UNIVERSITY OF GLASGOW

Information Governance Group

A meeting of the Information Governance Group will be held on:

Thursday 28th May 2015 at 9.30am in the Principal’s Meeting Room

AGENDA

Apologies: (none/list names)

1. Minutes of meeting held on 20 April 2015

2. Matters arising
   Data Protection Policy
   Documentum Retention Policy Services module
   Email retention and emails requested under FOI

3. Information Governance Strategy
   - Updated Strategy document (paper 1)
   - Local Record Officer remit (paper 2)

4. Cloud storage developments and draft policy (paper 3)

5. DP and Confidentiality Policies
   - Reviewing Information Governance Policies (paper 4)
   - Accessing Emails and Files Without User Consent (paper 5)

6. Reuse of Public Sector Information – University Libraries

7. A.O.B

8. Date of next meeting

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Information Governance Group

Minute of Meeting held on 28 May 2015 at 09.30 hours in the Principal’s Meeting Room

Present: Dorothy Welch (Chair), Simon Macauley (SMacA), Lesley Richmond (LR), Chris Edwards (CE), Anna Phelan (AP)

Attending: Stacey Harper (SH) (Clerk)

1. Apologies

Sandy Macdonald

2. Matters arising

Data Protection Policy

Simon Macauley confirmed that the policy had been presented to and agreed by IPSC.

Documentum Retention Policy Services module

Simon Macauley reminded the group that ahead of implementation of the RPS module, Documentum was to be rolled out in the DP & FOI Office. The first steps in this rollout involved cleaning up and streamlining the department’s file plan.

Stacey Harper explained that the steps highlighted by Simon are ongoing. The DP & FOI team will initially implement Documentum with their Data Protection records. She and Gemma Tougher (DP & FOI) have created a draft file plan focused on DP related records. This draft will be shared with the rest of the team and the Data Protection Officer for further input, and then presented to the Documentum team for implementation in the EDRMS.

Action: DP & FOI team

It was recognised that, in general, file plans needed to reflect the broader UoG need rather than just that of the owning unit.

Email retention and emails requested under FOI

Simon Macauley had confirmed with Dave Anderson (IT Services) that the University’s policy on deleting the email accounts of staff and student leavers would be implemented.

Lesley Richmond noted that the Principal’s emails are retained, as evidence of decision making processes. She suggested that the emails of other senior staff should also be retained as they are involved in high-level decision making.

Action: SMacD
3. Information Governance Strategy

Dorothy Welch introduced the paper by indicating that the intention was to submit the strategy to IPSC for approval at its next meeting (on 8 September).

The Group discussed and proposed a number changes for each section of the strategy. It was decided that all amendments and alterations to the strategy document would be taken forward by Stacey Harper and Gemma Tougher (DP & FOI).

Introduction and scope of the strategy

Dorothy Welch suggested defining “good information management”, since this definition would direct the rest of the strategy and so should be clear and prominent within the introduction. Simon Macauley stated that he intended the strategy to be pitched to senior management, with the implication that they would understand the definition of information management.

After discussion, the Group decided that the strategy should be pitched to the “average user”, and the third paragraph of the Introduction – detailing the need for records and records management – should remain in the document.

Aim 1: Electronic Document Management

At the suggestion of Anna Phelan and Sara Somerville (IT Services), wording was added to this aim which highlights that structured data in databases and unstructured data in shared drives have different management requirements.

It was decided that guidance for users under the “Actions” heading should be added, and that the current action bullets should be streamlined into fewer, related points.

Action: SH & GT

Aim 2: Local Records Officers

The Group agreed that the implementation of Local Records Officers would promote good information management across the University.

The order of the action points will be rearranged.

Action: SH & GT

Aim 3: Personal Data Audits

Simon Macauley reminded the Group that the rollout of personal data audits will be a long-term and ongoing process.

Anna Phelan pointed out that the strategy should make clear that we must assess the personal data held in the systems that the University currently uses. It was decided that the second paragraph will be amended to include this, and that an action will be added which states that the DP & FOI Office must be consulted regarding personal data management when new databases are implemented.
Dorothy Welch suggested a change to the second action bullet to indicate that we would consider undertaking an independent audit in the future, as the University may not want to commit to a particular auditor at this time.

**Action: SH & GT**

**Aim 4: Information Governance Policies**

The Group agreed the following changes to aim 4:

- Information security policies will be noted in the first paragraph as reviewable by IGG
- The first action point will be changed to read “IGG to identify and review appropriate policies”
- The second and third action point timelines will be labelled as “ongoing”
- Under the Future Proposals heading, the “information management umbrella” phrase will be more clearly defined to mean a single location where users can access all relevant policies.

**Action: SH & GT**

**Aim 5: Digital Preservation and Access to Information**

Lesley Richmond explained to the Group that at this point in time there is no policy or procedure in place for preserving digital information. She advised that the approach to digital preservation required a team effort – involving the Library, IT Services, and the Archives – as there must be joint agreement on the need for information together with the location for storing information and access rights and requirements.

