CENTRAL MANAGEMENT GROUP
Raeburn Room, Old College
26 September 2017, 10 am

AGENDA

1	**Minute**	**A**
	To *approve* the minute of the previous meeting held on 29 August 2017.	
2	**Matters Arising**	**Verbal**
	To *raise* any matters arising.	
3	**Principal's Communications**	**Verbal**
	To *receive* an update by the Senior Vice-Principal.	

SUBSTANTIVE ITEMS

4	**Social Responsibility and Sustainability Strategy 2010-20 Review**	**B**
	To *discuss* the paper by the Director of Social Responsibility and Sustainability	
5	**Optimising Personal Tutor Support – A New Approach**	**C**
	To *consider and approve* the paper by the Assistant Principal Academic Support	
6	**Course Enhancement Questionnaire – Question Set**	**D**
	To *consider and approve* the paper by the Vice Principal People and Culture.	
7	**Undergraduate Intake Strategy – 2018-19**	**E**
	To *note* the update by the Deputy Secretary Strategic Planning.	
8	**Planning Round Context and Timetable**	**F**
	To *consider and approve* the paper by the Deputy Secretary Strategic Planning.	
9	**Finance Director's Report**	**G**
	To *consider and comment* on updates by the Director of Finance and approved the revised Expenses Policy.	
10	**Holiday Pay and Non-Contractual Overtime**	**H**
	To *consider and approve* a paper by the Director of Human Resources.	
11	**General Data Protection Regulation** (**GDPR**) **Update**	**I**
	To *consider* a paper by the Deputy Secretary Strategic Planning.	
12	**Internal Audit Status Report**	**J**
	To *consider* the report by the Chief Internal Auditor.	

13   Health and Safety Quarter 4 Report   K
To *consider and note* a report by the Director of Corporate Services.

14   Any Other Business   Verbal
To *consider* any other matters by CMG members.

ITEMS FOR NOTING OR FORMAL APPROVAL

15   Principal's Strategy Group   L
To *note.*

16   Date of next meeting
31 October 2017 at 10 am in the Raeburn Room, Old College

17   CMG Communications   Verbal
To note the key messages to be communicated.

THE UNIVERSITY of EDINBURGH

CENTRAL MANAGEMENT GROUP

29 August 2017

[Draft] Minute

Present:
Vice-Principal Professor Jane Norman (Convener)
Vice-Principal Professor Dorothy Miell
Vice-Principal Professor James Smith
Vice-Principal Professor David Robertson
Mr Hugh Edmiston, Director of Corporate Services
Mr Phil McNaull, Director of Finance
Ms Zoe Lewandowski, Director of Human Resources
Ms Leigh Chalmers, Director of Legal Services
Ms Tracey Slaven, Deputy Secretary, Strategic Planning
Mr Gavin Douglas, Deputy Secretary, Student Experience
Professor David Gray, Head of School of Biological Sciences
Professor David Argyle, Head of School of Veterinary Medicine
Professor Ewen Cameron, Head of School of History, Classics & Archaeology
Mr Grant Ferguson, on behalf of Mr Gary Jebb
Mr Alistair Fenemore, on behalf of Mr Gavin McLachlan
Mr Barry Neilson, Director of Student Systems and Administration (for items 5, 6 &7)
Ms Shelagh Green, Director for careers and Employability (for item 8)

In attendance: Ms Kirstie Graham, Deputy Head of Court Services

Apologies:
The Principal
Senior Vice-Principal Professor Charlie Jeffery
Vice-Principal Mr Chris Cox
Vice-Principal Professor Sir John Savill
Vice-Principal Professor Lesley Yellowlees
Vice-Principal Professor Jonathan Seckl
Ms Sarah Smith, University Secretary
Mr Gavin McLachlan, Chief Information Officer
Mr Gary Jebb, Director of Estates
Professor Jeremy Robbins, Head of School of Literatures, Languages & Cultures
Dr Ian Conn, Director of Communications and Marketing

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1 **Minute**   **Paper A**

The Minute of the meeting held on 20 June 2017 was approved.

2 **Matters arising**

The Convener welcomed Vice-Principal Professor David Robertson, Head of the School of Science and Engineering, to his first meeting.

3   Principal's Communications

Vice-Principal Professor Jane Norman, on behalf of the Principal, reported on the following: congratulations on securing the City Deal; strong undergraduate student recruitment with continuing demand from RUK and International markets and successful clearing which resulted in an increase in SIMD20 unconditional firm offer holders; postgraduate taught recruitment holding up but possibly impacted by the change from bursary to loans; a 30% increase in research grants; a successful Festival.

SUBSTANTIVE ITEMS

4   NSS Results   **Paper B**

CMG considered an analysis of the results of the 2017 National Student Survey (NSS) and proposed measures aimed at improving the University's position in the Survey. There was a wide ranging discussion in which members acknowledged the continuing hard work of academic and support colleagues and emphasised the importance of maintaining this momentum whilst recognising there was more work to be done in building student engagement and a sense of community, including working with EUSA and EUSU. The importance of a whole University approach was discussed, with the later agenda items on the Service Excellence Programme and Supporting Personal, Professional and Career Development for Graduates also important components in enhancing the student journey. Developing a more integrated approach across teaching and learning, administration and the estate would facilitate a more joined up student experience. Building on CMG advice, a refined version of the paper will be presented to Court on 25 September.

5   Service Excellence Programme   **Paper C**

CMG received an update on the Service Excellence Programme and it was reiterated that many of the issues raised in the Student Administration & Support Programme were picked up in the points raised in the discussion about the NSS. The linkage between SEP and actions around NSS should be clearly articulated and communicated.

6   Course Enhancement Questionnaire Policy   **Paper D**

CMG considered and approved the recommended changes to the Course Enhancement Questionnaire Policy as set out in the paper.

7   Bulk Email   **Paper E**

CMG considered the report on the investigation into the graduation email error and noted the report, findings and follow up work.

