

UIGG (14/15)18

EDINBURGH NAPIER UNIVERSITY RISK, RESILIENCE AND AUDIT MONITORING COMMITTEE

UNIVERSITY INFORMATION GOVERNANCE GROUP

Minutes of the meeting held on Tuesday 02 June 2015 at 2.30pm in Room 7.B.14, Sighthill Campus

Present

H Mizen (Senior Governance Officer Data Protection & Legal)(Co-Convenor); D Watt (Senior Governance Officer, Records Manager)(Co-Convenor); R Bews (Appeals, Complaints & Conduct Officer); A Deegan Wood (Planning Officer); J Dickson (Faculty Quality Advisor); S Duncan (Head of Campus Services); G Ferguson (Assistant Director Property & Facilities); O Dellal (Assistant Faculty Manager Executive Support); L McElhone (Head of Student Administration); M Mackay (Administration Assistant/Clerk); B Merchant (Portfolio & Services Engagement Manager); L Smith (Operations Support Manager); D Spiers (Lecturer)

Apologies

J Archbold (Senior IT Developer); C Biggar (PA to Principal); J Baillie (Campus Support Assistant/Technician); E Clark (Governance Assistant)(Clerk); D Cloy (Assistant Secretary); J Hutchison (Systems Improvements Manager); N Kivlichan (Market Intelligence Officer); E Lambie (Administrator (Research Integrity & Development); L Mabberley (Assistant Director); J Moxey (Network & Security Services Manager); A Ramsay (HR Advisor); G Sharkey (Faculty Director for International Developments); Simona Simeone (Assistant Faculty Operations Manager); C Sutherland (Systems Officer); N Turner (Head of Research and Innovation Office)

Opening Remarks

Members were welcomed and apologies were **noted**.

1 Minutes of the Meeting held on 26 February 2015

UIGG(14/15)10

Members **approved** the minutes of the meeting on 26 February 2015 as an accurate record.

2 Matters Arising from the Minutes

a) Minute 2 Information Governance Newsletter

The Senior Governance Officer (Records Manager) reported that the first edition of the Information Governance newsletter had been sent to all staff in March. The best response on click-throughs for the embedded links had been to Retention Schedules, although the overall numbers had been disappointing. The next newsletter would be sent over the summer, and would be shorter, with five 'headlines', planned to include: a poll on awareness of the Data Protection Code of Practice, policy update, year end record destruction preparation reminder/guidance, FOI clauses for

contracts/procurement guidance, IG for new system implementation guidance.

- b) Minute 3 Intranet Editors Best Practice
 The Portfolio & Services Engagement Manager noted that there was currently no central guidance for intranet editors, but that this would be developed.
- Minute 4 Policy Review Schedule Work is underway to review those policies highlighted in the schedule. Records Retention Schedules, as policy documents, have been added to the schedule. The SGO(RM) reported that a drive to ensure Retention Schedules were up to date was underway, following recommendations from the University's internal auditors. Faculty Retention Schedules would be rolled forward to the Schools during the restructure. The intent was to work on new retention Schedules for the Schools at the same time, to encourage consistency.
- d) Minute 6 Information Security Online Training Module

 The PSEM reported that, following a successful pilot, Information Services were proposing to run the online training module internally. The required software was in place, but work remained to be done to integrate the modules with University systems. This would allow tracking of participation. As a proof-of-concept and additional module on University policies to allow monitoring of the take-up of policies.

The existing externally-run service would remain in place until the internal version was ready to be implemented. Information Services would also hold discussions with Human Resources regarding the proposal to make the training mandatory.

3 Information Risk Assessments

ORAL

The SGO(RM) reported that a tool to identify Information Risks and provide staff with generic Information Risk Assessments was being developed. Aspects of information risk were incorporated into the revised Manual and Physical Data Security Policy, as well as Privacy Impact Assessments and the Information Security Classification Scheme (ISCS). Whilst the Information Security Classification Scheme is a risk assessment tool it only covers security – members were asked to consider whether or not they felt there was a requirement for an additional Risk Assessment tool or if it should be incorporated into one Scheme. Members were asked to provide their comments to the SGO(RM).

In response to a query about how staff would apply the tool, the SGO(RM) reported that it should be used when considering the information gathered to support each business process, starting with those business processes which use the most sensitive information.

In response to a query, the SGO(RM) noted that an email would be sent to staff leaving the University, to help ensure that any corporate information was held in shared locations, rather than in personal storage areas and/or email systems.

ACTION: SGO(RM) and Members

4 Manual and Physical Data Security Policy

UIGG(14/15)11

The SGO(DPL) reported that the Manual and Physical Data Security Policy had been

approved by Risk, Resilience and Audit Monitoring Committee with some minor amendments regarding risk assessments and that the title had been amended from 'Manual Data' to 'Manual and Physical Data'. Members were requested to disseminate the Policy.

5 Guidance on the Safe Disposal of Confidential Waste

UIGG(14/15)12

The SGO(DPL) reported that the Guidance on the Safe Disposal of Confidential Waste had been approved by Risk, Resilience and Audit Monitoring Committee and was ready for dissemination and use.

