



Review of SFC's Information Management Framework

Purpose

1. To invite the Audit and Compliance Committee to review the latest version of SFC's Information Management Framework.

Background

2. SFC's Information Management Framework sets out the organisation's arrangements for managing corporate information and identifies roles and responsibilities. The Framework is a high-level document, which is supported by a suite of more detailed policies and procedures, including:
 - Records management staff manual.
 - Retention and disposal policy.
 - LINKS user manual (for our intranet and electronic document and records management system).
 - Information security policy.
 - Data protection and data breach policies.
 - Data processing policy.
 - Freedom of Information policy.
 - Acceptable use and monitoring policies.
 - Remote working policy.
3. These policies are updated as and when necessary and are reviewed formally on an annual basis. Any key changes are notified to staff. We also provide training to staff on some of the key policies, such as Data Protection and Freedom of Information.
4. Our current focus is on reviewing and updating our data protection policies in anticipation of the introduction of the General Data Protection Regulation (GDPR) from 25 May 2018. A separate paper setting out our preparations for the introduction of GDPR is on the agenda for today's meeting (ACC18 06).

Latest version of the Framework

5. The document has been updated to:
 - Make reference to the changing regulatory regime with the introduction later this year of the EU General Data Protection Regulation (GDPR) and the EU Network and Information Security Directive.

- Make reference to the role of the Senior Information Risk Owner (SIRO).
 - Make reference to the role of the Data Protection Officer.
 - Make reference to social media and new information technologies (for example: smartphones, tablets, and use of voicemail).
6. We have also introduced a set of information management principles and made changes to the underpinning policies. A copy of the revised Framework is attached.
 7. We have also introduced a commitment to complying with the key elements of 'Cyber Essentials', including certification as 'Cyber Essentials Plus'. (Cyber Essentials is a Government-backed, industry-supported scheme to help organisations protect themselves against common online threats.)
 8. In terms of the development of the Framework, we are now considering bringing it together with our other related policies and procedures to create a single Information Governance Manual for staff within the organisation.

Risk assessment

9. The Information Governance Framework helps to mitigate the risk that information is mishandled or not handled by SFC in line with good practice and legal and regulatory requirements.

Equality and diversity assessment

10. There are no equality and diversity issues associated with this paper.

Recommendation

11. The Audit and Compliance Committee is invited to note the latest version of the Information Management Framework.

Financial implications

12. There are no financial implications arising from this paper.

Publication

13. This paper will be published on the SFC website.

Further information

14. Contact: Callum Morrison, Information Management and Governance Officer (tel: 0131 313 6566; email: cmorrison@sfc.ac.uk.)