



SCOTTISH

CHILDREN'S REPORTER

ADMINISTRATION

Scottish Children's Reporter Administration Minute of Information Governance Leads held on Tuesday 12 February 2019 at Ochil House, Stirling

Present:

Malcolm Schaffer (Chair), Gillian Henderson, Donald Lamb, Paul Harkness, Janet Robertson, Nicola Baird, Gwen McNiven, Colette Cairns, Bruce Knight, Anne Marie McIntosh, Jacqui Stephenson
Via VC – Angela Mitchell, Lesley Siewert, Rosemary McCracken

		Timescale	Action
1.	Apologies. Ed Morrison, Vicki Ritchie, Stephen Eodanable, Helena Watson		
2.	<p>Any Other Business</p> <p>Translations/Global service. Global translated CSO and RoP papers for the Dundee office, however, it would appear that the translator had copied and pasted the form and had left another child's details on the paper. Whilst we have a Data processing contract with Global, meaning the breach would be their fault, we should raise awareness within in teams and good practise would be to check (where possible) names and dates to ensure that these are accurate.</p> <p>MS meeting with Global to raise these concerns and ensure that Global are not overtyping templates</p> <p>Recording of Breaches – it would be good practise to put a case note on CMS when the case has been involved in a breach, particularly when this involves a ND breach.</p> <p>Court Paper Work – paper work for court should not be scanned into CMS ie police statements. The guidance is that they should be retained in a paper file and destroyed when case is complete after the appeal period. Should not be imported to CMS (excessive information)</p>		
3.	<p>Minutes of last Meeting (20 November 2019)</p> <p>2) Cyber Security Training on e-learning. This is a government requirement and needs to be done. BK has asked Eden for numbers of staff who have completed. SPAM emails & phishing attack posters are available. Please contact BK. Secure Email – on going – BK to chase up again. Stirling have now stopped sending on Egress as of Monday.</p> <p>3) CHS joint meeting postponed again – this will now take place in March</p> <p>5) Reception Training – will be completed by end of February (point 6 on this agenda)</p> <p>7)Retention/Deletion Policy. Some localities have started and still require LRM's to check files that possible need to be retained. MS requested that all localities put a plan in place to start the process.</p>		<p>ALL</p> <p>BK</p> <p>ALL</p>

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	<p>DL corrected previous minutes, it is CMS (IT Team) who need to delete files from CMS and this is a long process. IT team have been dealing with public folders and contacting localities regarding this.</p> <p>8) Recording of Offences. DL to circulate reports Victim information Co-ordinators – checking of offences. Training on Recording on CMS, very useful JS suggested this be rolled out to all staff. GH suggested this could be done at locality day to ensure all staff are covered. It was noted that some staff are not aware of the impact/consequences of accurate recording.</p> <p>9)New System. Unfortunately KC & SE were unable to attend, so no feedback on ND banner risk @ present.</p> <p>10) Privacy Notices – if anyone requires more please contact I&R team.</p>		DL MS
4.	<p>Audit & Risk Committee Report</p> <p>Breach stats discussed. Cases involving ND breaches are reducing. Low level breach figures are being combined and given to ICO for them to take them to the local authorities SOLAR DPO meeting.</p> <p>Please keep reporting low level breaches as before, so this data can be monitored.</p>		ALL
5.	<p>SIG (Security Information Governance) Team Update</p> <p>The Security and Information Governance (SIG) Plan, defines our approach to SIG and details the work to be done. The Non-Functional Requirements (NFRs) have been created to support the SIG Plan and are an Appendix to the SIG Plan. The NFR's have been supplied to the Technical Assurance Group (TAG) who will be responsible for their implementation. Leidos co-chair the TAG and will put in place the specific controls which are then tested by SCRA/CHS to ensure they satisfy the requirement. . CSAS is being developed to comply with the 22 Digital First Standards, and there is a standard specifically on Information Governance. The SIG Team are currently working on the audit recommendations made in the area of Information Governance</p>		
6.	<p>Feedback from Reception/Support staff training.</p> <p>Feedback given. Point 5 – we should always use CMS as our main source of information.</p> <p>Point 6. Data sharing agreement will assist with this.</p> <p>Point 7. Encourage using secure emails for solicitors.</p> <p>Some IG leads requested feedback from individual offices, so these can be addressed if necessary.</p>		CC
7.	<p>Information sharing protocol with local authorities – update</p> <p>Proposed same agreement for each authority, David Freeland from the ICO has agreed to take this to the next SOLAR DPO meeting. We are lucky to have the support of ICO in regard to this as there is no legal requirement for this agreement, but it will help set out practical points – addresses/breaches etc.</p>		

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	<p>This will replace the Education and SW Local Authority agreements, it can also be used with Health organisations. MS to use with CHiP partners This will be reported back on at next meeting</p>		<p>ML SE</p>
8	<p>Over 18's – progress of destruction of paper files and deletion from CMS. Process – in terms of paper files – I&R team can help, but we are not there to do this for you. Each locality needs to put a plan in place. SE to attend LSM Network to clarify any points regarding files for retention. Files being kept should be cross checked with MS and kept electronically rather than in paper files. Live cases scanned to CMS (back scanning exercise) should all be deleted by now. Central raised issue of storage once files pulled, prior to being destroyed. Cost implications on extra uplifts. MS to raise at EMT. CMS side – slow at deleting files, overhead significant to delete from CMS. We do not want these files migrated to new system. SE to have separate discussion on this. Files that are required to be kept, the data should be entered on the spreadsheet on Connect, which identifies name, and key documents to be kept, and next review date for destruction.</p>		<p>MS SE</p>
9.	<p>Guidance of information sharing with solicitors – update SE is developing a guidance on information sharing with solicitors – consulting with the Law Society. Requiring Mandates (which is an ICO recommendation) – this will be issued soon, and requires consistency across the country. Use of secure email will be the preferred method to provide information. Start asking for mandates particularly for new cases.</p>		<p>SE ALL</p>
10.	<p>Enveloping processes, including security and postage stickers. There is inconsistency with this. Security stickers should be on all envelopes that contain any special category data. The stickers should have a phone number of them, please ensure this is up to date and correct. Also check that the front postage sticker has the correct numbers on it.</p>		<p>ALL</p>
11.	<p>Thoughts on Tracking Mail ICO recommendation was that we looked at our method of delivering information, in particular with regard to tracked mail. MS asked for the groups feedback. Royal Mail offered tracked mail, however, there is no certainty of who this is delivered too as no signature required. All aware of the issue with recorded delivery mail returned not called for. MS will report this back to EMT.</p>		

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12.	<p>Issues with courts not providing complaints/convictions It has been raised that some clerks are asking about the legality of us acquiring information. We are in touch with court service and SE and Neil Mitchell will continue the work started by Ava and get an agreement in place. Courts are sending advice request by email, but say they can only send the copy of the corresponding complaint by mail. MS will look into this as we need this information to support the advice. We are developing an information sharing agreement with the courts and they should recognise we have statutory rights to information to support children. If necessary we can provide links to our DP section on our website. Any ongoing difficulties contact MS</p>		<p>SE</p> <p>MS</p>
13.	<p>Training – GDPR All new starts and sessional staff who have not had GDPR training will need to attend, this is compulsory training, sessions have been organised in Glasgow on 20/02/19 @ 10am and Dundee on 19/03/2019 @ 10:30am. ICO require us to carry out annual training, it is in the business plan for 2019/20 to carry out this training via e-learning for all staff. Next Data Protection Role specific training will be for Managers with regard to staff records.</p>		
	Date of next Meeting – 14 May 2019		