**8   Supporting Personal, Professional and Career Development for   Paper F
      Graduates**

CMG considered a range of high level actions proposed to support enhanced personal professional and career development and positive destinations outcomes for our graduates. This was a follow up to a briefing paper considered by CMG at its May meeting and as previously discussed supported an enhanced student experience through explicit, coordinated, and collaborative action.

The University's strong position was noted, with many examples of good practice to build on. The diversity of the range of approaches was acknowledged, with many Schools work in this area strongly driven by the demands of professional accreditation, but other Schools less likely to see the immediate relevance to their academic activity. With that backdrop, it was essential to secure staff support and accountability to drive forward the planned actions. CMG endorsed the proposed approach and reiterated the importance of a joined up approach to University wide activity.

9   Managing Capability Policy   Paper G

The University's revised policy for managing capability will take effect from 1 September 2017 and members were briefed on the context of the policy and its implementation process. The policy was a 'bolder and better' approach, with a simplified informal stage, reduced number of formal meetings and performance improvement plans, increased flexibility with the ability to 'fast-track' and to 'pick up where left off' should underperformance re-occur. CMG welcomed the new policy and commended the simpler, plain English style.

10   Update on City Deal   Paper H

The Edinburgh and South East Scotland City Deal was announced on 20 July with the UK and Scottish Governments each to commit up to £300M, along with match-funding of up to £501M by the various regional partners. The total value of the Deal reaches to up to £1.1B. The University is leading on Data-Driven Innovation, which includes: World Class Data Infrastructure; the Bayes Centre; the Quartermile Old Royal Infirmary; the Usher Institute; the National Robotarium (on which we are cooperating with Heriot-Watt University, with Heriot-Watt in the lead); and Easter Bush. The Principal is chairing a strategic board for internal oversight and there will be roadshows and internal presentations to inform the University community of the opportunities presented by the City Deal. CMG commended all involved in securing the City Deal and looked forward to further developments as the business processes were developed.

11   Finance Director's Report   Paper I

The Director of Finance reported that full year outturn is being finalised and it was anticipated that the budgeted surplus at year end would be exceeded.

Members were asked to note that the new supplier request process will be implemented on 1 October 2017 and the policy of no payment without a purchase order for trade suppliers will be implemented on 1 December 2017. Members attention was also drawn to the new Criminal Finances Act 2017 (CFA 2017) legislation which introduces a corporate criminal offence of failure to prevent (FTP) the facilitation of tax evasion. This offence is not about the University itself avoiding, evading or underpaying tax, as existing laws cover this, but about the University failing to prevent its employees and associates (contractors, suppliers, agents and intermediaries) from facilitating the evasion of both domestic and foreign tax by another party. A defence to the CFA2017 legislation is having reasonable prevention procedures in place and the University's prevention controls will be reviewed and reported to CMG.

12 Expenses Policy   Paper J

CMG commended the revisions to the Expenses Policy and asked for some further minor amendments and that it be discussed with Union representatives before returning to the next meeting for endorsement

13 Value for Money Report 2016/17   Paper K

CMG considered and endorsed the Value for Money report for 2016-17, to be forwarded to Audit & Risk Committee as part of the mandatory requirements from SFC.

14 Integrated transport Plan 2017 - 2021   Paper L

CMG noted the Integrated Transport Plan 2017 – 2021 and agreed that listening to the student voice in considering transport across the campus was an important part of the student experience.

15 Drinking Water Policy Review   Paper M

CMG noted and was supportive of the review of drinking water and proposed approach and policy updates.

16 Assistance Animals Policy   Paper N

CMG approved the Assistance Animals Policy subject to a clarification in the supporting guidance in relation to the University's responsibilities for providing facilities.

17 Data Steward Role   Paper O

CMG approved the catalogue of golden copy data sources, including data steward appointments for the core golden copy data sources; the formal definition of the data steward role; and that Heads of Colleges and Support Groups be accountable for appointing Data Stewards in their areas, in line with their overall accountability for information security.

18   Renaming George Square Lecture Theatre   **Paper P**

CMG endorsed the renaming of the George Square Lecture Theatre the Gordon Aikman Lecture Theatre and recommended to Estates Committee for approval, subject to confirm that Gordon Aitkman's family were supportive of the proposal.

ITEMS FOR NOTING OR FORMAL APPROVAL

19   Fee Strategy Group   **Paper Q**

CMG endorsed the fee proposals approved by CMG Chair's Action

20   Research Policy Group   **Paper R**

The report was noted.

21   Principal's Strategy Group   **Paper S**

The report was noted.

22   Date of next meeting

Tuesday, 26 September 2017 at 10.00am in the Raeburn Room, Old College.

23   CMG Communications

The key messages arising from the meeting to be communicated more broadly were noted.

THE UNIVERSITY of EDINBURGH

CENTRAL MANAGEMENT GROUP

26 September 2017

Social Responsibility and Sustainability Strategy 2010-20 Review

Description of paper
1.   This paper summarises progress on the review of the University's Social Responsibility and Sustainability (SRS) Strategy 2010-20[1]. The SRS Committee has oversight of this review with the aim of publishing a revised strategy in 2018.

Action requested/Recommendation
2.   CMG is invited to note and discuss the paper and continued efforts to enable the University to understand, explain and deliver on its ambition to be a leading socially responsible and sustainable university.

Paragraphs 3 - 15 have been removed as exempt from release due to FOI.

Risk Management
16. Key risks include ethical and reputational, both are associated with not having a clear strategic long-term direction for the University on SRS issues. Other risks include raising expectations, delivering aspirational but unrealistic goals and failing to achieve buy in from stakeholders. To manage these risks, the project works on de-risking opportunities. Key stakeholders have been consulted to ensure ambitions are aligned and develop a shared sense of ownership. The project plan clearly sets out critical success factors and deliverables, and highlights stakeholder engagement as a critical element of the project.

