AGENDA

	Item	Purpose	Paper	Action
1.	**Apologies**			
2.	**AOB**			
3.	**Minute of Previous Meeting –** 02 March 20	Approval	Attached	
4.	**Matters Arising**			
5.	**Employee Pensions Contributions**	Noting	Attached	SD
6.	**Support Staff Consultation**	Approval	Attached	SD
7.	**Hamilton & Stirling Smart Working Projects**	Approval	Attached	EM
8.	**Legislation & Policy Changes Group**	Approval	Attached	EM
9.	**Internal Audit Action Tracker**	Noting	To follow	PA
	Standing Items			
10.	**Digital Programme** a) Virtual Hearings update b) Digital CAB • CCB update • Digital Governance Review • CSAS improvement and development programme	Update Update	Verbal Verbal	SD LMcD
11.	**Covid 19 -** Recovery Plan	Update	Verbal	PM
12.	**Keeping the Promise** a) Hearing System Working Group (HSWG) b) Keeping The Promise Programme Board	Update Update	Verbal Verbal	AH AH
13.	**Practice and Policy** a) Care and Justice Bill consultation b) Consistent Language options c) General Update	Update Discussion Info	Verbal Attached Verbal	AH AH AH
14.	**Information Governance** a) Retention Policy b) General Update	Approval Info	Attached Verbal	AH AH
15.	**New Risks**	Discussion	Verbal	All
16.	**Forward Plan** a) Covid 19 C&F Collective Leadership Group 7/4 b) SCRA CSE System workshop 11/04 c) CHS/SCRA Business Meeting 13/04 d) SCRA Nominations Committee 14/04 e) SCRA Board Development Day 27/04			
	Date of Next meeting; Wednesday 04 May, Ochil House/Teams			

Present

Neil Hunter (**NH**)	Principal Reporter/Chief Executive – Chair
Alistair Hogg (**AH**)	Head of Practice & Policy
Ed Morrison (**EM**)	Head of Finance & Resources (By Teams)
Lisa Bennett (**LB**)	Head of Strategy and OD
Susan Deery (**SD**)	Head of Human Resources
Helen Etchells (**HE**)	Senior Operational Manager (West & North)
Paul Mulvanny (**PM**)	Senior Operational Manager (East & Central)
Patricia Stevenson (**PS**)	HR Manager (Items 10-12, By Teams)
Pamela Armstrong (**PA**)	Governance Officer – Minute (By Teams)

	Item	Timescale	Action
1.	**Apologies** None		

2.	**AOB**
	Information Governance – Succession Planning
	• AH advised the group Gillian Henderson will be retiring at the end of April**.**
	• AH to move to seek to discuss
	  ○ additional duties payment
	  ○ Reallocation of complaints function
	  ○ Taking time around any research appointment, and is this an option for an external manager?
	• There is benefit in succession planning of critical posts.		

3.	**Minute of Previous Meeting – 02 February 2022** Agreed		
4.	**Matters Arising** Covered within agenda		
5.	**Standard Operating Model** PM introduced the report, updating EMT on the progress of the Standard Operating Model (SOM). **Noted:** • The concept of a Standard Operating Model (SOM) was presented to EMT in March 2021. It was identified that a standard approach to case processing needed to be developed to promote the most effective and		

	Item	Timescale	Action
	efficient use of the then new case management system CSAS.		
	• From 29th November 2021 until January 2022 a review process of the SOM was undertaken by the Operational Development team under the newly appointed lead, Collette Gallagher. This involved eight of the 9 localities and feedback was sought from LRMs, LSMs and Digital Leads from each of the localities who had been asked to seek feedback from their teams prior to meeting. Wider staff group reviews were also arranged to include UNISON, Practice and head office staff. Additionally, there is now a SOM review group in place to consider findings and recommendations from the review.		
	• The SOM review process has identified a number of improvements to the current model of the SOM and also has identified additional functional requirements for CSAS improvements that will help address some of the feedback from the roll out.		
	• Additionally, the SOM will now be expanded to include the Hearings Service Models with the various approaches to virtual and face to face hearings.		
	• The challenge of adopting a standard and best practice approach to the scheduling and arrangement of hearings is a requirement that will require development in the next year.		
	• Consequently, the work of the Operational Development Team will focus on three key activates of *improvement, expansion and additional development* in 2022/23. It should be noted that with a team of only three people the focus for the early part of the year has to be on the first two actives.		
	• Another factor that needs to be taken into consideration for future developments, particularly in relation to the development activity of the SOM around hearings is workforce roles and responsibilities. Some of the feedback from the roll out of CSAS and the SOM raises questions about who is best able to undertake particular aspects arranging and notifying hearings.		
	• The first version of the Standard Operating Model has been successfully rolled out across the organisation. There is a robust review and improvement process and the area of work covered by the SOM is being expanded to support the new Hearing Service Models. More substantial developmental work needs to be undertaken though to increase both operational efficiency, better practice around hearings and redesign of the workforce.		

	Item	Timescale	Action
	Issues arising during discussion: • The SOM has been embraced by localities, with an aim to adopting a consistent approach both locally and nationally. • The report provides a baseline analysis there is plenty of scope to measure efficiencies. Quality improvements need to be identified and valued too. If we address when to do things, further develop the SOM model, deliver CSAS improvements and align roles then we should see efficiencies. • If our focus is on a child centred approach we need to strip back tasks on the Reporter. • Previous discussion about the nature of the service we need to deliver in the Promise world and the roles required, fits well with SG interest in transformational change proposals/business cases, when we are ready to develop and present this. • Localities or considering the shape of their teams. More discussion is required around the future of roles and the slight change in balance. • The SOM and links to data quality will be brought to a future EMT meeting.		

6.	**Corporate Procurement Strategy**
	EM introduced SCRA's revised Corporate Procurement Strategy in line with the Procurement Reform (Scotland) Act 2014 (the Act) which further aligns SCRA with Scottish Public Sector best practice.
	
	Noted:
	• The main changes to the Strategy were to update the following key priorities;
	   ○ to reflect changes to the Fair Work First criteria
	   ○ to include that we will work to build long term resilience into our supply chains
	   ○ to revise wording around inclusive procurement
	   ○ to reflect work carried out in connection with continuous improvement
	• The Procurement Officer has continued working with the Inclusion & Diversity Manager to further understand how we can ensure an inclusive approach to procurement. Some actions have now been integrated into our procurement processes and the intention is to review and introduce further actions during 2022/23.
	• The Procurement Officers will work with the Head of Property to implement the actions required to assist SCRA to meet its net zero targets.		

