

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

**Minutes of the meeting held on Thursday 26th February 2015
at 2.30pm in Room 7.B.16, Sighthill Campus**

Present	
<p>H Mizen (Senior Governance Officer Data Protection & Legal)(Co-Convenor); R Bews (Appeals, Complaints & Conduct Officer); C Biggar (PA to Principal); D Cloy (Assistant Secretary); O Dellal (Assistant Faculty Manager Executive Support); N Kivlichan (Market Intelligence Officer); L McElhone (Head of Student Administration); M Mackay (Administration Assistant/Clerk); B Merchant (Portfolio & Services Engagement Manager); J Moxey (Network & Security Services Manager); Simona Simeone (Assistant Faculty Operations Manager); N Turner (Head of Research and Innovation Office)</p>	
Apologies	
<p>D Watt (Senior Governance Officer, Records Manager)(Co-Convenor); J Archbold (Senior IT Developer); J Baillie (Campus Support Assistant/Technician); E Clark (Governance Assistant)(Clerk); A Deegan Wood (Planning Officer); J Dickson (Faculty Quality Advisor); S Duncan (Head of Campus Services);G Ferguson (Assistant Director Property & Facilities); J Hutchinson (Systems Improvements Manager); E Lambie (Administrator (Research Integrity & Development); L Mabberley (Assistant Director); A Ramsay (HR Advisor); G Sharkey (Faculty Director for International Developments); L Smith (Operations Support Manager); D Spiers (Lecturer); C Sutherland (Systems Officer)</p>	
Opening Remarks	
<p>Members were welcomed and apologies were noted. The Senior Governance Officer (Data Protection & Legal) (SGO (DPL)) (Co-convenor) extended a specific welcome to J Moxey and N Turner who were attending their first meeting. R Bews was also welcomed.</p>	
1	Minutes of the Meeting held on 14 October 2014 UIGG(14/15)05
<p>Members approved the minutes of the meeting on 14 October 2014 as an accurate record.</p>	
2 Matters Arising from the Minutes	
i)	<p><i>Minute 2 UIGG Membership</i> It was noted that the membership of UIGG had been amended as discussed. The SGO (DPL) advised that the membership would be further amended to reflect the expanded remit, discussed further under Item 3.</p>
ii)	<p><i>Minute 4 ii) Information Audit</i> The SGO (DPL) advised that the information audits were ongoing and some areas had</p>

engaged well in the process. Members were asked to actively encourage managers in their areas to complete the questionnaire and identify the top 3 highest information risks and records management co-ordinators who would complete the relevant spreadsheets.

- iii) *Minute 5 – Information Governance Implications of Academic Restructuring*
It was noted that the key area for concern from an information governance point of view was around records management, particularly records retention schedules and filing structures. Members in areas affected by the re-structuring were asked to advise the SGO (RM) of any comments or concerns so that these could be taken into account.
- iv) *Minute 6 Information Governance Newsletter*
The SGO (DPL) reported that the publication of the IG Newsletter in the new year had not been distributed as planned. However, it was intended to publish a revised version with a 'Spring Clean' theme, focusing on the appropriate destruction of records in accordance with records retention schedules, the Data Protection Code of Practice and the guidance on the Safe Disposal of Confidential Waste.

3 Report on Internal Audit on Information & Data Security

ORAL

The Assistant Secretary (AS) reported that an Internal Audit on Information and Data Security had been conducted in December 2014, involving Information Services (IS) and Governance Services. The report had been presented in January, to go to the Audit and Risk Committee on 4th March 2015.

The report had been generally positive, but had highlighted some areas for improvement. The AS extended thanks to the SGO (DPL), the Senior Governance Officer (Records Manager) and colleagues in Information Services for their work in responding to the Audit.

Areas where scope for improvement had been identified were:

- A more explicit policy to ensure staff had read information security policies and guidelines was required.
- Policy documents required more rigorous version control, and a review schedule, which would be monitored by UIGG
- While the University offered a good range and availability of training material, more could be done to encourage and monitor staff uptake, and a review of the effectiveness of training would be carried out every six months
- UIGG's remit would be expanded beyond the current focus on data protection, freedom of information and records management to include the more technical side of information governance systems. The membership of UIGG would be extended to include additional IS staff to cover the expanded remit.

Members discussed the importance of version control of documents, in particular for those posted on the internet / intranet, which might remain accessible despite being outdated. The need for procedures to be in place and promoted to intranet editors was discussed. The Portfolio & Services Engagement Manager (PSEM) undertook to ascertain whether there was a forum for intranet editors to promote best practice.

