

**GOLDSMITHS
University of London**

ACADEMIC BOARD/COUNCIL

INFORMATION MANAGEMENT AND SYSTEMS COMMITTEE

Minutes of the meeting held on 5 March 2014

- Present:** Mrs Liz Bromley (in the Chair), Mr Richard Bolley, Dr Veronica Lawrence, Dr Vivienne Richmond, Mr Peter Roberts, Dr Daniel Stamate, Miss Rosemary Harrison (Secretary).
- Apologies:** Ms Lynda Agili, Dr Julian Henriques, Professor Kay Stables.
- Present by invitation:** Ms Alison Ahern and Ms Helen Goodwin (for the business to which item 7 relates); Dr Marianne Franklin (representing UCU for the business to which items 11 and 12 relate (UNISON was invited but unable to attend)).
- In attendance:** Ms Sarah Gibbon, Ms Alex Harris, Ms Rachael Johnson, Mr Mike Jones, Mr Daniel Rubie, Ms Rachel Soper.

OPEN BUSINESS

1 MINUTES

Resolved:

that the Minutes of the meeting held on 23 May 2013 be approved.

2 MATTERS ARISING FROM THE MINUTES

(i) Minute 5: Students' Union data transfers (MSL)

The Committee noted the signing of data sharing agreements with both Goldsmiths Students Union and the University of London Students' Union, following the approval of MSL as a dataprocessor (see also item 3(iii) below).

(ii) Minute 13: Bring Your Own Device (BYOD) guidance from the Information Commissioner

The Committee noted that analysis of the implications of this guidance for Goldsmiths had been deferred pending a wider review of BYOD arrangements, to be undertaken following the arrival of the new Chief Information Officer.

3 ACTION TAKEN BY THE CHAIR

The Committee noted that since the last meeting the Chair had taken the following action on behalf of the Committee:

- (i) The retention period for unsuccessful Council membership applications had been shortened from four academic years after the year of application, to one academic year after the year of rejection of the application.
- (ii) Further to the decision at the last meeting to hold "raw" security card (swipecard) data from which individuals were identifiable, for one month, the Chair had approved a proposal from the Director of Estates and Facilities to extend this retention period to six months, to cover the

eventuality of items being stolen during long periods of staff leave, leading to late detection, perhaps followed by several weeks for conclusion of police investigation (*Minute 4, 23 May 2013 refers*).

- (iii) MSL had been approved as a dataprocessor to transfer limited student personal data for Goldsmiths students in membership of the University of London Students' Union (ULU), for routine service provision and electoral role purposes, given the precedent of student data transfers to ULU and the Committee's approval of MSL in general terms when proposed by the College Students' Union to the 23 May 2013 meeting (*Minute 5 refers*).

4 STANDING ORDERS

Noted:

The revised Standing Orders in force for all Goldsmiths Committees from 1 September 2013 (13-300).

5 CONFLICT OF INTERESTS POLICY

Noted:

the College's Conflict of Interests Policy, and its potential implications for the obligations of members of the Committee (13-301).

6 TERMS OF REFERENCE, COMPOSITION AND MEMBERSHIP OF THE COMMITTEE

Noted:

the terms of reference, composition and membership of the Committee for the academic year 2013-14 (14-57), including in particular the term of reference relating to commenting on the capital programme (item 15 below refers).

7 SECOND PHASE OF THE STUDENT RECORDS SYSTEM DATABASE: PROPOSAL

Received:

a proposal for Phase II of the Student Records System Project (14-84).

Comments were made in two areas:

Retention Scheduling and delivery of fair processing notices to data subjects:

The Head of Information Management drew the Committee's attention to the ethical and legal problems which had arisen in Phase I in relation to data subject rights, serious weaknesses having come to light in the following areas:

- (i) retention scheduling, with commitments made by Council in June 2010 still not implemented, and
- (ii) lack of a robust, systematic system for ensuring delivery of fair processing notices when collecting personal data online (Minute 14, 29 February 2012, refers).

