

**GOLDSMITHS
University of London**

ACADEMIC BOARD/COUNCIL

INFORMATION MANAGEMENT AND SYSTEMS COMMITTEE

Minutes of the meeting held on 23 May 2013

- Present:** Mrs Liz Bromley (in the Chair), Professor Mark Bishop, Mr Richard Bolley, Dr Jacqueline Cooke, Dr Basem El-Haddadeh, Professor Sarah Kember, Dr Vivienne Richmond, Mr Peter Roberts, Dr Juliet Sprake, Miss Rosemary Harrison (Secretary).
- Apologies:** Ms Lynda Agili
- Present by invitation:** Trades Union representatives: Ms Suzanne Stead and Mr John Wadsworth (for the business to which Minutes 3 and 4 relate).
- Observer:** Ms Alex Harris

OPEN BUSINESS

1 MINUTES

Resolved:

that the Minutes of the meeting held on 27 February 2013 be approved.

2 MATTERS ARISING FROM THE MINUTES

(i) Terms of reference 2013-14 (*Minute 2 refers*)

It was noted that proposed changes had been approved by Academic Board and Council.

(ii) Cloud computing in teaching (*Minute 5 refers*)

The Committee noted that, following the decision to modify the Offsite Processing Policy on the basis of the risk-based typology approved at the last meeting, a systematic analysis had been conducted, in consultation with academic departments, of the data from the 2011 survey on cloud computing usage for teaching, and enquiries made as to future plans.

It had emerged from this work that only one usage from the 2011 survey required approval (as being in the defined higher-risk category), but as this had recently been discontinued, there were no new learning and teaching proposals for approval at this meeting.

(iii) Anonymisation Code of Practice (*Minute 7 refers*)

It was noted that no report was yet available from Research Ethics Committee.

It was noted that the UK Anonymisation Network had been set up, coordinated by a consortium of 4 organisations, 2 of which are universities (Southampton and Manchester), and was available to individuals to join free of charge.

3 COVERT CCTV

Received:

a proposal that the use of covert CCTV should be employed at Goldsmiths in limited circumstances (13-235).

Both members of the Committee and representatives of Trades Unions were concerned that the institution of covert CCTV as proposed would create mistrust between managers and other members of the College community, despite the fact that by law covert surveillance was permitted only for strictly limited periods and purposes. The Committee also considered whether a requirement to report annually on any covert CCTV usage undertaken in the previous year would be sufficient to create confidence, and concluded that it would not.

The Committee felt that as far as possible *overt* CCTV should be used to address security problems, and that there was no justification for using covert monitoring except in relation to an investigation where there was direct Police involvement. In such cases the Committee regarded it as preferable for the Police to be data controller of any covert cameras, but noting that this was unlikely to be feasible, agreed that it would be acceptable for the College to be data controller of covert cameras if this were done on Police advice in a specific case.

4 DOOR ACCESS CONTROLS (SWIPECARD DATA)

Received:

proposals concerning the processing purpose and retention of personal data collected through the swipecard system (13-236).

The Committee noted that due to an error in the assembly of information when the Data Protection Policy was set up in 2004, and again during the 2009 Information Audit, the existence of a system to record data from usage of door entry cards had been overlooked. As a result institutional fair processing notices for College data subjects referred to the use of card data for opening doors, but not to the data about movement around College buildings which was collected by the system. The case illustrated the general importance of accuracy in the central collation of records of College information, it being noted that the fundamental rights of data subjects to be informed of the processing purposes of their personal data, and also to be assured that it was being retained no longer than necessary, could only be honoured to the extent that the Data Protection Officer was correctly informed about processing which existed.

The Committee noted that the current processing purposes for swipecard access data were twofold:

- (i) Monitoring of building/facility usage (including potentially equal opportunities

monitoring in future) - for which anonymised personal data was sufficient;

- (ii) in exceptional circumstances as part of an investigation of crime or serious misconduct (for which a short retention period comparable to that for CCTV camera footage was necessary).

It was noted that account would be taken of the existence of swipecard data in future in fair processing notices issued to students and staff. The Data Protection Officer confirmed that in researching paper 13-236 she had consulted all known potential users of the collected data in order to ensure that as far as possible details of existing and potential processing purposes were complete.

The Committee noted that its terms of reference included responsibility for approving additions to the Retention Schedule - which in essence involved determining that the periods proposed to be specified were reasonable in terms of the purposes of usage of the information. It was further noted that the proposed retention periods were those recommended by managers who were users of the data.

Resolved:

- (i) that the proposed period of one month, for retention of "raw" swipecard data from which individuals were identifiable, be approved for the time being, subject to review at the next meeting as to whether a longer period was necessary;
- (ii) that the proposed period of six years from the year of recording be approved for statistical analyses.

5 PERSONAL DATA PROCESSING BY THE STUDENTS' UNION AND ITS EXTERNAL DATAPROCESSORS (including an Offsite Processing Proposal)

Received:

a paper concerning a proposed increase in the range of student personal data made available by the College to the Students' Union, and concerning the engagement by the Students' Union of external dataprocessors generally (13-237).

The Committee noted that the paper addressed two separate principles which were linked operationally, namely:

- (i) the need for any dataprocessors used by the Students' Union to process student personal data transferred to it by the College (in the particular case MSL Solutions), to be approved by the College according to the same standards as were used by the College to assess its own proposed dataprocessors;
- and
- (ii) the question of the extent of the student data which it was appropriate for the College to transfer to the Students' Union, it being noted that - associated with the proposal for a new dataprocessor and intended expansion of its range of activity - the Union had proposed a very substantial expansion of the range of student personal data to be transferred - as a condition of Students' Union membership.