4 Policy Review Schedule	ORAL
<p>The SGO (DPL) tabled an example of a Policy Review Schedule, which had been developed in response to the recommendation referred to in 3. above. Policy review is to become a standing item on future UIGG agendas and a standard document control table will be adopted for all policies subject to review by UIGG. A copy of the schedule and the associated version control template is appended to this minute for information.</p>	
5 Information Security Roadshows	ORAL
<p>The PSEM reported on the series of Information Security Roadshows which had been run across the University that week. The roadshows were a collaboration between Information Services and Governance Services, had focused on email security and the overall response had been very positive.</p>	
6 Review of Online Training Modules	ORAL
<p>The SGO (DPL) reported that the online training modules had been running for 18 months and an increase in uptake had been seen, both within the University and in the wider Scottish HE sector. A review of the modules would be carried out in the summer, to which all members were asked again to contribute.</p>	
<p>The PSEM reported that Information Services had been piloting an online training module on information security, and invited members to participate and offer feedback on the modules, prior to the wider roll-out. The module was currently being hosted by its external provider, but IS were planning to bring it in-house. The system being trialled could offer additional functions, such as uploading relevant University policies and tracking who had read it by incorporating a tick box to confirm their understanding.</p>	
7 Update on Records Management	ORAL
<p>i) In the absence of the SGO (RM), the SGO (DPL) reported that the email management intranet pages had gone live, had been promoted at the Information Security Roadshows and would be further promoted in the Information Governance newsletter.</p> <p>ii) The SGO (DPL) reported that consultation continued on the detailed guidance section of the Information Security Classification Scheme and members were invited to contribute to that process and comment on how the scheme could be implemented. The final version would be presented to the next meeting of UIGG for approval and Governance Services would liaise thereafter with Technical Services to progress the implementation of the Scheme.</p>	
8 Records Manager's Report to January 2015	UIGG(14/15)06
<p>In the absence of the SGO(RM), the SGO(DPL) spoke to the report and highlighted some guidance offered by the Office of the Scottish Information Commissioner:</p> <ul style="list-style-type: none"> • Staff needed to ensure that thorough checks of records were conducted before responding to a requestor that no information was held; and • Information may lose its sensitivity over time, an exemption may no longer apply therefore and blanket exemptions were not to be used. 	

Members in areas which dealt with University procurement processes and contracts were asked to re-inforce to colleagues that: FOISA statements must be incorporated into tender documentation and contracts and suppliers must be asked to state what information, if any is subject to an exemption and why. It was noted that the University has a 'Confidential Information Statement' which will be published on Governance services intranet site; a copy is attached to these minutes for information.

In response to a query, it was clarified that the 'golden copy' of records from a procurement tender should be held by the Procurement Team in Finance Services and other departments involved would only need to retain the information necessary to manage the contract in their area.

9 Data Protection Officer's Report to January 2015 UIGG(14/15)07

The SGO(DPL) spoke to the report and outlined some key points:

§1: There had been two data breaches at the University, the more serious of which had been self-reported by the University to the Information Commissioner's Office (ICO). Further information on the outcome of this would be reported to the next meeting of UIGG.

§2: Progress with the new EU regulation on data protection was slower than anticipated, it was not expected to be approved before 2016 and a further two years for implementation was likely to be required.

§5: The SGO (DPL) invited members to continue to provide feedback on queries to ensure FAQs were kept up to date.

10 Review of the Data Protection Code of Practice ORAL

The SGO (DPL) reported that the 'light touch' review of the Data Protection Code of Practice, which had begun in autumn of 2014, had been completed. The Code had now been updated, subject to the ongoing reviews of the Manual Data Security Policy and the Guidance on Safe Disposal of Confidential Waste. Thanks were expressed to M Mackay for revising the Code and making it available on the Governance Services intranet site.

11 Manual Data Security Policy UIGG(14/15)08

The SGO (DPL) spoke to the paper and invited feedback from members on the amendments to the Manual Data Security Policy. It was noted that the application of this Policy had been specifically extended to include associate, temporary and casual staff.

Key points in the discussion included:

§1.2: The need for new staff to receive specific induction when dealing with manual data.

§1.5: The addition of information on the University's offsite storage facilities for long-term records.

§2.5: The added requirement for managers to designate a member of staff with

responsibility for departmental arrangements for handling records was endorsed by members

§2.7: The particular issues with exam scripts which were commonly removed from the University by markers and were inherently difficult to securely transfer and store due to their volume, were discussed. It was agreed that prior to each exam diet, staff were to be reminded of the requirements of the Policy.

§4.5: It was agreed that this section should be expanded to cover mobile devices such as laptops, phones and tablet computers, in addition to storage devices.

§6.2: The Network & Security Services Manager informed members of the security focused work of their team within Information Services, particularly in the development of policies and technology to support information security.

§8.2: The added section extending responsibility for compliance with the Policy to all University employees was highlighted.

It was agreed that a final version of the Policy would be circulated to members prior to being submitted to the Risk, Resilience and Audit Monitoring Committee for approval at its meeting in April.

12 Guidance on the Safe Disposal of Confidential Waste

UIGG(14/15)09

The SGO (DPL) spoke to the paper and outlined some key points.

§2: This section had been updated to include a definition of 'Golden Record'

§4: The guidance would be updated with reference to the new online training module on information security, and reworded with input from the PSEM to discourage the use of C and/or H drives and personal devices to store electronic versions of University records. Information Services were currently reviewing the process for disposal of redundant equipment, as well as developing a central process for handling lost devices.

13 Future meeting dates in 2014/15

Tuesday 2nd June 2015 to be held in room 7.B.14, Sighthill Campus.