



SCOTTISH

CHILDREN'S REPORTER

ADMINISTRATION

# Scottish Children's Reporter Administration Minute of Information Governance Leads held on Tuesday 20th May 2025 via Microsoft Teams

**Present:**

Stephen Eodanable (chair), Jo Donald, Donald Lamb, Gwen McNiven, Angela Mitchell, Neill Mitchell, Pamela Armstrong, Paul Mulvanny, Kelly Scarlett, Kerry-Ann Kean, Jacqui Stephen, Jackie Johnston, Ross Monteith, Janet Robertson, Caroline McCall & Stephanie Spence

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| 1. | <b>Apologies</b><br>Alistair Hogg, Victoria Thorpe, Sheena Banks, Helen Etchells   |           |        |
| 2. | <b>Any other Business</b><br>None  |           |        |
| 3. | Minutes of last Meeting (18 <sup>th</sup> February 2025)<br>Accepted as correct.<br><br>Matters arising<br>Updates on actions from previous minutes<br><br>None  |           |        |
| 4. | <p><b>Individuals recording telephone conversations with SCRA – What should we do in these circumstances? – SE</b></p> <p>SE explained that item 4 is largely related to telephone calls that are made to complainants, and it was added to the agenda to help ensure that we are striking the right balance between the concerns raised by colleagues about being recorded and the rights of an individual, who records a call. Up until now, we have been dealing with these calls as they arise, but they appear to be getting a bit more frequent</p> <p>Handling calls from complainants who wish to record a call will be covered in Complaints training scenarios. Some complainants in the past advised that if they can't record the call then they won't communicate with the SCRA by telephone.</p> <p>There is a concern for SCRA staff that the recording, or worse still, an AI amended version, could make its way onto social media. It is <i>not</i> an offence to record a call without consent of all the parties involved. An individual does not even need to let SCRA staff know that they are recording a call, <i>if</i> it is for personal use.</p> <p>If a recording makes its way onto a social media platform and no consent was given, then it should be easier (in theory anyway) to have it removed from the platform. There appears to be slightly different approaches in different Localities, which is why it may be useful to decide whether it would be beneficial to have a national approach. SS, KS, NM all agreed that a national approach would be favourable. KS added that they have two parents who always advise they are recording calls, and it is useful to know that consent is not required. NM wondered what approach other public services take as they must be having similar issues? Does the Ombudsman have any guidance for customer-facing roles? SE advised that the Complaints policy states that where an individual can't put their complaint in writing we can accept the complaint by email or verbally. So, we could provide a face-to-face meeting, but it is often more convenient to discuss the complaint by phone.</p> <p>Staff can state that they can't provide consent because it's our organisation's policy. PM noted that it is a customer care issue and staff have to be comfortable</p> |           |        |

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|    | <p>with that. People will record calls, and we must keep it proportionate. There is ongoing project work around people who work in customer-facing roles. PM manages the extreme extent of this role and advises staff to put it in writing if people become unreasonable. Dealing with complainants who are aware of the thresholds (a small minority) can be difficult for Localities to deal with. CM wondered if there was value in neutralising the situation by stating that SCRA will record all calls? Recording can be a safeguard, but SE advises that as soon as the call becomes unreasonable, that gives staff an opportunity to revert to deal with the matter in writing. Stephen will incorporate guidance around this in the complaints training that will be delivered later this year.</p>  | Update next meeting | SE     |
| 5. | <p><b>How Localities handle returned mail and trace it back to a breach – SE</b></p> <p>SE explained that this was added to the agenda as we have seen quite a few data breaches where an unintended recipient, (possibly a new tenant) calls to say they have received the papers in error and will post them back to the Locality.</p> <p>IG then gets in touch with the Locality to ask if the papers have been returned, but often Localities can't provide a clear update as they aren't sure if the papers etc have been returned and sometimes we are advised that they have possibly been placed straight in the confidential waste, but there is no way to verify that.</p> <p>This can create an issue in terms of the risk assessment and means the recording of the breach incident can be weak. Plus, if an unintended recipient called and advised that they hadn't opened the envelope, we subsequently need be able to verify that an unopened envelope was returned. If it was returned unopened, we can downgrade the incident to a near miss.</p> <p>What happens to that mail when it arrives back in the relevant Locality? Is it logged anywhere? Is it processed through confidential waste? Are there suggestions for closing off the risk of undelivered papers not being accounted for? Should there be a central point of return?</p> <p>SS suggested that each Locality probably needs their own process e.g. straight to LSM or into a basket? JS noted that in Central, mail goes to the LSM and its return is recorded on CSAS e.g. 'mail for mum returned unopened' is entered into the 'Additional Info' tab. KS agreed that a list would be useful in a tray to cross-reference. SS then asked if there should be a SOM process? CM offered to put together a spreadsheet and run it past the IG Leads and it can be added to the SOM if required. SE noted that this helps to demonstrate that SCRA took all reasonable steps if the organisation were to be scrutinised.</p> | ASAP                | CM     |
| 6. | <p><b>Training Updates – Breach Prevention &amp; Cyber Security – JD &amp; RM</b></p> <p>JD advised that there would be a final message going to out to LRMs shortly to advise of the final 20 or so staff members that haven't attended the online training available via e-Learning. She is working on the 2025 training which will be delivered via Teams and utilise information provided by the ICO. RM advised that the next breach of security training is being prepared. Phishing awareness training is still running and SCRA is still above average (from the Cyber Audit), and this level should be maintained. Ransomware and Phishing attacks on Local Authorities are prevalent and the attack vector is new. A newsletter will be available soon. The Captcha prompt to identify that the user is human, is being used to convince the end-user to take actions which unwittingly cause the copying of a rogue command onto the PC. RM has recently delivered Information Security training using AI generated images e.g. spot the threat scenarios. This raises discussion points and soon this tool will be available to share with managers.</p>   |                     |        |

