Guidelines for retention and disposal of digital information at Duke University

This document is intended to provide guidance for Duke organizations that are deploying or maintaining systems that manage and store digital information related to the mission of the university. It is not a policy document *per se* - you should consult with University Archives and your organization's administrative leadership to determine what policies and requirements apply to your particular situation and the type of data being managed and stored. Instead, this document provides general guidelines for situations where no policy guidance currently exists, and is intended to promote best practices that protect the investment and interests of the stakeholders of the data and the University overall. If you have questions about any of this or wish to consult with someone who can help you interpret and apply these guidelines and any relevant policies, please contact University Archives.

Retention periods

In general, materials created as part of Duke's research mission should be shared as broadly as possible and placed in relevant archives or publication venues so that others may build on Duke research well into the future. For materials created as part of the administrative, teaching, or student life aspects of the University, in general records should be kept only as long as needed for ongoing work or legal compliance, and then either deposited with University Archives if appropriate or disposed. Following are some guidelines about retention periods for various categories of materials.

1. Organization/Administrative records (documents related to management of units/programs, organizational web sites, etc.)
   - Retention and disposal periods for organization and administrative records are set by University Archives and/or the organization's administrative leadership. Please consult with them for the appropriate retention and disposal procedures.
   - For more information, see http://library.duke.edu/uarchives/about/records-management/
   - Organizational web sites that have become inactive may be expired and deleted after 2 years. Organizations may wish to keep an offline copy of their old web site for archival purposes, or check with University Archives about archiving web sites there.
2. Course-related materials (including works authored by students)
   - In general, course-related materials should be kept for the typical period of student matriculation for a particular program, plus one year to allow time for archiving or exporting. For example, for Blackboard and Sakai course sites, and for WordPress sites related to undergraduate courses, the retention period is 5 years. For graduate programs it may be longer.
   - Students and other stakeholders in the materials (i.e., instructors and their departments) should be notified well in advance of expiration, so they have an opportunity to export and archive, renew, or transfer custodianship of materials

(see section below). These notifications should be at least one semester before graduation and then again four months before expiring and a few weeks before expiring.

3. Research data (materials created in the course of Duke research projects)
   - The retention period of research data is outlined in the Duke Policy on Research Records: Sharing, Retention, and Ownership (https://ors.duke.edu/orsmanual/research-records-sharing-retention-and-ownership). In general, the policy states that materials should be kept at least five years, or longer as required by funding agencies, patent processes, and other considerations. Please review the policy linked above for full details.

4. Publications derived from Duke research
   - Under the open access policy adopted by the Academic Council in 2010, all scholarly articles authored by Duke faculty in peer reviewed journals should be archived in the DukeSpace repository, where they will be archived and made openly accessible indefinitely.
   - For more information, see http://library.duke.edu/openaccess/duke-openaccess-policy.html and http://library.duke.edu/dukespace/

5. Student group materials
   - For materials created by student groups, system managers should aim to keep records of contact information for the group's governance structure, so that custodianship of materials may be transferred from a particular student who created the materials to others who may take on responsibility for them as particular students leave Duke.
   - In general, there is no need to keep these materials beyond 5 years, though custodians of such materials should consult with University Archives to determine whether the materials should be transferred to University Archives, retained in the originating system, or some other option.

6. Materials that are primarily in individual workspaces or user accounts (e-mail, desktop/laptop storage, personal directories in fileshares, WebFiles, etc.)
   - Materials in user accounts should only be kept as long as the individual is associated with the University. If the materials are of ongoing use to the organization with which the individual was affiliated, these materials should be transferred to an organizational space before the individual leaves the organization and their users spaces are deleted.
   - For employees, current practice is to expire materials in their user accounts immediately after they leave Duke. If possible, it may be useful to provide tools and assistance for individuals to export and take with them any materials that are purely personal in advance of their departure and deletion of their accounts.
   - For students, current practice is to expire their accounts and delete individual spaces (such as WebFiles) one year after they have left the university. System managers should provide notification of this practice well in advance of expiration (before graduation, and again a few months before expiration) and provide tools and assistance for exporting any personal materials the students wish to take with them.

- For faculty, current practice is to expire user accounts and individual spaces 30 days after leaving the University. Again, tools and assistance in exporting such materials prior to deletion are helpful.

Expiration and disposal procedures

1. If possible, systems should implement some mechanisms that track use and allow auto-renewal of the retention period if materials are clearly still being modified and heavily used. For example, blogs or web sites that are still being updated or heavily used need not be expired, while sites that have not been updated in a long time and are getting little use may be expired at the end of the periods indicated above, after notification of stakeholders.
2. When materials are reaching the period of expiration and disposal, system managers should make efforts to contact stakeholders well in advance to notify them of the expiration and provide them with options.
3. Stakeholders may include the creators of the materials, the organization the work was created for (department, lab, student group, course), and/or possibly Duke overall.
    - It's important to capture at the time of creation who the potential downstream stakeholders are.
    - Wherever possible, it should be a standard part of the process of creation in a digital information management system that records are kept about who the stakeholders are (or may be during the life cycle of the information).
    - For example, in addition to recording the NetID or Duke Unique ID of the creator in the system, it is useful to know if they are creating it for purely personal purposes or whether it is on behalf of a Duke organization. If the latter, have the creator indicate an organizational contact (either explicitly by recording organizational contact info, or by placing the information in a space that is accessible to other relevant people in the organization) at the time of creation.
4. Options that may be given to stakeholders at time of expiration, depending on the types of materials:
    - Renew the expiration term, so they will not expire for another cycle.
    - Transfer ownership/custodianship to someone else, or record organizational contact information if it wasn't done before.
    - Export the materials so they can be archived in a different context.
    - Discuss with the University Archivist whether it is appropriate for the University Archives or elsewhere on campus.
    - Agree to expire and allow to be deleted.
5. System managers and data custodians should be aware that even when materials are deleted from active spaces they may continue to exist on backup tapes or in other copies.
    - If a request is received to retrieve or reactivate materials that were intentionally deleted, this decision should be made at a director level.

Other considerations

As you develop your data retention plan, you should also keep in mind the intersection with other existing policies and legal requirements, in particular related to privacy, security, and data agreements already in place.

For more information about existing policies, or to consult with experts on these other areas, please see the information below.

- Duke University Policies: http://web.duke.edu/policies/
- IT Security: http://security.duke.edu/
- Duke University Archives: http://library.duke.edu/uarchives/
- Duke Libraries Office of Copyright and Scholarly Communications: http://library.duke.edu/about/depts/scholcomm/
- Duke Office of Counsel: http://www.ogc.duke.edu/
- Retention Period for Accounting Documents: http://finance.duke.edu/accounting/gap/m200-240.php