

Public Records (Scotland) Act 2011

**Public Authority
Food Standards Scotland**

The Keeper of the Records of Scotland

25 January 2018

Contents

1. Public Records (Scotland) Act 2011 3
2. Executive Summary [3](#)
3. Authority Background [4](#)
4. Assessment Process [4](#)
5. Model Plan Elements: Checklist [5](#)
6. Keeper's Summary [21](#)
7. Keeper's Determination [21](#)
8. Keeper's Endorsement 22

1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came fully into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor record keeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

2. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of Food Standards Scotland by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 29 September 2018.

The assessment considered whether the RMP of Food Standards Scotland was developed with proper regard to the 14 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of Food Standards Scotland complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

Food Standards Scotland's primary responsibility is to ensure that information and advice on food safety and standards, nutrition and labelling is independent, consistent, evidence-based and consumer-focused. Its primary concern is consumer protection – making sure that food is safe to eat and ensuring consumers know what they are eating and improving nutrition. With that in mind, their vision is to deliver a food and drink environment in Scotland that benefits, protects and is trusted by consumers.

FSS develops policies, provides policy advice to others, is a trusted source of advice for consumers and protects consumers through delivery of a robust regulatory and enforcement strategy.

FSS was established by the Food (Scotland) Act 2015 as a non-ministerial office, part of the Scottish Administration, alongside, but separate from, the Scottish Government. It is mainly funded by government but also charges fees to recover costs for regulatory functions.

4. Keeper's Assessment Process

The RMP was assessed by the Public Records (Scotland) Act Assessment Team on behalf of the Keeper. Assessors used the checklist elements listed in section 5, to establish whether Food Standards Scotland's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key:

G	The Keeper agrees this element of an authority's plan.		A	The Keeper agrees this element of an authority's plan as an 'improvement model'. This means that he is convinced of the authority's commitment to closing a gap in provision. He will request that he is updated as work on this element progresses.		R	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Keeper may choose to return the RMP on this basis.
----------	--	--	----------	--	--	----------	--

5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	The Records Management Plan (RMP) of Food Standards Scotland identifies Elspeth MacDonald, Deputy Chief Executive Officer, as having overall strategic responsibility for records management. This is confirmed in a covering letter from Ms MacDonald which accompanied the submission of the RMP (evidence E01). Ms MacDonald is also a member of the Senior Management Team and the covering letter describes the Team's commitment to ensuring the implementation and maintenance of the records management systems outlined in the RMP. She is also identified as the corporate owner of the RMP.

			<p>Ms MacDonald is also Food Standards Scotland’s Senior Information Risk Owner (SIRO), which is also confirmed in the abovementioned covering letter. This means that Ms MacDonald will be aware of the information governance structures and processes of Food Standards Scotland. The roles and responsibilities of the SIRO have been submitted (evidence E03).</p> <p>The RMP is endorsed by Ms MacDonald and she has committed to ensuring that the relevant improvements in records management provision are carried out and are monitored in the longer term by the records manager.</p> <p>Ms MacDonald is also the officer responsible for signing off Food Standards Scotland’s Information and Records Management Policy (evidence E02).</p> <p>The Keeper of the Records of Scotland (the Keeper) agrees that an appropriate individual has been nominated to take senior management responsibility for records management as required by the Public Records (Scotland) Act 2011 (PRSA).</p>
<p>2. Records Manager <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The RMP identifies Tigan Daspan as the Corporate Records Manager for Food Standards Scotland and in terms of the RMP is the individual nominated as having day-to-day responsibility for records management. Mr Daspan is the author of the Information and Records Management Policy (evidence E02). The Policy confirms that the Records Manager has responsibility for the effective and consistent management of all of Food Standards Scotland’s records and that he will work closely with all departments to ensure the organisation-wide application of the Policy.</p> <p>Mr Daspan reports to the Head of Corporate Services who has the remit for Food Standards Scotland’s Information Management and Assurance function.</p> <p>Also provided as evidence is the Records Manager’s Job Description (evidence E04). This clearly shows that Mr Daspan has responsibility for developing and</p>