Equality & Diversity
17. Equality and diversity issues are considered as part of the review and development of the new strategy. This includes work to ensure the review engages with a diverse range of stakeholders and making events accessible to all.

Next steps & Communication
18. The paper will be submitted to Policy & Resources Committee and Court. We will use feedback received to continue to develop the new SRS Strategy.

Consultation
19. The paper has been based on contributions from a wide range of colleagues from academic and support departments across the University.

Further information
20. *Author*   *Presenter*
     Matthew Lawson   Dave Gorman
     Programme Manager   Director of SRS
     11 September 2017

Freedom of Information.

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[1] www.ed.ac.uk/files/imports/fileManager/UoE-SRS-Strategy2010-20.pdf

21. This is a closed paper.

CENTRAL MANAGEMENT GROUP

26 September 2017

Optimising Personal Tutor Support – A New Approach

Description of Paper

1.   This paper proposes a new approach to gain insight into, and thus improve, the quality of our students' support from their Personal Tutors (PTs). The approach aims to provide PTs and, in due course, Heads of School with:

- qualitative data that will identify *where* strengths and weaknesses exist
- an insight into these strength and weaknesses at individual PT level.

Action requested/Recommendation

2.   Central Management Group is asked to approve the development of this approach during the 2017-18 academic session, aiming to run the exercise in June or September, 2018 and provide PTs with feedback early in the 2018-19 session.

Paragraphs 3 - 16 have been removed as exempt from release due to FOI.

Equality & Diversity

17. This action will require a full Equality Impact Assessment (EIA) as the process and questions are designed. Particular attention should be taken to minimise and/or account for the potential effects of unconscious bias.

Next steps & Communication

18. Assistant Principal Murray will convene a group to design the process above, within the *Making Transitions Personal* framework. The group will work with the Senior VP's office to communicate the plans and to allow colleagues to comment on them, and the questions to be used, at every stage.

Consultation

19. This paper has been approved by, and optimised with the advice of, SVP Charlie Jeffery and VP Jane Norman. The paper has also been seen and approved by Gavin McCabe from the *Making Transitions Personal* team.

Further information

20. Author/Presenter
    Assistant Principal Alan Murray

Freedom of Information

21. This paper is closed.

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CENTRAL MANAGEMENT GROUP

26 September 2017

Course Enhancement Questionnaire Question Set

Description of paper
1.   This paper provides Central Management Group with the outcomes of the Course Enhancement Questionnaire (CEQ) Review Task Group considerations on aspects of the core question set.

Action requested
2.   Central Management Group is asked to approve the recommendations from the Task Group relating the staff free text question and note the plans for developing a student engagement question.

Background and context
3.   The CEQ Review Task Group's remit covered two aspects of the core question set:

- To consider the value of reinstating the staff free-text question for academic session 2017/18 in the context of other feedback channels (such as mid-course feedback) and the feedback gathered through the key stakeholder survey in order to make a recommendation to Central Management Group.
- To consider the proposal to introduce a student engagement question to the core question set for academic session 2017/18 in the context of the feedback gathered from the key stakeholder survey and students in order to make a recommendation to the Quality Assurance Committee.

Recommendations – Core Question Set
Staff Free Text Question
4.   A survey was sent to the following key staff stakeholders: Heads of College, Heads of School, School Directors of Quality and Teaching; College Deans of Quality and Learning and Teaching; College Office Academic Administration contacts; School Teaching Organisation contacts; and Student Surveys Course Enhancement Questionnaire School contacts.

5.   Only academic members of staff were asked if they thought that the following (slightly reworded) question should be reinstated into the core question set for 2017/18: 'Please provide any further comments about this staff member's teaching in the space below.'[1] Staff were then asked to explain their choice.

6.   In total, 37 member of staff responded to this question. 22 (59.4%) answered 'yes' and 15 (40.6%) answered 'no'. Whilst 'yes' came out roughly 20% ahead of 'no', making it the clear preferred option, just over two in five respondents are against the introduction of a qualitative question focused on individual staff

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[1] Following stakeholder feedback, the free text staff question in the core question set "Please provide any further comments about this staff member in the space below" was removed in semester 1 2016/17.

members. Respondents against the introduction of the question expressed concern over the surfacing of unhelpful or hurtful comments, and the point of contention concerning the perception that gender bias is an inevitable in this sort of survey remains present.

7.   Having considered the available evidence, the Task Group **recommend** to Central Management Group that the reworded version of the staff free text question is not reinstated into the core question set.

8.   The Task Group **recommend** that a more supportive route (outwith CEQs) is found for gathering feedback on individual staff members' teaching. The student representative structure and peer observation of teaching were mentioned by Task Group members within this context. The Task Group invites Learning & Teaching Policy Group to consider how to progress this recommendation.

Student Engagement Question
9.   The same key staff stakeholder survey contained the question (56 respondents): 'There is a proposal to introduce a student engagement question to the core question set for academic session 2017/18. Please indicate which of the questions you prefer:

- I have taken responsibility for my learning on this course = 27 (48.2%)
- I have been an active participant on this course = 19 (33.9%)
- I actively contributed to the learning community of this course = 10 (17.9%)'

10. Whilst 'I have taken responsibility for my learning on this course' is the clear leader with just under half of respondents preferring it to other options, more than 50% of respondents preferred one of the other two questions.

11. A student survey was distributed to the electronic student panel and promoted to all students through the University's and Edinburgh University Students' Association's social medial accounts. Students were presented with the same three questions and asked what they thought they meant. At the end of the survey they were also asked for any further comments about the questions.

12. Despite concerted efforts, due to the necessary timing of consultation, only 18 students responded.

13. Students expressed mixed feelings about all available question options, as well as displaying at times contradictory understandings of what the questions were asking.

14. Having considered the available evidence, the Task Group **recommend** that a student engagement question should not be introduced to the core question set for 2017/18. Thus no recommendation will be presented to the Senate Quality Assurance Committee (who own the core question set).