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| 7. | <p><b>Managing the risk of prematurely deleting PI records – SE</b></p> <p>SE explained that Practice Network recently highlighted an issue in relation to retaining the contact details of a Participation Individual.</p> <p>The issue arises when a participation individual who is also a referred child in their own right, reaches 19 and we delete their records. This means that we no longer have a record of them being a participation individual in relation to their younger sibling.</p> <p>Currently we only have 9 Participation Individuals who are older than the referred child, so it affects a relatively small number of cases.</p> <p>Digital have advised that an automated solution would be time consuming and expensive.</p> <p>We wanted to explore a possible manual solution. One such solution would be for a report to be periodically provided to Localities, who could then manually copy the PI contact details over to the referred child's CSAS record before the PI turns 19.</p> <p>A Power BI report can be sent to Localities for them to identify how many cases per month are affected and contact details are copied onto the child's case. PM asked why we can't create a new contact for the PI once they are no longer a child? Should we consider this a dynamic issue and review PIs constantly anyway? NM commented that if the record is lost, they may not attend a Hearing. A connection has already been made if it's in CSAS. We may need a reminder e.g. 'PI will be 19 in 2 months – add contact in different capacity'. SE asked if we need a line in the SOM or actively be looking at the report. CM stated that we could add to the SOM, but good practice should already highlight this. Usually there are contact details on the Social Work report or SW can be asked. CM will put a line into the SOM. It was noted that Senior Practitioners raised this concern and welcomed a reminder but came up with the same solution as PM.</p> | ASAP      | CM     |
| 8. | <p><b>Updating CSAS with new addresses from SW – detecting updates within reports – SE</b></p> <p>SE explained that new addresses contained within SW reports are not routinely being added to CSAS and this is causing breaches. The organisation needs to be clear on what we expect from members of staff when they receive a new report (usually from Social Work). Do we expect the entire report to be read? Should Reporters be responsible for identifying new address information. It is appreciated that staff can't suddenly find the time to thoroughly read every report received. Do we need to ask SW to provide address changes in a certain way? JJ noted that they used to provide addresses at the top of each report, but new style reports don't display the information that way. Support staff won't read an entire report, so the new format is unhelpful. SS made the point that this is especially true if it's a late report. One would assume addresses would be at the top, but they can be throughout the body of a lengthy report.</p> <p>NM made it clear that there is no expectation to read every page of an update report. There is also other information that can be missed e.g. relating to secure accommodation or appointment of a SLAB duty solicitor. PM discussed Digital Strategy and how we share information with Partner Agencies. We need a better information exchange. There needs to be cut-off dates for reports being received before a Hearing. There needs to be a future operational process, a digital transfer system, as with the Police, which updates our information. SE asked if there is a forum where this can be discussed with SW, so they are put on notice, not to provide address information within the main body of a report or send late reports? Should SW be shouldering some of the risk? How do we communicate this to SW?</p>   |           |        |

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|     | <p>It was suggested and agreed that we highlight within our request for a report that addresses must not be provided within the body of a report. NM suggested the CHIP. CM asked if anything was already included. PM noted that Local Authorities prefer mini-CHIPS to engage with local partners and explain our limitations. Some areas have local protocols with deadlines and late address information. Timing and arrangement issues with LAs will be improved.</p> <p>CM advised that Neil McKinley and Linda Scott are who those amendments need to go to. She thinks that staff aren't using the search function in reports and that there are some simple tools to prevent breaches that aren't being utilised. A new tool is being trialled. SE advised that a school name was recently disclosed. JJ commented that we don't want staff to only rely on the search tools available and not run their own checks, we need people to do both. SE is concerned that we have developed a false sense of security with two people checking. An extra few minutes in most circumstances will make all the difference. SS advised that the current redaction tool and CTRL F on an entire HIP works well. JD to speak with SS and CM to put something in the 'lessons learned' section of the monthly breach report. SE will draft wording to be used when requesting a SW report, so SW are aware that any address related information must be highlighted on the front page and not within the body of the report.</p> | ASAP      | JD     |
| 9.  | <p><b>Examples of good Locality practice or issues arising</b></p> <p><b>Decisions AI tool</b> – SE asked the group to advise him of any concerns that anyone has if we use the tool to record future IG Leads meetings so a rough set of minutes can be formed for Jo to work on, to save hand-writing meeting notes? PM stated he had no concerns and there are plenty of AI tools popping up. SE made it clear that one identified risk is people staying on after a meeting to discuss a matter which would then continue to be recorded and may contain personal information.</p>   |           |        |
| 10. | <p><b>New risks</b></p> <p>None to report</p>  |           |        |
| 11. | <p><b>Date of Next Meeting - Tuesday 19<sup>th</sup> August 2025 via Teams @ 13:30</b></p> <p>Stephen thanked everyone for attending the meeting.</p>  |           |        |