

2.11.2 Data Protection Assessment			
	Question	Help Text	Guidance
2.11.2.12	<p><i>Detail how long personal data will be retained for in an identifiable or coded format.</i></p>	<p>For any research using personal data, the open access motto 'as open as possible, as closed as necessary' is important.</p> <p>See Guidance - please review carefully before answering.</p>	<p>Under Article 5 GDPR personal data must not be kept in a form which permits identification of the individual for longer than is necessary (storage limitation). Contact details should be kept for the minimum time necessary to complete the objective (i.e. arranging interviews). Consent forms should only be retained for as long as the data is identifiable or coded.</p> <p>Time limits should be established at the outset of the research project for; periodic review of research data, de-identification (pseudonymisation), anonymisation, archival and/or erasure (if applicable).</p> <p>This ensures that the retention period for personal data (identifiable or coded) is limited to the minimum. Irrevocably anonymised data can be stored indefinitely.</p> <p>In line with the principle of transparency, the relevant retention period and criteria used to calculate this retention period should be shared in your study's privacy notice/information leaflet provided to research participants.</p> <p>Anonymised data: Information which has been irrevocably anonymised (i.e. no key exists anywhere) and it is not possible to identify an individual from a combination of the data. held by you or a third party.</p> <p>When should you anonymise research data?</p> <p>This is a project-specific determination, but the following is a non-exhaustive list of aspects to consider when calculating this period:</p> <ol style="list-style-type: none"> 1. For legal and regulatory reasons (medical or professional negligence, audit etc) - duration of study plus 7 years. 2. For evidence reasons - i.e. novel IP etc, retain indefinitely. 3. For compliance with funding body - retain for period of time requested by funder. 4. To meet requirements of research contracts - retain for period of time specified in the contract. 5. For academic assessment. E.g. Vivas and publication purposes (when verification or re-analysis etc. is requested) - retain for duration of study plus 3 years. <p>Secondary use of personal data for research purposes (other than health research): Retain the minimum data required for the specific secondary use, providing that the data is kept accurate, confidential, and secure. It is recommended that due diligence is carried out on the lawful basis for the primary data collection to ensure that the secondary processing is not incompatible with the original basis.</p> <p>See the Data Protection Commission's Guidance Note for information on pseudonymisation and anonymisation techniques: https://www.dataprotection.ie/sites/default/files/uploads/2019-06/190614%20Anonymisation%20and%20Pseudonymisation.pdf.</p> <p>Trinity College Records Management Policy and Retention Schedule available at: https://www.tcd.ie/dataprotection/dataretention/</p>