	Item	Timescale	Action
	Agreed: • To approve SCRA's revised Corporate Procurement Strategy in line with the Procurement Reform (Scotland) Act 2014 (the Act) which further aligns SCRA with Scottish Public Sector best practice.		
7.	**Dalkeith External Works** EM introduced the report advising EMT of the need to undertake urgent repair works for the safety of building users and passers-by. **Agreed** • To approve the appointment of Corstorphine Roofing and Building Ltd to carry out the essential external works to our Dalkeith.		
8.	**Internal Audit Action Tracker** The tracker was reviewed. Any updates along with supporting evidence to be sent to PA.	Mar 22	All
9.	**SCRA Board Meeting** - review of draft reports The agenda and draft reports were reviewed by EMT ahead of the March Board Meeting. Final reports to be issued to PA by 08 March	08 Mar 22	All
10.	**SCRA Learning Strategy Plan** PS introduced the report setting out the SCRA Learning Strategy and Annual Learning Plan and outlining the implementation plans. The report also provides an update on the development of a Learning Hub on Connect which will provide staff with easy access to a rich range of learning resources to encourage and enhance their personal development. **Noted:** • The Learning Strategy and Plan recognises that the way we learn has changed over the last 2 years and the Learning Network are focussed on using and developing a blended approach to learning which complements a range of learning styles and enables staff to easily access learning in ways that fits into their working day. • The Strategy also commits to developing learning plans to support staff develop in their roles and learning profiles to highlight career development and succession planning. • The success of SCRA's Learning Strategy and Plan will be measured by the availability and take up of SCRA Learning Courses, Events and Resources. To improve access to, and increase availability of, a wide range of learning resources, a Learning Hub will be developed on Connect with the aim of providing a		

	Item	Timescale	Action
	single place for staff to access all SCRA Learning Resources. • The Learning Hub will feature all learning outlined in the Annual Learning Plan and Learning Network members will provide and refresh content on a regular basis to increase the learning opportunities available to staff. • The HR Manager is working with the Communications Manager on a plan to launch SCRA Learning Strategy and Annual Learning Plan 2022/23 by April 2022. **Agreed:** • To approve the SCRA Learning Strategy and Annual Learning & Development Plan		
11.	**Gender Pay Gap Report** PS introduced the Gender Pay Gap Report as at 31st March 2021 and the recommended actions for inclusion in SCRA's Equalities Outcomes 2022/23. **Noted:** • The Gender Pay Gap (GPG) is a measure of the difference between women and men's average earnings across an organisation. The Scottish Children's Reporters Administration (SCRA) is required by law to publish an annual GPG report and this is the fifth year that SCRA has reported on their gender pay gap. • The GPG data supplied is correct for all SCRA staff in post on 31 March 2021 (the snapshot date for the purpose of GPG reporting). The calculations are based on standard methodologies used in the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017. • Gender pay is different to equal pay, which is a legislative act to prevent pay discrimination between female and male staff performing the same or similar work. SCRA is fully compliant with equal pay legislation and publishes an Equal Pay Statement every 4 years. • In addition to publishing the Gender Pay Gap information, SCRA also publishes pay gap information in relation to Ethnicity and Disability, Age, Full-time & Part-time and Grade. • SCRA's pay gap is at the lowest level over the last 5 years of reporting. • SCRA's pay gap at grade level remains within acceptable limits with improvements seen at Executive Management level. SCRA Inclusion and Diversity activities which have been embedded and have contributed to reduction in the pay gap include: o Women into Leadership Network		

	Item	Timescale	Action

	o Visibility of flexible working options at all levels
	  o Promotion of women into management roles
	  o Access to development opportunities such as Professional Manager Award
	  o Women into Leadership Conference
	  o SCRA's Succession Plan
	  o Unconscious bias training
	  o Inclusion Ambassadors
	
	• The following actions, which are aligned with our Rights, Inclusion and Corporate Parenting Strategy will be progressed to support our continuing commitment to improving SCRA's pay gap.
	  o We will reinvigorate our Women into Leadership Network, which currently has 38 enthusiastic members as part of our work to tackle our Gender Pay Gap
	  o Our race equality work will be a significant focus of our inclusion and diversity work, including the development of an ambitious Race Equality Action Plan. We will engage with external organisations and individuals to do this in recognition that a wider expert reference group is required to fully enable us to realise our ambitions around racial equality and diversity.
	  o We will work to improve our equality data recording.
	  o We will continue to embed our Disability Confident commitments and work towards gaining our Disability Confident Leader Accreditation.
	  o We will focus on training our workforce on inclusion and diversity – including as part of our recruitment and selection approach
	  o As part of our Succession Plan, we will provide mentoring and career support for women across grades and age bands to increase opportunities and support career paths as well as develop a learning and development programme to support the career development and progression of staff
	  o We will continue to improve our approach to increasing the diversity of our workforce and the tools we use to attract, recruit and retain a broad and diverse workforce.
	
	Agreed:
	• The report will be published by 31 March, with NH as the Accountable Officer.		

	Item	Timescale	Action

12.	**Inclusive Leadership Behaviours**
	 PS introduced the report which sets out the SCRA Inclusive Leadership Standards and Behavioural Framework and outlines the plans for further consulting with Inclusion Ambassadors, Equality Groups, Managers and Staff on the Framework.
	
	 Noted:
	 • The SCRA Inclusive Leadership Standards and Behavioural Framework has been developed by the HR Manager in collaboration with the Inclusion and Diversity Lead.
	 • This Framework brings up to date the current set of management standards, which were fully considered in the development of this framework, but also ensures that our standards are less transactional, fully consider our values and can easily develop inclusive behaviours.
	 • In recognition of the wide reach and impact of the Framework, a robust consultation plan is proposed which will include seeking views from:
	     o EMT
	     o Inclusion Ambassadors and Equalities Group
	     o HR Sub Group
	     o Managers
	     o All staff focus groups.
	
	 Agreed
	 • Report to come back to a future EMT meeting, after discussion with UNISON via the HR Sub Group.
			
			SD

	Standing Items		
13. a)	**Digital Programme** **RAVHI – update** • Service Models 3 & 4 to be rolled back to localities by June 22, based on a detailed transition plan which will be developed. The VH team is making good progress. **Digital CAB** • Update will be provided at the next meeting	 June 22	 SD/HE/ LMcD
14.	**Covid 19 Recovery** • The CHCRG report has been presented to CHIP resulting in a useful discussion. • All staff are encouraged to continue to follow SG guidance. Details are available on CONNECT.		

