

**GOLDSMITHS
University of London**

ACADEMIC BOARD/FINANCE & RESOURCES COMMITTEE

INFORMATION MANAGEMENT AND SYSTEMS COMMITTEE

1 March 2011

Present: Mr Hugh Jones (in the Chair), Dr Mark Bishop, Mr Richard Bolley, Dr Virginia Brooke, Dr Basem El-Haddadeh, Dr Sarah Kember, Ms Mary Nixon, Ms Vivienne Rose, Dr Juliet Sprake, Miss Rosemary Harrison (Secretary)

Apologies: Mr Michael Waller

In attendance: Mr Mike Jones (Head of Applications and Corporate Systems) and Mr Kevin Thomas (Project Manager, Student Records System)

OPEN BUSINESS

1 NEW MEMBERS

The Chair welcomed Dr Mark Bishop (Computing) and Mr Richard Bolley (ECL) to their first meeting.

2 MINUTES

Resolved:

that the Minutes of the meeting held on 2 November 2010 be approved.

3 MATTERS ARISING FROM THE MINUTES

Offsite Processing applications: progress in resolving residual issues (Item 11 refers)

The Committee recalled that, at the last meeting, the Chair had been given delegated authority to approve the signing of contracts for the following Offsite Processing applications on behalf of the Committee:

Royal Bank of Scotland (purchasing card development);
Parabilis (supplier information);
Intend (contract information).

It was noted that in the event none of the suppliers had satisfied the requirements, although progress had been made on some of the outstanding issues. Particularly worrying was the continuing absence of information on the nature of direct third party disclosures by the Royal Bank of Scotland, together with extra-EEA

processing of personal data by the contractor or its data processors, referred to in the contract.

4 RETENTION SCHEDULE PROGRESS REPORT AND PROPOSED AMENDMENT

Received:

a progress report relating to the implementation of the Interim Retention Schedule, which was approved by Council in June 2010, together with proposals for amendment (11-74).

Noted:

- (i) that a number of outstanding declarations from Heads of Department remained, relating to the obligation to conduct first-round destructions by 17 December 2011, but that the most serious problems (in relation to both anticipated further delay and volume of data concerned) were in the Human Resources and Finance Departments;
- (ii) that under new terms of reference introduced from 1 September 2011, the Committee was responsible for approving, on behalf of Council, amendments to the Interim Retention Schedule on behalf of Council;
- (iii) that due to a typographical error, the table at item 11 of Appendix A did not reflect the commentary and should indicate the potential for longer-term retention where this was preferred by a department ("At least current year +6"): approval was proposed subject to this amendment;
- (iv) that no further comments had been received from the Department of History concerning the Schedule;
- (v) that from the experience of members it was not feasible to bring forward the deadline for signing off the annual destruction rounds to September when the process reached steady state in 2012;
- (vi) that anecdotal evidence suggested that some staff in the College still lacked cognisance of their individual responsibilities in relation to the Schedule, and that the expected future resolution of the present staffing problem in CGIM would open up the possibility of enhanced guidance being provided centrally (including for staff induction) to supplement actions by Heads of Department.

Resolved:

- (i) that the revisions to the Interim Retention Schedule shown at Appendix A to paper 11-74 be approved;
- (ii) that the deadline for signing off annual destruction rounds be retained at mid-December until further notice (15 December in 2011).

5 CLOUDMAIL AND ASSOCIATED APPLICATIONS

Received:

a report from the Head of Corporate Governance and Information Management on progress concerning outsourced email, which had not so far delivered the legally compliant contract originally hoped for (11-75).

Noted:

that given the lack of progress, about which the Committee expressed some concerns, it was expected to be necessary to investigate seriously the potential services of another provider.

Consideration of the proposed draft policy for cloud applications usage, attached to paper 11-74, and its implications for General Regulations, was deferred.