She expressed concern that - given past and ongoing issues, as well as anticipated more stringent requirements under the forthcoming revised legislation - these two information rights areas could helpfully have been identified prominently as top level "intentions" (section 1.1), and suggested that rather than being a global item in the task list chart, they would be more effectively represented as "dependencies" for most of the other individual tasks. However, the Committee accepted the view of

the Director of Student Services that the necessary developments could be effectively built in at the more detailed stages of planning.

Student Attendance:

The Committee noted that Phase II incorporated some functionality to support UKBA compliance (in particular concerning CAS), but none to support attendance monitoring overall in the College. It was noted that attendance monitoring was an available module in Unit E and the Committee expressed the view that implementation of this in Phase II would be highly desirable.

In addition, it was suggested that a flag against a student to indicate simply whether or not he or she was subject to immigration controls would be extremely useful.

Resolved:

to approve, in general terms, the proposal for Phase II of the Student Records Project as outlined in paper 14-84, subject to approval by Finance and Resources Committee and Council of the necessary budget, it being noted that preliminary budgetary approval had already been given by the Senior Management Team.

8 STUDENT PAPER RECORDS

Received:

a proposed amendment to the College's retention arrangements for student paper records, in the light of an audit of records and practical experience since the approval of the Interim Retention Schedule in 2010 (14-58).

It was noted that the Student Services Department (since incorporated into SALS) had deferred meeting its responsibilities under the Interim Retention Schedule in respect of the 2010, 2011 and 2012 destruction rounds pending investigation of archival issues, and during 2013 and reached the conclusion that - for practical reasons summarised in paper 14-58 - it was probably unrealistic ever to honour these responsibilities in respect of legacy paper records for the period up to, and soon after, the institution of the Interim Retention Schedule in 2010.

Paper 14-58 set out a proposal that the Interim Retention Schedule be amended in order to acknowledge this problem for legacy paper records, which in future would be retained in the Library under controlled access, given conservation issues which had separately emerged in the Richard Hoggart Building. The arrangements proposed were designed to ensure that these records were used only for processing purposes authorised within the revised Interim Retention Schedule, and that there was clear ethical separation between information approved for use for alumni relations purposes and information to be retained longer for the purposes of historical records.

In discussion the Committee noted that both the Interim Retention Schedule and the permitted processing purposes of personal data could be, and indeed regularly were, changed as the College's activities evolved. The vast majority of processing arrangements for student personal were not controlled in detail by law; instead it was incumbent on the College to be in a position to demonstrate that there was a legal basis under the Data Protection Act for each of the processing purposes in operation, that the purposes were accurately reflected in notices issued to data subjects, and further that the published period of retention was reasonably needed to deliver those same processing purposes.

Resolved:

- (i) that a limited number of staff with relevant duties be designated by the Director of SALS to have access to the subset of the archive relating to students more than six years from

departure from Goldsmiths and likely still to be alive;

- (ii) that the Data Protection Officer should provide targeted training for this group - which might perhaps be largely the same group as is designated for Third Party Disclosures - and access to the archive should not be permitted for new staff until this had been completed;
- (iii) that the Interim Retention Schedule be amended to accommodate the additional retentions which had emerged as necessary in practice for student paper records.

9 PROVISION OF EMAIL FOR ALUMNI

Received:

a proposal to offer "email for life" to alumni (14-59).

The Committee noted that since circulation of the agenda the Head of Applications and Corporate Systems had progressed some of the remaining technical and process queries further, and that all were now resolved or close to being so. It was envisaged that all graduating students would be migrated by default to the alumni system, supported as far as possible by self-service to avoid excessive call on staff time in IT Services. Provision would be made for individual students to transfer readily not only from student to alumni status but back to student status as necessary.

