

**EDINBURGH NAPIER UNIVERSITY
DIGITAL STRATEGY & INVESTMENT COMMITTEE
UNIVERSITY INFORMATION GOVERNANCE GROUP**

**Minutes of the meeting held on Tuesday 31 May 2016
at 10.00am in Room 6.B.14, Sighthill Campus**

Present		
H Mizen (Senior Governance Officer Data Protection & Legal)[Co-Convenor]; D Watt (Senior Governance Officer, Records Manager)[Co-Convenor]; S Bennett (School Research & Innovation Officer); R Bews (Appeals, Complaints & Conduct Officer); C Biggar (PA to Principal); E Clark (Governance Assistant); D Cloy (Assistant Secretary); O Dellal (School Operations Officer); G Hamilton (Information Security Manager); N Kivlichan (Head of Market Intelligence and Evaluation); L McElhone (Head of Student Administration); B Merchant (Portfolio & Services Engagement Manager); D Munro (International Marketing Manager); A Ramsay (HR Adviser Team Leader); S Rowell (Head of Student Systems & Process Improvements); L Smith (Operations Support Manager); C Sutherland (Systems Officer); N Turner (Head of Research and Innovation Office)		
Apologies		
J Baillie (Campus Support Assistant/Technician); A Deegan Wood (Planning Officer); J Dickson (Faculty Quality Advisor); S Duncan (Head of Campus Services); S Simeone (Assistant Faculty Operations Manager); D Spiers (Lecturer)		
In Attendance		
D Dack (Campus Manager)[for Item 7]; M Mackay (Administrative Assistant)[Clerk]		
Opening Remarks		
<p>The Senior Governance Officer (Data Protection & Legal) welcomed members to the final UIGG meeting of 2015/16, and extended a specific welcome to the new members: G Hamilton, D Munro and S Rowell, as well as S Bennett, who was deputising for J Dickson.</p> <p>The apologies were noted.</p>		
01	Minutes of the Meeting held on 25 February 2016	UIGG(15/16)21
Members approved the minutes of the meeting on 25 February 2016 as an accurate record.		
07	Revised CCTV Code of Practice	UIGG(15/16)23
<p>This item was discussed out of agenda order to allow the participation of the Campus Manager.</p> <p>The SGO (DPL) spoke to the paper and highlighted the key changes to the CCTV Code of Practice:</p>		

Introduction – Explicitly states the Code does not include the use of unmanned aerial systems (i.e. drones). Concerns regarding the use of drones were ongoing and the subject would be revisited in the future.

§6.1 – Provides clarity on the purposes for which the University used CCTV systems.

§7 – Provides an explicit definition of ‘covert surveillance’ and the criteria that must be met for the University to use it.

§10.6 – Extends the authority for the use of CCTV to the Head of Student Accommodation who has locus over systems in the University’s student lodgings.

The CM reported that the Code of Practice had required updates with the extension with CCTV systems now in place in student accommodation. Accommodation Officers were covered by the same Code of Practice and would have the same authority as Security staff to supervise viewing of CCTV images, once they had been trained to the same standard. This training would cover the Data Protection Act, Human Rights Act and the CCTV Code of Practice. Downloading CCTV images would remain under the authority of Security.

The issue of drones had been raised at the Campus User Groups, and with relevant senior staff. The need for written guidelines, to provide operational clarity for Security staff and for insurance purposes was reiterated.

The revised CCTV Code of Practice was **approved**.

The CM would report back to the group at a later date to discuss the implementation of the Code of Practice and any further updates required.

02 Matters Arising from the Minutes

- a) Minute 2b) – Information Security Training Module. The Portfolio & Services Engagement Manager reported that promotion of the Information Security training module had been temporarily put on hold. This was due to the change in staff log-in to using staff number, which would have caused some staff to lose their history for the modules. The change-over was due to be complete by 28 June, and Information Services would revisit the modules to relaunch at the beginning of July.
- b) Minute 4) – Membership. The SGO(DPL) reported that Paul Barron would join the group in 2016/17, along with an additional representative, to be determined, from Human Resources.
- c) Minute 5) – HR Update on PDR Process Review. The HR Advisor Team Leader reported that a new HR Partner had started with the University and was liaising with the Director of HR on the review of the PDR process, and was aware of the group’s recommendations. The new PDR was due to be rolled out in September. The SGO(DPL) passed on her thanks to HR for their work in this regard.
- d) Minute 5) – Promotion of Roadshows through HR Connect. The PSEM reported that the next round of Information Security Roadshows were due to be held in September, and would be promoted via HR Connect.

