



Present:

Malcolm Schaffer (Chair) (MS), Janet Robertson, Ava Wieclawska (AW), Gillian Henderson GH), Gwen McNiven (GMcN), Paul Harkness (PH), Dawn Turner (DT), Donald Lamb (DL), Angela Mitchell (AM), Vicki Ritchie (VR), Kelly Campbell (KC), Ed Morrison (EM), Bruce Knight (BK), Caroline McGinn (CMcG)

By VC – Rosemary McCracken

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| 1. | Apologies None | | |
| 2. | Any Other Business GDPR – GDPR is a responsibility of all IG Leads in terms of data quality and accuracy. Record Correction/Deletion – Where asked for a record to be corrected or deleted due to being inaccurate, what do we do with the reporter Decision? It was discussed by the group that if brought to a hearing it will be subject to proof. If new information becomes available there is the opportunity to appeal at proof. | | |
| 3. | Minutes of previous meeting: 14 February 2018 Page 1 to be updated to the following “ Still problem of Reporters retaining grounds in their own folders on the group drive and not importing into CMS” The rest of the minute was agreed as an accurate record. Matters Arising: G Drive clean up Ayrshire – Good progress has been made. All children subject to CSO have grounds imported. Grampian – No further forward, Issue has been discussed at LMT, Glasgow – No further forward. North Strathclyde – Clean up activity is on-going Tayside & Fife – Clean up activity has improved since GDPR training. There is an issue around personnel data held by managers. All managers are asked to consider what information they are holding and if it is appropriate. | Immediate | PA |

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| | <p>SPR2 Deletions</p> <ul style="list-style-type: none"> • Checks are on-going and we will start reporting back to the Procurator Fiscal on joint cases. • What can a reporter do if a child is on a SPR2 but on an English order? The Police have a responsibility to inform the correct authority. • A possible GDPR vulnerability has been identified where children from separate families are on the same concern report or SPR2. MS will raise this at a future Police Scotland meeting. <p>Non-Disclosure</p> <ul style="list-style-type: none"> • The Glasgow improvement project continues to make good progress locally with Panel Members and Social work, stressing the importance of applying the test. In the past two years, non-disclosure orders have dropped from 366 to 170, Rule 16's have reduced from 161 to 17. Additional ND training is planned for the Glasgow locality. | | |
| 4. | <p>GDPR Update including GDPR Action Plan</p> <p>AW introduced the information governance quarterly report that will be taken to the May Audit & Risk Committee. The report recommends that the Committee approves the recommendation that SCRA adopts new policies and procedures on 25 May that are compliant with GDPR but are updated again as soon as the new Data Protection Act comes into force.</p> <ul style="list-style-type: none"> • The report provides updated progress on a number of activities including: <ul style="list-style-type: none"> ○ The development of a Record of Processing Activities ○ The delivery of GDPR awareness training to all staff ○ The development of child-friendly privacy notices ○ The introduction of new breach reporting procedures ○ The agreement of new Data Processing Contracts ○ The development of new Information Sharing Agreements ○ The development of a new Data Protection Policy ○ The development of new Data Subjects Rights guidance ○ The development of procedures on the management of data subjects rights ○ The development of Data Protection Impact Assessment (DPIA) templates • The report also provides Brach statistics for Q4 and SAR and s10 statistics <p>AW took the group through the GDPR action plans.</p> <ul style="list-style-type: none"> • The action that evidence that all staff have read and understood the IG policies and procedures to be collated and retained, will miss the 25 May deadline however this will be built into and captured by the role based training that is in development. Managers can meantime direct staff to look at policies as they appear on Connect. | | |

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| 5. | <p>Training plan (including feedback from localities)</p> <ul style="list-style-type: none"> • Core GDPR training sessions will be scheduled until the end of June 18 for any staff members who have not attended. Managers are asked to ensure staff attend. • One to one sessions will be provided to staff members returning from long term leave as required. • Positive feedback on GDPR training has been given from all localities and head office. • Role based online training will be developed and rolled out early 2019. | | |
| 6. | <p>Notification of referral</p> <ul style="list-style-type: none"> • On receipt of a referral, the child, if old enough and RP's need to be notified. • Only where evidence has been provided that there is the potential for harm, absconding etc. should the receipt of referral letter not be sent. This will be on a case by case basis and should be recorded. | | |
| 7. | <p>Communication with institutions</p> <ul style="list-style-type: none"> • Two breaches have occurred where communications have been sent to a prison and a hospital. • The group were reminded that any prisoner correspondence has to follow the double enveloping procedure however requests for prison transport can still be sent via a secure email address. • No communications should be sent direct to a patient in a hospital. All correspondence to be sent to the home address or c/o a Social or social work. If there is any doubt about the address a letter can be sent asking where to send future correspondence to. • Check with Social work for anyone in temporary accommodation. • IG leads to back the above to teams. | Immediate | All |
| 8. | <p>Breach reports (Including feedback from localities)</p> <ul style="list-style-type: none"> • AW advised that during Q4, 28 breaches were reported. Since the new procedures were implemented on 04 April, the number has increased to 66, which is a massive increase. Of this number, 24 would have been reported to the ICO under new GDPR guidance. • The increase may be down to an understanding of what is/is not a breach. • Further analysis is to be done on the reasons for breaches since April however the biggest cause is not getting the correct information from Social work. • As a data controller, SCRA still have a responsibility to report breaches where incorrect information has been provided to the ICO. | | GMcN |

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| 9. | <p>Additional Charges There is an issue in SE locality where the Police have added additional charges to a SPR2, which has already been processed. The SPR2 cannot be resubmitted. DL to discuss with Police and request that additional charges are submitted as a new report with a new reference number. There are no examples of this issue in other localities.</p> | | DL |
| 10. | <p>Examples of good locality practice or issues arising An issue has arisen where a Panel Member has provided 3 different postal addresses. This has become increasingly difficult to manage and the PM has been advised to provide a single postal address. It is also acceptable to advise the PM they can collect papers from the SCRA office. Local convenor should be involved if necessary.</p> | | |
| 11. | <p>New Risks There are approximately 30 staff members who have not completed and are not currently signed up to the mandatory GDPR training. There is a risk that a breach may be conducted by a staff member who has not attended training.</p> | | |
| | <p>Date of next meeting Monday 06 August 2018 at Ochil House, Stirling</p> | | |