	Item	Timescale	Action
15.	**Keeping the Promise** LB provided a verbal update: • Internal communications to be considered. The Promise is a real opportunity. How do we communicate this to all staff?	Ongoing	All
16.	**Practice and Policy** AH Provided a verbal update • Cross Border issue – We have received a response to the consultation and are trying to address the issues raised by the Board • Ongoing discussion with CHS regarding the inclusion of past reasons for decisions in papers.		
17.	**Information Governance** AH provided a verbal update • Over 18's information - paper to paper to be brought to the April EMT relating to a minimalist approach of the retention policy.	April 22	AH
18.	**New Risks** None identified		
19.	**Forward Plan** A summary of key meetings over the next month was reviewed.		
	Date of Next meeting; Wednesday 04 April 2022, at Ochil House, Stirling		

Date	**6th April 2022**
Report Author	**Susan Deery, Head of Human Resources**

Recommendation:

1.   To note the change in managing employee's in-year pension contributions

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Reason for Report:	Noting
Resource Implications:	Within budget
Strategy/Service Plan	People
Implications	Minimal impact on employee's contributions
Consultation:	HR Sub Group Finance Team UNISON Falkirk Council
EHRIA Duties:	To be completed
Document Classification:	*[Not protectively marked]*

1. **Introduction**

1.1 SCRA is a member of the Local Government Pension Scheme, administered by Falkirk Council. We have been in discussion with Falkirk Council for a number of years about transitioning to their e-pensions scheme, which means that we will upload pension details from Itrent to their system – Iconnect.

1.2 Falkirk Council have not been able to accommodate SCRA's transition but now have the resources available to do this, which will hopefully commence in the first quarter of 2022/23.

1.3 The current arrangements for calculating pension contributions are completed manually by the Transactions Team, and are calculated with each change to an individual's contract/salary, which can mean a re-calculation on a number of occasions throughout the year. This goes beyond the current requirements of the LGPS.

1.4 The LGPS rules state "*Members without breaks in employment who remain with the same employing authority will retain the same contribution rate for the whole of the year (unless that member elects to join the 50/50 section of the scheme, where they would then pay half that rate of contributions). The exception to this is where regulation 9(4) of The Local Government Pension Scheme (Scotland) Regulations 2018 applies i.e. where there has been a permanent material change in the member's terms and conditions (e.g. on promotion, demotion, re-grading or a part-time member's contractual hours change). However where such a change is not considered material by the employer, i.e. where the change is not viewed in the context of the member's pay as significant, the employer may decide to ignore the change and assess at the next 1st April. An employer may consider frequent changes of a member's contractual hours as not permanent changes and assess at the next 1st April based on an estimate of average hours.*"

2. **Proposal to Change Method of Calculation**

2.1 With the transition to IConnect, Falkirk Council have asked us to reconsider our method of calculation, in line with the LGPS guidance. We are open to this but feel that we should apply criteria to when an in-year recalculation should be carried out to ensure consistency of treatment.

2.2 The criteria is proposed as *"SCRA is obliged to re-assess a staff member's contribution rate in-year only where it considers that a permanent and material change to their employment has occurred. The only circumstances SCRA considers permanent and material are:*

- *a permanent change of working hours of 0.3 FTE (10.5 hours per week) or greater; and/or*
- *a permanent change of post to a different salary grade."*

3.   Potential Impact

3.1   An example of a Reporter working an extra 7 hours per week on a permanent basis for 6 months would underpay £326 in pension contributions. The pension contribution rate would be recalculated at the next 1st April submission date. Similarly, if a Reporter reduced their hours permanently on the same basis, then they would overpay their pension contributions by £326. Neither of these examples would have a material impact on the employee's pension.

4.   Recommendation

4.1   That EMT note the change to the method of pension contribution rate changes to enable us to easily transition to e-pensions within Falkirk Council's Iconnect system.

Head of Service	**Susan Deery**
Date	**6th April, 2022**
Report Author	**Susan Deery**

Recommendation:

1. To note the outcome of the Support Staff Consultation Exercise
2. To approve the new generic support job description
3. To note the potential impact on the grading structure as a result of job evaluation

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Reason for Report:	Noting and approval
Resource Implications:	Potential Job Evaluation Process
Strategy/Service Plan	People Strategy
Implications	n/a
Consultation:	UNISON
EHRIA Duties:	tbc
Document Classification:	*[Not protectively marked]*

Support Staff - Role Consultation

1. Introduction

1.1 In September EMT noted the progress of the Support Administrator (SA) consultation process. Subsequently the agreed draft job description was shared with SA's as part of the second round of consultations.

1.2 The draft revised job description for SA included new elements of face to face corporate parenting activity, which aligns with our approach to Keeping the Promise and provides a broader reach for their role. Whilst there was mixed views on the role undertaking front line operational activity, more supported the review as not. There was a clear message that timing was important and that we shouldn't progress this before the end of 2021 whilst the SOM and other work activity was being implemented.

1.3 During that second round of consultations it became evident that there was an emerging overlap between the roles of SA and Support Assistant (Reception) (SAR) in some activity areas such as managing mailboxes, data input to CSAS, and in some offices, support administrators spending more time on reception etc.. As such we agreed with SA's a similar consultation exercise with SARs staff should also be undertaken. Additionally, with the intention to roll-back some virtual hearings functionality to localities it was thought that we should understand what that might look like more before concluding the final review.

1.4 We have now concluded all consultation sessions with SA's and SARs and their line managers. In total, there have been 17 consultation sessions with SA's (over 2 consultation periods – 42% of SA attended the first round and 41% of SA attended the second round), 2 consultation sessions with SARs staff held in February 2022 (66% of SAR staff attended), 2 consultation sessions with LSMs and 1 session with LRMs.

2. Methodology

2.1 A series of questions were asked of each group of postholders in the initial sessions as follows. These are outlined below. The second consultation with SA focused on the initial revised job description in for feedback.

- Does your current job description still reflect the role of SA/SAR?
- Has CSAS affected your role, in terms of activity and/or giving you more capacity?
- What would you like to see in any revised JD?
- What development do you/would you need for your role?

