



Scottish Environment
Protection Agency

**Agency Board Meeting
18 February 2020**

Board Report Number: SEPA 01/20

**Safe SEPA Digest
August - October 2019**

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| Summary: | <p>This is the quarterly Safe SEPA digest providing information about the activities, shown in the diagram below.</p> <div style="text-align: center;"> </div> <p>The report covers the three areas of Safe SEPA: people, resources and services.</p> <p>We have not been able to access the spam and virus report that is usually included in the final section of this report. This report is automatically generated by Proofpoint, our spam and virus protection system, and we are investigating the issue. We hope to include this information in the next quarterly digest.</p> |
| Risks: | Monitoring this information is one of the ways we are assessing the risks in the Safe SEPA activities. |
| Resource and Staffing Implications: | There are no resource requirements identified in this report |
| Equalities: | No equality issues have been identified through this report |

| | |
|--|--|
| Environmental and Carbon Impact: | There are no environmental or carbon impacts. |
| Purpose and audience of the report: | For information and discussion. Agency Management Team, Audit Committee, Board, Scottish Government, Public This digest was reviewed by the Audit Committee in December. |
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| Appendices: | Safe SEPA Digest |

**Safe SEPA Digest
August - October 2019**

1.0 Introduction

This digest provides an update on progress with Safe SEPA over the period August - October 2019. The digest is divided into three sections, representing the three areas that Safe SEPA protects: People, Resources, and Services.

1.1 Safe SEPA Handbooks

| Safe SEPA Handbooks | | | | | | |
|---------------------|--------|--------|--------|--------|--------|--------|
| | Aug-18 | Oct-18 | Jan-19 | Apr-19 | Jul-19 | Oct-19 |
| Complete | 4 | 6 | 6 | 6 | 6 | 7 |
| Draft | 5 | 3 | 3 | 3 | 2 | 1 |

1.1.1 Work is underway to set out our approach to Physical Security in a handbook but it is a lower priority than preparing for EU Exit. We hope to have this final handbook completed by the end of the year.

2.0 People

2.1 Keeping our people safe is our highest priority. We do this through:

- Policies and procedures.
- A programme of audits, internal (high hazard and site safety) and external, to provide assurance.
- Health and Safety training supported by awareness raising, shadowing and mentoring of staff and provision of protective equipment ,

2.2 Our short term priorities in continuing to build a health and safety culture across the organisation are:

- Making sure staff are equipped and trained to undertake their activities safely.
- Streamlining and improving internal health and safety reporting to ensure the right information is being reported at the right time to provide assurance at all levels.
- Ensuring that every part of the organisation is discussing and embedding a health and safety culture.
- Continuing improvement of our health and safety framework by learning from the best in the world.

2.3 What have we achieved?

- **Violence & Aggression:** Our Violence and Aggression Policy is being reviewed and updated by a cross-portfolio working group (including field officers) to ensure a consistent approach across the organisation. An initial draft will be discussed at our National Health and Safety Committee meeting in November.
- **High Hazard Audit programme:** our programme is up-to-date.
- **Site Safety Audit programme:** audit dates agreed with the Site Safety Auditors for all offices or premises where a site audit is due by the end of December 2019.
- A Health and Safety Officer attends the site safety forums at all the main offices.

2.4 Next steps

- We are working on a project to give assurance that our staff are equipped and trained to carry out their activities safely. A project manager is in place and a plan is being developed to fully understand the current issue and agree an appropriate solution for implementation.
- **Senior Responsible Officer:** A member of staff within each of our offices is nominated as the Senior Responsible Officer for the building. They work with our experts to ensure the maintenance and security of each building as well as the safety and security of staff and visitors. We are providing support to the new Senior Responsible Officers nominated as part of the Compliance and Beyond Portfolio re-structure.
- **Incident reporting:** We will update the incident reporting form to tailor the questions for near misses and hazards spotted. This is to streamline the process of reporting these incidents.
- **Protective Equipment:** Following presentations from manufacturers and suppliers, we are trialling tick proof clothing in the field. Other agreed items of Personal Protective Equipment will be trialled from January 2020.