It was further noted that it would be desirable for "email for life" to be an integrated part of a wider range of services offered to alumni, including continuing access to Mahara (portfolios) and to the Library, which would be coordinated by SALS with GLEU, IT Services and the Library.

Resolved:

to approve the proposal to grant email addresses to alumni, subject to the satisfactory resolution by IT Services of the residual technical queries.

10 COMMUNICATING WITH STUDENTS BY EMAIL

Received:

a proposal that students be obliged, by General Regulation, to use College email for College business, as was already the case for staff (14-60).

Resolved:

that consideration of this item be deferred for consideration in the Summer term, in view of the absence of the student representative from the present meeting.

11 ETHICAL FRAMEWORK FOR CLOUD COMPUTING

Received:

a paper outlining some key current ethical issues in cloud computing, in the light of recent public debates concerning international surveillance activities on the internet and proposing a framework ethical approach for Goldsmiths (14-61), while acknowledging the difficulty of accurate risk assessment in some relevant areas.

The Committee was broadly in agreement with the paper's proposal that it was necessary to establish a broad approach to ethical standards in cloud computing which, although of necessity provisional in such uncertain times, would avoid the need to debate the fundamental issues from scratch each time

a particular cloud computing facility was proposed, and would provide a framework within which new initiatives could continue to be progressed.

The Committee noted that the College had the capacity to deliver a wide range of resilient services in-house, so new services need not always involve an external cloud solution. Sometimes an external solution would have benefits, for example when procuring offsite storage as part of disaster recovery planning (an investigation currently under way).

Regarding email, it was noted that a return to an in-house solution (favoured by Dr Marianne Franklin who was present by invitation on behalf of UCU) would be technically feasible. However this might make it more difficult to enforce the obligation for staff to use College email, as use of unauthorised private contract email usage would be likely in practice to proliferate, potentially bringing higher risks than the present corporate outsourced arrangements. It was noted that any major decision on the future of Goldsmiths email would in any event need to await the filling of the new Chief Information Officer post.

Resolved:

that based on the current state of information, the College should continue - as provided for in its existing Offsite Processing approval process - to prefer European companies for IT provision in cloud environments as far as feasible, in particular where Sensitive Personal Data was involved.

12 OCCUPATIONAL HEALTH – DATA SHARING SOFTWARE

Received:

a proposal for a new mode of data sharing with the College's Occupational Health Service provider (14-62).

Noted:

- (i) that the Human Resources Department initially proposed a purely technical change in the mode of transfer of health information to the Occupational Health Service, without any change of processing purposes, and that the Committee was invited to approve this system for data transfer;
- (ii) that a further planned development - for future new staff appointments - would involve the use of this same system to hold additional health information by the Occupational Health Service on this system as part of pre-employment screening which would be a condition of appointment;
- (iii) that the overall implementation plan proposed in paper 14-62 was designed to avoid an externally-hosted solution, given the Sensitive Personal Data status of health information.

Resolved:

to approve new, extended arrangements for information transfer involving outsourced Occupational Health (currently IOM), involving the use of Cohort software hosted on Goldsmiths servers, with access by relevant staff of the Occupational Health provider as external Goldsmiths users.

13 OFFSITE PROCESSING

The Committee approved the following proposals for cloud computing facilities for College use:

- (i) **Doodle** (meeting scheduling - under new Goldsmiths corporate licence only), subject to the

availability of funds from the IT Services budget (14-63);

- (ii) **Digital Curation Centre Research Data Management Tool**, to support compliance with the new Research Council requirements to make research data outputs available, and to manage them more actively (14-64).

14 NEW DATASETS PROVISIONS OF THE FREEDOM OF INFORMATION ACT AND RELATED ISSUES: IMPLICATIONS FOR GOLDSMITHS

Received:

an overview paper concerning the new datasets provisions of the Freedom of Information Act, together with a note of prior consideration by Research Ethics Sub-Committee (13-356R).