			<p>implementing the RMP of Food Standards Scotland. Some of the other key tasks are to ensure that Food Standards Scotland staff receive appropriate records management training and to support the transition of records from shared drives to the Electronic Record and Document Management System (ERDMS), Objective.</p> <p>The Keeper agrees that an appropriate individual has been identified to take operational day-to-day responsibility for records management as required by PRSA.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>Food Standards Scotland has submitted their Information and Records Management Policy, version 3.0, dated 15 February 2016 (evidence E02). The Policy states that records created by Food Standards Scotland are considered to be public records under PRSA.</p> <p>The Policy also covers records created by contractors carrying out business on behalf of Food Standards Scotland (Section 5.2).</p> <p>The Policy emphasises that Food Standards Scotland recognises the importance of managing information and records appropriately to meet its statutory and regulatory obligations and also to ensure accountability.</p> <p>The Policy also states that all information should be created, managed and stored electronically unless there is a valid legal or business reason (Section 7.8).</p> <p>The Policy also covers the security of information and records, access to these and their preservation. The Policy also defines the roles and responsibilities for complying with the records management framework.</p> <p>The RMP states that the Policy is available to staff on Food Standards Scotland’s corporate SharePoint site and the Scottish Government’s Saltire intranet site. Food Standards Scotland have supplied screenshots showing that the Policy is available to staff on both the Saltire intranet site and Food Standards Scotland’s SharePoint</p>

			<p>system.</p> <p>Food Standards Scotland manages its records on the Scottish Government's ERDMS, Objective, and adheres to the Scottish Government's Records Management Policy. This has been supplied (evidence E05).</p> <p>Also provided as evidence are several presentations on Information and Records Management within Food Standards Scotland delivered to staff by the Records Manager (see Element 2) in March and April 2016 (evidence E06a and b). Also supplied are information management infographics also provided to staff (evidence E07a and b). The Keeper commends this commitment to training staff in records and information management.</p> <p>The Keeper agrees that Food Standards Scotland has an operational Records Management Policy Statement that is available to all staff.</p>
<p>4. Business Classification</p>	<p>G</p>	<p>G</p>	<p>As Food Standards Scotland uses the Scottish Government's ERDMS, Objective, to manage its records it has developed a Business Classification Scheme (BCS) to determine the structure of records held on the ERDMS. Food Standards Scotland information and records management staff liaised with Scottish Government records management staff to develop the BCS which is based on the Government Categories List (GCL) and the Integrated Public Sector Vocabulary (IPSV) scheme. The BCS consists of 5 levels, with the top level describing the key functions of Food Standards Scotland. Levels 2 and 3 are more subject specific and Level 4 describes the activities relating to these subjects and Level 5 are the individual files/documents. The Food Standards Scotland BCS has been supplied (evidence E08) which contains screenshots and descriptions of the BCS. The BCS provides the framework for managing Food Standards Scotland's records. A fileplan in spreadsheet format has also been submitted (evidence E12a) in addition to fileplan of records managed using the SharePoint system (evidence E12b).</p>

			<p>Also provided is Food Standards Scotland's Standard File Type Guidance (evidence E09) which provides guidance on the consistent naming of standard files. Similar guidance exists for the consistent naming of casework files (evidence E10).</p> <p>The RMP states that Food Standards Scotland contract some of their functions out to third parties and that they have adopted the standard Scottish Government terms and conditions for all contracts. All of the template contracts used for whichever function is being contracted, whether it is for goods or services, have been provided (evidence E13-E18). All of these clearly set out the arrangements for information and records governance.</p> <p>Food Standards Scotland's Information Assets are also listed on the Scottish Government's Information Asset Register (IAR). This list has been supplied (evidence E19).</p> <p>The Keeper agrees that Food Standards Scotland has a BCS which identifies its functions and the records created in carrying these out.</p>
5. Retention schedule	G	G	<p>Food Standards Scotland has operational retention and disposal schedules. These have been developed in line with statutory and legislative requirements as well as the business needs of the organisation. The retention and disposal schedules have been aligned to file types in accordance with the files created within the ERDMS. The file types are based on the Scottish Government guidance on standard and casework file types (evidence E09-E10) and the standard Scottish Government retention schedule is applied to these files.</p> <p>Prior to the creation of Food Standards Scotland and the use of the Scottish Government ERDMS, the Corporate Retention Schedule of the Food Standards Agency was used (evidence E21). This schedule is still used to review and dispose of records created before the formation of Food Standards Scotland.</p>

