

Public Records (Scotland) Act 2011

**Science and Advice for Scottish Agriculture (Part of ‘Scottish Ministers’)
Assessment Report**

The Keeper of the Records of Scotland

15th February 2017

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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 ***Science and Advice for Scottish Agriculture (Part of 'Scottish Ministers')*** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 16th September 2017.

The assessment considered whether the RMP of Science and Advice for Scottish Agriculture 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 Science and Advice for Scottish Agriculture complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

The Scottish Agricultural Science Agency was merged into the Scottish Government in April 2008 becoming a Division of the Scottish Government Agriculture, Food and Rural Communities Directorate. At the same time the Agency changed its name to "Science and Advice for Scottish Agriculture" (SASA). SASA's primary role is to provide scientific services and advice in support of Scotland's agriculture and wider environment specifically providing expert scientific and technical advice, information and services on agricultural and horticultural crops and aspects of the environment within the Scottish Government and to other customers. Although much of their work is in support of arable agriculture they also provide services in food safety, wildlife management and crime whilst providing specialist advice to Scottish Ministers. SASA staff members are civil servants, doing their scientific work in relation to devolved matters for Scottish Government ministers.

<https://www.sasa.gov.uk/>

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 Science and Advice for Scottish Agriculture’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.
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5. Model Plan Elements: Checklist

Science and Advice for Scottish Agriculture (Part of ‘Scottish Ministers’)
For brevity this authority will be referred to as ‘SASA’ in the assessment below.

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>SASA have identified Dr Kevin O’Donnell, Head of SASA as the individual in the authority with overall responsibility for records management.</p> <p>The <i>Plan</i> notes that the authority, as part of the Scottish Government (SG), complies with the government’s records management standards which are monitored by Sarah Davidson, Director General Communities and SG SIRO. The Keeper agrees this and accepts that Dr O’Donnell’s autonomy regarding records management provision is limited by the overarching guidance issued by Ms. Davidson.</p> <p>Dr O’Donnell’s role in SASA’s records management provision is confirmed by the <i>Records Management Policy (see element 3)</i>.</p> <p>Dr O’Donnell is designated as SASA’s Information Asset Owner. A Scottish Government Information Asset Owner is responsible for risk assessing storage systems (<i>Scottish Government Data Protection Policy</i> page 8) and must be informed of any data loss (the <i>Scottish Government Data Handling Policy</i> page 6).</p>

			<p>The Librarian and Information Management Officer (see element 2) reports directly to Dr O'Donnell.</p> <p>The Keeper agrees that SASA have identified a suitable individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
<p>2. Records Manager <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>SASA have identified Jill Tivey, Librarian and Information Manager, the individual with day-to-day responsibility for implementing the <i>Records Management Plan</i>.</p> <p>This is confirmed by the Records Management Policy (see element 3) section 5.</p> <p>The Librarian and Information Manager's identification to this role is also confirmed by the <i>SASA Records Management Competency Framework</i> which has been supplied to the Keeper (March 2016 version).</p> <p>The Librarian and Information Manager reports directly to the Head of SASA (see element 1).</p> <p>The Librarian and Information Manager is responsible for creating top-level folders within shared drives (but see element 4 for future developments) and for reviewing the implementation of the <i>Plan</i> (see element 13).</p> <p>Ms Tivey is responsible for liaising with the Scottish Government regarding elements of records management where SASA directly adopts SG provision (see elements 8, 9)</p> <p>The Keeper agrees that the Librarian and Information Manager is an appropriate individual to undertake this role.</p>
<p>3. Policy <i>Compulsory</i></p>	<p>G</p>	<p>G</p>	<p>SASA have a <i>Records Management Policy</i> which has been provided to the Keeper. This is version 2.0 approved by the Head of SASA (see element 1) and the Senior</p>

