

EDINBURGH NAPIER UNIVERSITY

RISK RESILIENCE AND AUDIT MONITORING COMMITTEE

UNIVERSITY INFORMATION GOVERNANCE GROUP

Minutes of the meeting held on Wednesday 26 February 2014

at 2.30pm in room 1/37, Craiglockhart Campus

PRESENT: H Mizen (Governance Officer Data Protection & Legal)(Co-Convenor); D Watt (Governance Officer, Records Manager)(Co-Convenor); J Archbold (Senior IT Developer); E Clark (Governance Assistant); O Dellal (Assistant Faculty Manager Executive Support); B Merchant (Portfolio & Services Engagement Manager); G Sharkey (Faculty Director for International Developments); L Smith (Operations Support Manager); A Leslie (HR Advisor); A McCleery (Leader of Research Strategy & Practice); L McElhone (Head of Student Administration)

APOLOGIES: R Bews (Appeals, Complaints & Conduct Officer); D Cloy (Assistant Secretary); N Kivlichan (Market Intelligence Officer); E Lambie (Administrator (Research Integrity & Development); L Maberley (Assistant Director); J Baillie (Campus Support Assistant/Technician); A Deegan Wood (Planning Officer); J Hutchinson (Systems Improvements Manager);

IN ATTENDANCE:

Opening Remarks

Members were welcomed and the apologies were **noted**. The Governance Officer (Data Protection & Legal) (Co-convenor) extended a specific welcome to J Dickson, C Sutherland and A McCleery who were attending their first meeting

1 Minutes of meeting held on 16 October 2013 UIGG(13/14)07

Members **approved** the minutes of the meeting on 16 October 2013 as an accurate record.

2 Matters arising from the minutes:

- i) Amendments to Remit and Membership (minutes 1 & 2): the Governance Officer (Data Protection & Legal) (GO(DP&L)) advised these had been done.
- ii) Annual Report (minute 5): a copy was provided to members, no further comments were made on this.
- iii) Access to Information Policy (minute 6): the Governance Officer (Records Manager (GO(RM))) provided an update. A discussion took place on what to do when information was requested; members were reminded that all requests for information made by the Police should be directed to Governance Services.

Members also discussed where the boundaries would be in relation to students who are ill either through a physical or mental illness, where there is parental intervention e.g. a parent requesting study suspension or withdrawal from a course on behalf of the student who is unable to do this themselves. The GO(DP&) advised that there was a 'permission to disclose' form on the Governance Services intranet site. A suggestion was made by a member that it would be beneficial to have a bit more guidance available on this subject, perhaps a FAQ.

- iv) Virtual Desktop (minute 10): it was noted that this software was now up and running and there appeared to be no issues. The Portfolio & Services Engagement Manager and Senior IT Developer would welcome any feedback from staff regarding its use.

3 Online Training Modules

ORAL REPORT

An oral update was given to members about the modules, along with a brief demonstration of them and advice on where they could be found in Moodle Community and on the Governance Services intranet site. Feedback from one member indicated that the number of answers required could be made a bit clearer, i.e. if more than 1 answer is required.

Both co-convenors have updated their signatures on outlook to include a link to the online modules.

One member requested the link be added to the minute, this has been provided below:
<http://staff.napier.ac.uk/services/secretary/governance/Pages/OnlineTraining.aspx>

The convenor requested that members promote the online training modules within their areas, and that all members take time to complete these modules prior to the next meeting and, provide any feedback.

ACTION – ALL MEMBERS – to complete the online training modules prior to the next meeting and provide any feedback.

ACTION – ALL MEMBERS – promote the online training modules within respective areas.

4 Information Audit

ORAL REPORT

The GO(RM) advised that the last Information Audit took place in 2006/7, she also advised that we will be looking for the support and buy in from members.

ACTION – all members – feedback to GO(RM) any ideas/suggestions on how best to approach an information audit within their own areas/teams and how to get buy in across the University.

