



SCOTTISH

CHILDREN'S REPORTER

ADMINISTRATION

Scottish Children's Reporter Administration Minute of Information Governance Leads held on Tuesday 21st November 2023 via Microsoft Teams

Present:

Alistair Hogg (chair), Stephen Eodanable, Nicola Baird, Jo Donald, Jacqueline Johnston, Bruce Knight, Donald Lamb, Hannah McCulloch, Gwen McNiven, Julie McManus, Neill Mitchell, Janet Robertson, Kelly Scarlett (until 14:25), Sara Law, Sheena Banks.

		Timescale	Action
1.	<p>Apologies Helen Etechells, Paul Mulvanny, Jennifer McIlree, Kerry-Ann Kean, Douglas Hill, Ed Morrison, Angela Mitchell (Julie McManus attending instead), Jacqui Stephen (Sara Law attending instead), Vicky Ritchie & Julie Duncan</p>		
2.	<p>Any other Business None</p>		
3.	<p>Minutes of last Meeting (22nd August 2023) Accepted as correct following amendments notified to attendees prior to meeting.</p> <p>Matters arising Updates on actions from previous minutes</p> <p>(i) Use of unsecured email accounts for low-risk admin matters & Test of Change – update SE – This began as a discussion in IG Leads and evolved into something more. During lockdown Objective Connect (OC) was used for sending Hearing Papers to children and families and now the opportunity to continue by recipient choice is being explored. Angela and Jacqui (now just Jacqui) have run a pilot. An email verification process has to be run by emailing out and obtaining suitable ID, this can also be done face to face. The agreed email address can be added to CSAS with a note in the Warning box confirming they are set up. The recipient receives guidance on using OC. A spreadsheet is being used to capture benefits and risks and cost savings (paper, post, time). SE invited anyone who wanted to discuss it further to contact him. JR mentioned in 'chat' that Ayrshire would be interested in the ToC. Information was sent out just prior to the meeting. AH thanked Jacqui and commented that this would offer a choice for children and RPs.</p> <p>(ii) MOU regulating appointment of safeguarders - update – SE – this is ongoing, and SE went back to Children 1st. SCRA will now have more flexibility in response times and content for information we provide to them. We can only confirm a child's sex, not gender.</p> <p>(iii) Email suggested recipients/dropdowns/address book – update – BK – guidance was drafted following the discussion at the last IG Leads meeting. A web page for security matters will be launched on Connect and include information on autocomplete and how to empty it for the email recipient details.</p>	Ongoing	SE
4.	<p>Subject Access Requests (SARs) – Request for Localities to encourage direct contact by requestor to IG team – SE</p> <p>To facilitate a smooth handover of SARs when they come in to SCRA, it would be really helpful if the initial recipient could take an email address as a contact. This allows for the most effective service and also, the team would almost always be requesting ID which can then be sent via email. The team are always happy to</p>		

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	contact the individual once they have an email and explain how assistance can be offered.		
5.	<p>Quality of breach reports and accountability of managers – SE</p> <p>This is based on an observation by the IG team that the breach forms most helpful to them are those completed as fully as they can be, where relevant. This prevents a back and forth trying to get more information. The team are currently looking at the service journey and have discovered that this is partly due to the existing breach form, which is now being worked on. The team are also looking at solutions with a possible digital form (HM investigating). The team want more information on an updated form so that they can have the information in a more succinct, efficient package which would also be more useful for the ICO if they request info. They have also observed that when the task of completing the breach report is delegated, they receive less useful forms and more back & forth is likely. They hope to have a simple, updated Word document at the next meeting. AH commented that it is about getting the balance between prompt reporting and giving as much information as possible to assess the risks.</p>	Next meeting	HM/SE
6.	<p>Uploading of documents on CSAS with a view to future Subject Access Requests (SARs) – HM</p> <p>Recent Operational Development videos covered this, and staff should try and avoid using word documents as they remain live and can be amended/edited. Use of PDF format is preferable. CSAS records end up with both, so the information is duplicated and that needs to be dealt with when the IG team are collating a SAR. There should only be one version and it should be a PDF. JJ commented that if it's a SCRA document e.g. RoP it was considered ok for it to not be converted to a PDF. HM was aware that previously, Emma Morrison had been trying to get confirmation from Op Devt on this issue of duplication with the risk of editing erroneously. JJ advised that some Reporters had been told that if it's a SCRA document, there is no need to convert. External documents must always be converted. Hannah will clarify whether that communication has changed. JM commented that they are changing everything to PDF and the Senior Practitioner then advised that they didn't need to convert. JR highlighted the issue with redacting if documents are not in PDF format, which is why they convert. There needs to be a balance of saving time and maintaining the integrity of documents. In addition, when the IG team are looking for information as part of a SAR, the information should be in Sharepoint and not elsewhere. DL and JM shared a link in the chat to CSAS FAQ. A decision needs to be made on whether this is safe to leave or if a review is required.</p>	By next meeting	HM
7.	<p>IG Leads review/approval of the attached draft MS Teams Recording Policy – SE</p> <p>Teams recording function has been used already and this has the potential to create an IG risk. The newly drafted policy (circulated with agenda) was based on the Scottish Govt approach but tailored to SCRA and has a built-in adaptability for exceptions to be made on a lawful basis. SE invited feedback & suggestions. There have been reminders since the summer on Connect but recordings have gone ahead with no surrounding governance. AH commented that it is disappointing not to be able to use the full functionality, but we need to balance security of data. This is just draft, so comments are welcome. BK commented on the pressure that can be applied to meeting attendees when there is a request to record or transcribe. Even where rules can be relaxed, it can't be used for recording of sensitive information. There is more freedom when meetings are spoken word and not recorded. SE noted that this scenario had been covered in Part 4 (permission from attendees). Scottish Govt have a different approach with consent, but SE was concerned with the genuine nature of 'freely given consent' as there can be an imbalance of power. The ICO also voices these concerns. It can stifle free and frank conversation. There are options to reduce restrictions if these can be justified. Comments by 1st December to SE please.</p>	By 1st Dec	All