2.2 The consultation was undertaken in partnership with UNISON.

3.   Consultation Outcomes – Themes

3.1   The information gathered from the consultation sessions has been summarised into themes in the bullets below:-

- **Capacity** – **Support Administrators** - there was mixed feedback on the capacity available for the SA role. The majority of SA participants indicated that their workload capacity was challenging and had not improved since the implementation of CSAS. They struggled to understand how they could potentially take on additional tasks such as f2f support from children and young people as well as the potential for virtual hearings functionality. This didn't align with some of the feedback which was received that they felt that Reporters were doing elements of administrative work that they used to do and that they wanted to get back.   Some managers felt that whilst SA work was busy there was some capacity available.

   Capacity – Support Assistant (Reception) – there was a less mixed view on this with all participants noticing an increase in their workload. This was reported as due to their increased involvement in CSAS and managing mailboxes that were historically managed by SAs as well as the hearing room technology support required on a daily basis. There was some concern raised that whilst they were spending increased time in resolving hearing technology as well as providing support to Panel Members with their own technical issues, they were spending less time with children, young people and their families, as all of this is happening at the same time. They were welcoming of the additional support that a broader JD might bring to their role.

- **Technology** – this was clearly an issue for both current roles. CSAS and the other software in use was no longer a particular focus of concern whereas hearing room technology was found to be challenging.   For SAR as outlined above they find themselves on the front line of providing fixes and solutions within the hearing room and don't feel skilled enough to do so – they referred to a guidance sheet and some reliance on an LSM if they are around but this didn't feel satisfactory enough to them given their desire to want to help and at the same time appear professional in the support they provided. SAs did not see this as their role, with many participants advising that this was not the role they applied to undertaken.

   To ensure we can provide a service in our hearing rooms whether it be Panel members or other visitors, we need not to be relying on a small cohort of staff and therefore all support staff should have the skills and job description expectation of working with and supporting technology in the delivery of our services. We can review the information and advice currently available and ensure that this is factored into the digital skills training strategy.

   There were one or two comments about feeding back to CHS about the level of support some PM's require in the hearing room and the impact that this is having on SCRA's ability to support children, young people and their families.

- **Virtual Hearings Support** – this theme is linked to the technology theme before and is more likely due to the uncertainty at the time of the impact of virtual hearings and what will be rolled back to Localities. With support and training it is hoped that both SAs and SARs will engage with the central VH team in terms of administrative and support activity.

- **Impact on Role – Support Administrators** – During the first consultation sessions with SA's the majority of participants welcomed the discussion around broadening and enriching the role to include a pastoral/corporate parenting approach before, during and after virtual/hybrid/face to face hearings. They recognised a change in skill set and noted that where they do provide reception cover, they tended to enjoy that. There were a number of participants who would clearly find that role challenging. During the second consultation sessions there was a bit more concern about the potential to include face to face support for children young people and their families in the SA JD – some still were very welcoming of the opportunity to increase their skill set and see the positive impact of that whilst others felt that the role of administrative element of their SA role was being minimised and saw this addition as a diminution of their role.

- **Impact on Role – Support Assistants (Reception)** – Whilst the majority of SAR's did not want to work on CSAS full time, they welcomed the recognition of the increased administrative work they do, particularly around mailbox management and incoming referrals. They were very clear that their flexible, empathic and professional front line role they deliver should be equally valued to those staff who are providing an administrative function in the service. They recognise that the skill sets are different and that not all SAs could deliver a front line service, equally neither do SAR's want to purely focus on CSAS and admin functionality.

- **Impact on Role – Locality Support Managers** – LSMs indicated that they would welcome a combined support role that covered all aspects of support functionality. This would provide significant flexibility in the use of resources and cover particularly in medium to smaller sized offices. They recognised that whilst staff were trained in new skills, or whilst staff were able to increase their confidence in new tasks, if the role was broad enough, there was an opportunity to allocate tasks based on people strengths and skill sets, whilst all staff become accustomed to and experienced in the broader range of tasks.

- **Training** – any change in skills required to deliver a role needs to be supported by training. Additionally, a further review of support required to manage and maintain hearing room equipment/software would be recommended.

4.   Conclusions

4.1   It is recognised that reviewing any job description, but particularly generic ones like our Support Administrator and Support Assistant (Reception) roles can become an emotive issue, with staff feeling either an increase in work expectations or the loss of a role that they have been doing for a number of years. The talent across all our support groups is undeniably evident with all participants keen to deliver the best role that they could. Therefore, there is a mixed view on the need to review roles, particularly from the Support Administrator cohort, some of whom clearly do not wish to be responsible for any technical aspects within their role or indeed working in such a front line role with panel members and other users of our services.

4.2   That being said, there is a greater majority who welcome the opportunities that a broader job description might offer, in terms of providing a varied and enriching role as well as a broader reach than they might previously have had.

4.3   Whilst there might be some merit in retaining two separate job descriptions for our purely administrative roles and those working across admin and providing face to face/virtual support to panel members, children and young people etc. it is clear that a flexible resource that can provide a broader range of support tasks would be of a significant benefit to localities. In progressing this, the job description would require to be broad enough to cover all aspects of our support roles. It would also need to be recognised that not all staff could easily undertake the breadth of the new role – and allow LSMs, at least initially, to allocate the resource according to strengths and skills sets.   It also provides opportunity to those staff who are very keen to have a more varied and interesting role which straddles both admin and support.

4.4   For those staff who have indicated that they would not be willing to work to a broader set of skills, that might be acceptable in the short term as LSMs appropriately allocate tasks according to skills/strengths, however there would be an expectation over time that all locality support staff could provide cover across the role.

4.5   A broader job description and possible associated grade would appropriately recognise the work and first point of contact with SCRA currently delivered by the SAR workforce. This aligns with an organisational view to ensure that all roles are valued and recognised appropriately.

4.6   Once the final job description is agreed, all new recruitment exercises will recruit to the skills required for the new role – thereby quickly starting to embed a broader range of skills within the organisation. We would hope that those staff who require more support and training to undertake the full role can do so organically over time with the support of their colleagues, organisation and experience in the role.

5.   Next Steps

5.1   A progress communication will be developed sharing the revised job description (attached at Appendix A) will be shared with SA's. SARs' and LSMs for comment. Comments will be collated and considered as part of the final consultation. This will go out mid to end April.   Three virtual consultation sessions will also be arranged in May to allow staff to provide verbal feedback.

5.2   EMT should be aware of the impact this potential change might have on operations where staff may feel unsettled by these changes/developments.

5.3   The final job description will be considered at the Job Evaluation Committee in June. The outcome of which will be reported to EMT in July 2022.

