



SCOTTISH

CHILDREN'S REPORTER


ADMINISTRATION

Scottish Children's Reporter Administration Minute of Information Governance Leads held on Thursday 26 November 2020 via Microsoft Teams

Present:

Alistair Hogg (Chair), Gillian Henderson, Stephen Eodanable, Colette Cairns, Gwen McNiven, Nicola Baird, Helen Etchells, Jacqueline Stephen, Sharon McArthur, Tricia Morris (item 2), Ed Morrison, Laura Dowds, Gill Short, Donald Lamb, Vicky Ritchie, Janet Robertson, Louise Robb, Kelly Campbell.

		Timescale	Action
1.	<p>Apologies Angela Mitchell (tried to access meeting but was unable to). Bruce Knight, Paul Harkness</p>		
	<p>AH started meeting by thanking everyone for attending given the circumstances. He stressed how important the meeting was as there have been many changes since the last meeting in January. As the meeting was virtual AH ran through some housekeeping points.</p>		
2.	<p>Any other Business</p> <ul style="list-style-type: none"> • Checks for ND cases <p>A discussion was held around the physical checks of ND papers within CSAS process. The current guidance on physically checking papers at the envelope stage, to ensure redactions have been done correctly, has not changed. It was indicated by some teams that where possible physical checks on papers are done, however, when there are limited members of staff in the office, this is not always possible. It was highlighted that staff are struggling with CSAS, and that there is a lack of understanding about HIP. AH thanked the team member for sharing the experience and explained that this is about understanding and not blaming. It was recognised that the training did not capture fully the issues with HIP and that during migration from CMS not all redactions are carried across. It is important that a check is carried out after migration and then when papers are moved to the HIP, any redactions should still go through the redaction process, ensuring the 2 separate redaction tasks given by CSAS are checked and completed. If an updated version of a report is received, then the original version within the HIP needs to be deleted, and the new version redacted (if necessary).</p> <p>SE noted that it is likely that we will continue to experience an increase in data breaches whilst staff are adapting to CSAS and are under increased pressures, and therefore put forward that the physical check of ND papers at the enveloping stage should continue to be mandatory as it carries a high risk.</p> <p>AH acknowledged there is an increased risk during this time and that it was more important than ever to carry out the envelope check, however, recognised that in some localities this is</p>		

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	<p>practically difficult due to limited number of people in the office. So where possible, physical checks should be carried out when placing papers in envelopes, even if this means the papers go out late. The EMT takes responsibility for the increased risk that this brings and are not looking to proportion blame, but find ways to help and improve the process.</p> <p>The increased risks of breaches during the transitional period should be time limited. It is important that we record the risk and evidence that we have considered and managed it. The risks are on the Ops risk register, however, it was suggested that this merits more detailed discussion on how we record this.</p>		AH
	<ul style="list-style-type: none"> • CSAS <p>TM – informed the meeting that the issue around the visibility of panel members as contacts is being improved with a ‘PM only’ search being introduced so that a PM with the same name as an associate contact can be clearly identified separately. Panel members are responsible for ensuring that they update their details within CSAS, however, when issuing papers staff should check that both the email and home address of the PM is completed in their contact section.</p> <p>Testing is currently being done on PM letters.</p> <p>A Standard Operating Model is being developed, this will need to go through the network groups and linked in with PD to ensure policy and processes are covered.</p> <ul style="list-style-type: none"> • Guidance regarding papers for Advocacy worker <p>Due to time constraints, this was not fully discussed. At present the guidance is that the advocacy worker should obtain the papers direct from the child/YP.</p> <ul style="list-style-type: none"> • Role of Blue books within CSAS <p>No decision has been made yet regarding keeping the blue books. . They have been necessary up until now as they form an extended part of the record of proceedings, containing addresses for Hearing attendees. However, CSAS now pulls in this information and so blue books may no longer be necessary. AH will consider, in consultation with some others, what should be done about blue books.</p> <p>GS – asked when the decision will be made so that PD can be updated. – AH advised very soon.</p> <ul style="list-style-type: none"> • Dealing with Social Media Guidance. <p>An updated social media guidance is now available on Connect, a copy is attached to the minutes, with the updated areas highlighted. Please ensure staff are aware of the update.</p>		AH
		 <p>Dealing with social media guidance -</p>	ALL
3.	<ul style="list-style-type: none"> • Minutes from Previous Meeting 		