<p><i>element</i></p>			<p>Management Team and dated September 2016.</p> <p>The Keeper agrees that the <i>Plan</i> supports the objectives of the <i>Records Management Policy</i>.</p> <p>An Intranet screenshot showing a link to the <i>Records Management Policy</i> has been supplied in evidence.</p> <p>Under 'Future Developments' for this element SASA state that "After review, the policy will be promoted to SASA staff via the news section of the SASA Intranet's home page."</p> <p>The Keeper agrees that SASA has a records management policy statement as required by the Act.</p>
<p>4. Business Classification</p>	<p>A</p>	<p>G</p>	<p>The <i>Records Management Policy</i> states that "A systematic approach to the management of SASA's records is essential to protect and preserve records as evidence of our actions." (<i>Policy</i> page 4).</p> <p>SASA have adopted the <i>Scottish Government Data Handling Policy</i> (supplied in evidence) which requires that "data should be stored in an official record, for example eRDM or an appropriate shared network drive".</p> <p>With this in mind, SASA is developing a full <i>Business Classification Scheme</i> for all corporate records that will "reflect the organisation's key business functions and activities." (<i>Plan</i> page 9)</p> <p>The development of the <i>Business Classification Scheme</i> will be pursued in conjunction with staff from different business sections. The Keeper commends the principle of utilising local service areas when creating corporate records management systems as likely to lead to a stronger business tool.</p>

