Edinburgh Napier
UNIVERSITY

UIGG(18/19)12

**EDINBURGH NAPIER UNIVERSITY
RISK & RESILIENCE COMMITTEE**

UNIVERSITY INFORMATION GOVERNANCE GROUP

**Minutes of the meeting held on Thursday 13th June 2019
at 10.00am in The Glassroom, Merchiston Campus**

Present
D Watt (Information Governance Manager)[Convenor]; E Clark (Governance Adviser (Freedom of Information)); L Donnelly (Transaction Services and Finance Manager); S Fitzpatrick (HR Advisor); L Gaddie (Systems Officer - Team Leader); G Hamilton (Information Security Manager); B Kieliszek (Information & Operations Manager); L McElhone (Head of Student Administration); D Munro (Communications Manager); A Richmond (Governance Adviser (Records Management)); S Shinnie (Programme & Project Delivery Manager); S Simeone (School Operations Officer); L Smith (Operations Support Manager); D Spiers (Lecturer)
Apologies
P Barron (Professor of Hospitality & Tourism Management); R Bews (Appeals, Complaints & Conduct Manager); R Burns (International Marketing Manager); D Cloy (University Secretary); L Conlan (Head of HR Services); O Dellal (School Operations Officer); J Dickson (School Support Manager); N Kivlichan (Head of Market & Student Intelligence); B Merchant (IT Business Change Consultant); A Ramsay (Senior HR Adviser); C Sutherland (Systems Officer); G Thomson (Executive Assistant); N Turner (Head of Research and Innovation Office)
In Attendance
M Mackay (Administrative Assistant)[Clerk]
Welcome, Introductions and Apologies
The Information Governance Manager welcomed members to the meeting, extending a particular welcome to new members L Donnelly, S Fitzpatrick, L Gaddie and S Shinnie. The apologies were **noted**.

01	Minutes of the Meeting held on 19 February 2018	UIGG(18/19)07

Members **approved** the minutes of the meeting on 19th February 2019 as an accurate record.

02	Matters Arising from the Minutes

a) Remit and Constitution (Item 2 – UIGG(18/19)08)
The IGM presented the amended remit of UIGG, extended to cover Information Security in more detail. It was noted that a new Director of Information Services would be taking up the post in July, and their input may lead to further revisions.

Members **approved** the amended remit of UIGG.

b) UIGG Membership (Item 3)
The IGM noted that the membership of UIGG was still incomplete, and would continue to seek out additional members.

c) Student Privacy Notice (Item 8)
The Student Privacy Notice was **provisionally approved**, subject to any further amendments from members. The IGM requested any feedback be sent to her by 27th June.

d) Information Requests from the Media (Item 5)
The IGM spoke to the issue of requests for information from the media being submitted on Friday for Sunday publication. While the issue had not been discussed at SHEIP, other institutions were aware, and would be taking an opportunity to discuss the matter directly with the Scottish Information Commissioner.

03	Freedom of Information Report: October 2018 to May 2019	UIGG(18/19)09

The Governance Adviser (Freedom of Information) spoke to the paper and highlighted:

- While the number of FoI requests received had decreased over the reporting period for the previous year, the complexity of individual requests had increased. The majority of requests had come from the media, with frequent topics for requests including sexual assault / harassment and student misconduct.

- Two Environmental Information Requests had been received.

- All but five requests had been responded to within the statutory 20 day deadline; however, requests had to be chased up with other departments on 27 occasions. There were eight occasions when no information was provided, primarily as the requested information was not held. Six reviews had been held, four upheld the initial decision, two overturned. Eight requests for information were closed due to the requestor not providing clarification.

The GA(FoI) noted that a deadline had been missed when a Freedom of Information request had not been treated as such. She reiterated that any written request for information should be considered an FOI request, and requested that members to encourage colleagues to contact Governance Services if they had queries about requests for information.