15. At their meeting, the Task Group developed four student engagement questions which will be added to the bank of additional question sets which can be used within Schools. These will be piloted with a number of Schools (to be finalised) in 2017/18

and evaluated with the aim of including a student engagement question in the core question set in 2018/19. The questions are:

- What advice would you give to a student taking this course in future? (Free text comment)
- What opportunities did this course give you for active engagement? (Free text comment)
- This course helped me take responsibility for my own learning. (Definitely agree – Definitely disagree + N/A)
- This course helped me become a more independent leaner. (Definitely agree – Definitely disagree + N/A)

16. Because some students are exempt from certain learning and teaching activities as part of their learning profile, student engagement questions that relate to participation and contribution should have a 'not applicable' or equivalent option. The Equality Impact Assessment will be updated to reflect this and also outline a commitment to monitor (with the assistance of the Student Disability Service) the levels of such adjustments. The current (August 2017) EqIA is available at: http://edin.ac/2eTwklT

Resource Implications
17. Existing resources will be diverted on to support the development, running and evaluation of the pilot question sets.

Risk Management
18. The review of the policy is one of a number of activities to address issues and manage risks in relation to course enhancement questionnaires.

Next steps
19. A communication will be issued by Barry Neilson to all Heads of School, Director of Teaching and Directors of Quality.

20. CEQ work strands for 2017/18 are:

- Develop a specific bank of core question sets for SLICCs, placements and dissertations.
- Explore the types of study abroad "courses" and how student feedback is gathered and acted upon.
- Pilot and evaluation of student engagement questions.

Consultation
21. CEQ Review Task Group; key stakeholder staff survey; student survey (distributed to the electronic student panel and promoted to all students through the University's and Students' Association's social medial accounts).

Further Information
22. Please contact Barry Neilson, Director of Student Systems & Administration. (barry.neilson@ed.ac.uk)

23. <u>Author</u>   <u>Presenter</u>
    Barry Neilson   Professor Jane Norman
    Director of Student Systems & Administration   Vice Principal. People & Culture
    Service Excellence Programme Lead
    20 September 2017

Freedom of Information:
24. This paper is open.

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CENTRAL MANAGEMENT GROUP

26 September 2017

Undergraduate Intake Strategy – 2018-19
Scotland/EU and RUK (non-controlled funding subject groups)

Purpose
1. In line with our agreed strategy, this paper reports to CMG on the setting of intake targets for the recruitment of full-time Scotland/EU (SEU) and Rest of UK (RUK) undergraduates in the non-controlled funding subject groups.

Action/Recommendation
2. CMG is asked to consider and endorse the planning assumptions and targets outlined in the paper for SEU and RUK non-controlled UG intake and the expectation of SIMD20 entrants as part of our progress towards delivering the Commission on Widening Access (CoWA) SIMD20 widening participation target.

3. CMG is also asked to approve the initiation of project to prepare for engagement in Clearing during the 2018-19 undergraduate UCAS cycle.

Paragraphs 4 - 19 have been removed as exempt from release due to FOI.

Risk Management
20. Effective recruitment and student number planning is fundamental to the delivery of the University's business plan and, via impacts on timetabling and student accommodation provision, to the delivery of a positive student experience.

Next Steps
21. Student number planning will feed directly into school, college and university level business planning.

Further Information
22. *Author/Presenter:*
    Tracey Slaven
    Deputy Secretary, Strategic Planning.

    19 September 2017

23. This paper is closed. This reflects the competitive nature of recruitment.

CENTRAL MANAGEMENT GROUP

26 September 2017

2018/21 planning round: timetable and context

Description of paper

1.   The purpose of the paper is to provide CMG with the context for the 2018/21 planning round, describe the refinements to the financial planning aspects of the planning round and to present a planning round timetable all of which will be issued to Heads of College and Support Group and be generally available for all who have input into the planning round.

Action requested/Recommendation

2.   We ask CMG to scrutinise the refinements to the financial aspects of the planning round, the 2018/19 planning timetable and context and to approve it for issue*.*

Paragraphs 3 - 23 have been removed as exempt from release due to FOI.

Resource implications

24.   There are no resource implications at this stage of the planning process.

Risk Management

25.   Colleges and Support Groups should update their risk registers in light of the contents of their planning submissions, which they will submit for review by Audit and Risk Committee at the May 2018 meeting.

Equality & Diversity

26.   We do not consider that an EIA is required at this stage in the planning process. The planning guidance contains strategic priorities for the equality and diversity agenda (as advised by the Vice Principal Equality and Diversity) that plans should address, and will be scrutinised as part of the review of plans as laid out in the planning timetable.

Next steps/implications

27. The next steps in the 2018/21 planning round are set out in the Planning Timetable.

Consultation

28. The paper has been reviewed by the Vice Principal Planning, Policy and Research Policy and the Director of Finance who are content with the contents of the paper.

Further information

29.   *Authors*   *Presenter*
         Tracey Slaven   Tracey Slaven
         Deputy Secretary Strategic Planning   Deputy Secretary Strategic Planning
         Peter Phillips
         Deputy Director of Planning
         19 September 2017

Freedom of Information
30. This paper is closed

CENTRAL MANAGEMENT GROUP

26 September 2017

Finance Director's Report

Description of paper
1. The paper summarises the finance aspects of recent activities on significant projects and initiatives updating on progress as appropriate.

Action requested/Recommendation
2. Central Management Group is asked to comment on the latest update and can use this report to brief their teams on Finance matters. CMG is asked to approve the proposal that the Finance Template is adopted as an integral part of the Committee Report template

Paragraphs 3 - 30 have been removed as exempt from release due to FOI.

Risk Management
31. The University continues to proactively manage its financial risk by not breaching the following minimum criterion - unrestricted surplus of 2% of gross income. The draft financial results demonstrate we do not expect this indicator to be breached. The continuing health and sustainability of the University depends upon strong direction supported by robust forecasting and we will continue to refine and challenge the assumptions underpinning the Ten Year Forecast.