6 VIDEO-CONFERENCING, VIDEO-RECORDING, AND DATA SUBJECT RIGHTS: SOME KEY ISSUES OF STRATEGIC APPROACH

Received:

a discussion paper from the Head of Corporate Governance and Information Management, outlining the implications for Data Subject rights of various possible future scenarios related to the video and audio recording of College activities, including teaching (11-76).

The Committee noted that the most complex legal problems (and often the longest lead-times for introducing new processing) arose in situations in which a larger group or the audience of a lecture was filmed and recorded, in particular where there was no easy way for participants to opt out of the recording. Where highly interactive events such as seminars were recorded, it was recognised that this would create difficulties with attendance and group dynamics, so in general would not be pedagogically desirable even if the legal issues were successfully addressed.

During further discussion it emerged that substantial benefits could be gained from recording activity which was limited to the following event types, which from a legal viewpoint were comparatively straightforward:

- the existing presentation ceremonies;
- lectures (where applicable using the various techniques available to avoid the audience becoming identifiable),
- small video-conference meetings
- unpublished recordings on behalf of individuals with disabilities and others with exceptional requirements (see note ¹).

In addition, special events other than presentation ceremonies should be considered for recording where the planning horizon permitted the relevant legal requirements to be met.

¹ It had already been noted from the paper that recordings made to meet the private study needs of students with disabilities were unproblematic because in JISC advice this fell within the definition of personal data processing for personal and domestic purposes, with the College having merely the status of Data Processor to a student Data Controller, and the student being exempt from Information Commissioner notification.

In general, the Committee felt that it would be desirable to focus on developments which represented "quick wins", in particular where there were identifiable benefits for the learning experience, rather than on building the more complex administrative infrastructures that would be required if the rights of multiple Data Subjects were to be engaged. Changes in academic strategy (eg a distance learning expansion) might in due course require modification to this approach. It was noted that the key to flexibility was to ensure that such developments were properly planned to catch points in the academic cycle where relevant fair processing notices were delivered (at present primarily summer enrolment of students).

The Committee noted that a pilot project was to be undertaken by IT Services to record lectures by a group of staff volunteers; it was suggested however that the existence of the opportunity to volunteer might benefit from becoming better known in the College, so that interested parties were already known to IT Services by the time resources were available to proceed. Dr Kember expressed an interest in becoming directly involved.

Resolved:

- (i) that routine video-recording of College events by IT Services be limited for the time being to presentation ceremonies, the recording of lectures and presentations where the consent of only one or a small number of lecturers/ presenters was necessary, the recording of small video-conference meetings, and unpublished recordings where the College was a Data Processor for individuals with disabilities (and others with exceptional requirements);
- (ii) that the recording of students on compulsory courses be not undertaken, unless some future programme were to be set up in such a way that this was evident in student recruitment material for the programme and the fair processing notice issued to students on enrolment;
- (iii) that recording of staff by the College as Data Controller be optional, and normally at their own request;
- (iv) that the question of the appropriate staffing resources in IT Services for the support of a recording facility, which were not yet available, be investigated.

7 UPDATE ON IT STRATEGY IMPLEMENTATION

Received:

a progress report from the Director of Information Technology (11-77).

There was a general concern about lack of overview by the Committee of all the systems under development, which was central to the delivery of the Records Management Strategy and the design of the information architecture to support it, and it was agreed that this should be further considered at the next meeting.

8 IT SERVICES ANNUAL REPORT

Received:

the Annual Report for 2009-10 (11-44).

9 OFFSITE PROCESSING APPLICATIONS

The Committee noted that under the procedures approved in the Autumn term 2009 (Minute 31, 1 December 2009, refers), a special approval process applied to the introduction of any new systems involving the holding of data on servers outside the Goldsmiths campus.

It was noted that the Committee's role related to assessment of the legal and technical risks; funding information might be provided as background, but the budgetary element of the approval process was the responsibility of the Senior Management Team. It was noted that recently the Senior Management Team, in its role of overseeing risk management in the College more generally, had expressed an interest in the consideration of proposals potentially involving high risk, but that this had not been formalised in the published Policy.

