



SCOTTISH

CHILDREN'S REPORTER

ADMINISTRATION

Scottish Children's Reporter Administration Minute of Information Governance Leads held on Tuesday 20th February 2024 via Microsoft Teams

Present:

Alistair Hogg (chair), Stephen Eodanable, Jo Donald, Jacqueline Johnston, Bruce Knight (from 14:38), Donald Lamb, Hannah McCulloch, Gwen McNiven, Neill Mitchell, Janet Robertson, Kelly Campbell, Sheena Banks, Jennifer McIlree (temporarily absent from 14:05-14:24), Kerry-Ann Kean, Angela Mitchell, Jacqui Stephen, Jackie Johnson, Nici Petrie

		Timescale	Action
1.	Apologies Helen Etchells, Paul Mulvanny, Ed Morrison, Julie Duncan (Nici Petrie attending) & Pamela Armstrong		
2.	Any other Business None		
3.	<p>Minutes of last Meeting (21st November 2023) Accepted as correct.</p> <p>Matters arising Updates on actions from previous minutes</p> <p>(i) Objective Connect Test of Change – update SE – There has been a slow uptake with just 10 individuals signing up. Jackie has put together a flyer to encourage sign-up to an OC account. Some people have been reluctant to sign up for the service once they realise it involves using Objective Connect, even though the process is fairly simple. SE asked for approval from the group to change the approach to emailing papers as a password protected PDF and sending a password via text from the Locality mobile phone instead of relying on OC sign-up. The IG team have emailed SAR responses for a number of years without a password, and it's only been since 2023 that we have offered password protected email. We are talking about sending mainly Hearing papers for this ToC. Most issues of security are linked to postal addresses rather than email addresses. This will drive down costs even further as there will be no OC licence conditions. SE reiterated that he was keen to hear views and concerns. AH commented that this was being looked at through an IG lens and it was probably more secure than sending through the post. He asked if there were any operational barriers? It is still in the testing stage so we should uncover any barriers. KC (in chat) asked 'does this include OC for use of JIIs? Lots too big to be shared via OC. Have to go to iTECs. Can be weeks of delay due to lack of available expertise of iTECs.' SE commented that this actually supports the proposal. We haven't encountered this yet but that is probably due to the lack of uptake. Can we maybe compress HIPs? This is moving into something else. NM noted that the JII file size issue is picked up in Bruce's Cyber Security report. A work-around will be likely to be in place for a while. SE responded that file sizes should be far less for the kinds of files we would be sending out, but the ToC should cover this, should it arise. A portal might be a future consideration.</p> <p>(ii) Prev item 5 Quality of breach reports – SE/HM – This is ongoing. We are in the process of updating the breach form. We will get a draft updated version of the breach form to IG leads in advance of the next meeting. If anyone has any suggestions for the updated breach form, then please get in touch.</p>	<p>Next meeting</p> <p>ASAP</p>	<p>SE</p> <p>All/HM</p>

