

EDINBURGH NAPIER UNIVERSITY

UNIVERSITY INFORMATION GOVERNANCE GROUP

Minutes of the meeting held on Wednesday 28 March 2018
at 10.00am in Room 0.D.09, Sighthill Campus

Present	
D Watt (Information Governance Manager)[Convenor]; J Baillie (Information Assistant); R Bews (Appeals, Complaints & Conduct Officer); R Burns (International Marketing Manager); E Clark (Governance Adviser (Freedom of Information)); O Dellal (School Operations Officer); G Hamilton (Information Security Manager); N Kivlichan (Head of Market & Student Intelligence); L McElhone (Head of Student Administration); J Martin (Systems Officer); B Merchant (IT Business Change Consultant); A Ramsay (Senior HR Adviser); A Richmond (Governance Adviser (Records Management)); C Sutherland (Systems Officer); G Thomson (Executive Assistant)	
Apologies	
P Barron (Professor of Hospitality & Tourism Management); D Cloy (University Secretary); L Conlan (Head of HR Services); J Dickson (School Support Manager); S Duncan (Head of Campus Services); L Maberley (Head of Marketing and Communications); J Martin (Systems Officer); D Munro (International Marketing Manager); S Simeone (School Operations Officer); L Smith (Operations Support Manager); D Spiers (Lecturer); N Turner (Head of Research and Innovation Office)	
In Attendance	
M Mackay (Administrative Assistant)[Clerk]	
Welcome, Introductions and Apologies	
The Information Governance Manager welcomed members to the meeting, extending a particular welcome to new members R Burns and G Thomson, and to returning member C Sutherland. The apologies were noted .	
01	Minutes of the Meeting held on 01 June 2017 UIGG(16/17)13
Members approved the minutes of the meeting on 1 st June 2017 as an accurate record.	
02	UIGG Remit and Constitution UIGG(17/18)01
Members approved the remit for UIGG, subject to functional updates to the referenced legislation under the group's area of responsibility.	
03	UIGG Membership UIGG(17/18)02
Members noted the current membership of UIGG, and discussed potential additions to increase representation across the University on the group. It was suggested that	

members could be sought from Recruitment and Admissions, International, Global Online and from the Academic GDPR Champions.

04 Matters Arising from the Minutes

Information Governance Co-ordinators' Network and Presentations to Senior Leadership Group

The Information Governance Manager reported that she had made a presentation to Senior Leadership Group in June 2017 to promote the Information Governance Champions Network, which had been well received. The IG Champions Network was now in place and meetings were being held.

The IGM reported that she had made a further presentation was made to SLG in January 2018 to promote data protection training. It was planned that DP training would be made mandatory for staff.

05 Report on Internal Audit on Information Governance

Verbal Report

The Information Governance Manager reported on the recent audit on information governance. The audit had focussed on preparation for the GDPR. The result had been largely positive, with most areas being rated green, and two rated amber, which required improvements:

- Monitoring of staff training. This would be mitigated by the incoming data protection training using an e-learning system, which would link with HR Connect.
- The GDPR plan – the auditors recommended deadlines.

06 Freedom of Information and Records Management

a) Report to September 2017

UIGG(17/18)03

b) Report to February 2018

UIGG(17/18)05

a) The Governance Adviser (Freedom of Information) spoke to the Fol sections of the report to September 2017 and highlighted:

- There had been a significant increase in the number of Fol requests over the same period last year, as well as an increase in the number of questions asked. The majority of requests came from the media, with frequent queries on sexual assault / harassment, cyber-attacks and mental health issues; followed by commercial organisations, with frequent queries on contracts and procurement.
- Benchmarks using data from the Office of the Scottish Information Commissioner showed that Edinburgh Napier performed well, ranking 4th out of 15 in meeting statutory deadlines, however this is a drop from previously.
- There had been an increase in the number of occasions where reminders were issued to departments to provide information for a request.
- Learning points from OSIC:
 - There were positive effects in giving requestors with additional information and contextualisation of the information provided to them
 - In considering a potentially vexatious request, the Commissioner had considered the effect of a request, irrespective of the intent
 - All staff should be able to identify an Fol request, to ensure requests were dealt with correctly.

The Governance Adviser (Records Management) spoke to the RM sections of the report to September 2017 and highlighted:

- Work on Records Retention Schedules was ongoing, with the RRS for the Department of Learning and Teaching Enhancement completed, and Property and Facilities nearing completion
- A review of schools' RRSs was underway, with the intent of developing an RRS for each school, then one for the School Support Service
- Following recent requests for historic module descriptors, the retention period for these was being made indefinite.

b) The Governance Adviser (Freedom of Information) spoke to the report to February 2018 and highlighted:

- The number of FoI requests received during the reporting period had increased over the previous year. The majority of requests came from the media, with frequent queries on sexual assault / harassment and student misconduct.
- There had been 15 occasions when reminders had been required to be sent to the department holding information requested, with some requiring multiple reminders.