03	Project Updates	Oral Report
<p>The Portfolio & Services Engagement Manager reported on current Information Services projects:</p> <p>Remote Access to Data Project – A workshop was to be held to establish where data was stored across the University. The key message of the project was that any systems need to be easy to use and collaborate in, and that there may not be a single solution for all areas. The project was currently collating feedback from users, to arrive at a shortlist of the top four available options.</p> <p>No timetable had been determined as yet, although Information Services were keen to move forward as soon as possible, as the current MyDrive system was no longer meeting the needs of the University (e.g. researchers had issues using it for collaborative working) and required replacement.</p> <p>Office 365 Project – the final iteration was to go to the project board the week following the UIGG meeting. Staff requirements required discussion.</p>		
04	Use of Eventbrite / BookItBee / SmugMug	Oral Report
<p>The SGO(DPL) reported that several queries had been made to Governance Services regarding the use of online booking and ticketing services such as Eventbrite and SmugMug. However, as these services hosted data in the USA, there are data protection concerns with their use. Any staff using these service would need to include a disclaimer that they were not affiliated with the University.</p> <p>The SGO(RM) reported that a UK-hosted alternative BookItBee was being investigated for suitability, and planned to be able to make a recommendation to staff within two to three weeks. A report would be made to the next meeting of the group.</p> <p>Members were requested to make their colleagues aware of the potential issues of using these services.</p>		
05	Records Manager's Report to April 2016	UIGG(15/16)22
<p>The SGO(RM) spoke to the paper and highlighted the following:</p> <ul style="list-style-type: none"> • The number of Freedom of Information requests had noticeably increased over the same period last year, and the numbers of questions from requesters had doubled. This increase highlights the need for good records management practices to enable University staff to cope with the increase. • Student Services and Human Resources had received the most requests. • The receipt of several requests relating to data breaches highlights increased interest in data protection and the new EU GDPR. • The Office of the Scottish Information Commissioner had run a 'secret shopper' exercise examining publication schemes, which had prompted a major overhaul of the University's publication scheme. The SGO(RM) thanked staff who had contributed. • The University will be proactively publishing details of the expenses of University Leadership Team members in the summer, which were a frequent topic of FOI requests. This, along with an increase in s.25 exemptions, demonstrates the 		

University's compliance with the Scottish Information Commissioner's recommendations.

- Property and Facilities Services had been carrying out a number of records management initiatives and Edinburgh Institute had finalised and published their Records Retention Schedule.

06 New EU General Data Protection Regulation Presentation

The SGO(DPL) spoke to the presentation, a copy of which is appended to the minutes.

Key points of the presentation were:

- GDPR was approved in April 2016 and comes into force on 25 May 2018
- Key changes are:
 - Strengthening of conditions for consent
 - Expansion of the definitions of personal data and sensitive personal data
 - Data subject access rights are expanded
 - The right to be forgotten
 - Privacy by design
 - Increased penalties for data breaches
 - Mandatory notification of data breaches
 - Data portability
 - Increased territorial scope
- ICO had published [initial guidance](#) and would produce further information in a phased, subject-specific manner
- What can be done now
 - raise awareness in their area
 - look at the information their area holds (an information audit may be required)
 - review how they are seeking, obtaining and recording consent – consider whether they need to make any changes
 - read the guidance on [Privacy Impact Assessments](#) and start thinking about how/when a PIA was required
- Further information would be available via the Governance Services [site](#) which will be updated as appropriate, and from the UK ICO's [site](#)

08 Data Protection Officer's Report to April 2016 UIGG(15/16)24

The SGO (DPL) spoke to the paper and highlighted these key points:

- There had been no reported Data security breaches at the University during the reporting period.

The Group discussed procedures for ensuring physical student records could be transferred securely. The School Support Service was exploring potential options including a dedicated 'handback' area at the student hub, and identity verification procedures.

- The UK Information Commissioner had levied the highest fine to date - £350,000 against a firm responsible for automated nuisance calls. The SGO(DPL) noted that

this fine could potentially be small in comparison to the fines levied under the new GDPR.

- The issues with the former Safe Harbour Scheme for data transfer to the USA were ongoing, the latest iteration of the replacement EU-US Privacy Shield had been deemed to be not adequate, and would require significant improvement. Further developments would be posted to the [Governance Services intranet site](#).
- Queries from staff and students continued to be many and varied.
- The SGO(DPL) would be presenting a briefing to the Senior Leadership Group on the EU GDPR.

09 Information Security Manager's Report Oral Report

The Information Security Manager provided an update on points from the previous meeting:

- The work on the Intrusion Detection System was ongoing. In addition to offering security to the University's information systems, the IDS would potential be a useful reporting tool to provide information on where users were storing data.
- A current major topic of discussion at information security meetings was ransomware installed via phishing attacks. The University's email systems have protection against external attempts to emulate university email addresses, but some accounts had been compromised, allowing some phishing attempts to come from genuine university email addresses.

There was a need to discourage users from re-using the same password for different purposes. Information services were investigating the possibility of using password management software across the university.

10 UK Information Commissioner's Guidance on Encryption Oral Report

The ISM reported on the use of encryption by the University.

The incoming EU GDPR requires data controllers to use appropriate technical measures to protect data. Encryption is a useful tool which can reduce the potential damage done by data security breaches, but should not be relied on as the sole protection of data.

Information Services were currently investigating options for enterprise encryption software for use across the University, and in particular for mobile devices such as laptops or mobile phones, and for USB sticks.

Encryption keys would require careful management, balancing control of access to keys and ensuring no user is the sole keeper of an encryption key for any system or data.

Any encryption systems used by the University need to be user-friendly and ideally would be active by default on University-owned devices. Information services were exploring the use of remote desktop software for users' own devices to increase security of data, which

would either remain on the University's internal systems or be held within a secure 'sandbox' on the external device.

Encryption is a valuable tool staff should be making use of. Guidance on the IS intranet was being continually kept up to date.

Next meeting date

Currently scheduled for **Thursday 06 October 2016**, at 2.30pm, venue to be confirmed.

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The SGO(RM) noted that this would be the SGO(DPL)'s last meeting, and thanked her for her considerable contributions to the group.

The SGO(DPL) thanked members and said it had been a pleasure to work with them. She wished them the best of luck for the future.