

FOI 021-22 Response

I am getting in touch to ask which company supplies the door access card readers on buildings around Edinburgh Napier University (used for contact-less access on campus cards).

Please give all information relating to:

- The make and model of readers used
- The company which manufactures/distributes the readers
- Any third-party installers/channel partners used to purchase the readers
- The security infrastructure provider
- The software used to manage the door controllers and readers.
- Approximate quantity of doors at the university.
- Name of the Head of Estates for the University.

Additionally, if the university uses readers from multiple suppliers, please give a list of all suppliers.

Exemption Notice

We have not provided the information requested as we consider that releasing this information into the public domain constitutes a security risk. We believe the information would, or would be likely to, prejudice substantially the prevention of crime, as it could potentially be used to build a picture of the University's IT infrastructure strengths and weaknesses (especially if this information was combined with other information available in the public domain). More specifically, the consequences of actions compromising door access card readers could be serious (e.g. by enabling unlawful entry to university premises to individuals pursuing other criminal activities) and could lead to significant damage to the University's operations. Thus, we are concerned that the information could be used to compromise the security of the University's IT systems, to the University's detriment.

Given the upsurge of cyber-attacks on educational institutions and, in general, globally, any information which may compromise the security of the University's ICT infrastructure is classified as strictly confidential. We are therefore issuing a refusal notice, under s.16 of the Freedom of Information (Scotland) Act 2002 (FOISA), as we consider this information to be exempt from disclosure under s.35(1)(a) of the Act.

Please note that we are not suggesting in any way that the exploitation of risks is your intention. Rather, our concern is that releasing information under Freedom of Information legislation is, by definition, releasing it into the public domain and once this has happened the University has no control over who has access to the information or how it may be used.

Section 35(1)(a) of the Act requires the application of a public interest test. Applying this test, I have weighed up the arguments for both disclosing and withholding the information, and found the following:

Public interest in favour of disclosing the information

- The release of information, such as that requested, promotes the transparency and accountability of public authorities.

Public interest in favour of withholding the information

- Disclosures made under FOISA are for the purposes of putting information into the public domain and are therefore potentially available to all members of the public. Releasing this information into the public domain may compromise the security of the University's IT infrastructure, particularly if used in combination with other information which may be publicly available.
- As the University's services and business are supported to a large degree by IT systems and equipment, in this case by door card readers, it is vital that the University keeps these resources as secure as possible. The consequences of any actions compromising this equipment could be serious (e.g. enabling unlawful entry to university premises to individuals pursuing other criminal activities) and could lead to significant damage to the University's operations.
- The Scottish Information Commissioner's guidance states "*s.35(1)(a) applies to information, the disclosure of which would, or would be likely to, prejudice substantially the prevention...of crime*". Furthermore, "*The term 'prevention' encompasses actions taken to anticipate and prevent crime*" – in this case anticipating crime by maintaining the security of vital equipment and systems which, if they were the target of criminal actions, could have wide ranging and serious repercussions for the University.

Overall, I do not find that disclosing the requested information is in the public interest.

Finally, I draw your attention to guidance given by the Scottish Information Commissioner which reads:

"The term 'public interest'...has been described as 'something which is of serious concern and benefit to the public'...not what is of interest to the public, but what is in the interest of the public".