			<p>Due to the regulatory role of Food Standards Scotland it carries out business which is unique to the organisation and separate retention and disposal schedules for the Operations Delivery and Scottish Food Crime and Intelligence Unit activities. These have been submitted as evidence E22 and E23.</p> <p>Food Standards Scotland also still uses shared drives. The Archival Policy for Shared Drives (evidence E11) states that these are important for carrying out its business but are not considered repositories for official records and are used to draft documents or for storing reference copies or transient material. Official records are to be stored on the ERDMS apart from MS Access Databases which cannot be saved onto ERDMS. Records held on shared drives will be subject to the requirements of the Enterprise Vault system where records stored on shared drives will eventually be deleted. The Keeper commends this approach of actively managing the content of shared drives.</p> <p>Food Standards Scotland has been in contact with Client Management staff at National Records of Scotland (NRS) with a view to identifying records suitable for permanent preservation (evidence E24a and b and E25) as part of the work in developing retention and disposal schedules.</p> <p>The Keeper agrees that Food Standards Scotland has a schedule which details the retention and disposal requirements of the records it creates and manages.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The Records Management Policy (section 7.6) states that records should be 'maintained and preserved for as long as it is needed and then disposed of (destroyed or transferred to the National Archives in line with The Corporate Retention Schedules'. In line with this commitment, Food Standards Scotland has outlines the following arrangements for the destruction of its records:</p> <p><u>Paper records (on-site)</u> – The RMP states that paper records are securely disposed of by Restore Datashred. These are collected from Food Standards</p>

			<p>Scotland's Head office in Aberdeen and destroyed on-site. Sample collection notes have been supplied as evidence that this arrangement is operational (evidence E26a and b).</p> <p><u>Paper records (off-site)</u> – The RMP also states that Food Standards Scotland stores records off-site with a commercial storage supplier (Iron Mountain). These are destroyed in line with the retention schedules of Food Standards Scotland and its predecessor body, Food Standards Agency. A sample certificate of destruction has been provided (evidence E28).</p> <p><u>Electronic</u> – Section 7.8 of the Records Management Policy states that 'Information should be created, managed and stored electronically, not in paper form, unless there is a valid legal or business reason'. The vast majority of records created and managed by Food Standards Scotland will therefore be electronic. Food Standards Scotland manages these records on the Scottish Government's ERDMS, Objective, and has adopted the Scottish Government's retention schedules. The deletion of records on the ERDMS creates a 'stub' which contains the file and document name of the item destroyed and its associated metadata. Screenshots have been submitted from the system showing the information that is generated when records are deleted (evidence E27).</p> <p><u>Hardware</u> – The RMP states that obsolete hardware is disposed of as part of Food Standards Scotland's arrangements with the Scottish Government. This is confirmed in an email from Food Standards Scotland's IT providers (evidence E30). The procedure for the destruction of hardware has also been provided (evidence E29).</p> <p><u>Back-ups</u> - Food Standards Scotland also follow the Scottish Government's pack-up procedures for its electronic records and systems. These are detailed in a document provided by the Scottish Government (evidence E29).</p>
--	--	--	---

			The Keeper agrees that Food Standards Scotland has arrangements in place to allow it to destroy records in line with the requirements of its retention schedules.
7. Archiving and Transfer <i>Compulsory element</i>	G	G	<p>Food Standards Scotland has identified the National Records of Scotland (NRS) as its place of deposit for records selected for permanent preservation. This arrangement is governed by a Memorandum of Understanding (MoU) which has been provided (evidence E25). The archiving of Food Standards Scotland’s websites is also covered by the provisions of the MoU.</p> <p>Food Standards Scotland has identified, in conjunction with NRS, a number of records that would be suitable for permanent preservation. A list of these records has been supplied (evidence E24a and b). Also submitted is the NRS Policy on the Selection of Records from the Scottish Government (evidence E32).</p> <p>Food Standards Scotland also uses the Scottish Government’s Enterprise Vault system for managing the deletion of emails. Although Enterprise Vault isn’t designed for the long-term retention of emails the Guidance (evidence E31) highlights the importance of saving emails with longer term corporate value to the EDRMS and shows staff how to do this.</p> <p>The Scottish Government is currently undertaking a project to consider the archiving of records currently managed using the ERDMS. An interim project report has been submitted (evidence E20) showing progress.</p> <p>The Keeper agrees that Food Standards Scotland has arrangements in place to transfer records selected for permanent preservation to an appropriate archive when required.</p>
8. Information Security	G	G	The RMP states that Food Standards Scotland has a number of policies and procedures in place to ensure the security of the records and information and the