The group discussed the issue of FoI requests which were clearly a prelude to a sales pitch. It was noted that OSIC had deemed these to be generally valid requests to be treated as any other FoI requests. While the University could often apply exemptions some commercially sensitive information, 'top line' figures were usually not exempt from release. It was noted that Procurement's systems were migrating online, which presented potential options to guide such requestors to information there.

06	Data Protection and Records Management Report to January 2019	UIGG(18/19)10

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

- No serious data breaches required to be reported to the Information Commissioner had occurred.

- Eleven non-reportable breaches had occurred, most commonly regarding emails sent to inappropriate recipients. One breach had flagged up issues with the use of email distribution lists, which had subsequently been restricted by Information Services. Overflowing confidential waste consoles were also a problem, the GA(RM) encouraged members to ensure their colleagues knew to contact Governance Services to have these dealt with.

- With regard to the examples of data breaches at other organisations, the case of London Borough of Newham was highlighted – a data breach had revealed a lack of policies and procedures for data sharing.

- A meeting of the Information Governance Champions Group had been held in May.

- Work was ongoing across the University on Privacy Impact Assessment audits and Layered Privacy Notices.

- Three Subject Access Requests had been received, along with four requests to be forgotten and two objections to processing. It was considered likely that requests to be forgotten would become increasingly frequent.

- Nine requests from the police for personal data had been received.

- Destruction Days organised by Property and Facilities had resulted in an increased number of queries from staff on records management.

The group discussed internal surveys, and the need to ensure clarity when using the University's online platform NOVI, following a request for comments from the Staff Survey, which participants had been told would be confidential.

It was noted that Data Subject Access Requests had almost always found emails with personal comments about the subject. The IGM re-iterated that emails should remain business-like and professional, but that care was needed to avoid a situation where information that could be vital for a chain of evidence was not written down.

07	Compliance and Risk Assessment Checks	Verbal Report

The Information Governance Manager reported on the current matters regarding Data Protection Compliance:

- The work of the Information Governance Champions was ongoing across the University, but there was still a lot of work to be done. Information Services had produced figures on the amount of data held on H- and S-drives, on SharePoint and in email. The IG Champions were looking into processes, carrying out Privacy Impact Assessments for processes and ensure these are covered in the relevant processing statements.

- The majority of departments had Information Governance Champions, but there were still some gaps.

- Data Protection checks would be included as part of the audit due to be carried out in September.

- Destruction events were ongoing, and would be added to Records Retention Schedules.

- Checks were ongoing into third party systems in use across the University, which were not GDPR compliant, and which had not been sourced through the procurement process or central Information Services procedure.

  The Scottish Government's Cyber Resilience Unit were working to ensure compliance in public sector bodies, and would be publishing guidance documents to assess suppliers on information security.

  It was noted that in practice third party companies were generally aware of the issues around GDPR, and were open to amending agreements to ensure compliance.

- Data breaches had been instrumental in flagging up issues. Staff had been moving quickly to put new or updated procedures in place, which was important to demonstrate compliance to OSIC.

08	Staff Privacy Notice – Review	UIGG(18/19)11

The Information Governance Manager reported on the current matters regarding the Staff Privacy Notice:

- Discussions were ongoing in the Higher Education sector regarding the handling of criminal convictions, with a paper from SHEIP having been submitted to the Secretaries' Group

- Minor changes from HR had been included.

- More detail had been included on the use of third party systems.

- More details had been included on UCEA and Athena SWAN.

- More details had been included on the use of IT monitoring and logging systems. IS were investigating the use of improved systems for e-discovery in relation to Data Subject Access Requests.

- Regarding Workplace by Facebook, the privacy impact assessment had been carried out by HR which had raised concerns. A robust list of risks had been presented to Senior Leadership Team; however the system had been approved.

  The concern was raised that information could be posted to Workplace that was not available elsewhere, particularly once a critical mass of users were using the service. The HR Communications Team were monitoring use of the service.