Equality & Diversity
32. Specific issues of equality and diversity are not relevant to this paper as the content focusses primarily on financial strategy and/or financial project considerations.

Next steps & Communication
33. We would welcome feedback as outlined in the discussion above.

Consultation
34. The paper has been reviewed by Phil McNaull, Director of Finance.

Further information
35. *Author*   *Presenter*
    Lorna McLoughlin   Phil McNaull
    Head of the FIRST Team   Finance Director

    20 September 2017

Freedom of Information
36. This paper should not be included in open business as its disclosure could substantially prejudice the commercial interests of the University.

CENTRAL MANAGEMENT GROUP

26 September 2017

Holiday Pay and Non-Contractual Overtime

Description of paper
1.   This Paper explains the issues associated with the University's current approach to ensuring voluntary, regular overtime is reflected in holiday pay and proposes an alternative method.

Action requested/Recommendation
2.   Central Management Group members are asked to note the issues associated with the University's current approach to ensuring employees receive holiday pay which takes into account voluntarily worked overtime and to approve the recommendation.

Paragraphs 3 - 24 have been removed as exempt from release due to FOI.

Risk management
25. The proposed approach balances the University's need to manage cost with its legal obligations

26. It removes the risk that staff, legally entitled to holiday pay which takes into account their overtime earnings, do not receive their entitlement.

27. Using the UK's statutory entitlement (28 days) as the basis of the holiday pay percentage exceeds the binding ruling that overtime must be reflected in the first 20 days of annual leave. This, combined with the increased frequency of payment, should reduce the potential for challenge from those who have benefitted from the current approach.

Equality & Diversity
28. There are no equality and diversity issues associated with this paper.

Paragraphs 29 - 31 have been removed as exempt from release due to FOI.

Consultation
32. The trade unions have been made aware of the administratively cumbersome and labour intensive nature of the current approach and are receptive to a more regular payment mechanism.   The proposed, automated approach has been discussed with and is supported by College/Support Group Heads of HR and the Payroll Manager.

Further Information
33. *Author*   *Presenter*
    Linda Criggie   Zoe Lewandowski
    Deputy Director of HR, Employee   Director of HR
    Relations
    15 September 2017

Freedom of Information

34. The paper is closed, pending collective agreement being reached with the trade unions.

THE UNIVERSITY of EDINBURGH

CENTRAL MANAGEMENT GROUP

26 September 2017

General Data Protection Regulation: Implementation Overview

Description of Paper

1. Central Management Group (CMG) considered an early paper on the implications of the then draft General Data Protection Regulation (GDPR) in January 2016. CMG agreed, recognised that this would have implications, particularly for areas such as Development and Alumni around the use of consent, and that a considered and proportionate approach aligned with other initiatives such as Service Excellence should be adopted in implementing the regulation.

2. On 4 May 2016, the GDPR was published in the Official Journal of the European Union and will come into force on 25 May 2018. The GDPR raises the overall level of compliance and introduces new requirements for data controllers and data processors. On 13 September 2017, the Government published a first draft of the Data Protection Bill, referring to and supplementing the GDPR. The Bill will also introduce the Law Enforcement Directive regulating the processing of personal data for criminal investigation and law enforcement purposes.

3. GDPR, and any additional requirements introduced by the successful passage of the Data Protection Bill, will need to be met and implemented throughout the University. This paper gives an overview of the current status of the implementation of the GDPR and the strategy supporting this process.

Background and Context

4. The University uses information about living, identifiable individuals throughout Schools, Colleges and Administration. Examples are personal data referring to students, staff, patients, research subjects, donors and alumni, conference attendees. The GDPR applies to all those categories, and the way the data are processed will need to be brought into accord with the new legal requirements.

5. The GDPR has effect in the UK until the UK leaves the EU. However, the UK Government intends to transfer the requirements of the GDPR and areas of national government derogation into UK legislation; confirming that the requirements will extend beyond Brexit.   A first draft of this legislation was published on 13 September 2017 and is currently being reviewed. The Statement of Intent published on 7 August confirmed that all mandatory aspects of the GDPR will be implemented and that, if anything, the new Data Protection Act will be even more restrictive. Mandatory components will be, for example, a comprehensive privacy notice at the time of collection of personal data, data privacy impact assessments for new projects involving either the collection of or the re-use of personal data, data sharing and processing agreements, data minimisation, and a centrally held data processing register. Importantly, appropriate legal bases to ensure lawful data processing will need to be determined.

6.   Within the University, implementation has begun with the intention to embed compliance with the new requirements within normal business practice and to integrate this with existing plans and initiatives. Efforts focus on the areas of new mandatory obligations which, in turn, also solidify and reinforce the existing obligations. Priority is given to the communication of requirements, focused on key risk areas (D&A, HR, Marketing), support for locally owned compliance projects and for cross-cutting ISG activities.

DPO Appointment
7.   A named Data Protection Officer reporting to senior management is one of the requirements of the GDPR. Dr Rena Gertz took up this role, which will become statutory, on 2 May 2017. Rena has over 10 years' experience in the information governance area and an established working relationship with the Information Commissioner's Office. She is one of the first named appointments in the Higher Education Sector. Collaborating closely with ISG, a light-touch co-ordinating GDPR Implementation Project was initiated in June with project management support.

Key Changes for UoE
Definitions
8.   The definition for 'personal data' – information whereby a natural person is identifiable – has been extended. A low bar is set for "identifiable" – if anyone can identify a person using "all means reasonably likely to be used" the information is personal data, so data may be personal data even if the University cannot itself identify a person. A name is not necessary either – any identifier will do such as an identification number, location data, an online identifier or other factors which may identify that natural person. In fact, online identifiers are expressly included with IP addresses, cookies and RFID tags all listed as examples. Moreover, the categories of sensitive personal data have been extended to now expressly include genetic and biometric data.