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	<p>(iii) Prev item 6 Uploading of documents on CSAS with a view to future SARs – SE/HM - There are a few question marks over what has happened in the past and what the guidance was. Word documents create a degree of risk although convenient to amend. Risk can be closed off if guidance can be amended to allow for all documents to be saved in CSAS as a PDF version only. There is a balance between the level of convenience and preventing duplicates. NP commented that they always convert from Word as they don't work in the HIP. Documents often come in PDF format. It is no hassle for users. KC (in chat) agreed with NP. SE concluded that an update to the guidance is ideal as it seems to be practical and reduces risk.</p>	ASAP	HM/SE
	<p>(iv) Prev item 10 Royal Mail delivery of Court documents – SE – A neighbour can sign for documents (see previous minutes). Should we introduce a freepost return that doesn't mention SCRA on the envelope? We can at a cost of £350 pa. Should this be per Locality? There are several reasons that an envelope might be labelled 'SCRA', it doesn't necessarily mean that the addressee's children have been reported to SCRA. Do the means justify the ends? There has been one incident that we have been made aware of since the Royal Mail changes to delivery of Signed For mail were made in 2012. KC commented that all envelopes have 'signed for' and there is the same risk if they are signed for or not. It is about having no identifiers. Could every envelope have a freepost service? Envelopes are often returned as 'not called for' rather than misdelivered. SB agreed that 'not called for' is more common. Information is printed on the envelope and not added by a sticker. JMcl and JS discussed the fact that individuals can opt out of having their post delivered to a neighbour but think most people don't know this. Postal workers often sign and photograph items themselves since Covid restrictions, particularly if they fit through a letterbox. SE will make further checks.</p>	Next meeting	SE
	<p>(v) Prev item 12 CSAS dropdowns – SB – Operational Development are coming up to Inverness office in March so Sheena will be able to address this issue with them then. Will feedback at next meeting.</p>	Next meeting	SB
	<p>(vi) Prev item 13 Integrity of recorded RoPs – DL – This was looking at the accuracy of the records of who chaired a Hearing.</p>	Next meeting	DL
4.	<p>Item 4 – Retention of Court Productions (exceptions) – SE SE had two questions to put to the IG Leads. Firstly, is it necessary to retain any productions beyond the appeal period and secondly, if so, what type of productions are necessary to retain and for how long? E.g. do police productions go back to the police? KC stated that in Fife, once they are finished with, all productions come back to the LSM and go into a box until it is full and then the police are contacted, and they come and collect the box. 90% are police productions, but sometimes NHS. SB stated that in Inverness, each Reporter deals with their own case productions and returns them to their own police contacts. NM supplemented SE's question: There is a retention of productions on Sharepoint – numerous signed witness statements, digital information such as JIIs, Social Work reports, medical reports not going to Hearings but going to Proof. We need to know if these productions are retained anywhere else and what is on Sharepoint because the Court Project is covering these questions. SE stated that he is looking at all types of productions, not just physical items. This would include anything that could or would be potentially included in a Subject Access Request such as personal information that isn't on CSAS. There could be a risk of not fully informing the requestor when fulfilling a SAR. We need to ensure we are accurately applying retentions. SE asked the group if there were any items held outwith productions stored on CSAS? KC responded that up until recently, these items would be stored in a child record folder on the G:Drive. As part of the Flexipack pilot, they are now all on Sharepoint since the launch of the project a</p>		

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	<p>few months ago. AH noted that this is all about assessing the risk of retention of these productions. Do we store beyond the appeal period? What reasons do we have to justify retention? Are there circumstances to justify an extended retention? NM then clarified that there are two possible situations: i) Reliance on the Grounds where evidence wasn't led e.g. a new child in the family – we would need the productions again such as a medical report, JII or files of x-rays. ii) The very rare S.110 application – virtually never happens. This is also being considered in the Court Project. SE noted that it is not a huge risk to retain until 18 years if required. It is a legitimate argument that the ICO would accept. We should do whatever suits our needs.</p>	ASAP	SE
5.	<p>Privacy Screens for Monitors – SE</p> <p>Stephen drew attention to the recent Hamilton Office incident where a member of the public mistook SCRA ground floor offices for those of a different organisation, he was seeking to draw attention to. He filmed through the windows and was able to see screens which contained no personal information and were unclear on the film he uploaded to YouTube. This did, however, raise a question as to what steps SCRA could or should take, bearing in mind the likelihood of a similar incident ever occurring again. It may be that the angle of screens could be adjusted, but SE wanted to assess if this had occurred anywhere before and whether there were other ways round this issue before investing in privacy screens. It was suggested that blinds could be shut when people approach the windows. No other scenarios were mentioned.</p>	Next meeting	SE
6.	<p>Outlook retention – any concerns with a 12-month retention period being applied within Outlook? – SE</p> <p>ITECS are encouraging a 12m retention period. Emails can be saved elsewhere. AH suggested that we really need to think about this. We can use archives, but would it apply to everything or just emails in the 'live' inbox? SB commented that she uses emails as a filing cabinet because you can't remember everything in detail. NM commented that he uses Outlook to store everything and it is convenient. He would have to save everything to G:Drive. JJ agreed with Neill and Sheena. There is a lot of email information that people want to retain and refer back to quite often. JS was quite concerned about a year – that would mean a big change of practise and email is a useful way to evidence having advised someone of something. JR agreed with the previous comments. Confirmed that after 6 months the email is auto archived. Two years would feel more reasonable. SE asked if it could be agreed that what is in the inbox goes, but not what has been filed? DL commented that for him, sent items are useful as he can look for reports generated in previous years when they are subsequently re-requested. It is easy to search by the name of requestor and run a repeat report, often these are annual reports. SE may suggest longer for folders, but at least two years for everything.</p>	ASAP	SE
7.	<p>Restricted cases on CSAS – new process – SE</p> <p>There are 75 active restricted cases on CSAS. The Digital Team just restrict at the request of a manager, there is no formal process or review. SE is requesting comments on a proposal to have LRMs complete a permission form for the IG Team who will then forward to the Digital Team. IG can then ask additional questions to support a restriction on a case-by-case basis. The Digital Team have noted inconsistencies in requests. This is just to formalise the process. AH confirmed this would be a one-page form for LRMs. It doesn't sound any more onerous than what is already requested. i.e. what is wanted and why. SE plans to draft and circulate a new form to LRMs before the next meeting.</p>	Before next meeting	SE
8.	<p>GDPR Training Update & Cyber Security training (induction and refresher) JD & BK</p>		

