

**EDINBURGH NAPIER UNIVERSITY**

**RISK, RESILIENCE AND AUDIT MONITORING COMMITTEE**

**UNIVERSITY INFORMATION GOVERNANCE GROUP**

**Minutes of the meeting held on Wednesday 11 June 2014**

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

**PRESENT:** D Watt (Governance Officer, Records Manager) (Co-Convenor); H Mizen (Governance Officer, Data Protection & Legal)(Co-Convenor); J Baillie (Campus Support Assistant/Technician); E Clark (Governance Assistant); D Cloy (Assistant Secretary); O Dellal (Assistant Faculty Manager Executive Support); G Ferguson (Assistant Director Property & Facilities); N Kivlichan (Market Intelligence Officer); B Merchant (Portfolio & Services Engagement Manager); A Leslie (HR Advisor); A McCleery (Leader of Research Strategy & Practice); L McElhone (Head of Student Administration); D Spiers (Lecturer, School of Accounting, Law & Finance)

**APOLOGIES:** R Bews (Appeals, Complaints & Conduct Officer); L Mabberley (Assistant Director); A Deegan Wood (Planning Officer); J Hutchinson (Systems Improvements Manager) ; C Sutherland (Systems Officer)

**IN ATTENDANCE:** M Mackay (Administrative Assistant)(Clerk)

### **Opening Remarks**

The Governance Officer (Records Manager) welcomed members and the apologies were **noted**. A specific welcome was extended to G Ferguson who was attending his first meeting.

### **1 Minutes of meeting held on 26 February 2014**

**UIGG(13/14)11**

Members **approved** the minutes of the meeting on 26 February 2014 as an accurate record.

### **2 Matters arising from the minutes**

- i) *Minute 3 – Online Training Modules*  
The Governance Officer (Records Manager) thanked members for their continuing support and promotion of the online training modules. Members who have not yet completed the modules were asked to do so, and it was noted that all members of staff in one faculty have been asked to complete the modules.
- ii) *Minute 4 – Information Audit*  
The Governance Officer (Records Manager) spoke to her presentation and reported that she had held discussions with staff across the University and was producing guidance notes on conducting the Information Audit.

The initial stages of the process had identified that emails were an area of concern, as vast numbers of unstructured electronic records in email form are being kept in Outlook rather than in shared drives. The arrangement and numbers of the records held in personal Outlook folders pose a risk to the University in that they are not arranged in record series with related records, are not disposed of in accordance with records retention schedules and access to the records is limited. Similarly, records held on H: and C: drives are not easily auditable or available as corporate information assets.

This has meant that an alternative approach to the Information Audit has been decided upon, where Managers will be asked to identify business processes where high risk information, such as personal data, confidential or commercially sensitive information, is collected or created and the audit is conducted on these records before moving on to lower risk records. It is expected that this approach will mean that best practice identified by the initial stages of the audit can be replicated for the management and audit of the remaining records. A spreadsheet of results from the Information Audit would be produced which would form the basis of the University Information Asset Register and updated Records Retention Schedules.

A questionnaire for all staff was being developed. A draft would be circulated to members for feedback. It was noted that the questionnaire needed to be clearly identified as an evaluation and monitoring exercise for internal efficiency, as it might otherwise be considered research and require approval from the University Research Integrity Committee. The Leader of Research Strategy & Practice would provide the necessary boilerplate wording for the questionnaire.

iii) *Minute 7 – New EU Data Protection Regulation*

It was reported that the final content and format of the proposed new Regulation was not yet known but that the standard of consent was expected to be higher with the requirement that it be 'freely given, informed, specific and explicit'.

iv) *Minute 8 – Data Protection Code of Practice*

The Governance Officer (Data Protection) requested that members continue to raise awareness of the University's Data Protection Code of Practice across the University.

Members noted that the GO (DP) had been invited to attend a meeting of the University Research Integrity Committee (URIC) and had found the cross-collaboration very useful. It was reported further that NOVI a new software for conducting surveys, which would be hosted internally had been made available by Technical Services. Guidance for students was to be developed by a group drawn from Governance Services, Technical Services and URIC.

Members were advised that the use of externally hosted 'cloud' computing services was being actively discouraged due to their inherent risks.

### **3 Update on Records Management**

### **ORAL REPORT**

i) *Information Security Classification Scheme*

The Governance Officer (Records Manager) spoke to her presentation and reported that as part of the Information Audit process, a requirement to develop an Information Security Classification Scheme had been identified. The presentation would be circulated to members for their feedback and assistance in developing the ISCS.

ii) *Email (Records) Management*

The GO(RM) reported that University's email system was being overstretched as it was being used inappropriately by staff members as an information storage repository – the software is designed to be a communication tool rather than a personal storage drive. A project in conjunction with Information Services was underway to explore alternative means of managing and storing these records. A project team was to be established, to explore the technical, governance and policy issues involved. The IS Project Manager would be invited to speak at the next meeting of UIGG.