2.3 Health and Safety Training

All health and safety training is delivered to meet needs identified by staff and managers.

| Training delivered ¹ | Jan-19 | Feb-19 | Mar-19 | Apr-19 | May-19 | Jun-19 | Jul-19 | Aug-19 | Sep-19 | Oct-19 |
|-----------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|----------|----------|-----------------------|-----------|
| 1-day Emergency First Aid at Work | 2 | 1 | | 31 | 13 | | 1 | | 18 | 13 |
| 2-day First Aid refresher | | 2 | 2 | 2 | 2 | | | | 4 | 1 |
| 3-day First Aid at work | | | | 3 | 2 | | | 1 | | 1 |
| 1-day Maritime First Aid | | | | | | 12 | | | 9 | |
| Defibrillator | 15 | 41 | 15 | | | | | | | |
| Personal Safety | 29 | 4 | | 2 | 9 | 8 | | | 22 | 8 |
| Personal Survival (STCW) | 1 | | | 8 | 1 | 2 | | | | |
| Risk Assessment | | 13 | 15 | 4 | 12 | | | | 12 | |
| 4x4 Off road | | | | | | | | 2 | | |
| Swiftwater | | | | 32 | 21 | 14 | | | See note ⁺ | |
| Total staff | 47 | 61 | 32 | 82 | 60 | 36 | 1 | 3 | 65 | 23 |

*Swiftwater training was cancelled in September due to the low number of staff being able to attend

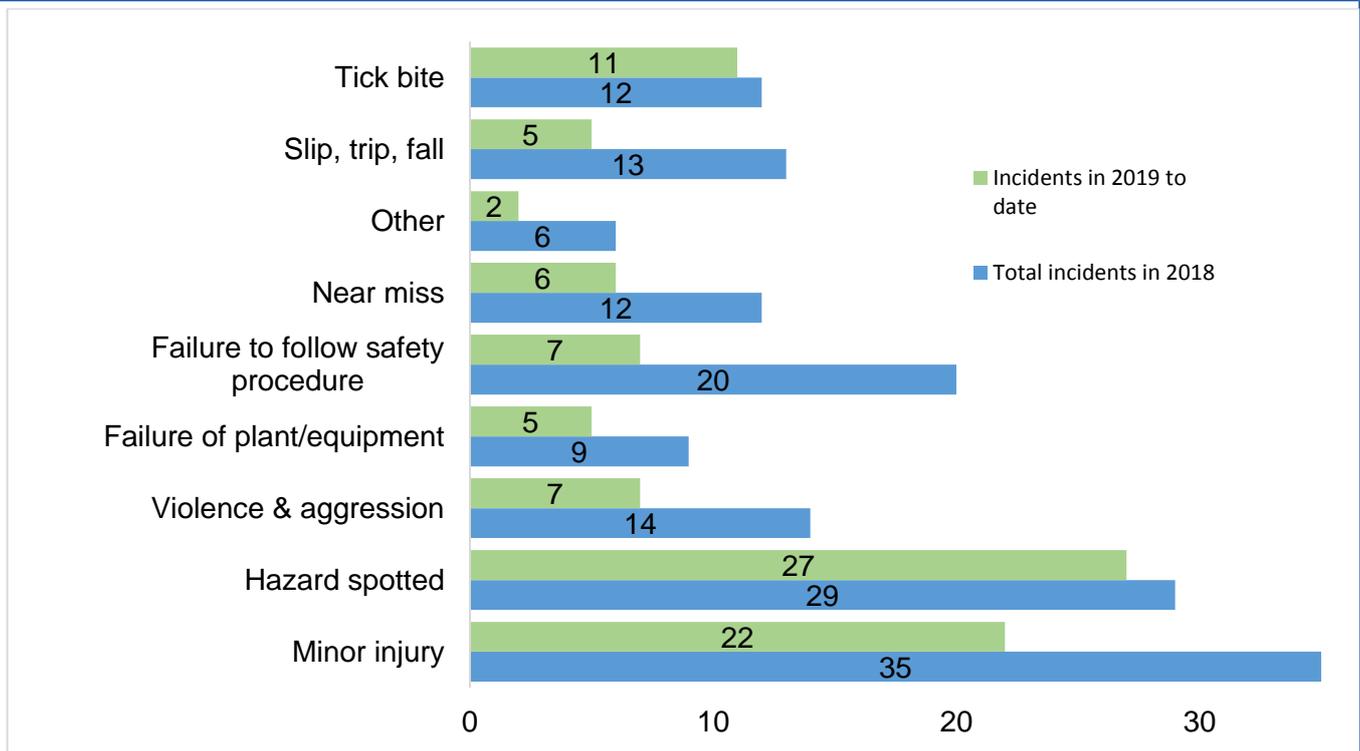
| | Training requests outstanding ¹ | Of which, number booked on current events |
|---------------------------------|--|---|
| Emergency First Aid at Work | 54 | 13 |
| Water First Aid | 10 | |
| Driving Awareness ² | 91 | |
| Off road 4x4 | 22 | |
| Trailer Towing | 2 | |
| Abrasive Wheels | 6 | |
| Asbestos Awareness ² | 31 | |
| Personal Safety | 58 | 21 |
| Risk Assessment (internal) | 53 | 2 |
| Working at Heights ² | | |
| Swiftwater | 47 | |
| Personal Survival | 24 | |
| Powerboat | 10 | |
| VHF Radio | 19 | |
| Lifejacket | 7 | |
| Total | 434 | 36 |