6.   Recommendations

6.1   That EMT note the revised draft job description (attached at Appendix A), which will be recommended as the job description that will incorporate the current roles of Support Administrator and Support Assistant (Reception).

6.2   That we seek to conclude the consultation by the end of May 2022 with the revised JD going to JEC in June 2022.

6.3   Impact of the outcome will be considered at the July EMT.

REVISED - JOB DESCRIPTION

1.   **JOB TITLE**   **HEARINGS SUPPORT ADMINISTRATOR**

2.   **JOB PURPOSE**

Deliver exceptional support to the Reporter in the administration and management of face to face and virtual hearings.   Support children, young people and their families to attend and participate in their hearings to ensure that their experience of their Hearing is as good as it can be, and in line with our commitments to Better Hearings, Corporate Parenting and The Promise.

3.   **ORGANISATIONAL POSITION**

Immediate Line Manager: Locality Support Manager

Peers: All Locality Staff

Management Responsibilities: None

4.   **DIMENSIONS**

Working across Locality teams, ranging from 4 to 25 people as well as supporting children, young people and their families in hearing centres.

5.   **PRINCIPAL ACCOUNTABILITIES**

- Provide comprehensive support to the Reporter, ensuring the delivery of a flexible, effective, sensitive and customer-focused service.
- Manage Locality mailboxes and ensure that all incoming mail/communications are recorded appropriately.
- Use SCRA's case management system (CSAS) to record and support the processing of referrals in line with the service operating model, including creating and maintaining accurate records notifying face to face and virtual hearings, prepare and issue letters, hearings papers and other communications/ documentation for the Locality.
- Process and prioritise locality work queues ensuring that all work is processed in accordance with agreed statutory and organisational timescales.
- Support delivery of organisational compliance with non-disclosure conditions in line with SCRA policy and practice, protecting the integrity of information held by the organisation, in line with General Data Protection Regulations and internal policies and procedures.
- Provide the appropriate support to Reporters in preparing and submitting court-related papers.
- Provide a support service to Children's Hearings by:-
  - Liaising directly with the hearings Reporter prior to the Hearing to identify any particular needs to ensure full participation by all attendees, including the option of supporting child and family pre-hearing visits, providing information as to room layout, attendees and general hearing process.

- Ensuring that all equipment is ready and fit for use, including conferencing units, participation technology, toys/books etc. and that any issues that arise can be resolved quickly including identifying IT or connection issues
- Ensuring that the physical or virtual hearing room is ready for all participants, including ensuring that all participants are able to use the technology (testing in advance where required), are aware of facilities available to them and that they have had the opportunity to advise of any particular needs
- In the Hearing Centre ensure that any questions or requests can be resolved by the most appropriate person.
- Where applicable, work with children, young people and their families in promoting the use of feedback following hearings using the technology available.
- Administer payment of expenses to attendees at hearings and record all visitors to the Hearings Centre
- Liaise with partner agencies to support the effective flow of information to support the hearings process and provide an effective service to children and families

6. QUALIFICATIONS, TRAINING, EXPERIENCE, KNOWLEDGE AND SKILLS

- Educated to Higher level or equivalent
- Good administrative skills
- Competent in the use of Microsoft Office applications
- Ability to produce accurate work
- Ability to prioritise and work to deadlines
- Good communication skills, oral and written
- Good interpersonal skills with an open and empathetic approach to the needs of our service users.
- Sensitivity to the needs of children and young people
- Flexible, adaptable and able to work under pressure
- Ability to work on own initiative
- Ability to work as part of a team

7. COMMUNICATIONS

Internal: Locality Team Staff.

External: Children and families, panel members, staff in other agencies.

8. PRINCIPAL CHALLENGES

To accurately produce work to tight timescales and adapt to changing priorities. To provide a sensitive, customer-focused service.

SCOTTISH CHILDREN'S REPORTER ADMINISTRATION

Policy and Legislative Change

Accountable Director: Principal Reporter/Chief Executive   **Date:**   23 March 2022

Report Author: Head of Finance and Resources

Recommendation:

1. To approve the creation of a group to scope the scale of challenge posed by proposed increases to the age of referral to the Reporter, UNCRC implementation and the array of work being undertaken in Keeping the Promise.

Reason for Report: For approval

Resource Implications: Outwith approved budgets

Strategy: Outwith approved plans

Consultation: PR/CE

Equalities Duties: An Equalities Impact Assessment is not required.

Document Classification: Not protectively marked

1.   Introduction and Background

1.1   This report is seeking approval of the the creation of a group to scope the scale of the capacity challenge posed by proposed increases to the age of referral to the Reporter, UNCRC implementation and the array of work being undertaken in Keeping the Promise. The purpose of this work id to ensure that SCRA is in a pro-active position to contribute to the Care and Justice Bill financial assessment/financial memorandum (focussing on age of referral) as well as to update SCRA future investment needs for discussion with SG and Scottish Ministers on wider policy challenges.

1.2   Priority 4 in the 2022/23 Business Plan is **"**Engagement with the Political Environment and Influencing Social Policy" which in relation to the focus of the proposed group encompasses The Promise, implementation of UNCRC, Raising the age of Referral and the Care and Justice Bill.

1.3   The objectives in the 2022/23 Business Plan are as follows:

4.1: We will work with The Promise and with partners to reform the areas of the Hearings System, outlined in Plan 2021-24 by:
   - *Working as a key partner in the Hearings System Working Group to drive forward, influence and collaborate on The Promise Reform agenda, using our extensive knowledge of the system, the large volume of data and research and our experience in legislation and policy.*
   - *Ensuring all our work in Reform is informed by evidence, learning and voice.*
   - *Working consultatively with staff, partners, children and families to ensure all voices are heard.*
   - *Working with the Office of Chief Designer, Scottish Government to ensure robust methodology is explored and applied regarding reform work.*

4.2: We will respond to consultations and provide insights and influence into policy development such as implementation of UNCRC, Raising the age of Referral, Care and Justice Bill to shape Reform, Social Policy and Legislation by:
   - *Responding to any consultation where we have a meaningful contribution to make, and particularly in relation to any proposals that have an impact on the Hearings System.*
   - *We will meaningfully participate and contribute to multi-agency forums, and engage with Scottish Government and other partners, in order to share our knowledge and experience and influence policy change that is going to improve the lives of children and young people.*

1.4   The detailed work on these objectives will be carried out by lead Head Office Teams, principally Practice & Policy, and newly created internal groups e.g. Keeping The Promise Project Team and Programme Board.