The Group agreed that a policy on what University information should be preserved and how it was accessed (including access by the public) is an integral part of a digital preservation strategy.

The Group agreed to produce a policy and strategy for digital preservation within a year. Work would commence immediately.

**Action: LR**

**Local Record Officer remit**

The Group reviewed the Local Record Officer (LRO) remit document and decided on the following points:

- LRO’s must be sufficiently senior to take on the responsibilities and required authority of the role – it was expected that this role would be undertaken by an individual normally working at grade 7 or above.
- Ultimately, the LRO role should encompass all University records – administrative, teaching, and research
- It is the Head of College or Service’s responsibility to determine how the LRO role is taken up and/or delegated
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- Simon Macauley suggested that LROs should be trained in and implement the Retention Policy Service module of Documentum, however this does not require explicit statement within the remit document.
- The updated remit will be included as an appendix on the Information Governance Group Strategy

Lesley Richmond suggested that some research funding requirements may stipulate the appropriate retention of research data and records, and as a result, many research units or institutions may already have individuals in place who provide the functions of the LRO.

4. Cloud storage developments and draft policy

Chris Edwards reported that the draft policy has been shared with IT colleagues. He requested any further comments the Group could offer.

Dorothy Welch suggested that the definitions provided in the policy be added to an appendix, to streamline the policy.

Simon Macauley suggested obtaining a Privacy Seal to demonstrate that the University is meeting Data Protection requirements as they relate to cloud storage usage. The Privacy Seal is received from an ICO sanctioned third party organisation. Simon suggested that the Privacy Seal in conjunction with robust encryption of information would cover the University in terms of safe cloud storage practice. Chris Edwards countered that it would be difficult to both obtain the Seal and ensure adequate encryption on all information, and that encryption does not automatically ensure cloud safety. Retention practices and the longevity and staying power of the cloud provider are still important.

It was noted that a major concern with implementing a cloud storage policy is that doing so would automatically put a large number of staff (who currently use unregulated cloud storage) in breach of the policy. The Group decided that a service must be in place to aid and ensure compliance, and that a grace period should be offered to meet compliance.

Discussion moved on to the list of approved cloud service providers, and how “approved” status was awarded. The draft policy currently lists two providers – Arkivum and OneDrive – as approved for use by University staff. These providers were assessed by IT Services staff based on their ability to meet Data Protection and security requirements. IT Services’ intention is to increase the number of approved providers.

It was suggested that, as staff currently use Drop Box for cloud storage, action should be taken to get this provider formally approved.

Action: IT Services

5. DP and confidentiality policies

Reviewing Information Governance policies

Dorothy Welch reminded the Group that they currently have no authority to sign off on policies: this would change if IPSC approves the Information Governance Strategy.
After discussion, the Group agreed the following for the future:

- IGG will take advice from knowledgeable areas and staff when ratifying complex policies
- IGG has two policy jobs: reviewing policies annually and seeking gaps and proposing new draft policies
- IGG will retire old policies and merge related policies

Dorothy Welch queried why the IT governance/security policies listed on Paper 4 are not approved. Chris Edwards advised that they still require minor changes, but IGG should accept the current versions as live. IGG will review and approve the policies once this authority is sanctioned by IPSC.

**Procedure for accessing emails and files without user consent**

Simon Macauley opened discussion by noting that Paper 5 is a draft policy which would benefit from input from IGG members – it is not ready for approval by IPSC.

Dorothy Welch questioned the meaning of “vital interests to an individual” in bullet point three under the Criteria for Allowing Access heading. Simon Macauley explained that the phrase “vital interests” is in the Data Protection Act. He suggested expanding the bullet’s phrasing to read “where access to personal data is in the vital interest of an individual”.

It was agreed that allowing access to an email account in order to meet the University’s business interests includes accessing for FOI or Subject Access Request responses.

The Group agreed that line managers would be consulted on whether absent users should be contacted re: accessing their emails.

The Group agreed that, once approved, this policy should be made known generally, to all staff. The second paragraph under the Guidance for Users heading, referring to Heads of School or Service making staff aware of the policy, should therefore be removed.

Chris Edwards will refine this policy in conjunction with the DP & FOI Office.

**Action: CE & DP/FOI**

6. Reuse of Public Sector Information – University Libraries

Lesley Richmond informed the Group that a new regulation which controls the reuse of information – including making information available for reuse and charging for reuse – is coming into force in July 2015. The regulation does not apply to universities, but it does apply to university libraries and other cultural bodies (including museums and archives).

The full details of the regulation and how it will impact the University is still to be determined. However, the Hunterian and the Library are working on defining their public task and preparing for the regulation.

More information will follow as it is made available.

**Action: LR**
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7. AOB

None reported

8. Date of next meeting

The next meeting will be scheduled for August 2015.