2.3.1 A project manager is in place and work is progressing to establish a project to implement the changes required to health and safety training. A project plan is being developed to fully understand the current issue and agree an appropriate solution for implementation. An update will be provided to the Audit Committee in December 2019.

¹ All training delivered by external providers unless stated

² This shows the number of staff who have not yet completed the necessary open access e-learning.

2.4 Health and Safety Incidents



Notes:

Failure to follow safety procedures includes forgetting to call in and cancel safety cover

A near miss is when an incident occurred but no-one was hurt

2.4.1 Incident details

In the period August to October 2019, 24 incidents were reported. Of these, six were proactive with hazards being spotted before an incident occurred.

There were two incidents involving violence and aggression. One involved officers visiting an unregulated site which resulted in verbal abuse. Corrective actions detailed in our Violence and Aggression procedure were reviewed by their line manager and the Health and Safety Unit. This involved double manning at this site and the site being recorded as 'Amber' on our Intelligence Unit's Violence and Aggression Database, meaning there is the potential for confrontation and/or verbal abuse. Police presence will be required for any further visits.

The second incident involved a staff member contacting police to request aid to serve a notice. There was no resource available but Officers went to the site. The Officers were asked to get off the site by the owner and aggressive physical action was threatened resulting in police being called. This incident is currently being investigated by two senior members of staff.

3.0 Resources

3.1 What have we achieved?

3.1.1 This year we are focusing on ensuring that we understand our information assets and have the proper protections in place. Over the summer we met with all Information Asset Owners and by the end of September we had completed our Information Asset Register. We have identified that the main risks to our information are (i) unauthorised use of our information and (ii) we are unable to access our information when we need it.

3.1.2 Board members are now using Diligent Boards for all meetings.

3.2 Next steps

3.2.1 Our new Information Security Officer is currently meeting with all Information Asset Owners to discuss the assets where the risks set out in 3.1.1 would have the biggest impact, and to ensure that the appropriate controls are in place.

3.2.2 Our security breach statistics show that many incidents are caused by carelessness with emails. We are developing an Email Essentials training programme to highlight to staff the need to take more care when sending information through email.

| 3.3 Whistleblowing (internal and external) | May-Jul 18 | Aug-Oct 18 | Nov 18-Jan 19 | Feb-Apr 19 | May-Jul 19 | Aug - Oct 19 |
|---|------------|------------|---------------|------------|------------|--------------|
| Number | 0 | 0 | 1 | 0 | 6 | 6 |
| Details: All six of the incidents for this period were external and in the area of waste regulation. | | | | | | |

| 3.4 Fraud, bribery and corruption incidents | May-Jul 18 | Aug-Oct 18 | Nov 18-Jan 19 | Feb-Apr 19 | May-Jul 19 | Aug-Oct 19 |
|--|------------|------------|---------------|------------|------------|------------|
| Number | 3 | 2 | 0 | 0 | 1 | 1 |
| Details: The incident in this period was an anonymous allegation of potential corruption. A desk-based fact-finding investigation was undertaken which concluded that there was no evidence to indicate corruption. The matter was closed from a Fraud Response Group perspective with wider lessons learnt and recommendations being progressed through Safe SEPA. | | | | | | |