1.5   The new group proposed in this paper will keep an overview of all significant legislative and policy developments ensuring:

   - the scope, resource impacts (capacity and capability) and financial risks of each challenge are assessed in time to inform planning internally, in partnership groups and in Scottish Government; and
   - interdependencies between challenges are identified and kept under review.

1.6 The two briefing papers attached at Appendix 1 were part of SCRA's 2022/23 budget submission to the Scottish Government. SCRA bid to secure the continuation of temporary contract funding to complete recovery and start preparations for new legislative and policy challenges, the minimum funding requirement being current resources plus the additional resources put in place as the recovery team.

2. Membership of the Group

2.1 The group will comprise one or more representatives from:

- Practice & Policy
- Operations
- Planning
- Human Resources
- Finance
- Partnership

2.2 If approved, the Executive Management Team will be asked to ensure effective nominations to the Group and identify appropriate leadership of and administrative support for the group.

3. Reporting

3.1 It is suggested that the group meets monthly for the six months from April to September 2022 with the group deciding on the frequency of meetings thereafter. A light touch progress report should be submitted to each EMT meeting.

4. Links to other groups

4.1 The group should forge links with other established groups as required. EMT are asked to suggest which groups should be considered.

5. Conclusions

5.1 A number of very significant legislative and policy changes will impact on SCRA over the remaining two years of the current Corporate Plan. Some dedicated resources are required to help senior management scope the potential impact of these changes in terms of the capacity, capability and finance that will be needed to ensure SCRA responds in the best way possible for children, young people and their families.

6. Recommendation

6.1 To approve the creation of a group to scope the scale of challenge posed by proposed increases to the age of referral to the Reporter, UNCRC implementation and the array of work being undertaken in Keeping the Promise.

Appendix 1

Briefing Paper for SG Finance – significant legislative changes

1. Background/Context

There are a number of planned legislative changes that will have a significant impact on SCRA, and on the resources that we will need to absorb those changes. Some have already just commenced and others are planned for the short to medium term. The main changes are as follows:

- Children (Scotland) Act 2020 – partly implemented on 26th July 2021, with full implementation over the next year
- UNCRC incorporation – The Bill has passed Scottish Parliament, with implementation within 6 months of Royal Assent. Some uncertainty due to the Supreme Court challenge from UK government.
- Raising of the age of referral – a consultation last year resulted in overwhelming support to raise the age to 18, and for all grounds of referral
- Age of Criminal Responsibility Act – partly implemented, but full implementation expected in late 2021.

2. Impact of Change

Children (Scotland) Act 2020

Among other provisions, this Act introduces new rights for siblings. There is now a duty on LA's to keep siblings together wherever possible, and a duty on children's hearings to consider contact between siblings. Where certain criteria are met, some siblings now need to be notified of a hearing and be offered the right to participate in the hearing. There are also requirements to provide them with information, and to notify them of outcomes, as well as rights of those individuals to request a PHP or a review hearing in certain circumstances.

The Act also has other provisions that will impact on hearings – the right to request attendance by remote means, the ability to require an individual to attend by remote means, and the requirement to provide the LA with all hearing papers.

UNCRC Incorporation

The Bill incorporates the articles of the UNCRC into law, meaning that all public services must act compatibly with those articles. If they fail to do so, there are rights of challenge for individuals who consider their rights have not been observed, leading to potential court action. The Children's Commissioner also has rights to enforce compliance.

SCRA will require to conduct a full analysis of our practice, policies and procedures, to ensure they are compliant. This may highlight some changes that may be required. We also believe that we will need to change our approach to become rights based, and the need for more choice in hearings to improve participation will create more complexity in the arrangement of hearings.

Raising the age of referral to include all 16 and 17 year olds in the Hearing system

Currently only children under 16 can be referred to the Reporter, with some exceptions. If 16 or 17 you can only be referred if you are on a CSO, or from a criminal court. It is a clear SG intention to raise the age of referral to 18, and for any ground of referral (care and welfare reasons as well as in relation to offending). We can clearly anticipate an increase in referrals, and also an expectation that we will be handling cases that have a different dynamic and complexity.   In relation to offence grounds, there will be a rise in the number of more serious offences that will need to be proved by the Reporter – the kind of cases that may be prosecuted in a High Court and which would merit prosecution by an Advocate Depute. Although not necessarily "complex", these are highly sensitive and pressurised cases which often find the Reporter facing senior counsel in court. Referrals for other grounds are less easy to predict, but are likely to be more complex due to the different challenges faced by young people in this age group.

The raising of the age of referral has numerous implications in our work. We have considered the extent of this change, and listed some themes in the following paper.

16&17 Change
Themes - SCRA.doc

 These will have resource implications for SCRA.

Age of Criminal Responsibility Act

This Act raises the age at which children in Scotland can be held responsible for committing a crime to 12 – previously it was 8. This has implications for the grounds that are available to children's reporters, and also contains complex expectations in relation to how the police interview and interact with children under 12. The Act also requires the age of criminal responsibility to be reviewed, and the expectation is that this will rise to a higher age. This review must be completed within 3 years of the enactment of the Act.

The implications for children's reporters are that they must draft grounds that relate to a different s.67 ground and cannot use the "offence" ground under s.67 (j) of the Children's Hearings (Scotland) Act 2011. There will also be an impact in relation to the service we should provide to victims of the harmful behaviour of children under the age of criminal responsibility.

3. Pressures and Issues

The developments highlighted above are likely to translate into the following pressures and issues:

- Increase in referrals for 16 and 17 year olds
- Increase in number of hearings as a result of the increase in referrals
- Increase in court activity – more referrals will translate into more proofs, but it is also likely that this older age group will be more likely to challenge decisions and therefore there will be more appeals
- More complex and time consuming arrangement of hearings for a number of reasons:
    - UNCRC expectations will require more bespoke hearings, with more engagement pre-Hearing and the potential for more remote attendance to support participation.
    - For 16 and 17 year olds, there is an added issue around identification of relevant persons, unless the law is changed to clarify this.

5

- o The Children (Scotland) Act requires Reporters to identify individuals who meet the criteria to be offered participation rights. The Reporter must apply the criteria, instruct notification, and select the information that it is appropriate to share with the participation individual.
- More challenging court activity – due to the expectation that the Reporter will handle many more serious offence proofs, including serious assaults and sexual offences.
- More admin in relation to all of the above, but particularly around hearing arrangement, including the increased numbers of notifications and papers for people with participation rights, and the requirement to provide full papers to Local Authorities for every hearing.
- Court challenge in relation to alleged breach of UNCRC rights.
- Greater expectation in relation to victims of offences committed by young people.