			<p>The Business Classification Scheme development project is described as follows: “SASA’s current file structure, which has evolved organically over the years for both paper and electronic files, has been compiled as a first step in the process of developing a Business Classification Scheme for all records” The Keeper agrees this action and thanks SASA for providing him with the current file structure in evidence.</p> <p>SASA operate a hybrid electronic/hard copy records system. Shared drives and electronic line of business systems are “the corporate repository for the majority of information created and received by SASA...” (<i>Records Management Policy</i> section 6).</p> <p>The <i>Business Classification Scheme</i> development project is a major feature of the <i>Records Management Improvement Plan</i> which has been shared with the Keeper. It suggests that the new scheme might be piloted 2016/2017. The Keeper requests that he is kept updated as this project progresses.</p> <p>The <i>Business Classification Scheme</i> when complete may be utilised as the core structure to which an EDRM can be applied. The possibility of implementing an EDRM solution is currently being investigated by SASA as a possible long-term replacement for the shared drives system. The Keeper must be informed if this change is made as it will have a fundamental impact on the records management provision in the authority. The necessity for reviewing the <i>Plan</i> in the case of EDRM adoption is recognised by SASA (<i>Plan</i> page 27).</p> <p>The Keeper agrees this element under Improvement Model terms. This means that he acknowledges that the authority have identified a gap in provision and have committed to a plan to close that gap. He requests that he is updated as the project progresses.</p>
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<p>5. Retention schedule</p>	<p>A</p>	<p>G</p>	<p>SASA has a retention schedule which has been supplied to the Keeper.</p> <p>This fulfils the objective in the <i>Records Management Policy (see element 3)</i> section 6 that SASA will maintain a retention schedule that "...set out the recommended periods for which particular classes of records should be retained in accordance with legal, audit and operational requirements. They provide a formalised, accountable system for the retention and disposal of records, and can help to save time, money and space by ensuring that information is not kept unnecessarily." It supports the <i>Scottish Government Data Handling Policy</i>, which SASA has adopted, which requires (page 6) that "data should be retained in line with each business area's data retention schedule."</p> <p>However, the <i>Retention Schedule</i> is not yet centrally imposed on the records of the organisation. "At the moment SASA only uses retention schedules on its paper records." (SASA Records Management Improvement Action Plan page 4) and "At the moment SASA does not enforce the use retention and disposal schedules on shared drives, pst files and public folders" Plan page 11. This gap in provision will be addressed by the implementation of a business classification structure as explained in element 4 above. The Keeper agrees this action.</p> <p>SASA will use the Scottish Council on Archives retention decisions as guidance when creating an updated retention schedule for records held on electronic systems: http://www.scottisharchives.org.uk/projects/toolsstandards/retentionschedules</p> <p>The Keeper agrees this element under Improvement Model terms. This means that he acknowledges that the authority have identified a gap in provision and have committed to a plan to close that gap. He requests that he is updated as the project progresses.</p>
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<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>A</p>	<p>G</p>	<p>The <i>Records Management Policy</i> (see element 3) sets SASA the following objective in section 6: "...the records will either be destroyed or transferred to the National Records of Scotland for permanent preservation.." (see element 7 for archival transfer).</p> <p>The <i>Scottish Government Data Handling Policy</i>, which SASA has adopted, requires (page 6) that "data must be deleted/destroyed securely once it is no longer required."</p> <p>In order to fulfil the commitment to destruction of records SASA have the following procedures in place:</p> <p><u>Paper (Internal)</u>: The <i>Plan</i> (page 12) provides a good explanation of the irretrievable and secure destruction of hard copy records. Evidence has been provided to show that the authority has arrangements in place with a third-party confidential waste contractor.</p> <p><u>Paper (External)</u>: SASA have confirmed that it does not hold record utilising a third part storage supplier.</p> <p><u>Electronic</u>: Currently SASA do not have robust systems in place to ensure the secure and timely destruction of records held electronically in central systems. The Plan states (page 11): "At the moment SASA does not enforce the use retention and disposal schedules on shared drives, pst files and public folders". Addressing this gap in provision is part of the business classification/retention schedule development programme explained in element 4 above. SASA state: "SASA recognises the need to apply retention and disposal schedules on the electronic information which is created and stored within SASA. This will be addressed through the implementation of an ERDM system."(SASA Records Management Improvement Action Plan page 4). The Keeper agrees this in principle. SASA go on to state "As part of the</p>
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			<p>work on the Business Classification Scheme and shared drives, and/or the implementation of an eRDM system, SASA will need to ensure that functionality in respect to destroying files is in place. Audit reports to be run on shared drives to flag records for destruction which would be checked by Branches for records of historical or special interest. Records not falling into the latter category to be destroyed through deletion from the local server storage and tapes will be destroyed by the secure off site storage provider. Destruction certificates would be completed and signed by ITS and the Section. The Keeper requests he is updated as these projects progress.</p> <p><u>Hardware:</u> Redundant hardware is stripped of records by an external contractor. A disposal certificate and other documentation has been provided as evidence that this procedure is approved and operational.</p> <p><u>Back-Ups:</u> SASA, quite properly, keeps back-ups of electronic records for business continuity purposes (see Plan page 22, element 10). An explanation of the back-up cycle has been provided in their <i>Server Back-Up Procedure Document</i> which has been supplied to the Keeper (Version 8, July 2015)</p> <p>The Keeper agrees that SASA have procedures in place to securely and irretrievably destroy hard-copy records.</p> <p>The Keeper agrees that SASA have procedures in place to ensure that records are securely removed from redundant hardware.</p> <p>The Keeper agrees that SASA have an understanding of the availability of back-up copies of records and can be confident that, after an appropriate, time these are securely and irretrievably destroyed.</p> <p>The Keeper agrees this element of SASA’s Records Management Plan under ‘improvement model’ terms. This means that an authority has recognised a</p>
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			<p>gap in provision (in this case the difficulties around the controlled and timely destruction of electronic records) and have put processes in place to close that gap.</p>
7. Archiving and Transfer <i>Compulsory element</i>	A	G	<p>The <i>Records Management Policy</i> (see element 3) sets SASA the following objective in section 6: "...the records will either be destroyed or transferred to the National Records of Scotland for permanent preservation.." (see element 6 for destruction).</p> <p>An MOU will be created between SASA and the National Records of Scotland to formally document the 'archiving' arrangements. This is an objective of the <i>SASA Records Management Improvement Action Plan</i> (4). When this is in place the Keeper will require a copy to be provided for the PRSA submission.</p> <p>The Keeper can agree this element of SASA's <i>Plan</i> under 'improvement model' terms. This means that the authority has identified a suitable repository for records selected for permanent preservation and have accordingly put processes in place to formalise transfer arrangements. The Keeper's agreement is conditional on the MOU, between NRS and the authority being created, signed and a copy being forwarded to the PRSA Assessment Team.</p>
8. Information Security <i>Compulsory element</i>	G	G	<p>SASA have adopted the Scottish Government Information Security framework with which the Keeper is familiar and which has already been agreed as appropriate for public records under the Act.</p> <p>It is the key principle of the <i>Scottish Government Information Security Policy</i> that "Information will be protected against unauthorised access."</p> <p>Examples from the Scottish Government suite of policies and guidance, such as the <i>Data Handling Policy</i> and <i>Information Security Policy Statement</i> have been provided</p>