| 3.5 Information Governance | May-Jul 18 | Aug-Oct 18 | Nov 18-Jan 19 | Feb- Apr 19 | May-Jul 19 | Aug-Oct 19 |
|--|------------|------------|---------------|-------------|------------|------------|
| Notifications of data breach to Information Commissioners Office | 0 | 0 | 0 | 0 | 0 | 0 |
| Customer Appeals to Office of the Scottish Information Commissioner | 0 | 1 | 1 | 1 | 0 | 2 |
| Customer Complaints to Scottish Public Services Ombudsman | 0 | 0 | 1 | 0 | 3 | 0 |
| Details: Two customer appeals were submitted to the Office of the Scottish Information Commissioner during this period. | | | | | | |

The first was submitted in August and related to the withholding of information due to the size and scale of the customer's request, information not being held, and information being within the scope of an ongoing enforcement investigation. We have made a partial submission to the Commissioner's Office and are waiting for confirmation on the status of the enforcement action the information relates to.

The second was submitted in October. This relates to the withholding of information being held by a third party. The information was the subject of a previous appeal. In the [Decision Notice](#) for that appeal, our decision to withhold the information was upheld by the Commissioner. We have provided the schedule of information to the Commissioner's Office.

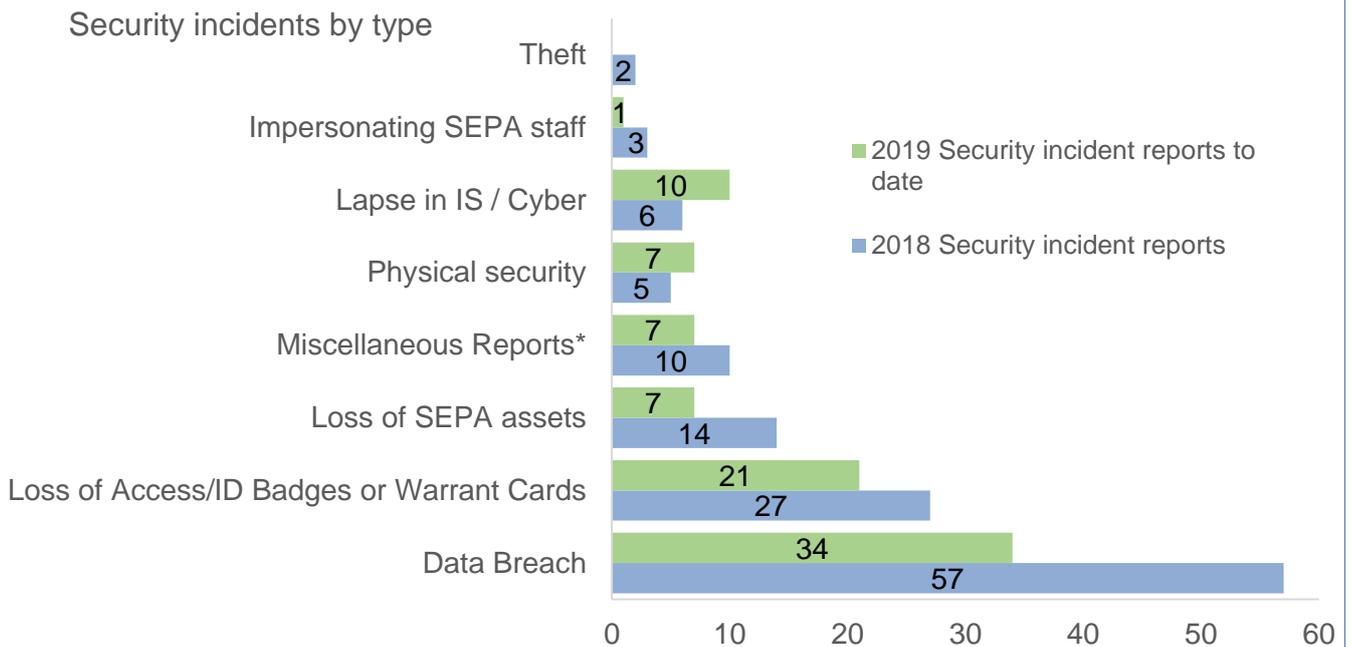
3.6 Security Incidents



This graph shows the number of near misses reported compared to the number of incidents reported. Data for near misses was not collected prior to October 2018