4. Timeline

26/07/21 – implementation of provisions of the Children (Scotland) Act 2020

Oct/Nov 2021 – expected full implementation of the Age of Criminal Responsibility Act

Late 2021/Early 2022 – expected implementation of the incorporation of UNCRC

2022/23 – likely timeline for raising the age of referral

Plan 2021 – 2024 in relation to The Promise, will expect re-design of the children's hearing system, as well as continuing improvement while re-design work is done.

5. Planning assumptions

It is possible to project patterns of referral into the older age group, as provided in the following attachment:

16-17 profile.xlsx

We also have some numbers of cases dealt with by COPFS which are likely to come to the Reporter in the future. The data relates to the financial year 2018/19 period and counts:
- 3816 16/17 year old accused reported to COPFS, of which
- 1,583 were 16 years
- 2,233 were 17 years

The number of hearings where individuals will be offered participation rights is too early to estimate, but the consideration of this issue will have to be applied in every case. The amount of time spent on arranging hearings will increase, impacting on the Reporter and Assistant Reporter capacity.

Although digital developments will achieve some efficiencies in admin tasks, these are likely to be off-set by the increase in admin highlighted above.

The impact of increased and more challenging court activity could be substantial, impacting on Reporter capacity.

6.   Summary of our position

Some factors are difficult to estimate at this stage, but others may be able to be quantified in more detail. It is, however, very likely to be the case that SCRA will have to at least maintain current resources, including the additional resources put in place as the recovery team.

Although the Promise expects a "shrinkage" in the hearing system, it does also expect more specialisation and a more personalised hearing arrangement. The huge changes expected from universal services and the cultural change required, are not likely to happen quickly and lead to the "shrinkage" expected for several years. Any such shrinkage will be off-set by the additional workload that will occur from the issues highlighted in this paper, and in particular the addition of all 16 and 17 year olds.

Briefing Paper for SG Finance – Keeping the Promise

1.   Background/context

The Promise has made a number of recommendations for the Childrens Hearings System. Some of the most significant of these are:-

- A focus on children's rights throughout the hearing system, including that children age under 18 be defined as children and taken outwith, wherever possible the criminal system.
- That the hearing system should shrink and specialise in line with securing significant investment in supporting children and their families in their communities.
- That the principles of Kilbrandon should be refreshed and updated.

SCRA will become part of the Childrens Hearings System Review Group which will lead the review of the legislative underpinning of the system, alongside redesign. The outcomes of this will populate a Care and Justice Bill in 2022/3.

2.   Impact of change

The implications of the Promise are as yet not fully clear, however the following assumptions are made:

- Referrals to the Reporter will generally decrease over the next 8 years
- This will be offset by an increase in the age of referral to 18, in line with UNCRC.
- The planning that has been done to date suggests that 2500-4000 young people age 16/17 years of age will be referred to the Reporter on offence grounds alone. No data exists on referrals that may be made on care and protection grounds – but this is likely to be equally significant. The offence ground referrals will have a much higher prevalence of crimes against the person – involving physical and sexual violence
- The degree of complexity of referrals across the board, albeit reduced in number (over a prolonged period of time as other preventative services are put in place) are likely to increase the labour intensity of Reporter assessment, investigations, gathering of information from other agencies and decision making. The degree of dispute over grounds and the observance and protection of human and children's rights involved in cases of higher complexity will without doubt increase Reporter activity in court, leading high intensity evidence.

3.   Known pressures and issues

Like every other public service SCRA is still dealing with the consequences of the global pandemic. We have taken on temporary staffing to assist us with the Hearing System recovery plans. A great deal of intensive efforts have been put into the induction and training to these staff in the performance of their statutory duties. These staff are due to be released from SCRA by March 2022. In the likelihood that a Care and Justice Bill will be less than 12 months away it could be considered highly unwise and inefficient to simply let this trained and increasingly skilled capacity walk out of the door at SCRA, when, in less than 12-18 months we may have to recruit further staffing to deal with the steep increase in capacity needed to meet SCRA's new duties and respond to increase demands on finite capacity.

4.   Resources required

There is a need for a dedicated Programme Manager and an Operational Change Lead to ensure SCRA responds to the challenges set out in Change Programme 1 and Plan 21-24 published in June 2021. The Programme Manager will be at Locality Reporter Manager (LRM) level and be a full time position for 12 months (£70k). The Operational Change Lead will also be at LRM level and be a full time position for 12 months (£55k - SCRA made provision in the 2021/22 budget for an LRM for 6 months).

5.   Summary of our position

It would be irresponsible of the Principal Reporter to allow trained and skilled staff to be released at the end of the COVID recovery plan period. The pressures on SCRA are highly likely to increase from 2023 onwards – either through expansion of our remit or increased labour intensity and complexity of our functions. A proper period of planning and assessment is required in order to understand the needs of the Reporter function as the picture involving the Promise and the Care and Justice Bill become clearer.

SCOTTISH CHILDREN'S REPORTER ADMINISTRATION

INTERNAL AUDIT ACTION TRACKER UPDATE

Accountable Director: Head of Finance & Resources   **Date:**   04 April 2022

Report Author: Governance Officer

Recommendations:

1. **To note the latest status of the Internal Audit action tracker.**

Reason for Report: EMT Update

Resource Implications: Within approved budgets

Consultation: EMT

Document Classification: Unmarked

Equality Impact Assessment: Not applicable

1. Introduction

1.1 This report provides an update to the EMT on all outstanding audit actions, identified by BDO, Internal Auditor.

2. 2021/22

2.1 Current BDO status;
- 20 open (3 not yet due)

Current SCRA status
- 3 not yet due (LRM04, VH01, VH02)
- 3 In progress, update and supporting evidence requested (LRM05, LRM02. C19HS01)
- 8 recommended closed, supporting evidence provided (CM03, CM05, LRM03, LRM01, GPC01, GPC02, IE01, IE03)
- 1 unable to evidence (CM04)
- 2 suggest partially closed (CM01, CM02)
- 3 recommend revised date (CM06, CM07, IE02)

3. 2020/21

3.1 Current BDO status;
- 9 open

Current SCRA Status;
- 5 in progress, update and supporting evidence requested (DP02, DP04, FOI02, BCP01, BCP02)
- 2 recommended closed, supporting evidence provided (FOI03, S03
- 1 in progress, unable to evidence as complete (S04,
- 1 in progress, recommend revised date (BCP03

4. Other outstanding items

4.1 Current BDO status
- 4 open

Current SCRA status,
- 1 unable to evidence closed (CMSR01)
- 1 in progress, update and supporting evidence requested (FP07)
- 1 recommend superseded (BCP22)
- 1 recommend closed (BE01)

5.   Internal Audit Tracker

5.1   [IA Tracker](#)

6.   Recommendation

6.1   EMT are asked to note the latest status of the Internal Audit action tracker.

SCRA:

Consistency of Language - Interim use of terminology to be followed until The Promise Language Project concludes. SCRA needs to write internal and public facing documents and it would be helpful if we could adopt consistent approach to the terminology we use in relation to children within these.