<p><i>Compulsory element</i></p>			<p>systems used to manage these. Food Standards Scotland has submitted its Information Security Policy Statement (evidence E33) which emphasises the need to ensure that its information is appropriately protected against loss, unauthorised access or compromise.</p> <p>The Policy Statement is supported by the more detailed Information Security Management Policy (evidence E38). The Policy underlines Food Standards Scotland’s commitment to protecting its information assets. The Policy describes its scope and assigns roles and responsibilities. It also details the policies around the secure disposal of information and information sharing.</p> <p>Food Standards Scotland uses Scottish Government SCOTS hardware and IT systems and has therefore adopted the Scottish Government iTECS IT Code of Conduct (evidence E42). This covers the acceptable use of IT systems. Also submitted as evidence is the Scottish Government Data Handling Policy (evidence E34), which provides guidance on the use of security classifications and the transfer of information.</p> <p>Food Standards Scotland also operates a Clear Desk Policy (evidence E35). It also has an Information Access Control Policy (evidence E44) which outlines the procedures in place for controlling user access to Food Standards Scotland systems and information, including topics such as password management and third party access to systems. Also supplied is an IT Security – Incident Reporting Form (evidence E45).</p> <p>Food Standards Scotland maintains a High Level Information Risk Register (evidence E39) in a spreadsheet format which lists information incidents. This is governed by the Risk Management Policy (evidence E36) which is used to calculate the levels of acceptable risk for business activities.</p>
----------------------------------	--	--	---

			<p>The RMP states that all Information Asset Owners (IAOs) have been trained in the role and are provided with guidance (evidence E37).</p> <p>Food Standards Scotland has also applied access controls to some records managed using the EDRMS and has produced guidance for staff detailing how files and records on the system can be protected (evidence E40 and E41).</p> <p>The RMP states that as part of their arrangements with the Scottish Government, all Food Standards Scotland staff, including temporary staff and contractors, are required to undertake a mandatory online Data Protection course on an annual basis. Permanent staff are also required to complete a Responsible for Information online module. These requirements are confirmed in an email which has been submitted (evidence E43).</p> <p>Food Standards Scotland has also run awareness sessions, workshops and activities to raise the profile of information management within the organisation. One such series of events was entitled 'Information Management' which took place in May 2017 and included sessions on the General Data Protection Regulation (GDPR), 'Keeping Safe Online' and the EDRMS. The full programme, included in an email to all Head Office staff has been provided (evidence E46). Guidance for staff on how to select an appropriate Protective Marking has also been supplied (evidence E47). Also submitted are a series of articles relating to the Government Classifications and EDRMS on Food Standards Scotland's intranet (evidence E48a-c). The Keeper commends this proactive approach to raising the profile of information management within Food Standards Scotland.</p> <p>The Keeper agrees that there are robust provisions in place to protect the information created and managed by Food Standards Scotland and staff are made aware of their responsibilities and provided with appropriate training.</p>
--	--	--	---

<p>9. Data Protection</p>	<p>G</p>	<p>G</p>	<p>Food Standards Scotland is registered as a Data Controller with the Information Commissioner’s Office (registration number ZA109196) and their registration certification has been supplied (evidence E49).</p> <p>Food Standards Scotland’s Data Protection Policy (evidence E50) describes how it will comply with the requirements of the Data Protection Act 1998 and assigns the roles and responsibilities for ensuring this. The Records Manager (see Element 2) is identified as being the Data Protection Officer. The Policy points towards Data Protection page on the Scottish Government’s Saltire intranet, which is also used by Food Standards Scotland as its intranet site, for further information and guidance.</p> <p>Also provided is Food Standards Scotland’s Privacy Impact Assessment (PIA) Policy (evidence E53) which outlines the conditions required for conducting a PIA. This is accompanied by a Privacy Impact Assessment Checklist (evidence E54).</p> <p>The RMP states that as part of their arrangements with the Scottish Government, all Food Standards Scotland staff, including temporary staff and contractors, are required to undertake a mandatory online Data Protection course on an annual basis. Permanent staff are also required to complete a Responsible for Information online module. These requirements are confirmed in an email which has been submitted (evidence E43).</p> <p>Food Standards Scotland is also preparing for the changes in Data Protection law and has provided staff with awareness raising sessions on GDPR. These have been supplied to the Keeper (evidence E55a and b). The Keeper commends this preparatory work in advance of the GDPR coming into force in May 2018.</p> <p>Stakeholders have the right to submit a Subject Access Request for their personal information held by Food Standards Scotland. This is explained on the Food Standards Scotland website http://www.foodstandards.gov.scot/terms-conditions.</p>
---------------------------	-----------------	-----------------	--