  It was noted that a team using a closed Workplace group, rather than the all-staff one, had found the service useful, particularly for inter-campus communication.

The Staff Privacy Notice was **provisionally approved**, subject to any further amendments from members. The IGM requested any feedback be sent to her by 27th June.

09	Access to Information Policy Statement – Review	UIGG(18/19)12

The Information Governance Manager reported on the current version of the Access to Information Policy Statement, this had been amended with some minor updates to ensure GDPR compliance.

The Access to Information Policy Statement was **approved**.

10	Manual & Physical Data Security Policy – Review	UIGG(18/19)13

The Information Governance Manager noted that the Manual and Physical Data Security Policy had been updated to legal compliance. Members were requested to feed back any further changes that might be required.

The Data Protection Policy Statement was **provisionally approved**, subject to any further amendments from members. The IGM requested any feedback be sent to her by 27th June.

The issue of information packs being damaged in the post was discussed. The IGM strongly recommended that large amounts of paperwork be double-enveloped or placed in a plastic wallet inside an envelope to help ensure security.

11	Information Services Update	UIGG(18/19)14

The Information Security Manager spoke to the paper and reported on current Information Services matters:

- An average of around two million spam emails each month were being intercepted before reaching staff inboxes.

- Spam being sent from University email addresses was an area of concern, as this could indicate the account had been compromised. IS were working on improving systems and policies to deal with the issue, including implementing Multi-Factor Authorisation, which should help by adding an additional layer of security to email accounts.

  It was considered positive that the numbers of compromised accounts had decreased following a spike in November 2018, likely due to a particularly aggressive phishing campaign at that time.

  IS were considering running a simulated phishing attack, which would direct users to a page with links to information security guidance and training.

  Implementing a policy to directly contact staff who repeatedly follow phishing links would require discussions with Human Resources. There was scope for IS to explore tailored guidance where possible.

  Phishing attacks were becoming increasingly sophisticated, and this was a key driver towards a layered security approach.

  While Outlook supported the implementation of a button to report phishing emails, this feature was linked to an undesirable functionality that would potentially cause problems

with email distribution lists (such as the All Staff or All Students lists). IS could investigate other options.

- IS were implementing collaborative programmes with students from the School of Computing to assist in improving information security.

- Support for Windows 7 was due to end in early 2020. IS were working to encourage staff to re-image their PCs to Windows 10, and members were requested to upgrade their PCs and promote upgrading to their colleagues.

- While Information Security training was now mandatory, take-up still remained low. A push from senior staff to raise awareness of the requirement

- Discussions were ongoing regarding moving all the training onto a single system. Additionally, the training courses themselves were under review, with the potential to break these up into 'bite-size' chunks to encourage take-up by spreading out the time commitment.

- The implementation of Multi-Factor Authentication was a priority project. Initially MFA would be applied to email accounts, but would be rolled out to other systems in the future. MFA could be implemented conditionally, e.g. it would not be applied to on-campus access, but would be off-campus, or only at certain times of day.

- The SharePoint update project was ongoing, a newly appointed IS manager would be taking up the reins of the project.

12	Any Other Business

The Information Governance Manager noted that, following the expansion of UIGG's remit and change to the reporting line from Digital Strategy and Investment Committee, the Director of Finance was keen to have group report directly to the University-level Audit and Risk Committee. Members were supportive of this.

The Information Security Manager encouraged members to contact his team if they required tailored guidance and training for their areas.

Proposed meeting dates for 2019/20

01 October 2019 (Tuesday, 10.00am – 12.00noon) - Glassroom, Merchiston Campus
13 February 2020 (Thursday, 2.00 – 4.00pm) - Siegfried Room, Craiglockhart Campus
18 June 2020 (Thursday, 10.00am – 12.00noon) - Horizon Suite (LRC5), Sighthill Campus