

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

**Minutes of the meeting held on Thursday 01 June 2017
at 10.00am in the Tower Boardroom, Merchiston Campus**

Present		
D Watt (Information Governance Manager)[Convenor]; R Bews (Appeals, Complaints & Conduct Officer); C Biggar (PA to Principal); A Deegan Wood (Planning Officer); O Dellal (School Operations Officer); G Hamilton (Information Security Manager); N Kivlichan (Head of Market Intelligence and Evaluation); L McElhone (Head of Student Administration); J Martin (Systems Officer); A Richmond (Governance Adviser (Records Management)); S Simeone (Assistant Faculty Operations Manager); D Spiers (Lecturer)		
Apologies		
J Baillie (Campus Support Assistant/Technician); P Barron (Professor of Hospitality & Tourism Management); E Clark (Governance Advisor (Freedom of Information)); D Cloy (Assistant Secretary); L Conlan (Head of HR Services); J Dickson (Faculty Quality Advisor); S Duncan (Head of Campus Services); L Fraser (HR Adviser); L Mabberley (Assistant Director Marketing Brand and Communications); B Merchant (Portfolio & Services Engagement Manager); D Munro (International Marketing Manager); L Smith (Operations Support Manager); N Turner (Head of Research and Innovation Office)		
In Attendance		
M Mackay (Administrative Assistant)[Clerk]		
Opening Remarks		
The Information Governance Manager welcomed members to the meeting. The apologies were noted .		
01	Minutes of the Meeting held on 21 February 2017	UIGG(16/17)10
Members approved the minutes of the meeting on 21 st February 2017 as an accurate record.		
02	Matters Arising from the Minutes	
a) Information Governance Co-ordinators' Network		
The Information Governance Manager reported that she had circulated the remit for the Information Governance Co-ordinators' Network, but required more volunteers for the role of IG Co-ordinators.		
IG Co-ordinators were intended to be a focal point for their teams for records management, data protection and freedom of information, and help to promote best practice.		

A potential issue with referring to the roles as 'Co-ordinators' was raised and it was suggested to rename this to Information Governance Champions.

Actions: Members who had not already done so to notify the IGM of nominees for Information Governance Co-ordinators by **15th June 2017**

**03 Freedom of Information and Records Management UIGG(16/17)11
Report to April 2017**

The Governance Adviser (Records Management) spoke to the paper and highlighted some key points:

Fol Requests

- There had been a slight decrease in the number of Freedom of Information, however this was not thought to be indicative of an ongoing trend
- The majority of requests continued to be received from the media
- The main focuses of requests were Finance and Human Resources
- The primary exemptions used were S17 (Information not held) and S38(1)(b) (Personal data), although one request, regarding Prevent, was refused under S18 (Neither confirm nor deny)
- There was one request for the review of a decision during the reporting period, which had upheld the initial decision.

Thanks were extended to those colleagues across the University who had assisted with providing information for Fol requests.

Office of the Scottish Information Commissioner

As recommended in the OSIC model publication scheme, the University would begin pro-actively publishing details of the expenses of the University Leadership Team from the first week in June.

Records Management

The Records Retention Schedule for Finance had been completed. Thanks were extended to the Finance Operations Support Manager for her role in the project. The development of Retention Schedules was ongoing in other areas of the University, including Property and Facilities, Student Accommodation, the Department of Learning and Teaching Enhancement, and Information Services as part of their ongoing SharePoint Project.

The Records Management intranet pages had been updated, and now included the date when the page was most recently updated.

The GA(RM) was liaising with colleagues involved in organising events to develop best practice and guidance for records relating to events.

Guidance on the use of Outlook archives (.PST files) had been developed.

04 Data Protection and GDPR Report to April 2017 UIGG(16/17)12

The Information Governance Manager spoke to the paper and highlighted some key points:

There had been no data security breaches during the reporting period.

The UK Information Commissioner's Office (ICO) had been increasing both the number and the amount of fines levied, bringing the current regulatory regime into line with the GDPR. Over the reporting period a total of £844,000 in fines had been imposed. This had included eleven charities fined for profiling activities, unlawful sharing and the use of personal data not provided by data subjects. A further two organisations had been fined for contacting customers without being able to provide evidence that individuals had consented to receive these communications or had unsubscribed from contact lists.

This highlighted a potential challenge for the University with contacting alumni, due to the age of some records and the effect that changes in legislation had to the requirement to gather consent over the years. If universities were classified as public authorities under the GDPR, it would further limit how the University could process these records. The decision on this was still to be made by ICO. Alumni have engaged with Governance Services on this issue, however the challenge extends across the University.

The IGM was liaising with Marketing and Communications to ensure GDPR compliance, including with planned outsourced system for marketing which would include model / template privacy notices. The IGM encouraged anyone conducting e-marketing to contact her to discuss the data protection requirements. A major potential issue would be teams with ad hoc mailing lists outside the formal systems.

The IGM had been chairing the Scottish Higher Education Information Practitioners group, which had been co-ordinating universities' work on developing guidance and best practice and consulting with ICO.

