

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

**Minutes of the meeting held on Thursday 25 February 2016  
at 2.30pm 6.B.14, Sighthill Campus**

<b>Present</b>		
H Mizen (Senior Governance Officer Data Protection & Legal)[Co-Convenor]; D Watt (Senior Governance Officer, Records Manager)[Co-Convenor]; J Baillie (Campus Support Assistant/Technician); C Biggar (PA to Principal); E Clark (Governance Assistant); D Cloy (Assistant Secretary); O Dellal (Assistant Faculty Operations Manager); L McElhone (Head of Student Administration); B Merchant (Portfolio & Services Engagement Manager); A Ramsay (HR Adviser Team Leader); L Smith (Operations Support Manager); N Turner (Head of Research and Innovation Office)		
<b>Apologies</b>		
R Bews (Appeals, Complaints & Conduct Officer); A Deegan Wood (Planning Officer); J Dickson (Faculty Quality Advisor); S Duncan (Head of Campus Services); G Ferguson (Director of Property & Facilities); N Kivlichan (Head of Market Intelligence and Evaluation); L Mabberley (Assistant Director Marketing Brand and Communications); S Simeone (Assistant Faculty Operations Manager); D Spiers (Lecturer); C Sutherland (Systems Officer)		
<b>In Attendance</b>		
D Dack (Campus Manager); M Mackay (Administrative Assistant)[Clerk]		
<b>Opening Remarks</b>		
<p>The Senior Governance Officer (Records Manager) welcomed members to the meeting. Thanks were extended to G Ferguson and B Cameron who had demitted from the group.</p> <p>The apologies were <b>noted</b>.</p>		
<b>1</b>	<b>Minutes of the Meeting held on 13 October 2015</b>	<b>UIGG(15/16)13</b>
Members <b>approved</b> the minutes of the meeting on 13 October 2015 as an accurate record.		
<b>2</b>	<b>Matters Arising from the Minutes</b>	
<p>a) Minute 4a) – Information Governance Newsletter. The SGO (RM) informed the Group of the results of the survey attached to the previous IG Newsletter. The feedback was generally positive from staff who had attended an IG briefing session, but less so among staff who had not attended a briefing, where awareness of information governance was lower.</p>		

Due to a change in policy on how information was sent out to staff, the IG newsletters would not be continued, although IG information would continue to be promoted via newsletters from the University Secretary and Information Services via the Joint Director's update.

- b) Minute 4c) – Information Security Training Module. The Portfolio & Services Engagement Manager reported that the Information Security training module had gone live before Christmas and was now available to all staff. Take up of the modules was lower than desired. The modules were part of the induction process for new staff, but there was a need for promotion to reach existing staff.

Information Services were exploring the possibility to add a link the modules to the 'Online Resources' tab in My Workplace online. It was suggested that posters promoting the modules could be placed in the print rooms, and also that the modules needed to be communicated to managers to promote to their staff.

- c) Minute 6 – Annual Report. The SGO(DPL) informed the group that the IG annual report had been presented to the Risk and Resilience Committee meeting on 17<sup>th</sup> November 2015 and had been well received. A copy of the report had also been passed to the Principal during her recent visit to the Governance Services team.

<b>3</b>	<b>Remit and Constitution</b>	<b>UIGG(15/16)14</b>
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The SGO (DPL) presented the amended remit and constitution for UIGG. The Group's reporting line had been changed to the Digital Strategy and Investment Committee for routine reporting and policy approval, and would continue to present the Annual Report to Risk and Resilience Committee. DSIC was considered to be the best fit for UIGG.

The constitution had been amended in line with discussions at the previous meeting.

The amended remit and constitution were **approved**.

<b>4</b>	<b>Membership</b>	<b>UIGG(15/16)02</b>
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The SGO(DPL) informed members that two of the current vacancies on the group would be filled by D Munro from International Operations and a new staff member in the Network and Security Services Team in Information Services, who would be starting in April.

The SGO(DPL) was liaising with the joint Chairs of Research to source an appointee for the remaining vacant post, probably from the membership of Research Integrity Committee.

The current membership for UIGG was **noted**.

<b>5</b>	<b>Communication of Information Governance Matters</b>	<b>Oral Report</b>
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The SGO(RM) discussed the need to get the message out that Information Governance was the responsibility of all staff, and asked the Group for input on increasing communication with staff.