Received:

an application for offsite processing:
Capita Unit E Fault Resolution and Development (11-78)

Noted:

- (i) that this proposal assumed approval of current plans for the further development of the Student Record System, and would be needed for implementation;
- (ii) that the key issue was the use by Capita, the provider of the system, of a Data Processor located outside the European Economic Area, which made certain specific controls on the export of Data necessary, primarily in order to comply with the Eighth Data Protection Principle;
- (iii) that since the circulation of the agenda certain inaccuracies had been identified in matters of detail set out in paper 11-78, concerning the procedure for effecting restrictions on exported data, but that it had not been possible to obtain full clarification in advance of the meeting.

Resolved:

that the Chair be given delegated authority to approve the application for offsite processing, on the basis of further information and any necessary consultation with the College's legal advisers, to ensure that College's obligation not to transfer personal data to countries without adequate protection (the Eighth Data Protection Principle) was met.

10 REPORTS ON PLANS AND CURRENT PROJECTS IN SPECIFIC AREAS STUDENT RECORDS SYSTEM

(Minute 35, 18 May 2010 and Minute 13(i), 2 November 2010 refer)

The Registrar and Secretary gave an oral report on progress in implementing the Student Records System project, within the planned framework of a new system and provider. A small Project Board was being set up to be chaired by the Director of Student Services. A project plan would be presented for the Committee's consideration at the next meeting. Important priorities continued to include direct access by academic departments to their students' data, and online services for re-enrolment by students. It was noted that Finance and Resources Committee would be responsible for approving the budget for the project, as under the Financial Authority Limits the sum involved was above the level which could be approved by the Senior Management Team.

Members of the Committee emphasised the need to see evidence in the near future that the College was learning from its past problems with project management, and to have clear information about the statement of requirements to ensure that user requirements already indicated at an earlier stage would be met. A presentation to the IT User Group would be helpful in this regard.

The Committee was of the view that external review of the project and its progress would be desirable.

The Committee noted that it was desirable to reduce the number of reports to different committees, and also important to define the role which committees played in the process. (For example, the role of the Information Management and Systems Committee would be to ensure alignment of defined project outcomes with the implementation of the Records Management Strategy across the College, rather than direct project management, which was the responsibility of the Director of Student Services who reported to the Senior Management Team.)

The Head of Corporate Governance and Information Management expressed concern at the continuing lack of explicit focus, within the planning process for the project, on ensuring robust adherence to declared processing purposes for personal data, as well as on enabling departments to meet more cost-effectively their obligations to monitor this adherence. The Committee noted that the Project Manager envisaged developing the relevant functionality through assignment of custom fields.

It was noted that it was important to establish as soon as possible an appropriate interface between the Scientia timetabling system and other systems to enable individual timetables to be generated for staff and students, but that this would not be achievable in the first stage of development of the project. It would also be desirable for the timetabling system to interface with the committee timetable to avoid clashes for teaching staff who were also committee members.

11 NATIONAL DEVELOPMENTS RELEVANT TO INFORMATION COMPLIANCE IN UNIVERSITIES

Received:

a note from the Head of CGIM on some recent and current national developments,

mainly relating to Freedom of Information (10-80).

12 MINUTES OF THE IT USER GROUP

Received:

Minutes of the following meetings of the IT User Group:

2 November 2011 (11-81);
3 February 2011 (11-82).

13 GUIDANCE TO DEPARTMENTS ON INFORMATION MANAGEMENT FOR A CHANGING ENVIRONMENT

Received:

Copies of guidelines issued on 14 December 2010 to Heads and Departmental Administrators of academic departments: "Information Management at Goldsmiths: some implications of the changing environment" (11- 83).

14 FORTHCOMING MEETINGS

Noted:

that the final meeting of the Committee of 2010-11 would be held on Thursday 19 May 2011 at 10.00 am

RMH
March 2011