



Present:

Malcolm Schaffer (Chair), Ed Morrison, Ellen Young, Janet Robertson, Ava Wieclawska, Angela Mitchell, Bruce Knight, Victoria Ritchie, Anne-Marie McIntosh

By VC – Donald Lamb, Moyra Gordon, Rosemary McCracken

		Timescale	Action
1.	<p>Apologies Gillian Henderson, Gwen McNiven, Lesley Siewert, Paul Harkness, Jacqueline Stephen, Pamela Armstrong</p> <p>Ava Wieclawska was welcomed to the group as the new IG Officer</p>		
2.	<p>AOB</p> <p>Staff directories</p> <ul style="list-style-type: none"> Some staff still have the wrong telephone number listed on their staff directory entry (0300...). IG Leads asked to check the staff directory for their locality and ensure the correct telephone numbers are listed. There have been glitches in the system when trying to update the directory – any further problems should be sent onto the Information Security & Technical Assurance Officer for investigation. <p>Secure communications</p> <ul style="list-style-type: none"> If localities are aware of local authorities who are no longer using GCSX/GSi email addresses, please let the Information Security & Technical Assurance Officer know so that a check of their new secure email can be undertaken. <p>MOUs</p> <ul style="list-style-type: none"> Template has been sent to SOLACE for local authority Chief Executives to review. Template is high level and won't contradict any other MOUs that may be in place with individual local authority departments. So far there have been no replies. A reminder is to be issued to SOLACE. <p>Personal Message Manager</p> <ul style="list-style-type: none"> The Personal Message Manager tool has been upgraded and some emails appear to be getting stuck – all localities to be aware. 		<p>All</p> <p>All</p> <p>BK/NH</p>
3.	Minutes of previous meeting: 15 August 2017		

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	<p>Page 1 – Royal Mail - Panel Papers: Framework Manager to be changed to Framework Group</p> <p>Page 1 – Non-disclosure on CMS: action with DL/GS instead of DL/GH</p> <p>Subject to the above amendments, the minutes were agreed as an accurate record.</p> <p>Matters Arising:</p> <p>Royal Mail – standard complaint letter still to be produced. Reminder that localities should log any issues they have with Royal Mail. Framework Manager is not aware of any complaints being made and suggested speaking to Royal Mail directly. Response received today from Royal Mail clarifying their processes – will be circulated to the group for information. New breach in Central where Royal Mail sent papers to the wrong address despite the envelope being correctly addressed.</p> <p>Non-disclosure in CMS – List of anomalies in CMS has been circulated to the group. Final check is now being undertaken and the Data team will soon be ready to do a test run with localities.</p> <p>Issues with refreshing in CMS discussed – in some cases, taking 25/26 refreshes before a change will be accepted. All localities aware of this as an issue.</p>		<p>PA</p> <p>PA</p> <p>MS/EM</p> <p>DL</p>
4.	<p>Joint IG Group minutes</p> <ul style="list-style-type: none"> • Joint GDPR Action Plan to be discussed at item 9. • CHS are looking into the text messaging systems that are in place in some localities and whether or not a Data Processing Contract is required with the systems provider. The systems are to continue to operate as normal while CHS looks into this. • CHS are looking into the needs of individual volunteers during recruitment and training, particularly where there are specific systems requirements in order to read panel papers. All needs will be assessed on a case by case basis in consultation with SCRA. 		
5.	<p>Role of IG Leads</p> <ul style="list-style-type: none"> • There was reflection and a reminder of the importance of the IG Leads role. • IG must be a standing item on team meetings where information from the IG Leads group can be discussed, in particular the breach statistics and case studies. • IG Leads group papers should be circulated to fellow managers within localities and contents discussed with teams. 		All