Human Resources and Development were currently reviewing the PDR process, which would present an opportunity to push for inclusion of Information Governance training.

Governance Services would create an information sheet with details of Information Governance issues, such as data security breaches for Group members to pass on to their teams.

The Portfolio & Services Engagement Manager would send the roadshow flyer in JPEG format to the HR Adviser Team Leader to promote through HRConnect.

<b>6</b>	<b>Information Security Classification Scheme</b>	<b>Oral Report</b>
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The SGO(RM) reported that the Information Security Classification Scheme had been approved and would inform the University's Information Security Policy going forward.

<b>7</b>	<b>Information Security Roadshows</b>	<b>Oral Report</b>
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The Portfolio & Services Engagement Manager reported on the Information Security Roadshows, which had been held during the week commencing 25<sup>th</sup> January. Representatives from Information Services and Governance Services had held roadshows across all three campuses for staff and students to raise awareness of issues related to Information Security. The week of roadshows ended on 28<sup>th</sup> January, which was also International Data Protection Day.

Double sided flyers were also distributed advertising the staff online training for both Information Security and Data Protection/Freedom of Information and the Virtual Desktop Service/Securing Your Mobile Device.

Separate staff and student versions of a short quiz were produced in order to engage individuals in conversation regarding the issues raised and also to inform the organisers regarding areas where there is a lack of understanding. Participation in the quiz was not mandatory and considerably more copies were handed out than were received back due to staff or students not having time to complete them there and then. 78 staff and 183 student quizzes were collected over the week, many of which involved a significant interaction with a member of the roadshow crew. Both quizzes included a question regarding the length of time before a University PC is logged off/locked – which was followed up, particularly with staff, to re-emphasise the need to lock PC when unattended.

Following on from the roadshows, Information Services had been requested to attend a class of distance learning students to discuss information security.

<b>8</b>	<b>FOI Message on Automatic Email Replies</b>	<b>Oral Report</b>
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The SGO(RM) informed the Group that there had been an increase in non-FOI related messages received by the Freedom of Information email address, in response to the use of the FOI message in automatic email replies. An amended recommended Out of Office message would be circulated to clarify the purpose of the FOI inbox.

<b>9</b>	<b>Records Manager's Report to January 2016</b>	<b>UIGG(15/16)16</b>
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The SGO(RM) spoke to the paper and highlighted some points:

- The number of Freedom of Information requests had increased over the same period last year, and the numbers of questions in individual requests had also increased.
- The University had refused more requests over the same period as last year.
- There had one request for review of responses during the period of the report.
- Two requests had missed the statutory deadline, each by one day.
- The Office of the Scottish Information Commissioner had begun an audit of publication schemes. The SGO(RM) was working to ensure the University's publication scheme was up to date and had already contacted a number of UIGG members in this regard.
- An application was pending for funding to update the IG training modules.

<b>10</b>	<b>Staff Fair Processing Statement</b>	<b>UIGG(15/16)17</b>
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The SGO (DPL) presented the current version of the Staff Fair Processing Statement, and drew members' notice to the two main amendments:

§7.3 – The process for gaining access to records held by staff who had left or were absent from the University on C or H drives or staff email accounts and were necessary for business continuity, had been approved by the University Secretary and the Director of Information Services.

§10.3 – A new section had been added in response to requests for staff data from external research funders. The SGO(DPL) was liaising with the Head, Research and Innovation Office on the content of a data protection statement for RIO which was to ensure clarity of the DP issues involved and responsibility for referring relevant staff to it was devolved to lead academics/ Principal Investigators. It was observed that the data requests from external research funders could potentially place a significant audit burden on the University as detailed staff information, including employment contracts and payslips of researchers were being requested for the life of a research project. The assistance of Payroll staff in Human Resources in dealing with the data requests was noted and appreciated.

The revised Staff Fair Processing Statement was **approved**.

<b>11</b>	<b>Revised CCTV Code of Practice</b>	<b>UIGG(15/16)18</b>
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The SGO (DPL) presented the current draft of the CCTV Code of Practice, which had been amended following the UK Information Commissioner issuing a revised CCTV Code of Practice and the University's proposal to make Body Worn Radio audio recordings by Security Staff.

