

EDINBURGH NAPIER UNIVERSITY

UNIVERSITY INFORMATION GOVERNANCE GROUP

Minutes of the meeting held on Monday 17 October 2011  
at 14:30 hrs in Room 7.B.14, Sighthill Campus

**PRESENT:** J Timlin (Co-convenor: Governance Officer (Records Manager), H Mizen (Co-convenor: Governance Officer (Data Protection & Legal), L Laidlaw (Assistant Faculty Manager) [Deputising for O Dellal], B Merchant (Depute Director (Central Support)), C Snedden (Assistant Property and Facilities Services Manager), L Smith (Executive Support Officer (Finance, Planning & Commercial Services)), A Deegan Wood (Planning Officer, Finance, Planning & Commercial Services), N Kivlichan (Market Intelligence Officer, Finance, Planning & Commercial Services), T Mulhall (HR Advisor), T Brogan (Team Leader, Student Administration) [Deputising for L McElhone], J Archbold (Principal IT Developer), M Mackay (Administrative Assistant, Governance) (Clerk)

**APOLOGIES:** D Cloy, F Lopez, S Bradley, O Dellal, V Wood, D Spiers, D Callister, J Baillie, G Bishop, J Hutchison, L Maberley, L McElhone, R Bews

**Welcome and Opening Remarks**

Members were welcomed to the first meeting of 2011/12 and the apologies were noted.

**1. UIGG Remit and Terms of Reference** **UIGG (11/12)02**

1.1 The members **approved** the Remit and Terms of Reference for 2011/12.

**2. Membership** **UIGG (11/12)01**

2.1 The Co-convenor (Governance Officer (Data Protection & Legal)) informed the group that there were still representatives to be found for some of the posts on UIGG. It was considered important to fill these to ensure representation from all areas of the University.

2.2 It was noted that due to role changes within Human Resources, the current representative would be standing down and it was proposed that a colleague who had Freedom of Information within her remit would be invited to join the Group. This was to be discussed with the Depute Director of Human Resources and confirmed to the Convenors.

2.3 The members **approved** the Membership for 2011/12, subject to the potential changes discussed.

**3. Cross University and Dedicated Department Briefings**

3.1 The programme of Information Governance (IG) briefings, covering Data Protection, Freedom of Information and Records Management, offered to all

University staff, was ongoing. In addition, a number of IG briefings for specific departments had been held, including two for Student and Academic Services, and one for Human Resources, with a further briefing for HR planned. .

- 3.2 The Co-convenor (Governance Officer (Data Protection & Legal)) requested that members consider whether a dedicated information governance briefing would be of value to their areas and if so, to promote these.

#### **4. Annual Report on Data Protection, Freedom of Information and Records Management**

- 4.1 The Group noted that the Annual Report would be submitted for information and approval to the meeting of the Risk, Resilience and Audit Monitoring Committee on 10 November 2011.

#### **5. Records Management**

- 5.1 Records Management matters were covered in detail in the Records Manager's report under Item 6.

#### **6. Records Manager's Report to September 2011 UIGG (11/12)03**

- 6.1 The Co-convenor (Governance Officer (Records Manager)) spoke to the report. Demand for Freedom of Information requests had increased, with 130 requests received in the year to date, compared with 127 requests in the same period in 2010. There had also been an increased number of complex requests received. Commonly recurring subjects of FoI requests included expenses, budgets and spending. The University's restructure and the sale of Craighouse campus were also generating a significant number of requests.
- 6.2 Governance Services was monitoring FoI requests to identify trends, with a view to publishing more information proactively as part of the University's publication scheme and on the intranet.
- 6.3 The publication scheme for publically owned companies had been updated in accordance with the University's legal obligations, and approved by the Scottish Information Commissioner until 2015.
- 6.4 The University's own publication scheme continued to be updated, and was due for review in 2013.
- 6.5 The Governance Officer (Records Manager) had been working with several areas of the University dealing with records management issues arising from the restructure, notably International, Development and Externals Affairs, which was consolidating records from three departments into one.
- 6.6 A review of records management was beginning at the Faculty of Engineering, Computing and Creative Industries, in advance of the redevelopment of Merchiston Campus. This was anticipated to be a significant amount of work, with a need to review records, and ensure that ownership of records was clear and that records retention schedules were in place.
- 6.7 The current records management guidance materials, available on the Governance Services intranet site, were due to be reviewed and updated to