Governance Services continued to promote awareness of the GDPR, most recently with an email newsletter. Attendance on scheduled and team briefings had been good. HR were in the process of making data protection training mandatory.

All of the University's privacy notices would need to be assessed to ensure GDPR compliance, members were asked to make sure any privacy notices were sent to the IGM to be reviewed.

Privacy Impact Assessments had been embedded in the processes for procurement and strategic projects where the resulting systems would involve processing personal data.

Contracts where data would be shared outwith the EEA would require review. Members were requested to contact the IGM to discuss any relevant contracts. Contracts where data would be shared with or accessed by any third parties required review to ensure data sharing agreements were included or were GDPR compliant.

One IG Briefing session had been held during the reporting period, which, together with the team-specific briefings and data protection/GDPR-specific briefings, led to a combined total of around 120 staff attending a data protection session. The briefings were generating an increase in IG queries from staff. This was considered a positive sign that the message was getting out regarding the importance of IG. Members were requested to encourage their colleagues to attend a scheduled IG briefing, or to arrange a team briefing.

A new system for producing Student ID cards would be introduced for the 2017/18 academic year. The ID cards would be produced by an external supplier, which would require sending students' personal data, including photographs. A privacy notice would be

required, although the ID cards would be considered as a condition of entry to the University and should not require a specific additional consent. A Privacy Impact Assessment was being worked on by the IGM and colleagues involved in the procurement exercise.

A GDPR briefing session at a meeting of Senior Leadership Group was requested by members.

05	Information Security / Network and Security Services Report	Oral Report
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The Information Security Manager reported on current information security issues:

The recent WannaCry ransomware incident, which had affected the NHS and other organisations, had highlighted the importance of keeping device software up-to-date, as it would not have spread to the extent that it did if the affected PCs had received the latest updates. Although there were no reports of affected PCs at the University, the incident had revealed some shortcomings in the application of software updates and these were being addressed. Future malware campaigns were likely to be even more sophisticated, therefore it was essential that all network-connected devices receive software updates in a timely manner.

A proposal to seek Cyber Essentials certification had been presented to the University Senior Leadership Group was welcomed by its members. Assuming approval to proceed was given, there would need to be a broad programme of work across all areas of the University, to ensure that the areas evaluated by Cyber Essentials were brought into compliance – particularly asset, system configuration and user identity management. Cyber Essentials certification was already a prerequisite for some Government contracts and potentially could become mandatory for public bodies.

A new Information Security Awareness Training course had been developed and was currently being piloted on Moodle. Information Services were in liaison with HR to make the training mandatory. The IGM requested that any member of UIGG wishing to review the course before it was made generally available contact him to arrange access.

The number of students who had not yet enrolled for the Password Manager service was down to 4295 (including 2061 overseas students) and there were 1252 staff not yet enrolled. Users were encouraged to enrol by a pop-up message when they logged into their PC. IS were working toward making enrolment in the system mandatory.

06	Information Services Project Updates	Oral Report
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The Information Security Manager reported on the major projects currently being undertaken by Information Services:

Management of Shared Administrative Credentials

This project was intended to develop additional security and monitoring to shared high-level access to information systems. Meetings had taken place within Information Services and it was hoped that a summary report with recommendations could be produced this summer. Work on this project had been delayed by the need to prioritise the Web Filter Replacement project.

Office 365 for Staff

Following extensive testing, the first group of early adopters were migrating during the week commencing 13th June. There were still decisions to be made regarding access to collaborative features such as Office Groups, however a presentation by Microsoft to the Project Team would be taking place that would assist with those decisions. Both Exchange Online email and access to the Office suite of products for personal devices would be released as part of Phase 1. Skype for Business was planned for the second phase.

Remote Access to Data

The previous Proof of Concept had failed to provide the required functionality. An options/recommendation paper had gone to the Project Board where it was decided that the project should be closed and a new project scoped to review the wider on-premise data storage available to staff. This would provide the opportunity to review the University's requirements regarding on-premise/Cloud data storage as well as modernising and improving the existing H: and S: drive infrastructures.

The MyDrive service had been closed down, as it ran on an obsolete operating system and had been shown to be vulnerable.

Web Filter Replacement

The existing web filtering solution was no longer being developed by the vendor and it was failing to categorise the majority of web browsing traffic, which may result in undesirable content being allowed through. A project was underway to urgently replace this with a new solution, with the aim of providing more accurate content categorisation and better filtering of malicious content. The new system would require a review of the relevant privacy notice to ensure this was up to date.

Windows 10 Desktop

The project to develop a new Windows 10 desktop image had its first project board meeting and work was continuing in the planning phase. The Information Security Manager had contributed a list of recommendations for how the image should be configured to take advantage of the modern security benefits of Windows 10, including device encryption by default.

Meeting dates for 2017/18

Currently scheduled for:

Tuesday 10 October 2017 (10.00am – 12.00noon), Tower Boardroom, Merchiston Campus

Tuesday 27 February 2018 (2.00 – 4.00pm), Tower Boardroom, Merchiston Campus

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