Details: During the reporting period, there have been 24 incidents reported. Five were near misses

Ten incidents involved the loss of SEPA property, such as mobile phones, notebooks, or access/ID/warrant cards. A further six were data breaches involving emails and/or attachments, or text messages being sent to the wrong recipient or profiles being created for the wrong user. One incident was a physical security incident in an office, and one related to loss of access to data.



*Miscellaneous Reports include reports not categorised such as leaving windows open

4.0 Services

4.1 What have we achieved?

4.1.1 The business continuity plans for all offices have now been completed.

4.1.2 During this period, we have taken part in two Regional Resilience Partnerships and 15 planning Local Resilience Partnerships. In addition, we attended eight EU Exit planning meetings and delivered training to staff required to support our EU Exit response. This covered Loggists, Crisis Management (two courses) and Resilience Direct training.

We continued to engage in cross-border planning and information sharing.

We also delivered three workshops on Reservoir emergency response, involving internal, and a range of external, partners.

4.2 Next steps

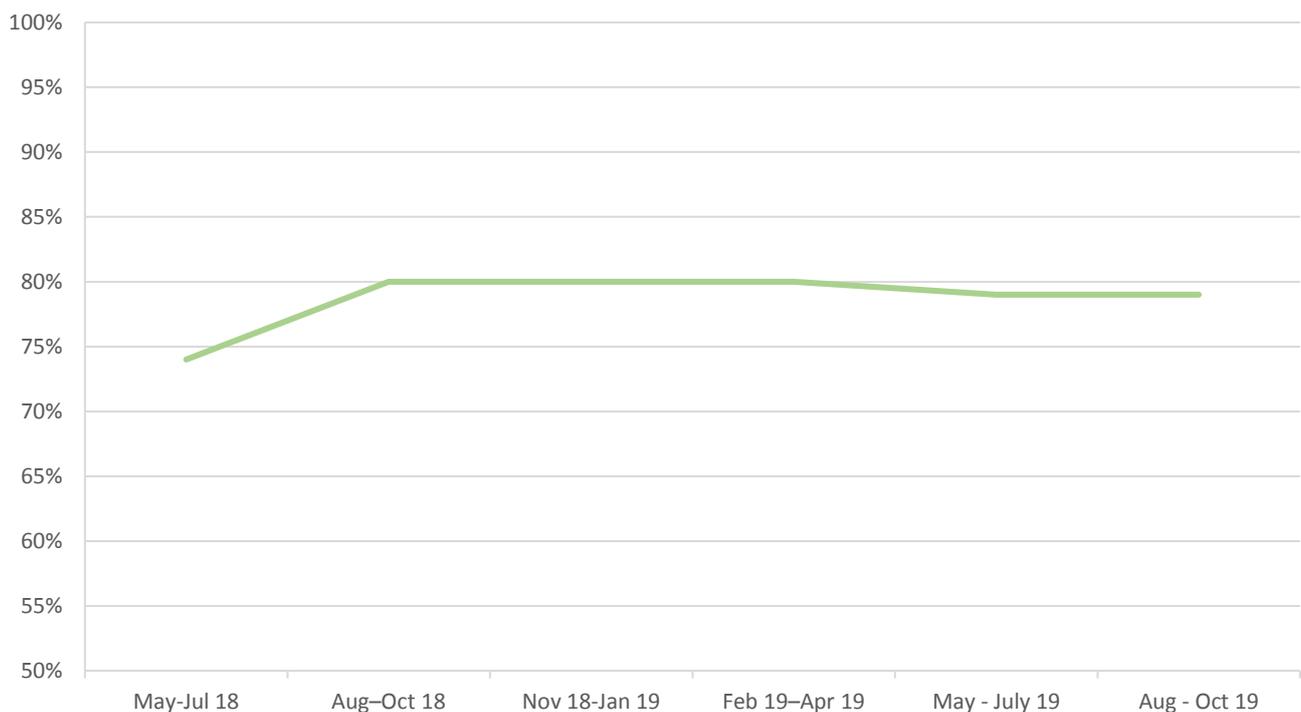
4.2.1 We will deliver a further multi-agency Reservoir Emergency Response workshop in the West and deliver training to our Regulatory Managers. We have also developed new training (Resilience Matters course) combining two courses into one and this training will be rolled out over the next quarter with first event planned for November.