reflect current best practice and new guidance from the Information Commissioner.

- 6.8 The Governance Officer (Records Manager) had been working with a number of areas to develop records retention schedules, in order to meet the University's statutory requirements.
- 6.9 The University had begun to use an offsite storage facility, with approximately 1,400 boxes of records stored offsite. The use of this facility was recommended both from a cost and business continuity perspective. The Co-convenor (Governance Officer (Records Manager)) requested that members promote the use of offsite storage in their areas of the University.
- 6.10 Shredding consoles had been placed in Craiglockhart Campus, replacing confidential waste sacks for the disposal of confidential paper records. Specialised shredding consoles for electronic media were also available. It was suggested that having standard waste-paper bins near to the consoles might help to discourage their use for non-confidential waste.
- 6.11 Two training sessions on records management were scheduled for November. Short sessions on specific topics such as email management and managing electronic records were being developed.
- 6.12 A major Business Continuity project was underway across the University. A key aspect was identifying vital records, and developing procedures for safeguarding these.

## **7. Review of the Data Protection Code of Practice**

- 7.1 The current Data Protection Code of Practice had been launched in 2009, and it had been decided that a review was now required to: incorporate new legislation, new guidance from the Information Commissioner, updated guidance and materials developed by Governance Services and to reflect the University's new organisational structure. 7.2 The Co-convenor (Governance Officer (Data Protection & Legal)) would be contacting key members to assist with this review. Sections requiring amendment included:

- Data Sharing – based on a new code of practice from the ICO
- Web pages – based on the revised Privacy and Electronic Communications Regulations, mainly relating to the use of 'cookies'
- Privacy Impact Assessments
- Transfer of Data
- CCTV – to reflect new CCTV protocols
- References – to be reviewed based on requests received by Governance Services, and to reflect particular issues for the Faculty of Health, Life and Social Science such as Fitness to Practise

## **8. Data Protection Officer's Report to September 2011      UIGG (11/12)04**

- 8.1 Sections A – C of the Report were covered in detail under Items 7, 9 and 10 of the agenda.
- 8.2 Compliance Update – the UK Information Commissioner now had powers to impose civil monetary penalties for serious breaches of the Data Protection Act.

As a result of a significant penalty imposed on a council for faxing personal data to the wrong recipient, a poster warning about the use of fax and the related data protection issues had been developed and disseminated across the University for placing by the University's fax machines. The Co-convenor (Governance Officer (Data Protection & Legal)) requested that members encourage the use of this poster.

8.3 The Report's standing items E – H were noted for information.

**9. Current FAQs – For Information and Comment** **UIGG (11/12)05**

9.1 The current Data Protection Frequently Asked Questions for staff was noted for information. The Co-convenor (Governance Officer (Data Protection & Legal)) requested that members feed any comments and suggestions for other topics back to her.

**10. Staff Fair Processing Statement – For Information** **UIGG (11/12)06**

10.1 The Staff Fair Processing Statement had been updated, mainly parts of Section 2 (Purposes for which Personal Data is obtained and processed by the University) to accommodate the introduction of the new Human Resources information system, HR Connect. The statement would continue to be reviewed in light of any changes required by the use of HR Connect in practice.

**11. Next Meeting Date** 11.1 The next meeting was scheduled for Wednesday 15 February 2012, in Room 7.B.14, Sighthill Campus.