7 Information Security Classification Scheme

UIGG(14/15)13

The SGO (RM) spoke to the paper, and requested that members provide feedback on the Information Security Classification Scheme, and examples for inclusion in Section 2.6 of the Scheme by 24th June.

ACTION: Members

8 Update on Records Management

ORAL

i) The SGO (RM) reported that while some areas held 'disposal days', there was no university-wide participation. It was considered that best practice would be for every area to hold at least one disposal day annually.

There was a need to promote working to retention schedules for records and away from the practice of holding on to records 'just in case'.

The upcoming academic re-structuring offered the opportunity to engage with the incoming Deans of School to encourage compliance.

Members were requested to feed back any suggestions for promoting records management events.

- ii) The SGO (RM) was working on an updated Records Management Policy, and planned to circulate a draft to members in July for comment, to be approved at the next meeting of UIGG.
- iii) A draft Email policy will be sent to Information Services in July for their input and would be circulated to members in August for consultation, to be approved at the next meeting of UIGG.

The SGO(RM) was also trialling a SharePoint integration tool for Outlook, to enable staff to easily retain emailed information in a shared location.

ACTION: Members & SGO(RM)

9 Records Manager's Report to May 2015

UIGG(14/15)14

The SGO(RM) spoke to the report and highlighted the following issues:

i) The University continued to receive a fairly steady number of Freedom of Information

requests.

- ii) Updated Procurement and Contract Guidance had been produced, which members were requested to promote.
- iii) Proactive Publication of Information: the website update provided the University with the opportunity to take a proactive approach to Freedom of Information, with individual departments being responsible for publishing information online. Governance services could provide an analysis of FoI requests for guidance if requested.

ACTION: Members

10 Draft Student Fair Processing Statement 2015/16

UIGG(14/15)15

The SGO(DPL) presented the draft Student Fair Processing Statement for comment. The Statement was produced in accordance with the Data Protection Principles, and updated for each academic year. Members were requested to provide feedback on the current draft.

ACTION: Members

11 Current Staff Fair Processing Statement

UIGG(14/15)16

The SGO (DPL) presented the current Staff Fair Processing Statement for review. The statement will require review with regard to upgraded functionality on HRConnect, and amendment in view of the proposal to publish an edited version of the Staff Directory. Members were requested to provide feedback on the statement.

A further review may be required to take into account the 'Right to be forgotten' once the new EU Data Protection regulations were published, currently expected to be in the first half of 2016.

ACTION: Members

12 Data Protection Officer's Report to May 2015

UIGG(14/15)17

The SGO (DPL) spoke to the report and highlighted the following issues:

- i) There had been one reported data security breach at the University. Members' attention was drawn to the examples of data breaches at other organisations, which highlighted the many different ways in which data could be disclosed by mistake.
- ii) As discussed under Item 11, the reform of EU data protection regulations was underway.
- iii) The SGO (DP) was liaising with the Security Supervisor who had been assigned responsibility for reviewing the CCTV Code of Practice with reference to the ICO's updated Code. .
- iv) The programme of Governance Services' briefing sessions on Information Governance and on Information Security in conjunction with Information Services was ongoing. It was important to keep taking the message on information governance and security across the University.

13 Network and Security Services Manager's Report

ORAL

In the absence of the Network & Security Services Manager, the PSEM made an oral report

on Network and Security.

- i) In the period since the last UIGG, Information Services had dealt with five major security incidents: four relating to serious vulnerabilities in software which required emergency patching of multiple servers and one relating to a misconfiguration of SITS.
- ii) Information Services security partner NCC had carried out penetration and vulnerability scanning on the perimeter of the network, wireless network and the core servers networks. This was a proactive step taken by IS to ensure that standards were met, to identify vulnerabilities and put in place remediation strategies.
- iii) The Team had completed the twice-yearly review of the firewall and were in the process of the twice-yearly review of 3rd party access accounts.
- iv) The Team was reviewing and updating the following procedures: the Security Incident Security Response Procedure and Plan, the Third Party Access Procedure, the Redundant Equipment Procedure and the Web Filter Procedure.
- v) The Team was working on a project to upgrade the University's Intrusion Detection System to allow greater visibility of possible threats on the network; this project meant an increased investment in hardware.
- vi) The teams in the Infrastructure Systems Group were working on a Mobile Device Management solution (Airwatch) which was being piloted within Information Services, and were also investigating solutions to replace MyDrive as a flexible and secure way to access University data from anywhere.
- vii) Work was ongoing to look at an alternative encryption solution for the University as an alternative to the freeware software TrueCrypt, it was hoped that an alternative enterprise solution would allow for more reliable and secure key management.
- viii) Information Security Awareness training had been resumed, again as a proactive approach to information security. So far three sessions had been delivered, attended by 21 members of staff from various departments. The last training session was collaboratively delivered with input from the SGO (DP). Members were requested to promote the training to their departments.

ACTION: Members

14 Proposed meeting dates in 2015/16

Members were asked to note the meeting dates and venues for session 2015/16: 13 October 2015 (Tuesday), Siegfried Room, Craiglockhart Campus 25 February 2016 (Thursday), Room 6.B.14, Sighthill Campus 31 May 2016 (Tuesday), Room 7.B.14, Sighthill Campus

All meetings were scheduled to commence at 2.30pm.