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	<p>JD gave a brief update on the 2023 refresher training. This information is largely included in the 6 monthly report already circulated to IG Leads. Jo is re-running the training on 27th February for new-starts and returners and asked if anyone has any new team members who may not have attended training yet, to get in touch. The IG team are working on some online training to roll out during 2024.</p> <p>BK joined the meeting (14:38) with apologies for not joining earlier. Bruce is devising cyber security induction training based on Scottish Govt. training but adding in some pieces that are missing. He wants to know if this can be used instead of refresher training. Do we have any permanent members of staff of over 5 years' service that have ever attended a cyber security refresher course? It would be available over a year but be kept as mandatory training, with a focus on phishing, protecting data, clear screen policy etc. Once released, should this be used as a refresher course? He can obtain reports on who has accessed the training and when. AH commented that it makes sense to use the new induction course as a refresher – a good reminder of what has been previously learnt. BK listed the subject areas to be covered in training, with a small amount being retained concerning National Security which is relevant depending on the physical location of a staff member's office.</p>	<p>ASAP</p> <p>ASAP</p>	<p>All</p> <p>BK</p>
9.	<p>Email banners – proposed project for external email alerts - BK</p> <p>Bruce shared his screen showing the proposed style of the 'caution' notice for emails that originate from outside the SCOTS network. He wants to get IG Leads on board. AH suggested that early communications to warn people could lead to 'warning fatigue' He asked if this was a Scottish Govt project? SE asked what would be expected of him e.g. checking a URL, how do we check the legitimacy? E.g. emails received from a trusted party, what checks would be expected? BK explained that this has been set up as a mini-project and then he will bring it back to IG Leads. All IG Leads appeared to be happy to volunteer for the mini-project. BK will advise re start date and feedback procedure.</p>	ASAP	BK
10.	<p>6 Monthly Report summary – JD</p> <p>Jo briefly summarised the report that had been received by the Audit & Risk Committee and had been circulated to IG Leads with the agenda.</p>		
11.	<p>Safeguarders – Proposal for CJSM central list - BK</p> <p>Bruce is a sponsor for CJSM/other Safeguarders that are introduced and gives approval for CJSM accounts. He wants to know from Localities whether Children 1st issue a list – how do staff know who the available Safeguarders are and their contact details? He has the home address for the Safeguarder so he knows the Locality. What are the expectations? Is the process satisfactory? How is the list maintained in the Localities? Do Children 1st alert Localities when there are updates? BK gets a list every year but it doesn't always give the areas they are in. NP has a list from 2021 – Safeguarders come and go. Notes of new people are taken and stored but not sure how they come into the Locality originally. AH commented that new Safeguarders are quite rare. JS noted that Safeguarders appointment form comes in from Children 1st and an email address is provided every time a Safeguarder is appointed. JJ, SB and JR agreed with JS. They don't hold on to that information. SE commented that Brian at Children 1st has mentioned a new 'portal' which might override email addresses. The MoU didn't need to consider this change as it didn't affect the existing infrastructure. AH noted that it is not that vital. Children 1st retain the list and needs to be at arms-length to SCRA.</p>		
12.	<p>Examples of good Locality practice or issues arising</p> <p>Nici Petrie raised an issue. What do we do when solicitors refuse to use CJSM? SE commented that we are not obligated to give them papers. We have had similar instances over the years. The starting point is that they get papers from their client or get a CJSM account e.g a Shetland resident might find it more difficult to share papers if they have a mainland solicitor. SE wanted to know what</p>		

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	the reason was behind the 'no' to CJSM? It's free, we set up the link and give a step-by-step guide. Exceptions were made during Covid as it was difficult to get in touch with clients. BK commented that he has sponsored defence agents for CJSM. They need to understand that we have a valid reason to send them information over CJSM. We don't want to use other sharing mechanisms due to spam. Objective Connect and NHS image portal are the only other secure platforms SCRA uses.		
13.	New risks No new risks noted.		
14.	Date of Next Meeting - Tuesday 21st May 2024 via Teams @ 13:30 Alistair thanked everyone for attending the meeting.		