Transparency
9.   Privacy notices to provide information to data subjects were a requirement under the Data Protection Act, however, under the GDPR, the information that must be provided is greatly increased and must be in a concise, transparent and easily accessible form, using clear and plain language. The following information must be provided (Article 13) at the time the data is obtained: purposes for processing; legal basis for processing; data recipients; retention times; subject rights; data controller and DPO contact details; right to complain; right to withdraw consent (if consent is relied on); nature of legitimate interest (if legitimate interest is relied on).

Consent
10. The conditions for consent have been strengthened, and the University will no longer be able to use opt-out or pre-ticked boxes for consent. Instead, consent must always be a positive indication. Consent must be clear and distinguishable from other matters and provided in an intelligible and easily accessible form, using clear and plain language, with the purpose for data processing attached to that consent. It must be as easy to withdraw consent as it is to give it.

Data Subject Rights

11. *Right to Access* - Part of the expanded rights of data subjects is the increased right for data subjects to obtain from the University confirmation as to whether or not personal data concerning them is being processed, where and for what purpose. Further, the University must provide a copy of the personal data in an electronic format. This change is a dramatic shift to data transparency and empowerment of data subjects. The timeframe has been shortened from 40 calendar days to 1 month and a fee of £10 can no longer be charged.

12. *Right to be Forgotten* - Also known as Data Erasure, the right to be forgotten entitles the data subject to have the University erase his/her personal data, cease further dissemination of the data, and potentially have third parties halt processing of the data. The conditions for erasure include the data no longer being relevant to original purposes for processing, or a data subject's withdrawing consent.

13. *Data Portability* - GDPR introduces data portability, which is the right for a data subject to receive the personal data concerning them, which they have previously provided in a *"commonly use and machine readable format"* and have the right to transmit that data to another controller.

Data Protection by Design and Default

14. "Data protection by design" requires taking data protection risks into account throughout the process of designing a new process, product or service, rather than treating it as an afterthought. This means the inclusion of data protection from the onset of the designing of systems and/or projects involving personal data, rather than an addition. More specifically, a Data Protection Impact Assessment (DPIA), a type of risk assessment focusing on privacy, will become a mandatory prerequisite before implementing the project.

15. "Data protection by default" requires ensuring mechanisms are in place within the University to ensure that, by default, only personal data which are necessary for each specific purpose are processed. This obligation includes ensuring that only the minimum amount of personal data is collected and processed for a specific purpose; the extent of processing is limited to that necessary for each purpose; the data is stored no longer than necessary and access is restricted to that necessary for each purpose. For research, "data protection by default" means that personal data must be anonymised where possible, or, if complete anonymisation is not possible, pseudonymised.

Accountability

16. A general obligation is introduced to keep extensive granular internal records of data protection activities. This means that each College, School and University Department must create a Data Processing Register of all categories of personal data they process, and include information about, e.g., the purpose for processing, legal basis, data sharing, whether held electronically or in paper, security measures, whether sent abroad.

Data Processors

17. One positive change is that data processors – companies the University employs and instructs to perform tasks for and on behalf of the University – can be held directly liable by the Information Commissioner in case of a breach. If the University

has instructed the data processor fully on security requirements and the type of work the processor is supposed to perform, then the processor will be held liable if he breaches data protection law wilfully or negligently. A data processing agreement, outlining the responsibilities, is mandatory.

Penalties
18. Under GDPR organisations can be fined a maximum of 4% of annual global turnover or €20 Million (whichever is greater) for the most serious infringements. There is a tiered approach to fines – for minor administrative breaches, a fine of a maximum of 2% of the annual global turnover or €10 million can be imposed.

Breach Notification
19. Breach notification will become mandatory where a data breach is likely to "result in a risk for the rights and freedoms of individuals". This must be done within 72 hours of first having become aware of the breach. Data processors will also be required to notify their customers, the controllers, "without undue delay" after first becoming aware of a breach.

Implementation Overview
Communications and Engagement
20. At this time, the following implementation measures have been taken:

- Meetings have taken place and work is ongoing to ensure that D&A are going to be compliant with both the GDPR and the Etherington Review. This was a review of the charity sector due to concerns over alleged malpractice and resulted in recommendations regarding the ethics, lawfulness and transparency related to approaching potential donors while fundraising.
- The need for GDPR implementation has been explained to Heads of Colleges and Schools. To achieve that, meetings have now taken place with all three Registrars respectively the Head of Finance and Planning in CAHSS; with the majority of Heads of Schools in CAHSS and CSE and the respective DoPS; and meetings have been scheduled for CMVM.
- Within the University Secretary's Group, meetings with HR, Edinburgh Global, Internal Audit, Academic Services, Student Systems, Student Disability Service, Recruitment and Admissions, the USG Business Unit Manager, ACE and the Chaplaincy have taken place to initiate implementation work. Further meetings with the remaining departments have been scheduled.
- After the initial meetings, working groups have been formed in many Schools to implement the changes. The DPO will attend these working groups, help with the implementation and simultaneously carry out a data protection audit. The intention is to share information across the University through the DPO – if one School identifies a problem or a risk, this will then be communicated to all other Schools.
- In July, the DPO gave a presentation at Communication & Marketing's Marketing Forum.

Transparency
21. In order to facilitate implementing the principle of transparency across the University, a layered privacy notice has been drafted and is being disseminated. The first half of the notice will be customised by the data collector, while a link

underneath the text will take the data subject to the generic part of the privacy notice on the website.

22. The notice will be placed in the 'tools' part of the data protection website where it can be downloaded and used. Guidance on how to fill in the privacy notice has already been written and will be on the website alongside the privacy notice. Moreover, guidance on how to determine the applicable legal basis has been finalised, as has guidance on consent. All these documents will be available on the website to enable users to competently write privacy notices.