5 Update on Records Management ORAL REPORT

- i) Records Management (RM) Strategy review: the GO(RM) advised that the Information Audit will form the first step of developing the RM Strategy. Many of the aims and objectives of the previous RM Strategy have been met, and as the University Strategy 2020 is currently under development it is timeous that the RM strategy is reviewed. Involvement of staff in the Information Audit will assist with raising awareness and gaining buy-in across the University for the RM Strategy, but this approach will be supplemented by the review of the RM Policy
- ii) Records Management Policy review: the GO(RM) advised that the Policy will only be reviewed once the RM Strategy review is underway, as there may be actions resulting from this that need to be reinforced in the Policy.

6 Records Managers report to January 2014 UIGG(13/14)08

The GO(RM) spoke to the paper and referred in particular to the increase in requests received within the University and across all public bodies, identifying that there had been an increase in the number of requests which were received where a template request has been used.

The GO(RM) thanked those staff responsible for providing information for FoI requests to Governance Services, and explained that there will be occasions where the Governance Assistant and/or herself would go back to the person providing the information asking further questions, this is so that we are fully aware of all the information required to fully comply with the request and where possible to prevent a request for review.

The GO(RM) advised members on the outcome of the appeal on which the Scottish Information Commissioner made a decision during the reporting period. The University was required to provide some additional information to the requestor but the majority of the response was upheld.

The access to Information Policy has now gone live and is published on the FOI website. It has been circulated via the FOI newsletter to staff involved with FOI responses. UIGG members are asked to raise awareness further in their respective areas.

In terms of OSIC, emails are received weekly with the decision summaries for each appeal dealt with by OSIC, the main point taken from the most recent summaries would be to ensure that searches for information within the University are thorough.

The GO(RM) advised that the Record Retention Schedules (RRS) are under review. Guidance sections in the RRSs have been updated and a template is now available on the intranet. The fields of information have been expanded to ensure that they are more informative and useful longer term. All members were asked to let the GO(RM) know if they have any questions around retention.

The Offsite Storage contact is generally working well, the facilities provide secure storage

and the charges are reasonable. Procedures have been tightened up to limit who can authorise records being sent offsite and guidance on the intranet has been updated

Training sessions are continuing to take place, with another one scheduled for 10th April 2014 and 10th June 2014, the training is fairly generic but can be tailored to suit individual departments. The GO(RM) advised she would be happy to arrange sessions for individual areas. A tailored training session for FECCI will take place at the beginning of March.

7 New EU Data Protection Regulation

UIGG(13/14)09

The GO(DP&L) spoke to the PowerPoint hand out and referred in particular to the key proposed changes and new elements of the draft Regulation: the increased monetary penalties for breaches; higher standard of consent; the right to be forgotten/erasure; requirement to conduct privacy impact assessments; increased transparency and accountability; data portability and future role of the UK Information Commissioner's Office.

The GO(DP&L) also spoke of the process and likely timeline for progressing this amended regulation. There had been a further delay of 6 months on the timeline originally proposed due to the European parliament elections in May 2014 and once the elections had taken place the newly elected parliament would be responsible for driving though the negotiations in the autumn in a trilogue with the EU Commission and the European Council of Ministers. It was thought unlikely that the Regulations would be adopted before late 2014/early 2015 and a two year transitional period had been proposed. Speculation continued to mount about how far the current proposals would be maintained.

8 Data Protection Officer's Report to January 2014

UIGG(13/14)10

The GO(DP&L) spoke to the paper and referred in particular to the three reported University data security breaches, providing detail on what these breaches were and what action(s) have been taken.

The GO(DP&L) also referred to recent examples of external data protection breaches handles by the UK Information Commissioner (ICO), providing detail on the breaches and the penalties imposed by the ICO.

The GO(DP&L) referred to the requests for student data from the police and other external third party requests. Members were reminded that all enquiries of this type should be referred to Governance Services to ensure any such requests were dealt with strictly in accordance with the Act and disclosures made where this was required or permitted under the Data Protection Act.

The GO(DP&L) spoke of the 22 Staff/Student enquiries and gave a brief outline of the subject matters.

The GO(DP&L) spoke of the Data Protection Code of Practice CoP), and associated guidance and other relevant documents, advising that the CoP was updated as required, with no recent revisions taking place. **All members** were asked to feedback on the content, subjects for FAQ's and where any other guidance could be developed.

The report was **noted**.

11 Date and Time of Next Meeting

The next meeting of UIGG will be held on Wednesday 11 June 2014 at 2.30pm in room 7.B.16 at Sighthill Campus.