			The Keeper agrees that Food Standards Scotland is aware of its obligations under the Data Protection Act 1998 and has procedures in place to protect the personal information it collects and processes.
10. Business Continuity and Vital Records	G	G	<p>The RMP states that Food Standards Scotland considers Business Continuity Management to be a fundamental part of good corporate governance. Food Standards Scotland has submitted its Business Continuity Plan (BCP), version 2.0 dated August 2017 (evidence E56) which documents how its business activities can be restored in the event of an interruption. The BCP details the responsibilities for responding to an incident and the actions that need to be taken. Appendix A of the BCP lists the business critical activities of Food Standards Scotland and the requirements for the corresponding records. Also supplied are screenshots of the location of the BCP on the Saltire intranet site and also the Food Standards Scotland SharePoint system showing that the BCP is available to staff.</p> <p>The Scottish Government's EDRMS also has a BCP which has been supplied (evidence E57). The IT services provided by the Scottish Government to Food Standards Scotland are covered by the Information Services and Information Systems BCP (evidence E58).</p> <p>Food Standards Scotland has provided details of the back-up and disaster recovery arrangements for the Scottish Government's SCOTS system (evidence E29).</p> <p>The Keeper agrees that there are appropriate procedures in place to allow Food Standards Scotland to resume its business activities in the event of an interruption.</p>
11. Audit trail	G	G	Food Standards Scotland is committed to creating and managing records entirely electronically, except where there is a clear business or legal need to create a paper records. Therefore the vast majority of records will be managed using EDRMS. The EDRMS used by Food Standards Scotland, Objective, provides audit trails for

			<p>viewing, modifying and deleting records held on the system. An example of the audit trail provision has been submitted (evidence E59) as well as an example of the metadata that is created when a record has been destroyed (evidence E27).</p> <p>The paper records stored off-site are tracked using a spreadsheet, a sample of which has been provided (evidence E60). This tracks the movement and destruction of paper records. A sample destruction certificate (evidence E28) for the secure destruction of paper records held off-site has also been supplied.</p> <p>The RMP also contains a commitment to transfer records identified as being suitable for permanent preservation to NRS at the appropriate time.</p> <p>The Keeper agrees that there are suitable audit trail provisions in place for the records created and managed by Food Standards Scotland.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>The Records Manager's (see Element 2) Job Description (evidence E04) clearly shows that he is responsible for creating and implementing the RMP and also the supporting policies and procedures. The 'Further Developments' column of this Element indicates that Food Standards Scotland is looking at providing the Records Manager with relevant training to allow him to achieve a professional qualification. The Keeper commends this commitment to staff development.</p> <p>Food Standards Scotland have also developed a Records Management Competency Framework (evidence E61) for staff that have responsibilities for records management within the organisation. The Framework sets out the desired skills and competencies for staff responsible for records management. The Keeper commends the formal recognition that records management forms a key component of some staff's day-to-day roles.</p> <p>The RMP states that as part of their arrangements with the Scottish Government, all Food Standards Scotland staff, including temporary staff and contractors, are</p>

			<p>required to undertake a mandatory online Data Protection course on an annual basis. Permanent staff are also required to complete a Protecting Information online module. These requirements are confirmed in an email which has been submitted (evidence E43).</p> <p>Food Standards Scotland has also run awareness sessions, workshops and activities to raise the profile of information management within the organisation. One such series of events was entitled 'Information Management' which took place in May 2017 and included sessions on the General Data Protection Regulation (GDPR), 'Keeping Safe Online' and the EDRMS. The full programme, included in an email to all Head Office staff has been provided (evidence E46). Guidance for staff on how to select an appropriate Protective Marking has also been supplied (evidence E47). Also submitted are a series of articles relating to the Government Classifications and EDRMS on Food Standards Scotland's intranet (evidence E48a-c). The Keeper commends this commitment to raising the profile of information management within Food Standards Scotland.</p> <p>All staff are required to undertake training on the EDRMS before they are permitted to use the system.</p> <p>The Records Manager (see Element 2) is also a member of the Information and Records Management Society (IRMS).</p> <p>The RMP states that information assurance is achieved through the Food Standards Scotland mapping process which is based on the Scottish Government internal control checklist. The Assurance Map Template, which includes a section covering information, has been submitted (evidence E68).</p> <p>The Keeper agrees that Food Standards Scotland formally recognises the importance of records management in relevant staff's competencies and that</p>
--	--	--	---