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	<p>Agreed.</p> <p>EM – informed the meeting that due to COVID no progression had been made on the envelope issue (point 6). However contracts are in place until 2021 and if there are any issues regarding envelopes, to contact either EM or Crawford Gardiner.</p> <p>SE – LA sharing agreement is with SOLAR for approval, and hopefully this will be in place early next year.</p>	<p>2021</p> <p>02/21</p>	<p>EM</p> <p>SE</p>
4.	<ul style="list-style-type: none"> • IG six monthly report to Audit & Risk Committee <p>AH highlighted 6.2 – Error rates, showing the number of communications leaving the offices compared to the number of breaches that occur, is a very small proportion. That said the impact of a breach can be disproportionately high.</p> <p>GS – raised a question regarding a breach involving a Form 1. This is an issue with CMS whereby on the odd occasion information that was marked to be withheld was populated into the Form 1. Whilst staff do not populate Form 1 themselves, they should still check that there is no information on the form that shouldn't be there.</p>		
5.	<ul style="list-style-type: none"> • Update paper <p>The paper was written before the IG leads meeting was scheduled as an update for IG leads on some important issues. Most of these are covered in today's agenda.</p>		
6.	<ul style="list-style-type: none"> • Training update/reminder <p>A gentle reminder that any new starts within SCRA are required to complete GDPR training. A new start induction to GDPR has been developed and is on e-learning under the Induction section. IG Leads are asked ensure all new starts complete this as part of their induction before access to CSAS is given. In addition to this training, a full GDPR training session is still required. Please contact Colette Cairns to book. This will be carried out via Teams on a 1:1 or group basis.</p> <p>GDPR refresher training is carried out annually. In 2021 this will be face to face (likely to be virtually via Teams) for all staff. Once the training is available, sessions will be put onto Connect – all staff must complete this training.</p>		<p>All</p> <p>All</p>
7.	<ul style="list-style-type: none"> • Review of Information Sharing Guidance <p>The guidance in the form of a Q&A paper was updated in July. A few of the questions raised are no longer relevant and further revisions are required. SE to discuss with Neill Mitchell.</p>		SE/NM
8.	<ul style="list-style-type: none"> • Deletion of >18's from CSAS <p>When this item was put on the agenda it was understood that the automated deletion of >18's from CSAS was not available, meaning deletions would need to be carried out manually. However, this has now been addressed and there will soon be an automated deletion of electronic files for children 18+ 1 month, unless the system is instructed not to delete. The instruction for this will only be necessary for a very small number</p>		

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	<p>of files and these must be entered into the retention register. AH highlighted that this may change in the future in connection with the implications of holding records under UNCRRC.</p> <p>JS raised the question about paper files. Again the same criteria applies, so if the file is deleted on CSAS the paper file can be shredded. There will only be a very small number of files required to be kept, ideally these will be noted whilst they are still live, as files will need to be marked to be kept. This will avoid the issue of LRM's having to go through a back log of potential files for retaining.</p>		
9.	<ul style="list-style-type: none"> • ICO outcomes <p>SE ran through some of the recommendations from the ICO following reported breaches (these - six month IG report). SCRA is able to evidence to the ICO that we have processes and procedures in place to prevent the breaches that have occurred and that human error has been the main factor. The ICO has been understanding of this explanation, but has been measured in response – this may not always be the case. There is an increased risk during the CSAS transitional stage of human error.</p>		
10.	<ul style="list-style-type: none"> • Account changes on SCOTs <p>A copy of the email issued is within the Update paper (item 5) and highlights managers' responsibilities for ensuring our IT security processes are adhered to with regard to staff changes and access to the SCOTS system.</p>		ALL
11.	<ul style="list-style-type: none"> • File Storage <p>The space allocated for files within some offices is still large, whilst there has been a reduction in files/relocating files. There is still the potential for the organisation to significantly reduce files/space used for filing, which is an issue. Need to look at the scope for reducing file storage.</p> <p>>18's files addressed in item 8.</p> <p>There is the potential for reducing <18's paper files, especially those which pre-date CMS.</p> <p>KC – paper files hold the blue book with stat docs/grounds as everything else is on CMS.</p> <p>Clarity is required on the expectation of what is in paper files. This should be carried forward to next meeting – localities to think about this in advance.</p> <p>It was noted that some localities are discovering that some stat docs have not been loaded onto CMS and thus have not been migrated to CSAS. These will need to be back loaded into CSAS as they may form part of the HIP documents.</p> <p>DL – indicated he was happy to look at a couple of examples of missing stat docs for people if they emailed him directly.</p>	IG Leads Meeting 02/2021	ALL
12.	<ul style="list-style-type: none"> • Itecs Breach 		

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	This item was intended for the cancelled meeting in April to raise awareness, Itecs informed SCRA that there had been a potential risk to some of our information. They did however rectified this.		
13.	<ul style="list-style-type: none"> • Returning of hard copies of PM papers <p>The issue of some panel members' difficulties in returning hard copies of papers when they attend virtual hearings was raised by CHS. The responsibility for this lies with CHS as data controller, however, they have asked SCRA for solutions. AH asked localities what their experiences with this issue have been:</p> <p>Fife – PM bring papers in next time they are in the office. Dundee – are providing stamped addressed envelopes. Grampian – enclosing return envelopes and PM are claiming postage from CHS. Highland – hand papers in next time at hearing. HE – suggested domestic cross cut shredders which can be purchased from Amazon for about £40 AH/SE – have a meeting with CHS next week to discuss the issue. AH thanked localities for input, which gave a range of options to suggest to CHS.</p>	Feed back to IG Leads meeting 02/2021	AH/SE
14.	<ul style="list-style-type: none"> • Providing panel papers to solicitors. <p>SE updated the guidance for solicitors so that a mandate is no longer required, but instead a letter on headed papers saying the solicitor is acting on behalf of the client. In a couple of Localities there has been a request that an email from the solicitor should be sufficient.</p> <p>VR – this is an important issue as solicitors who expect papers, will defer a hearing if not received. Further investigation required. AH/SE to link up, clarify and make a decision so that there is consistency across localities.</p>	02/2021	AH/SE
15.	<ul style="list-style-type: none"> • Privacy Research <p>Whilst no time to look at this research within the meeting. IG Leads were encouraged to read this. There are very interesting points made and responses from SCRA.</p>		
	AH thanked everyone once again for attending and wished everyone a good Christmas, with some well-deserved time off.		
	Date of Next Meeting Tuesday 23 February 2021 @ 13:30 – 15:30 via Teams		