In introducing the paper, the Head of Information Management drew attention to the rather narrow definition of "dataset" to which the new Freedom of Information Act obligations applied, but also to the possibility that future changes in either the activities of the College (in particular developments in academic research), or the behaviour of requestors, might cause the new requirements to become significant for Goldsmiths. Given the short time (20 working days) available for responding to a Freedom of Information request, it was important that staff in all departments (both academic and professional services) were prepared by being familiar in broad terms with the new requirements.

It was noted that there was also a specific need to identify the licensing arrangements to be adopted by the College for any released datasets, although this was a choice that could be altered at any time in the future.

Resolved:

- (i) that for the time being Goldsmiths should adopt the Open Government Licence for datasets of any kind required to be released and/or published under the new provisions of the Freedom of Information Act added by the Protection of Freedom Bill (2013), where the copyright was held by the College;
- (ii) that the Committee should reconsider this decision as necessary in the light of developments, including any future amendment to the Goldsmiths General Regulation on Intellectual Property which had the effect of altering the range of circumstances in which the College claimed copyright in academic work, and any proposal from Research and Enterprise Committee relating to the licensing of research datasets.

15 IT CAPITAL PROGRAMME PROPOSALS FOR 2014-15

Received:

a paper outlining components of the IT Capital Programme for 2014-15 (14-96).

Members of the Committee noted that the proposed Capital Programme had been conceived in support of the wider strategic agenda for IT, based on functionality delivered through multiple devices, free from the limitations of the model with existed prior to Virtual Desktop. There had also been a review with colleagues in Estates and Facilities of the financial operation of the programme, to establish more clearly what IT expenditure was properly paid for from the Estates budget.

It was noted that the proposed "MICAD" facility related to the retention of Health and Safety information in relation to location. It was confirmed that this facility would be run in-house, and that none of the other proposals in paper 14-96 required Offsite Processing Policy approval (apart from the non-core Office 365 services, where the need for a further stage of the Offsite Processing Policy procedure had already been noted at the time when Office 365 was originally approved).

16 MINUTES OF THE IT USER GROUP

Received:

minutes of the meetings held on 16 October 2013 (14-65) and 13 February 2014 (14-85).

As Chair of the Group, Mr Richard Bolley thanked Ms Sarah Gibbon, the new Secretary, for her work in encouraging improved attendance. The Group had sometimes found itself in a difficult position as a non-decision making body engaging with fundamental issues of College IT provision. However, at the last meeting there had been a useful discussion of developments in the Desktop Migration, highlighting in particular the need for support for staff in academic departments who withdrew for the time being from the migration process.

It was noted that the discussions concerning the Virtual Desktop had revealed a lack of awareness amongst staff that avoidance of storage on the local hard drives of personal computers had already prescribed by the Records Management Policy in 2009, and that in this respect the Virtual Desktop had introduced nothing new. It would be necessary in the medium term to ensure that the broad and fundamental objective of eliminating local hard drive storage under the Records Management Policy was not compromised in respect of those staff who had opted out of the Virtual Desktop, and was delivered by other means.

17 INTERNAL AUDIT REPORT ON IT ASSURANCE

Noted:

the Internal Auditors' report on IT Assurance (14-66).

18 DRAFT ANNUAL REPORT OF THE COMMITTEE

Resolved:

that the draft report of the Committee to Council and Academic Board on the academic year 2012-13 be approved¹ (14-67).

19 JISC SURVEY OF INFORMATION COMPLIANCE IN 2013

Noted:

a report on the JISC Survey of information compliance in the higher education sector (principally Freedom of Information) in 2013 (14-97), and on a recent press report concerning a similar area, in which Goldsmiths' transparency achievement had been specifically commended.

20 FORTHCOMING MEETINGS

Noted:

that the next meeting of the Committee would be held on 28 May 2014 at 2.00pm.

RMH
March 2014

¹ Subject to minor correction of Freedom of Information Statistics.