It was noted that email could not be considered to be secure.

iii) *PDF-A Guidance*

The GO(RM) encouraged members to promote the use of PDF-A as the most suitable format for long-term storage of electronic records, as the file format was intended for this purpose, and included features such as the preservation of the document metadata .

#### **4 Records Manager's Report to May 2014**

**UIGG(13/14)12**

1. *Freedom of Information*

The Governance Officer (Records Manager) spoke to the report, noting that there had been an increase in the number of Freedom of Information requests received by the University, and that the media continued to be the most common source for requests.

It was reported that the University had only missed one statutory deadline during the reporting period. The Office of the Scottish Information Commissioner was monitoring statistics for compliance with the Freedom of Information Act, and Edinburgh Napier compared favourably to other universities.

2. *Office of the Scottish Information Commissioner (OSIC)*

The GO(RM) highlighted the guidance from OSIC that requests for information considered 'business as usual' carried the same rights as an explicit Freedom of Information request and needed to be dealt with accordingly . This will be highlighted in the Information Governance briefings and members were asked to encourage staff to attend these.

3. *Scottish Ministers' Code of Practice for FOI(S)A*

The GO(RM) reported that there was a general consensus throughout public authorities that the realities of the resources available to manage requests should be taken into account during the review.

*ISO 15489 Review*

4. Members were advised that a review of the international records management

standard was underway.

5. *Records Retention Schedules*

The process of reviewing and maintaining records retention schedules across the University was ongoing.

6. *Offsite Storage*

In addition to the ongoing contract, a scoping exercise had been held with the University's offsite storage contractor to explore the possibility of digitising long-term records.

7. *Training*

The Records Management training sessions continued to be held on a regular basis, and had been well-attended and received positive feedback from participants. Members were requested to continue to promote the training.

The use of Freedom of Information disclaimers on email out-of-office replies was discussed, members were requested to encourage their use.

**5 Data Protection Officer's Report to May 2014**

**UIGG(13/14)10**

1 *Compliance Update*

The Governance Officer (Data Protection) spoke to the report. It was noted that one data security breach had been recorded during the reporting period, caused by paperwork containing personal data being placed in a standard recycling bin rather than a shredding console, which was located next to it. The GO(DP) informed members that a poster had been created to warn staff to be careful when disposing of personal data and members were asked to check in their respective areas whether there was a similar potential risk.

The GO (DP) highlighted several data security breach cases at other organisations and the variety of situations in which breaches had occurred. These had included the Student Loans Company where insufficient checks when documents were scanned resulted in sensitive personal data being sent to incorrect individuals; and Wokingham Borough Council, where sensitive personal data was lost when a Council delivery driver left records outside the recipient's home.

2 *Legal Update*

The recent European Union Court of Justice ruling against Google regarding the 'Right to be forgotten' (now 'right to erasure') was discussed. It was commented that whilst this ruling was not likely to directly affect the University, which generally does not provide personal data publically, the proposed right to erasure could have implications.

3 *Draft EU Regulation*

Discussed under Item 2 iii)

4 *Subject Access Requests*

No Data Subject Access Requests had been received during the reporting period.

- 5 *Police and Other Third Party Requests for Data*  
Six requests from third parties for personal data had been received over the reporting period and were dealt with in accordance with the Data Protection Act.
- 6 *Staff and Student Queries*  
Governance Services had received 22 queries from staff and students over the reporting period, covering a variety of topics. The GO(DP) noted that these queries were useful in informing the guidance produced.
- 7 *Data Protection Code of Practice*  
There had been no revisions to the Data Protection Code of Practice.
- 8 *Online Training Modules*  
The Information Governance online training modules continued to receive positive feedback from users. The GO(DP) requested that members continued to raise awareness of the modules.
- 9 *Briefing Sessions*  
The GO(DP) requested that members continued to raise awareness of the ongoing programme of Information Governance briefing sessions.

The current data protection leaflet was being revised and would also be made available as an online version.

## **6 Proposed Meeting Dates for 2014/15**

The proposed meeting dates for the next academic year were:

14 October 2014 (Tuesday)

26 February 2015 (Thursday)

02 June 2015 (Tuesday)

All commencing at 2.30pm, with venues to be confirmed.

Members were asked to feedback any potential problems with the dates.

The GO(DP) thanked members for attending and wished them a pleasant summer.