

EDINBURGH NAPIER UNIVERSITY
RISK RESILIENCE AND AUDIT MONITORING COMMITTEE
UNIVERSITY INFORMATION GOVERNANCE GROUP

Minutes of the meeting held on 15 February 2012

at 2.30pm in room 7. B.14, Sighthill Campus

PRESENT: J Archbold (Principal IT Developer); J Baillie (Information Assistant); S Bradley (Assistant Faculty Operations Manager); A Deegan Wood (Planning Officer); O Dellal (Assistant Faculty Manager Executive Support); N Kivlichan (Market Intelligence Officer); A Leslie (HR Advisor); P McFall (Senior Media & Comms Officer); L McElhone (Head of Student Administration); B Merchant (Depute Director Central Support); H Mizen (Governance Officer DPA & Legal); C Snedden (Administration Manager); J Timlin (Governance Officer, Records Manager)

APOLOGIES: R Bews (Appeals, Complaints & Conduct Officer); G Bishop (Head of Campus Services); D Cloy (Assistant Secretary); J Hutchinson (Systems Improvements Manager); A McCleery (Leader of Research Strategy & Practice); D Spiers (Lecturer); V Wood (Head of Business & Administration)

IN ATTENDANCE: F Lopez (Clerk)

1 Opening Remarks

Members were welcomed to the second meeting in session 2011/12 and the apologies were noted

2 Minutes of meeting on 17th October 2011 and matters arising **UIGG (11/12)07**

The Minutes of the last meeting were approved. The following were reported as matters arising:

Min. 3.2: No requests for dedicated briefing sessions had been received. Members were encouraged again to promote these within their areas

Min.9: The FAQs had now been published on Governance Services intranet site

Min.10: The revised Staff Data Protection statement had also been posted on the Governance Services intranet site

3 Annual report , to the Risk, Resilience & Audit Monitoring Committee on Data Protection, Freedom of Information & Records Management **UIGG (11/12)08**

The Governance Officer (Records Manager) provided a brief overview of the Freedom of Information aspects of the report. The number of FOISA request was continuing to

increase year on year with information being requested by the media, members of the public and Trades Unions. The University's running costs and expenses continued to generate the greatest number of requests. The complexity of FOI requests and the amount of information requested was proving to be a challenge and Governance Services was considering proactive measures to manage the volume by making information already released more publicly available e.g. by means of a disclosure log.

4 Online Training Packages

Oral report

The University had been successful in a bid for funding from the Leadership Foundation for Higher Education for the adaptation for the benefit of the Scottish HE sector, of a suite of existing on-line training modules, developed by the Institute for Cancer Research, on Freedom of Information, Information Governance and Data Protection. It was proposed that once adapted the materials would be piloted internally and UIGG members would be asked to participate in this. Corporate Learning and Development would then arrange for an external pilot with selected groups. These online training materials were designed to complement the quarterly and bespoke briefing sessions already offered by Governance Services.

Colleagues in Information Services commented that they would welcome the opportunity to offer additional advice on information security.

5 Cloud computing

Oral report

The Governance Officer (Data Protection & Legal) introduced this item. It was reported that cloud computing had come to the fore in recent months and Governance Services had been asked to contribute to an Information Services (IS) paper on the use of externally hosted cloud computing services. A discussion took place about the compliance issues and risks concerning external hosting of personal and commercially sensitive data in a cloud.

With fines up to a maximum of £500k being imposed by the UK Information Commissioner's Office (ICO) for data breaches, it was noted that the ICO had issued guidance for organisations on what to consider before entering into any contractual agreements for the provision of any externally hosted cloud service and this included:

- Ensuring strict control of the environment
- Conducting privacy impact assessments
- Developing effective retention schedules
- Ensuring secure records storage and disposal/destruction
- Implementing an exit strategy and business continuity plans

Governance Services, in conjunction with IS, would also be issuing guidance about retaining documents on the "S drive"; email retention and general electronic information.

6 Records Management: Merchiston co-location project; Records retention schedules; records management activities Oral report

6.1 Records management work relating to the Merchiston Co-location project had begun and the Records Manager had met with Property and Facilities Services to discuss:

- records destruction days
- the appointment of Records Management Co-ordinators who would also assist and advise on records management issues

Preliminary dates for departments affected by the move had been agreed, with the first moves expected to take place in June 2012.

6.2 Work was also under way to draw up retention schedules for Student and Academic Services retention (the first group to move) and for the Faculty of Engineering, Computing and Creative Industries.

6.3 Shred-it console bins had now been installed at the Merchiston and Craiglockhart campuses and it was noted that additional uplifts of console bins and extra bags could be arranged through the Property & Facilities HelpDesk. The Group was also informed that Shred-it provided separate console bins for the disposal of CDs and other physical devices and a request for these should also be made via the HelpDesk.

In addition to developing new records retention schedules, the Records Manager would also be reviewing the existing retention schedules for Finance Services, Human Resources and the Faculty of Health, Life and Social Sciences. In line with best practice, it was noted that agreed retention schedules should be reviewed and updated where necessary every year.

7 Records Manager's report to January 2012 UIGG (11/12) 09

The Records Manager reported that all departments within the University now had access to the offsite storage facility provided by CINTAS but were only able to deposit records offsite once an agreed retention schedule had been put in place. It was noted that it was considerably cheaper to store boxes off-site than to retain them in the University and there were presently over 1,400 boxes being stored offsite.

Business Continuity plans were currently being drawn up by the Risk Management Officer which would involve identifying vital records and then putting in place appropriate procedures to safeguard these types of records.

8 Review of Data Protection Code of Practice UIGG (11/12) 10

The Governance Officer (Data Protection & Legal) reported that the Code of Practice, launched in 2009 had undergone a major review to take account of new legislation, case law, advances with technology and additional guidance published by the UK Information Commissioner (ICO). Sections of the Code and linked guidance documents had been

revised or developed to refer to:

- The Privacy & Electronic Communications (EC Directive)(Amendment) Regulations 2011 (PECRs)
- Monetary penalties up to a maximum of £500K for serious breaches of the Data Protection Act and PECRs
- Use of fax and the disposal of confidential waste
- The ICO's new code of Practice on data sharing
- Case law on References
- Privacy Impact Assessments
- The new HR Connect system

Hyperlinks had been included throughout to make the Code more user friendly.

8 New regulations on the use of cookies

Oral report

The Governance Officer (Data Protection & Legal) reported that measures were being put in place to ensure that Edinburgh Napier complied with the new PECRs on the use of cookies and that central guidance was being developed with IT Services for all those hosting University websites. It was pointed out that failure to comply with the new regulations could lead to a maximum fine of £500k.

Concerns were raised about the security of I pads and I phones and personal and confidential information being stored on them and it was noted that Information Services were investigating this further.

9 Data Protection Officer's report to January 2012

UIGG (11/12) 11

The Governance Officer (Data Protection & Legal) spoke to her report on data protection developments and activity during the last quarter.

The Group was reminded of the forthcoming Information Governance Briefing sessions to be carried out by Governance Services in March and June 2012.

14 Date and Time of Next Meeting

The next meeting of UIGG will be held on 13th June 2012 at the Sighthill Campus.