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	<ul style="list-style-type: none"> It appears from recent discussions with localities that many are not aware of the breaches report which is essential for learning lessons around breaches. It was reported that some staff feel they are getting too much information so it may be better for IG Leads to go through the papers and select items of interest that can then be shared with localities. 		
6.	<p>ICO Investigation - Update</p> <ul style="list-style-type: none"> The ICO will not be taking any further action following the two recent incidents that were reported to them. The ICO recognised the activities currently being undertaken and that are planned by SCRA and will not take any further action at this stage but will retain details in case of further incidents. This is a positive affirmation of the actions being taken by everyone in relation to IG. As highlighted by the ICO in their closure letter, there is an expectation of mandatory, annual IG training for all. The IG Officer is currently looking into this and will prepare a Training Plan for consideration by IG Leads at the next meeting. The Information Security and Technical Assurance Officer suggested that this training should be coupled with Information Security training. A meeting will be arranged with the IG Officer to discuss further. There was a discussion regarding a recent breach and complaint to the ICO about a report that was sent to SCRA in error by a local authority and then sent out to those attending the hearing. A response was issued to the ICO this morning. As this report was so excessive in its nature, there is an expectation that this would have been checked by the locality prior to sending. However, it is important to strike a balance – SCRA are not in a position to challenge every report that is sent for inclusion in papers under Rule 80. The IG Officer is working on new procedures for notifying partners when inaccurate data is shared with SCRA, in order to comply with new GDPR requirements. It may be that procedures for handling/querying excessive data can also be built into this. Refresher training is still to take place in Highlands and Islands before the end of the year. Due to the location of staff, face-to-face training may not be the most suitable format. The IG Officer will contact the locality to discuss further. 		<p>AW</p> <p>BK/AW</p> <p>AW</p> <p>AW</p>
7.	<p>Internal Audit actions</p> <ul style="list-style-type: none"> Actions 1.1 and 4.1 are now complete Action 1.2 - Policy review is now underway but is unlikely to be completed by the end of October. The IG Officer has completed a self-assessment which will be shared with IG Leads ahead of 		AW

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	<p>the next meeting and as well as a number of policies needing to be changed in line with GDPR, there are also a number of new policies to be produced. The IG Officer suggested that all new policies, which are fully reflective of GDPR requirements, are in place by May 2018.</p> <ul style="list-style-type: none"> • Action 2.1 - The IG Framework is currently being produced and should be ready for approval at the next IG meeting. The framework will identify all of the IG related policies and procedures in place at SCRA. • Action 5.1 - MOUs discussed under AOB. • Action 5.2 - Compliance review – it was suggested that a self-assessment process could be introduced whereby each locality could self-assess IG practice and any issues identified could be followed up with the IG Officer. It was suggested that the IG Officer could work with the Planning & Performance Manager and the Quality Assurance Manager to draft a self-assessment template for review at the next IG Leads meeting. • Action 6.1 - The IG Officer will meet with the Information Security and Technical Assurance Officer and the Assistant HR/OD Officer to consider the best way of delivering GDPR training before May 2018. A long term Training Plan will also be established. • Action 7.1 - Historical Abuse Inquiry – there is a new Government contact in place who has previously worked with the Sponsor Team. IG Officer to contact the Inquiry for further clarification on what information is to be retained by SCRA. • Action 7.1 - G Drive and retention policy compliance – discussed at item 8. 		<p>AW</p> <p>AW</p> <p>AW/BK /NM</p> <p>AW</p>
8.	<p>G Drives</p> <ul style="list-style-type: none"> • Grampian have made good progress on the clean-up of the G Drive but still need to find time to work with individual staff on the review of their H drives. • Central – most of the team have reviewed and deleted their documents but some Reporters are less keen to delete information in case they need it. There is an ongoing issue with grounds being retained for future use but not being anonymised. Work is ongoing. • Ayrshire – a joint inspection recently took place which found that some established grounds had not been saved to CMS. A random check last week also found grounds that were on the G Drive but not on CMS. Ayrshire working with all Reporters to check individual cases as and when they are dealing with them and to log on a spread sheet when they have checked that the grounds are on CMS. • Paisley – Greenock want to retain their information as much as possible but Renfrewshire and East Renfrewshire are making good progress. Work is ongoing. 		<p>VR</p> <p>EY</p> <p>JR</p> <p>AM</p>

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	<ul style="list-style-type: none"> Highlands and Islands – LRM has been assured that they are making good progress but would like to check. Lanarkshire, Dumfries & Galloway – all aware that they have until 13 October to review the G Drive – anonymised model styles now being created by the Reporter at the point of grounds being established and saved to CMS. Work is ongoing. Head Office – work ongoing with many departments still to review information held on G Drive All aware of restrictions with CMS and not being able to edit documents once they have been uploaded. There is an opportunity with the new system to manage information correctly. All localities encouraged to keep going. Acknowledgement that they are unlikely to fully complete the exercise by mid-October and that the ultimate deadline is May 2018. It is essential that all established grounds are on CMS. The Data team can provide information on linked grounds to the data warehouse if that would help any locality. If anyone wants to find the items that are being held on their G Drive which take up the most space, they can search for this and review these items individually. The Information Security and Technical Assurance Officer will continue to consolidate G Drives – next to be consolidated is Central locality. 		MG RMcC MS All BK
9.	GDPR Preparation <ul style="list-style-type: none"> CHS and SCRA have produced a joint action plan to identify the joint activities that need to be completed prior to GDPR implementation. Although all activities will be worked on jointly, a lead has been identified for specific pieces of work where progress may have already been made by either CHS or SCRA (e.g. Data Processing Contracts). The joint Action Plan will be taken to the joint CHS and SCRA Board meeting in November. The group approved the joint action plan. The IG Officer has completed a self-assessment of IG practices within SCRA and has identified current strengths as well as any gaps. There is a focus on GDPR within the self-assessment but it also covers wider IG compliance. The self-assessment and associated action plan will be made available ahead of the next meeting. 		AW
10.	GDPR – Publication of Data Protection Bill <ul style="list-style-type: none"> The Bill was introduced to the House of Lords on 13 September and is due for its second reading today. It is an extremely complex piece of legislation with significant 		