07 Data Protection and GDPR

a) Report to September 2017

UIGG(17/18)04

b) Report to February 2018

UIGG(17/18)06

a) The Information Governance Manager spoke to the report to September 2017 and highlighted:

- There had been no reportable data breaches during the reporting period. There had been two incidents of emails with personal data being sent to the incorrect recipient, which had been resolved by Information Services.
- The UK Information Commissioner had been increasing the amount of fines levied, with a record level imposed over the reporting period.
- Preparation and training for the GDPR continued.
- Layered Privacy Notices had been rolled out.
- Governance Services had logged 77 data protection enquiries; many staff queries were driven by awareness of issues raised by training sessions.

b) The Information Governance Manager spoke to the report to February 2018 and highlighted:

- There had been no reportable data breaches during the reporting period. There had been ten incidents, including seven with emails with personal data sent to the wrong recipient.
- The UK Information Commissioner had increased the number of staff and was continuing to increase the amount and frequency of fines imposed for data breaches.
- The Information Governance Champions were working to provide good engagement with and awareness of IG issues across the University. The IG Champions Group had held three meetings and three drop-in sessions.
- The University continued to make good progress towards compliance with the GDPR.
- Contracts were still an area of concern, as few contracts had been sent to Governance Services to ensure data sharing provisions were GDPR compliant.
- Three data subject access requests had been made during the reporting period.
- A total 200 staff had attended training or briefing sessions.
- A briefing for researchers on the GDPR was being developed.

ACTION: Members were requested to provide a list of their area's contracts involving data sharing by 30 April 2018	
08	Student Privacy Notice UIGG(17/18)07
<p>The IGM reported that the Student Privacy Notice had been updated for compliance with the GDPR, and requested that members check the Notice with regard to their areas of the University to ensure it was fully up to date, particularly the bases for processing of personal data.</p> <p>Members provisionally approved the Student Privacy Notice, subject to any required amendments; approval of the final version would be conducted by email prior to the next meeting of UIGG.</p>	
09	Staff Privacy Notice UIGG(17/18)08
<p>The IGM reported that the Staff Privacy Notice had been updated for compliance with the GDPR, and requested that members check the Notice with regard to their areas of the University to ensure it was fully up to date, particularly the bases for processing of personal data.</p> <p>It was noted that §10 – Disclosure to Third Parties should also include the Scottish Public Services Ombudsman.</p> <p>Members provisionally approved the Staff Privacy Notice, subject to any further required amendments; approval of the final version would be conducted by email prior to the next meeting of UIGG.</p>	
10	Data Protection Policy Statement UIGG(17/18)09
<p>Members approved the updated Data Protection Policy Statement.</p>	
11	ICO Registration Notice UIGG(17/18)10
<p>The IGM presented the details of the University's current registration with the Information Commissioner's Office and requested that members check the registration with regard to their areas of the University to ensure it was fully up to date.</p> <p>Members provisionally approved the ICO Registration subject to any required amendments; approval of the final version would be conducted by email prior to the next meeting of UIGG.</p>	
12	Information Services Update UIGG(17/18)11
<p><i>a) Information Security / Network and Security Services</i></p> <p>The Information Security Manager spoke to the report and highlighted: The University had employed an external auditor to assess compliance with the requirements to achieve the Scottish Government's Cyber Essentials certification. The audit concluded that the University would not have met these requirements. Areas of concern raised by the audit were:</p> <ul style="list-style-type: none"> • Security of laptops and mobile devices; • Processes for user account management needed to be more robust; 	

- Password policy required improvement.

The requirements were considered to be reasonable and feasible for the University to achieve by the target date of October 2018.

The new Information Security Awareness module on Moodle had been trialled by Information Services and Human Resources staff, and was ready to be rolled out to all staff. Discussions were underway to make the module mandatory for all staff.

The ISM raised a number of additional issues:

- A policy on the use of personal devices needed to be developed.
- While the number of phishing attempts against University users appeared to be increasing, the new web filter was better than the previous system at blocking phishing links.
- A new policy for passwords was to be rolled out; users would no longer required to periodically update their password, but would be encouraged to create stronger ones.

b) Information Services Projects Update

The IT Business Change Consultant spoke to the report and highlighted:

The migration of staff email accounts to Office 365 was ongoing. The next phase was to migrate generic email accounts, which would require pruning un-needed accounts. A series of emails would be sent to generic mailboxes to help identify inactive accounts. Data storage for shared mailboxes needed to be addressed.

Issues around the use of collaborative features of Office 365 still needed to be addressed, these features were currently disabled.

The update of the University's local area network infrastructure had been completed at the Craiglockhart and Sighthill campuses and was ongoing at Merchiston.

Beta testing of the planned Windows 10 desktop image was underway with Information Services staff, with the aim for this to be available to staff by the start of the 2018/19 academic year. The Windows 10 installation would initially not be compulsory, but would be available when PCs were re-imaged.

The new web filter was now in place, with the intention of routing as much internet connectivity as possible through the new filter, including e.g. tills and digital signage, to add an additional layer of security to these.

The reporting capabilities of the new web filter provided a useful snapshot of the threats against University systems, as well as the services and applications in use by staff and students. This could provide awareness of areas where potential problems would need to be addressed. For example, the use of DropBox, despite this being prohibited by the University's Information Security Policy. Information Security policies were under review.

Remaining meeting dates for 2017/18

Thursday 07 June 2018 (10.00 am – 12.00 noon), Siegfried Room, Craiglockhart Campus