Introducing Data Protection by Design and Default
23. A tool for conducting privacy impact assessments (PIAs) for new projects involving personal data on a large scale or for utilising personal data for a new purpose has been created and is already in use. Guidance on how to conduct a PIA has also been written and disseminated to users conducting PIAs. It is envisaged that an online tool will eventually replace the word document currently in use. The DPO also collaborates with the Chief Information Security Officer on all data security matters.

Accountability
24. As the GDPR places the onus for proving compliance on the University, several steps have already been taken:

- A Data Processing Register template to comply with Article 30 of the GDPR has been created and is currently being disseminated to Colleges, Schools and University Administration. The Register is being populated with categories of personal data and information about these categories such as purpose for processing, legal basis, retention time, format of storage. Student Systems were the first part of the University to populate the Register providing a base list useable by Schools. Categories entered into the Register by one School will be disseminated to all other schools to facilitate the process and save time.
- In cases of a severe data protection breach, the Information Commissioner must be notified within 72 hours of discovery of the breach. A first meeting has been held to discuss the best procedure for dealing with this. Currently the Incident Response Team triage all data security breaches and the best and least time-consuming procedure for the DPO to be notified of data protection breaches will be determined.
- The Data Protection Policy will be updated shortly before May 2018 when all derogations have been adhered to by the UK Government and respective legislation has been issued.

Marketing
25. Meetings have been scheduled with CAM to ensure that all marketing will be in compliance with the GDPR and the Privacy and Electronic Communications Regulations. Marketing within the Schools and Colleges will be discussed during the audit meetings with the respective working groups and individuals.

Support to Staff
26. A website will be set up where all tools, templates and guidance will be made available to all staff members. While this website is being created, the existing

Records Management website will host the documents to ensure dissemination at the earliest possible time.

27. The DPO intends to create a network of Data Protection Champions within all Colleges, Schools and Administrative departments. Some of these will be recruited from existing Data Stewards, while others will take on this role due to their position within a School or department.

28. The DPO now has been given a designated space in LEARN to create an online GDPR training module. Work on this has begun.

Data Sharing/Processing Agreements
29. Any contract a data controller has with a processor must contain certain terms set out in the Regulation to ensure compliance and to ensure that the controller is aware of any sub-contractors. The University Legal Services has contracted Brodies Solicitors to draft templates for both data sharing and data processing agreements.

30. Existing contracts will need to be examined whether personal data are involved. Where necessary, new data sharing or data processing agreements will need to be put in place and existing ones will need to be updated. The audit carried out with the working groups in Schools and within the Colleges and Administration will include registering data sharing and data processing activities in order to conduct a gap analysis regarding agreements and examine existing agreements.

Areas awaiting further legislation
31. The GDPR includes a number of derogations for Member States to specify how the Regulation will apply to certain areas. First and foremost, at this time, it is still uncertain whether universities will be declared as public authorities. The DPO will continue to liaise with relevant sectoral and professional groups as well as the ICO to ensure that any new legislation issued by the Government will be implemented.

Expected completion schedule

Communications	
Meetings with Heads of Colleges and Schools, Directors and Managers	Ongoing, completion expected November 2017
Transparency	
Privacy notice roll-out throughout University	Initiated, completion expected December 2017
Accountability	
Data Processing Register	Initiated, completion expected May 2018
Breach notification	October 2017
Guidance	Partially completed, final guidance documents by December 2017
Policy	May 2018
Data Protection by design and default	
Privacy Impact Assessment tool	Paper version completed, online tool to be assessed and implemented by December 2017
Privacy Impact Assessment guidance	completed
Information Security	ongoing

Marketing	
Communications & Marketing	November 2017
Schools, Colleges, Administration	May 2018
Website	
Creating the data protection website	November 2017
Data Protection Network	
Establishing DP Champions	May 2018
Training	
Creating DP Training on LEARN	December 2018
Data Sharing/Processing Agreements	
Creating new agreements	Ongoing
Reviewing existing agreements	May 2018
Areas awaiting further legislation	
Derogations in the GDPR	tba

Resources

32. All GDPR implementation projects and processes are integrated into normal planning and are resourced locally. ISG has prioritised implementation within IS APPS workload.

Risk Management

33. Compliance with the GDPR will be a statutory requirement. Failure to comply having potentially financial and reputational impacts.

Equality & Diversity

34. Enhanced privacy and data protection, objectives of the GDPR, would be expected to support equality and diversity.

Further information

35. *Author*   *Presenter*
     Rena Gertz   Tracey Slaven
     Data Protection Officer
     14 September 2017

Freedom of Information

36. Paper is open.

THE UNIVERSITY *of* EDINBURGH

CENTRAL MANAGEMENT GROUP

26 September 2017

Internal Audit Status Report

Description of paper

1. The attached paper provides a summary update of progress against the Internal Audit Annual Plan. It is an abbreviated form of the report that went to the September Audit and Risk Committee. Members who wish to see the executive summaries of the reports listed in the report can request them. Executive summaries have traditionally accompanied this report but we are looking to provide briefer update reports. We will also be looking to redesign this report.

Action requested

2. CMG should note the contents of the report.

Paragraphs 3 - 9 have been removed as exempt from release due to FOI.

Further information

10. <u>Author and Presenter</u>
    Noel Lawlor
    Chief Internal Auditor
    17 September 2017

Freedom of Information

11. This paper is closed.

Internal Audit assignment summaries

The definitions for overall assurance and recommendation gradings used in the reports are given in the tables below.

<u>Overall assurance</u>

OPINION	DESCRIPTION
Full	Any control weaknesses identified are minor. No objectives are at risk, based on the findings.
Significant	The weaknesses identified are a moderate risk to the achievement of particular objectives.
Limited	The weaknesses identified are a significant risk to the achievement of particular objectives.
None	The weaknesses identified are a serious risk to the achievement of particular objectives.

<u>Assignment recommendation gradings</u>

GRADE	DESCRIPTION
4	This is a fundamental weakness in control. It affects the achievement of strategic objectives.
3	This is a significant weakness in control. The weakness is a risk to the achievement of agreed objectives.
2	This is a moderate risk to the achievement of agreed objectives.
1	This is a minor risk to the achievement of agreed objectives.