It was noted that Appendix B to paper 13-237 contained a list of all the personal data items requested by the Students' Union together with their proposed processing purposes.

In relation to (ii) above, it was noted that elsewhere in the sector the trend was towards universities refusing requests from Students' Unions to transfer Sensitive Personal Data categories (eg Ethnicity): this would by law require explicit consent from the individual students. There were also concerns that it was problematic for Students' Unions to maintain a level of in-house expertise in Data Protection sufficient for the more complex and demanding requirements relating to Sensitive Personal Data processing, and this had contributed to the recommendation by the Pro-Warden (Students and Learning Development) and the College Data Protection Officer that no Sensitive Personal Data categories be transferred to the Goldsmiths Students' Union.

The Committee had serious concerns about an extended range of personal data categories being proposed as a condition of Students' Union membership. It also noted that the proposed College response to the Students' Union's list of requested categories, as set out in the paper, meant that the Union's capacity to undertake some of its proposed equality monitoring activities directly would be curtailed - as these required transfer of Sensitive Personal Data. In discussion the Data Protection Officer explained that the transfer of Sensitive Personal Data to the Union would be legally possible provided that individual students had made a clear explicit choice in favour of this.

Resolved:

- (i) that MSL Solutions be approved as a dataprocessor of the Students' Union with effect from Student Enrolment 2013 and until further notice, subject to agreement by the Students' Union not to vary the conditions of processing or the dataprocessing contractor, or to engage additional dataprocessing companies, without the approval of the College;
- (ii) that transfer of personal data to the Students' Union additional to the limited dataset transferred at 2012 Enrolment, be a matter of choice for students, not conditional upon Union membership, and that in the case of Sensitive Personal data this should require a clear explicit decision in favour of the transfer.
- (iii) that future annual transfers of personal data to the Students' Union be subject to agreement by the Union (and formal incorporation into the Students' Union Articles of Governance at the earliest opportunity) that the Students' Union would not allow access to this personal data by any dataprocessors unless they had been approved under the College's Offsite Processing Policy;
- (iv) that a Datasharing Agreement be agreed between the College and its Students' Union, to have effect during the academic year 2013-14.

6 UPDATE ON THE CAPITAL PROGRAMME

(Minute 9, 27 February 2013, refers)

Received:

an update report on the Director of IT (13-238).

The Committee was pleased to note that wireless internet access would be available in all halls of residence by the start of the next academic year.

It was noted that the first phase of the Student Records System was nearing completion, and that the second was about to be planned. This would include links to the curriculum: members of the Committee emphasised the importance of developing links with the timetable

once this had been achieved. It was further noted that integration between the Student Records System and the Virtual Learning Environment was envisaged for the future.

It was reported that Mr Kevin Thomas, Project Manager for the Student Records System, would shortly be leaving Goldsmiths, and the Committee thanked him for his contribution to the development of the system thus far.

7 DESKTOP MIGRATION

Received:

a progress report on the virtual desktop pilot and the wider desktop migration project (13-239).

The Committee noted that the project was a complex one, with migration department by department organised over several months, and with departments having responsibilities for local management with the support of IT Services.

It was noted that not all staff were working in accordance with the All Staff Responsibilities in the Records Management Policy, which specified avoidance of local hard drive storage. Following the migration, storage to a local hard drive would be impossible, apart from short-term storage on encrypted flash drives and laptops, to enable various types of work away from Goldsmiths, including in locations from which there was no internet access.

It was recognised that there were exceptional circumstances in some departments - in particular the specialist storage needs and variety of operating system used in the Computing Department - where IT Services would need to develop customised versions of the planned future data storage facilities, working with the colleagues concerned.

The importance of simple instructions for the general use of staff was noted.

8 DESKTOP POLICY

Received:

a draft IT Services policy document concerning Desktop facilities (13-240) for information, it being noted that comments were invited from members of the Committee while the document was in the final stages of preparation.

9 AGRASSO UPGRADE PROJECT

Received:

an update report on the Agresso upgrade project (13-241).

10 GLEU REPORT ON CURRENT LEARNING TECHNOLOGIES ISSUES

Received:

an overview report from the Goldsmiths Learning Enhancement Unit on current

learning technologies issues (13-219).

11 JISC SURVEY OF FOI (2012) AND GOLDSMITHS TRENDS

Received:

a summary of the outcomes of the JISC survey 2012 and Goldsmiths FOI request trends (13- 242).

12 MINUTES OF THE IT USER GROUP

Received:

the minutes of the meeting held on 25 April 2013 (13-243).

13 INFORMATION COMMISSIONER GUIDANCE: BRING YOUR OWN DEVICE

Received:

the recent guidance from the Information Commissioner on the use of mobile devices (in particular the use of devices personally owned by employees, for work purposes) (13-244).

Members were asked to retain their copies for future meetings.

14 PROPOSED PRE-PUBLICATION RESEARCH EXEMPTION IN THE FREEDOM OF INFORMATION ACT

It was noted that an amendment to the Freedom of Information Act (2000), containing an exemption from disclosure for pre-publication research, had been included in the Intellectual Property Bill introduced into the House of Lords on 9 May 2013. This was the second attempt to add such an exemption to the Freedom of Information Act (the last having been in discussion of what is now the Protection of Freedom Bill). The proposal was noted as being for a qualified exemption (ie one subject to the Public Interest Test).

15 MEMBERSHIP OF THE COMMITTEE

The Chair thanked the following members of the Committee retiring on 31 August 2013:

Dr Sarah Kember
Dr Juliet Sprake
Mr Mike Waller

as well as Dr Basem El-Haddadeh, Director of Information Technology, who was leaving Goldsmiths in June 2013.