The Code of Practice would now require further revision to include at the request of the Head, Student Accommodation and the Sighthill Campus Manager the viewing of CCTV images by authorised staff at student residential accommodation sites for the prompt investigation of student conduct matters. It was noted that this was currently done under the supervision of Security staff and Accommodation Officers would receive the same training and guidance as Security staff.

The Group noted that responsibility for the downloading of CCTV images would remain with Security staff and CCTV images were to be retained for 14 days on campuses and 28 days for accommodation sites.

Protocols to carry out and log viewing of CCTV images were being developed by Security and Student Accommodation. The Student Accommodation Code of Conduct was also to be revised with reference to CCTV and the SGO (DP & L) would liaise with Head, Student Accommodation on this.

In addition, further amendments were being considered in §6.2 on the use of Unmanned Aerial Systems (i.e. drones). An additional guidance note on the use of UASs would need to be developed to address the significant data protection, legal, insurance and health and safety risks and issues. Pending that the current position was that the use of drones on the University's campuses and estate was strictly prohibited.

The SGO(DPL) and Campus Manager would circulate an amended version of the CCTV Code of Practice to members, either to the next meeting of UIGG, or via email if it was available sooner.

<b>12</b>	<b>Operational Guidance on the Use of Body-Worn Radio Audio Recording Equipment</b>	<b>UIGG(15/16)19</b>
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The SGO(DPL) presented the current version of the Operational Guidance on the Use of Body-Worn Radio Audio Recording Equipment, which had been amended following feedback from the Group.

As part of the ICO's layered 'privacy notice' approach, the wearing of badges by Security staff equipped with Body-Worn Radios was being considered.

The Guidance note was **approved** by the Group.

<b>13</b>	<b>Data Protection Officer's Report to January 2016</b>	<b>UIGG(15/16)20</b>
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The SGO (DPL) spoke to the paper and highlighted these key points:

- Data security breaches at the University had included two incidents where shredding console bins had been over-filled. A poster had been developed to be placed by consoles, and would be distributed by Campus Managers. The Sighthill CM was due to attend a meeting with the University's contractor to discuss the Waste Management contract, which includes the sub-contracted confidential waste disposal contract. The provision of more consoles for busy areas or increasing the frequency of uplifts, and the possibility of providing secure tags for shredding bags removed from the consoles and stored securely elsewhere would be raised.

The Group discussed procedures for retrieving items inadvertently placed in the shredding consoles. It was agreed that in order to maintain the security and confidentiality of the data placed in the consoles, the retrieval of paperwork was not to be permitted but that there should be a procedure for the retrieval of other items (e.g. keys) which would require high-level University authorisation and be carried out by Security staff.

- A recent data breach at an NHS Trust due to an inadequately trained temporary member of staff, reinforced the requirement for temporary University staff to receive the necessary training and guidance.

- An [ICO blog](#) on Wi-Fi location tracking, which was of interest for both professional and personal purposes.
- The Safe Harbor Scheme, deemed to be 'inadequate', had been replaced by a proposed EU-US Privacy Shield to cover the transfer of data to the USA, but this had not yet been assessed as 'adequate'. Further developments would be posted to the [Governance Services intranet site](#).
- As the ICO had developed new and more user friendly guidance on conducting Privacy Impact Assessments, the relevant [pages](#) had been updated.

The SGO (DP &L) referred to the serious data breach at the [University of Greenwich](#) and advised that Governance and Information Services would follow up on any lessons that could be learned from this.

<b>14</b>	<b>Network and Security Services Manager's Report</b>	<b>Oral Report</b>
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The PSEM reported on current key work being undertaken by the Network and Security Services Team which included:

- The team are close to completing the project to upgrade the Intrusion Detection System to provide improved visibility of threats across the network such as Malware/Ransomware
- A candidate had been successfully recruited for the Information Security Manager post and would be starting with the University in March, the post will be based within the Network Services & Security team within IS and would have interest in for both Information Security technology and governance.
- The Information Security Board had met on 21<sup>st</sup> January. Plans for Audit of third party accounts and Year 3 Confidential Review were discussed.

<b>15</b>	<b>Next meeting date</b>
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Currently scheduled for **Tuesday 31 May 2016**, Room 7.B.14, Sighthill Campus at 2.30pm, but may be subject to rescheduling. Members will be contacted to confirm.