REVIEW TITLE	DATE OF REPORT	NO OF REC's FOLLOWED UP	IMPLEMENTED	PARTIALLY IMPLEMENTED	NOT IMPLEMENTED	NOTES
13-09F Disposal of Computer equipment	2013/4	1			1	Follow up November 2017
14-01F University Web presence	2014/5	3		3		Being taken forward by new Webmaster
14-02F Student assessment and feedback	2014/5	1		1		First semester
14-05F Practice placements	2014/5	5			5	Stakeholder Forum being set up to take this forward
14-09F Consultancy agreements	2014/5	2	2			
14-10F Capital equipment expenditure	2014/5	4	1	1	1	One recommendation is now redundant
14-12F Utilities and service charges	2014/5	2		1	1	
14-20F School of Biological Sciences	2014-5	1			1	
14-21F Office of Lifelong Learning	2014/5	1	1			
14-22F Scholarships	2014/5	2	2			
14-23F Development and Alumni	2014/5	4	4			
15-02F Joiners and leavers	2015/6	7	6		1	
15-15F Heritage assets	2015/6	2	1	1		
15-16F Payroll analytics	2015/6	4	3	1		
15-18F Procurement-Accommodation Services	2015/6	6	5		1	
15-18F Procurement-IGMM	2015/6	7	7			
15-21F PCI-DSS compliance review	2015/6	6	5	1		
15-23F Library Services	2015/6	6	2	3	1	
15-39F Statutory and mandatory returns	2015/6	2	2			
15-44F Special investigation: Financial controls	2015/6	6	5	1		
TOTALS		72	46	13	12	

RECOMMENDATIONS NOT FULLY IMPLEMENTED FROM2014/15 OR BEFORE (AS AT 8th SEPTEMBER)

Reference	Audit Name	Subject of the recommendation made
13.09	Disposal of Computer Equipment	Review of Reuse and Recycling Policy
14.01	University Web Presence	Structured programme of engagement with Schools / Departments not using the EdWeb Content Management System
		Management of web presence outwith EdWeb
		Register of websites
14.02	Student Assessment & Feedback	Quality guidelines and quality review standards
14.05	Practice Placements	Governance of Practice Placements
		Systems for management of practice placements
		Student feedback on practice placements
		Structures for operational management of practice placements
		Forum for staff involved in management of practice placements
14.10	Capital Equipment Expenditure	Capital Equipment Asset records
		Use of Capital Expenditure Application forms
		Authorising utility payments
14.20	School of Biological Sciences	Validation of Personnel to Payroll

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CENTRAL MANAGEMENT GROUP

26 September 2017

**Health and Safety Quarterly Report: Quarter 4:
1 June 2017 – 31 August 2017**

Description of paper
1.   This paper provides a summary of health and safety related incidents that took place during the period 1 June 2017 to 31 August 2017, as well as relevant health and safety issues and developments, to provide information and assurance to the Central Management Group (CMG) on the management of health and safety matters.

Action requested / Recommendation
2.   CMG is asked to note the contents of the report.

3.   It is recommended that CMG notes the statistics included in the Appendices as illustrative of the University's accident and incident experience, and notes the issues and developments which are also described.

Paragraphs 4 - 24 have been removed as exempt from release due to FOI.

Risk management
25. The University has a low risk appetite for both compliance risks and for people risks. Monitoring of health and safety accidents, diseases and incidents ensures that risks to health are being managed and provides an early warning of more serious issues.

Equality & Diversity
26. This report raises no major equality and diversity implications, other than those associated with disabled evacuation.

Consultation
27. This paper, with minor alterations, will also be presented to the next appropriate meeting of the Audit and Risk Committee.

Further information
28. *Author*   *Presenter*
     Alastair Reid   Hugh Edmiston
     Director of Health and Safety   Director of Corporate Services
     8 September 2017

Freedom of Information
29. This paper is closed as its disclosure would substantially prejudice the legal interests of any person or organisation.

CENTRAL MANAGEMENT GROUP

26 September 2017

Principal's Strategy Group

Committee Name
1. Principal's Strategy Group (PSG).

Date of Meeting
2. 21 August 2017.

Action Required
3. Provided for information.

Key points
4. Among the items discussed were:

a) UniForum Results Briefing

PSG received a briefing from the Managing Director of the Cubane Group, Mr Edward Curry-Hyde on the UniForum results.

b) National Student Survey

The Senior Vice-Principal updated PSG on the initial results from the NSS 2017.

Overall satisfaction has improved, and a number of Schools have performed well, however there are still significant challenges.

PSG were supportive of the proposed follow up actions and offered the following additional comment:
- More could be done to make students feel valued right through from Open Day to Graduation.
- Although our breadth, and the interdisciplinary nature of our offer, is a real selling point we struggle to provide quality support across disciplines.
- Academic and professional services support should join up around the student and *their* needs.

c) Teaching Excellence Framework

Assistant Principal Harrison provided PSG with valuable insight gained from the first year of the Teaching Excellence Framework (TEF) and her experience as an assessor. The Group considered the implications of the metrics for the University and the options around our likely future engagement.

d) Refinements to Financial Planning

Deputy Secretary Strategic Planning, Ms Tracey Slaven noted that the motivating factor for the proposed changes was to increase transparency and move to using a single set of financial templates.

Following discussion it was agreed that Ms Slaven would meet with College representatives to discuss further and confirmed that no changes would be made until these meetings had taken place.

Equality & Diversity

5.   Items generally come to PSG at an early stage of development and it is anticipated that Equality & Diversity matters will be given full consideration as the initiatives take shape and become formalised.

Further information

6.   Additional information can be provided by the secretary to PSG Ms Fiona Boyd or by the individuals named against the individual items above.

7.   **Author**

Ms F Boyd
Principal's Office
16 September 2017

Freedom of Information

8. Open Paper.