



SCOTTISH

CHILDREN'S REPORTER

ADMINISTRATION

Scottish Children's Reporter Administration Minute of Information Governance Leads held on Tuesday 14 January 2020 at Ochil House, Stirling

Present: Alistair Hogg, Gillian Henderson, Stephen Eodonable, Gwen McNiven, Colette Cairns, Vicki Ritchie, Janet Robertson, Paul Harkness, Donald Lamb, Jacqui Stephen, Angela Mitchell, Laura Dowd, Rosemary McCracken (via VC) Indiya Kurlus (Research feedback), Maryanne McIntyre (Social Media Policy)

		Timescale	Action
1.	Kelly Campbell, Nicola Baird, Bruce Knight, Ed Morrison, Pamela Armstrong, Helena Watson		
2.	Any other Business <ul style="list-style-type: none"> • MOU – local authority information sharing. The new agreement is being take to SOLAR group for approval. • The question was raised by JR regarding contacting education etc, there is no problem doing this as we have a legal basis to do so, this can be done via secure email, the MOU is just to keep everything the same in all localities. 		
3.	Minutes of last Meeting (15 October 2019) <ul style="list-style-type: none"> • Minutes confirmed as accurate. • Item 2 – the guidance on sharing information with solicitors is still to be updated. • SOM's to be invited to next meeting. • Some localities still have a backlog of over 18's files to be checked. • We need a justification for any files to be kept, localities need clear expectations of which files are retained. CSAS will auto clear unless indicated to keep. A proposal is to go to EMT re clearing existing over 18 files and how this is approached. • AH to speak to PH re Glasgow potential breach spread sheet. • Localities need to continue to complete the potential breach spread sheet following a recommendation by ICO. • Updated Potential Breach Spreadsheet to be issued for this year. • ICO have recommended monitoring procedures following breaches. An audit sheet for monitoring processes of information will be provided for each locality. • Information sharing guidance was carried forward to this meeting. 	End Jan	SE AH/CC AH AH/PH NB GH/SE
4.	Research on Privacy and Participation. <ul style="list-style-type: none"> • Indiya Kurlus attended today to tell us about the research carried out by Who Cares Scotland? regarding Privacy and Participation within the Children's Hearing system. IK explained how the research was carried out and that the research paper will be published hopefully around March. 		

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	<p>The research will provide findings on understanding privacy and identify solutions. The research will be useful in providing Better Hearings with views and help improve how we deal with privacy in the hearing system.</p> <ul style="list-style-type: none"> AH requested that IK comes back to the group once the report has been published and give us the recommendations. 		
5.	<p>Revised Social Media Policy</p> <ul style="list-style-type: none"> Maryanne McIntyre attended today to update us on SCRA's Social Media policy. The policy has been updated so that staff using social media for personal use, do not state that they work for SCRA. Not only does this help protect your personal safety but helps avoid reputational damage to SCRA if you are posting personal opinions on social media. Guidance has been reviewed and updated and all staff should be made aware of this. DL suggested that this be passed to Neil Hunter for inclusion in the next Team Brief. MM requested that this group look at this policy on an annual basis. 		ALL
6.	<p>Envelopes</p> <ul style="list-style-type: none"> EM emailed AH and this was read out at the meeting. There have been procurement issues with envelopes and as a result a new tender exercise for the whole country to use the pre-printed plastic secure envelopes is underway. Those localities who are currently using these envelopes have a contract until 2021. It is hoped the new contract will be issued by May this year, with this being in place for remaining localities by this summer. 		
7.	<p>GDPR Refresher – E-Learning</p> <ul style="list-style-type: none"> This is mandatory training and must be completed by all staff. At present numbers who have completed are very low. Please ensure all staff have time to do this training, which has taken some people round the table 15 – 20 minutes to complete. Remember all sections need to be read to complete. Line managers are able to see who have completed this training in E-Learning. Update at next meeting. 	Feb 2020	ALL CC
8	<p>Panel Members using SCRA staff toilets</p> <ul style="list-style-type: none"> Livingston Office – PM's do not want to use public toilets, preferring to use staff toilets within the office. This has been an on-going situation since we started using the Civic Centre. From a data protection perspective, there are no strong grounds to stop this as PM's are trusted parties. AH is happy to discuss with LRM. 		
9.	<p>Sharing information for CPC audits</p>		

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	<ul style="list-style-type: none"> • Issue in Ayrshire – consent is not being obtained. • Ayrshire LA to contact other LA's to see what consent they rely on. Once the spreadsheet is received to see what all LA's do – SE to bring back to IG Leads – needs to be properly obtained consent in order for SCRA to share the information requested. 		SE
10.	<p>Work with Who Cares? On subject access requests</p> <ul style="list-style-type: none"> • Who Cares have published information on care experienced people accessing records, and there experience on receiving information through SAR. • I&R team met Who Cares team to discuss what it felt like to receive information, especially when heavily redacted. Young people see the information as “their records” and expect to see a complete file. We need to comply with GDPR and redact information which relates to other individuals, with the result that records can be heavily redacted. The order in which the information is received can also be an issue, work is needed to try and collate the information into order, as at present this is not easily done. 		
11.	<p>New Breach Reporting Form</p> <ul style="list-style-type: none"> • SE ran through the form, and there was a lot of discussion around risk assessment and the form. It was decided to leave the form as it is at the moment and monitor it until next meeting. • An E-Learning course will be created showing how to complete a breach form and give examples of breaches in different risk levels. • DL highlighted that the CMS number might not be carried forward to CSAS. If that is correct then the implications of this need to be checked (breach form, research papers etc). DL will check this out. • Breach form needs to be updated changing email addresses (remove gsi) 		<p>CC</p> <p>GH/SE</p> <p>DL</p> <p>CC</p>
12.	<p>Breaches update</p> <ul style="list-style-type: none"> • Looked over breach figures. • Comparison of ICO reported breaches, it was highlighted that last year, when GDPR first started we did report some breaches which we didn't need too, thus the comparison of figures is distorted. • All ICO reported breaches have been investigated and no action has been taken. • ICO had received complaints about SCRA and these have not been upheld by the ICO. 		
	Date of Next Meeting: Tuesday 21st April 2020 @ 1:30pm		