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8.	<p>Security Awareness Champions – BK & AH</p> <p>BK would ideally like a Security Awareness Champion in each Locality. There are more people taking up the course on offer through SG. It offers good information about security awareness which is useful for work and home life. Attendees can then assist colleagues working in SCRA Security and give it a Locality level approach as they will better understand Locality challenges. SB commented that since attending the course she finds staff approaching her in the office who wouldn't necessarily have sought help from the Security team. The courses are well subscribed but better to sign up in advance, even if you then can't attend. AH encouraged getting in touch with Bruce.</p>		
9.	<p>Training update – JD</p> <p>The GDPR training has generally been very well attended, largely due to the support of the IG Leads and Locality managers helping to make it clear that this is mandatory for good reason. There is one final session on 29th November and personal invites have been sent to anyone who has not yet attended. IG Leads will already be aware if there are staff in their locality still to attend.</p>		
10.	<p>Royal Mail delivery of Court documents – SE</p> <p>A postal worker delivered a 'signed for' letter containing court documents to a neighbour. Following research, it is now known that this became an accepted and approved approach by Royal Mail in 2012. If this is just one or two incidents, then the risk is minimal. Does it change our consideration? Is there a real issue or risk? It probably increases our drive to get more papers and communications delivered electronically. AH commented that we can monitor to see if more issues arise. Introducing more effort would be disproportionate. There was discussion about the envelope sticker which does offer some mitigation. The only negative is that a neighbour then sees that SCRA have sent something, but don't know the contents. It is all about balance. SE will look into Freepost again.</p>	By next meeting	SE
11.	<p>Downloading medical images – BK</p> <p>The Health board started an Image Exchange Portal (IEP) in order to safely send medical images to external partners. To access this, a two-factor authentication (2FA) needs to be set up for each user. There can be an issue with downloading if the files are too big. SCOTS has set a limit on download file size. If there is an exception, a request can be made to the SCRA Service Desk to download. The issue then becomes having to give your 2FA details to the Service Desk, but password sharing is acceptable in this instance. The download can be saved in the Locality JII folder. BK will send guidance.</p> <p>JR noted issues in Ayrshire with then sharing that information. If given a link with a password to share images how should images be shared with solicitors etc? BK stated that images can be downloaded onto a memory stick from JII folder to be used in Court, with a new password on the stick. This can be done for other agencies. JR asked if e.g. the hospital states the images are only for SCRA use, how do SCRA get round that? NM stated that the Reporter should go back to the hospital to clarify. SCRA would need to challenge any suggestion of needing images only for SCRA's own use, as the images may be required for Proof proceedings. Please raise with the Practice Team if this occurs. Storing and sharing as digital productions should be queries for the Practice Team. SE noted that Police Scotland do a similar thing and release the information with a disclaimer. SCRA is a data controller so if we are dealing with SARs, would this cause a difficulty? NM responded that we have an agreement with the police as it is subject to our duties of disclosure. It is looked at on a case-by-case basis if there is an exception to the rule.</p>		
12.	<p>Examples of good Locality practice or issues arising</p> <p>(The info re VH participants from Vicky/Julie will be postponed to the next agenda)</p>		

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	<p>CSAS dropdown name of solicitor/name of firm – Sheena Banks</p> <p>For constructing a Hearing appointment letter, only the solicitors name rather than their firm name is available from the dropdown selection on CSAS. There are many similar/identical names for the solicitors e.g. several John Macleod's. The letter would then go to the solicitor via a secure email. If a firm name is used instead, there is a less likely chance of a breach occurring, because it is not being sent to a named person which could be the incorrect named person. The firm would then forward the letter to the correct recipient. Could this be added to the SOM? i.e. associated firm name and not the individual solicitor?</p> <p>AH thanked SB of this good practice suggestion. SB will speak to Operational Devt about the idea.</p>	By next meeting	SB
13.	<p>New risks</p> <p>Item 10 – Royal Mail risk is not of significant proportion to add to the risk register. SE – Incorporated into DPIA for review of CSAS – Retention policy exceptions process – some personal information of Over 18's is being held within hidden information on CSAS. It is 'reasonably accessible' enough that we wouldn't want to be holding it. Is there anything in place to deal with that? DL responded that CHS were asking about Panel Chairs information held on CSAS within RoPs.</p>	By next meeting	DL
14.	<p>Date of Next Meeting - Tuesday 20th February 2024 via Teams @ 13:30</p> <p>Alistair thanked everyone for attending the meeting.</p>		