinator who will establish procedures to assure that:

- a) none of the documents or any part of them leaves the room where the data are being recorded,
- b) data entry personnel take no notes or otherwise record any of the information contained in the documents,
- c) the place where the documents are temporarily stored for recording purposes is secure and protected from unauthorized access at all times.

### **1.2.2. Storage of paper survey documents**

Bhopal books should be grouped and labelled in such a way that the appropriate interview record is easily retrievable. Paper questionnaires (including those in scannable format) should be organised, bound together using durable fasteners, and grouped for retrievability as well. The books and/or questionnaires should be kept in boxes whose contents are clearly marked. Once all the data have been entered into an electronic data base and data cleaning has been completed, the boxes should be appropriately sealed. Whenever the seal is broken a signed document should be

placed inside the box recording the date and the reason for breaking the seal, and the box should be resealed. A copy of the same document should be kept by the project manager.

The sealed boxes should be kept in a dry and secure place under the supervision of the project manager or the Executive Director, or persons authorised by either.

If the records are to be placed in a commercial storage facility, prior authorisation should be obtained from the Executive Director and only reputable, bonded facilities may be used. Access keys should be kept by the project director or her/his designee.

## **2. FINANCIAL RECORDS**

Financial records also exist in both electronic and paper form.

### **2.1 Electronic financial records**

CIET retains the following documents in PDF format indefinitely:

- a) Audited annual financial reports,
- b) Financial reports to funding agencies along with their explanatory notes,
- c) Reports of any special audits,
- d) Records relevant to the purchase of any equipment obtained using grant funds.

Additional records relevant to any grant received are kept for at least three years after the date of submission of the final expenditures related to that grant.

### **2.2 Paper financial records**

Paper financial records may be paper versions of documents that originate electronically or they may themselves be original documents.

#### *Project expenditure support documents*

These are receipts or other documents that attest to the time, nature and amount of expenditures made to complete a project. Records of expenditures made during field operations (payments to interviewers, receipts for transport and lodging, etc.) should be kept by field supervisors and given to field coordinators who will, in turn, pass them on to the financial officer. If they need to be transported by a public conveyance, the same procedures apply to financial records as to survey records.

Financial records are classified and their contents summarized by the financial officer in the form of financial reports which are transmitted electronically to CIET's internal accountant. All financial records should be photocopied and the copies stored in the field office following the same procedures as for survey records. The original documents are then shipped to the main office of the CIET entity that is the signer of the contract under which the project was financed.

### **3. OTHER RECORDS**

#### **3.1 Records of CIET ethical review committees**

In this matter CIET follows the regulations of the jurisdictions under which its ethical review committees operate.

In the United States, regulations of the Department of Health and Human Services (HHS) at 45 CFR 46.115(b) require that Institutional Review Board records be retained for at least 3 years, and records relating to research which is conducted be retained for at least 3 years after completion of the research. All records must be accessible for inspection and copying by authorized representatives of HHS at reasonable times and in a reasonable manner. (See: <http://www.hhs.gov/ohrp/policy/irbgd107.html>)

In Canada, the Terms of Reference of the CIETcanada Research Ethics Board (Item 1.8) require that records of the Board's proceedings be retained for at least seven years after the research project in question ends.

#### **3.2 Records of Financial Conflicts of Interest proceedings**

CIET's policy on financial conflict of interest, including the relevant policy on retention and destruction of records may be found at:

<http://www.ciet.org/documents/FCOI%20policy%20260912.pdf> (Section 5,b,v)

#### **3.3 Records of inquiries and investigations of allegations of research misconduct**

CIET's policy on Responsible Conduct of Research, including the relevant policy concerning records of inquiries and investigations of allegations of research misconduct may be found at:

### **4. DESTRUCTION OF RECORDS**

Only the Executive Director or a person or committee appointed by him for that purpose may authorize the destruction of any electronic or paper records.

#### **4.1. Destruction of electronic records**

As a general rule CIET does not destroy electronic survey records that are under its direct ownership, are not corrupted, are the most recent usable version of the data they contain and are secure from outside tampering. In cases where CIET has only stewardship rights to the data, as may be the case where CIET partners with indigenous communities, a data-sharing agreement will stipulate CIET's obligations as to the destruction of records.

In cases where destruction of electronic records becomes necessary, once proper authorisation is granted, the records must be deleted from all hard drives on which they may reside and the drives defragmented immediately thereafter. If the records in question also reside on separate media

such as CDs, these too must be destroyed by cutting or other irreversible means.

## **4.2 Destruction of paper records**

### *4.2.1 Destruction of paper survey records*

All paper records of surveys will be kept for at least seven years before being destroyed. Some, however, must be kept for a longer period.

- a) If the records are the subject of any publication, they must be kept for at least two years after the last publication in which they are likely to be used.
- b) If the records are those of a single cycle in a multi-year series of cycles with potential for longitudinal analysis, records from the earlier cycles that are seven years old or more must be kept for at least two years after the final report of the final cycle in the series to which they belong.

The Executive Director or his appointee(s) will take the following factors into account when authorising the destruction of any survey records:

- a) possible need for the records to substantiate statements made in a publication
- b) possible need for the records to verify data from a baseline or intermediate cycle in a multi-cycle study
- c) possible use in an academic thesis.

### *4.2.2 Destruction of paper financial records*

The Executive Director habitually delegates authority for destruction of paper financial records to the Associate Executive Director. Requests for authorisation to destroy any financial records must be justified with documentation of the relevant legislation of the country in which the expenditures in question are reported. Currently these countries are:

- Canada for CIETcanada projects
- South Africa for CIET Trust (South Africa) projects
- Botswana for CIET Trust (Botswana) projects
- Mexico for CIETmexico projects
- The United States for CIETinternational projects
- The United Kingdom for CIETeurope projects

The Associate Executive Director shall maintain a record of the authorisation to destroy any paper records.

### *4.2.3 Destruction methods and safeguards*

Destruction shall be by a method that is irreversible and as environmentally friendly as possible.

Irreversible methods include:

- a) shredding: fine shredding or cross shredding to insure irreversibility
- b) shredding and pulping
- c) burning: only if no more environmentally friendly method is available. Burning needs to be done in an industrial facility to be effective.

The covers of Bhopal books may be difficult to shred. If they are, they should be completely separated from the rest of the books' contents and either burned or ripped by hand into pieces in such a way as to render any identifying information impossible to reconstitute.

Burial or discarding for waste disposal or recycling without previous shredding are not acceptable.

A contractor may be used to destroy the records provided:

- a) one of the approved destruction methods is used
- b) closed and secure transport is used to convey the records to the place of destruction
- c) a certificate of destruction is obtained documenting the date, location and method used along with the signature of the person supervising the destruction.

If a contractor is not used, the CIET person responsible for the records shall prepare a certificate of destruction containing the same information.

A report on the destruction shall be sent to the Associate Director clearly identifying the records that were destroyed. The authorisation to destroy and the certificate of destruction should be attached to this report.