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	<p>cross-references to GDPR.</p> <ul style="list-style-type: none"> • There are potential issues with some of the definitions in the Bill – e.g. personal data. • Further updates will be provided as the legislation develops. 		
11. SPR2 deletions	<ul style="list-style-type: none"> • 39 SPR2s have been deleted where there was no corresponding match with the SPR2 database – the Data team will share the reasons with group members. • The most common reason was a wrong reference being typed into the reference field (15 instances). • There was an example of the wrong data being cut and paste into the reference field. • There was a discussion about moving the reference field in CMS but this is unlikely to happen due to other demands on the CMS team at present. Ideally the reference would be captured automatically so as to mitigate the risk of inaccurate data being entered. • The Data team will share the details where wrong references are being entered so that IG leads can follow up with their teams • In 14 cases there were no records held by police. • 2 cases were submitted in error by the police. • 1 case has disappeared from the system. • 1 case has been deleted in error. • 1 case had been saved to the wrong child's file. • The Data team will continue to monitor the issue and a record of deletions should be retained by the relevant locality. • Data will be shared with the Victim Information Coordinators. 		<p>DL</p> <p>DL</p> <p>DL/AII</p>
12. Refreshing child details on CMS	<ul style="list-style-type: none"> • The Data team have discovered an issue with child details not showing as updated on the front page of the case file when they have been edited. • Search function appears to search the edited fields and locate the correct child details but the front page shows the inaccurate data. • This presents a risk if the refresh function doesn't work and the data isn't updated correctly and a risk around duplicate case files being produced if users cannot find the correct case file. • Many of the IG Leads are aware of this issue with CMS and reported issues in having to go out of a child's case record and go back in again in order for the refresh function to work when adding new details or updating existing details. • IG Leads to remind locality colleagues of these risks around the refresh function and double-checking that the details are correct when adding new cases or updating any information. • The CMS team have offered to do a background fix on the data so that the edited data pulls through to the front page but they 		AII

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	<p>require IG Leads to check the cases for their localities first to ensure that the edited data is correct.</p> <ul style="list-style-type: none"> • There are currently 739 instances of inaccurate data being held on the front page of the file. • The Data team will send some test data for IG Leads to check before any further discussions take place with the CMS team about preparing a background fix. • The Data team will provide a weekly report regarding inaccurate data moving forwards. • The IG Officer is working on some key tips for staff when managing information and email – a reminder about the refresh issue will be included in the guidance. 		<p>All</p> <p>DL</p> <p>DL</p> <p>AW</p>
13.	<p>Dealing with Social Media</p> <ul style="list-style-type: none"> • The group reviewed the updated guidance and confirmed that they were happy to approve it. 		
14.	<p>Switch off your mobile phone</p> <ul style="list-style-type: none"> • The IG Officer advised that there had been some concerns raised in Livingston about recording and taking photographs with mobile phones in hearings. Guidance produced by the Hearings Management Group was circulated to the team and a poster has been produced to ask individuals to switch off their phone before entering a hearing room. It is hoped that this will deter some individuals from using their phone in a hearing. • The IG Officer will arrange to send copies of the poster to localities after the meeting. 		AW
15.	<p>Examples of good locality practice or issues arising</p> <ul style="list-style-type: none"> • Following a recent breach where papers for a Relevant Person were sent to an incorrect address, it was suggested that where localities are unsure of an address for a Relevant Person and/or the Relevant Person hasn't attended a hearing recently, localities should write and ask them to confirm their address prior to sending any papers. This should mitigate the risk of any papers being sent to out-of-date addresses. • Lanarkshire, Dumfries & Galloway currently send a letter asking for their up-to-date address, along with a copy of the Notification Sheet. Advice is to write to them first and not send the notification or the papers until confirmation of address has been received. 		All
16.	<p>New risks</p>		
	<p>Date of next meeting Pamela to arrange for early December</p>		