In order to reflect the cultural shift needed across Scotland for everyone to accept children as all persons under 18 years of age we have, over the last couple of years, deliberately framed documents around children's rights, being clear that the *children* referred to are all those under 18.

The use of this terminology is, however, not consistent across the organisation. It would therefor be helpful to have a decision made, on an interim basis pending the conclusion of The Promise Language Project, on the terminology to use going forward. The key terms for consideration are children/young people/young adults/children and young people. The options are set out below:

OPTIONS:

	Term to be used	For whom	For	Against	Preference of
1	Children	All U18	UNCRC compliant – all U18 to be regarded as children.	Older teenage children (16+) who have some adult rights / responsibilities in Scotland	UNCRC / rights based approaches
2	Children	All U16	Fits w current CH model of referral to principal reporter, although the Care and Justice Bill will alter this.	Not UNCRC definition / compliant	Historically the approach SCRA has used
3	Young people	12-16	Fits w current CH model of referral to principal reporter	Still needs a way to refer to those O16. Young adults?	Historically the approach SCRA has used
4	Young people	12-18	Approach used by education and across much of academia	Still needs a way to refer to those O18. Young adults?	Education
5	Young people	16-18	These are not separated as they are used interchangeably across the sector.		
6	Young people	18-25			
7	Young adults	16-18			
8	Young adults	18-25			
9	Young adults	18-older?			
10	Children and Young people	0-18 OR 0-25	Collective term to cover all of the children SCRA can work with. Probably needs to be 0-18 though.	Still needs a way to refer to young adults.	Used across the sector.

SCOTTISH
CHILDREN'S REPORTER
ADMINISTRATION

Head of Service: **Alistair Hogg**

Date: **March 2021**

Report Author: **Stephen Eodanable**

Recommendation:
1. **To approve and support this proposal, detailed below, for the amendments to the case retention policy**

Reason for Report:	To simplify the SCRA's current retention policy for case files retained beyond an individual's 18th birthday and to ensure compliance with GDPR.
Resource Implications:	Within Approved budgets.
Strategy/Service Plan Implications:	
Consultation:	IG Leads
EHRIA Duties:	
Document Classification:	**NOT PROTECTIVELY MARKED**

1. Introduction:

1.1 This paper outlines a proposed amendment to the SCRA's current policy on the retention of case information after a referred child's 18th birthday.

2. Context: The current situation and risks

2.1   The SCRA must ensure that personal data is securely disposed of when it is no longer needed to ensure compliance with GDPR. Consequently, all case information must be destroyed for an individual when they reach their 18th birthday, unless one or more of the three exceptions applies:

- *Exception 1-Where an individual is likely to pose a risk to children in the future*
- *Exception 2- Cases of national importance*
- *Exception 3- Cases of local importance.*

The Practice Team are responsible for identifying cases of national importance (Exception 2). These are largely cases of special or legal interest, for example those which have involved appeals to higher courts.

Localities can rely on Exceptions 1 or 3, if they wish to retain a case file beyond an individual's 18th birthday. Localities are provided with a periodic report from the Data Manager, which features a list of cases that contain either:

- *Victims of established/accepted Schedule 1 grounds, or*
- *Children who were perpetrators of an established/accepted violent/sexual offence.*

The information in the report is designed to help each individual locality decide whether to retain an individual's case file beyond their 18th birthday. Due to the various time constraints on localities, they are not always able to review these lists prior to the individual's 18th birthday, which results in case files being retained for longer than necessary.

For any case files retained beyond an individual's 18th birthday, the relevant locality is required to record the exception relied upon and schedule a retention review date for the case files. This information should be recorded in a central spreadsheet, which is managed by the Information Governance Team. In practice, localities have not been recording the applicable exception or scheduling review dates. This has created a risk for SCRA in terms of accountability, as there is no record of case files retained beyond a young person's 18th birthday nor a list of the Exceptions, which have been relied upon. The overriding risk is that if the SCRA was to continue with the current process, we would not be compliant with GDPR

However at the IG Leads meeting on 22 February 2022, there was a consensus of opinion that there has rarely, if ever, been a need for the use of a case file that a locality has retained beyond an individual's 18th birthday. Furthermore, if such a case file was ever required, it is likely that the necessary documents could be sourced from the relevant court.

3. The proposal: benefits and risks

The proposal is to remove Exception 1 & 3, so that localities are no longer able to rely on them to retain a case file beyond 18 years. The benefits of this proposal are as follows:

- *Reduced workload for localities as there will be no requirement to individually review case files*
- *Localities will have a greater ability to implement the destruction of paper files at age 18, as they won't have to weed out any case files for review, which has caused delays in the past*
- *Compliance with GDPR, as SCRA won't be holding case files unnecessarily*
- *Reduced possibility of valid complaints/compensation claims regarding the SCRA's non-compliance with GDPR*
- *Significantly reduce the risk of further unlawful processing. SCRA is currently obliged to disclose personal information with other agencies such as Disclosure Scotland, which should have been destroyed*
- *Increased ability to accurately respond to subject access requests. Localities would no longer hold case files for over 18's, which the Information Governance Team are unaware of due to the fact they haven't been centrally recorded on the previously mentioned spreadsheet.*

There is a low risk that in the future a locality may identify a case which they wish to retain beyond the individual's 18th birthday. To mitigate this risk, we will identify a process for staff to highlight such cases. In this event the case could be classified as a case of national importance and could be retained under exemption 3, which will remain in place.

4. Recommendation

4.1 The recommendation is for EMT to approve and support this proposal for the amendments to the case retention policy.