			appropriate training is provided to allow them to carry out their roles.
13. Assessment and Review	G	G	<p>The RMP states that all policies and procedures have been developed in consultation with colleagues across Food Standards Scotland and the Scottish Government.</p> <p>The RMP also states that the Records Manager is responsible for carrying out reviews of the RMP to ensure that it is kept updated. This is confirmed in the Records Manager’s Job Description (evidence E04). The results of the assessment and review will be reported to the Head of Corporate Services and any updates to the RMP will be signed off by the SIRO (see Element 1). Page 2 of the RMP states that it will be reviewed at least annually.</p> <p>Food Standards Scotland has also submitted its Assessment and Review Process (evidence E62). This indicates that the Records Manager along with the Information Management and Assurance Group will formally assess and review the RMP annually.</p> <p>The High Level Improvement Plan, which is included as an Appendix to the RMP, states that Food Standards Scotland will initiate an internal audit programme beginning in 2018 to ensure that the RMP and supporting policies and procedures remain up-to-date. This has an estimated completion date of August 2018. The Keeper requests that he is kept informed on the progress of this area of work.</p> <p>The Keeper agrees that Food Standards Scotland has measures in place to ensure that the RMP and supporting policies and procedures are regularly assessed and reviewed to ensure that they remain up-to-date.</p>
14. Shared Information	G	G	The RMP states that Food Standards Scotland shares information in accordance with the Data Protection Act 1998 and the Freedom of Information (Scotland) Act 2002. This is confirmed in the Information Security Policy (evidence E38) which

			<p>contains a Data Interchange Policy section relating to the exchange of information between Food Standards Scotland and other agencies.</p> <p>Section 7.6 of the Data Protection Policy (evidence E50) also highlights Food Standards Scotland’s commitment to securely sharing information with other bodies in line with the Data Protection Act 1998. A Data Sharing Template and Guidance (evidence E51) has been produced to ensure that a consistent approach is taken. The Template also considers Information Governance (Section 6), such as the security, retention and destruction of shared information. Sample Data Sharing Agreements between Food Standards Scotland and the Scottish Government and the Food Standards Agency have been provided (evidence E66 and E67).</p> <p>Food Standards Scotland also publishes datasets on its website which is covered using an Open Data Publication Plan (evidence E63).</p> <p>Guidance exists for staff in applying the Government Security Classifications when sharing information both internally and externally (evidence E47 and E64).</p> <p>The RMP states that Food Standards Scotland is also involved in trialling the use of Objective Connect which will allow it to share information classified up to Official-Sensitive level with other organisations. A screenshot of the system has been submitted (evidence E69).</p> <p>The Keeper agrees that Food Standards Scotland has arrangements in place to allow it to securely share information with other bodies</p>
--	--	--	--

6. Keeper's Summary

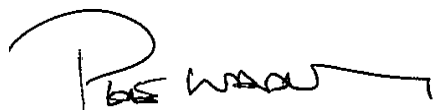
Elements 1-14 that the Keeper considers should be in a public authority records management plan have been properly considered by Food Standards Scotland. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper agrees the RMP of Food Standards Scotland.

The Keeper recommends that Food Standards Scotland should publish its agreed RMP as an example of good practice within the authority and the sector.

This report follows the Keeper's assessment carried out by,



.....
Pete Wadley
Public Records Officer



.....
Robert Fotheringham
Public Records Officer

8. Endorsement of Report by the Keeper of the Records of Scotland

The report has been examined and is endorsed under the signature of the Keeper of the Records of Scotland as proof of compliance under section 1 of the Public Records (Scotland) Act 2011, and confirms formal agreement by the Keeper of the RMP as submitted by Food Standards Scotland. In agreeing this RMP, the Keeper expects Food Standards Scotland to fully implement the agreed RMP and meet its obligations under the Act.



.....
Tim Ellis
Keeper of the Records of Scotland