We continue to develop the annual AMT exercise scheduled for February which will be around Pandemic Flu and the effects on SEPA.

We continue to prepare for the potential impacts of a No Deal EU Exit.

4.3 Business Continuity Messaging System

Percentage of staff registered over time



Note: In the September edition of the Digest, the figure for the period May - July 2019 was shown as 87% in error, the correct figure is 79%.

| | | |
|---|---|---|
| Messages issued by the Business Continuity Messaging System between August and October 2019 |  |  |
|---|---|---|

| 4.4 Business Continuity Incidents | | | | | | |
|-----------------------------------|------------|------------|---------------|------------|------------|------------|
| | May-Jul 18 | Aug-Oct 18 | Nov 18-Jan 19 | Feb-Apr 19 | May-Jul 19 | Aug-Oct 19 |
| Business Continuity Incidents | 3 | 4 | 2 | 1 | 1 | 8 |

Details: Details: 8 messages issued including two office closures as outlined below.

- 2 messages issued relating to power issues at the Elgin Office.
- 3 further messages for the Elgin Office relating to issues with foul drainage resulting in a closure of the office for less than a day.
- 1 message relating to closure of the Edinburgh Office over a weekend due to issues with the fire alarm.
- 2 messages from Information Services regarding network issues.

| 4.5 Safe SEPA testing and exercises | | | | | | |
|-------------------------------------|------------|------------|---------------|------------|------------|------------|
| | May-Jul 18 | Aug-Oct 18 | Nov 18-Jan 19 | Feb-Apr 19 | May-Jul 19 | Aug-Oct 19 |
| Number | 1 | 5 | 10 | 10 | 4 | 21 |

Details:

During this period, we held nine exercises relating to Control of Major Accidents and Hazards across all three Regional Resilience Partnership areas. Three of these were table-top and five included liveplay elements.

In addition:

- in the North Regional Resilience Partnership area, we held three exercises related to reservoirs and one nuclear exercise.
- in the East, we held an oil spill exercise and a reservoir workshop.
- in the West area, we held a harbour pollution exercise, and another nuclear exercise.
- there were four exercises relating to the reporting for EU Exit Civil Contingencies issues.

4.6 Emergency Management Team meetings

In the period from 1 August to 31 October 2019 we convened the Emergency Management Team for two separate incidents.

- The first involved protest activity targeting SEPA. This lasted for several weeks and required several meetings of the Emergency Management Team.
- The second was a flaring incident at Mossmorran which went on for one week.

Both incidents occurred in August. We worked very closely with external agencies who supported our response.

4.7 Safe SEPA debriefs

| | May-Jul 18 | Aug-Oct 18 | Nov 18-Jan 19 | Feb-Apr 19 | May-Jul 19 | Aug-Oct 19 |
|--------|------------|------------|---------------|------------|------------|------------|
| Number | 1 | 1 | 2 | 1 | 2 | 1 |

Details: Internal debrief held for the Emergency Response to Mossmorran incidents.

4.8 Business Continuity Impact Analyses

| Status | Jul 18 | Oct 18 | Jan 19* | Apr 19 | July 19 | Oct 19 |
|-----------------|--------|--------|---------|--------|---------|--------|
| Complete | 9 | 17 | 8 | 18 | 18 | 18 |
| In progress | 8 | 0 | 5 | 0 | 0 | 0 |
| Not yet started | 1 | 7 | 11 | 6 | 6 | 6 |

*Note: The number of complete analyses in the table above was reset to 0 at the start of January when we began our annual review of all existing analyses.

Update: No further progress has been made since the last report. However, we still anticipate we will complete this work by March 2020.