			<p>to the Keeper.</p> <p>SASA has its own <i>IT Code of Conduct</i> (version 1 2016) which has been supplied to the Keeper.</p> <p>An explanation of physical security in the SASA premises has been supplied.</p> <p>Evidence has been supplied that staff have access to these policies.</p> <p>The Keeper can agree that SASA has properly considered information security as required by the Act.</p>
9. Data Protection	G	G	<p>SASA have adopted the Scottish Government data protection policy and procedures with which the Keeper is familiar and which has already been agreed as appropriate for public records under the Act.</p> <p>The authority is registered with the Information Commissioner (through ‘Scottish Ministers’): Z4857137</p> <p>The Keeper agrees that the <i>Scottish Government Data Protection Policy</i> explains the 8 (current) principles of the Data Protection Act 1998. The policy guidance explains the subject access procedure and is available to the public at: http://www.gov.scot/resource/doc/1066/0006064.pdf</p> <p>SASA confirm that data protection responsibilities “...will be promoted on a regular basis via the SASA Intranet, highlighting information from the Scottish Government Intranet.” and “SASA Senior Management Team to issue a reminder to staff once a year”.</p> <p>The Keeper agrees that SASA have properly considered their responsibilities under the Data Protection Act 1998.</p>

<p>10. Business Continuity and Vital Records</p>	<p>G</p>	<p>G</p>	<p>It is a principle of the <i>Scottish Government Information Security Policy</i>, which has been adopted by SASA, that “Business Continuity Plans will be produced, maintained and tested.” <i>Scottish Government Information Security Policy Statement</i> (section 5).</p> <p>To comply with this principle SASA have created an overarching <i>Business Community Plan</i> for the authority. This has been supplied to the Keeper. This is supported by local service area plans, some of which are already in place. A sample of a local plan has been provided to the Keeper as evidence (Wildlife DNA Forensic testing, 2015). The Keeper agrees this sample local plan includes record recovery.</p> <p>Vital records will be added to the business classification scheme as it is created (see element 4).</p> <p>The Keeper agrees that SASA have a Business Continuity Plan that considers the recovery of records and that they have also considered the identification of vital records.</p>
<p>11. Audit trail</p>	<p>A</p>	<p>G</p>	<p>See element 4</p> <p>SASA state: “SASA to work to improve the audit trail for all formats as part of the ERDM project, with paper records referenced as objects.” (<i>SASA Records Management Improvement Action Plan</i> section 6). The Keeper agrees this action and commends the principle of identifying hard-copy records in the same system as electronic records where possible.</p> <p>The Keeper agrees that the developments explained in element 4 should greatly enhance the ability of the authority to centrally locate and identify records.</p> <p>The Keeper also notes a commitment in the <i>SASA Records Management</i></p>

			<p><i>Improvement Action Plan (6)</i> that local business areas are to review current procedures to track hard-copy records locally. The Keeper would be interested in receiving a sample from this review.</p> <p>The Keeper agrees that certain line-of-business systems operated by SASA will have record tracking functionality built in. SASA give examples of this (such as the Quality Management System).</p> <p>The Keeper agrees this element of SASA’s <i>Records Management Plan</i> under ‘improvement model’ conditions. This means that he agrees that an authority is taking steps to close a gap in provision, but requires regular updates on progress as they become available.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>SASA have supplied their <i>Records Management Competency Framework</i> which make clear that the Librarian and Information Manager is responsible for “for ensuring that records management practices and procedures are established in line with all legal obligations and professional standards, providing guidance to all staff, establishing and liaising with Section Heads and meeting the aims and objectives of the records management strategy.” (<i>Competency Framework</i> page 2).</p> <p>There is a commitment in the <i>Plan</i> (page 25) that the Librarian and Information Manager will undertake appropriate training to keep abreast of records management best practice. The Keeper commends this commitment.</p> <p>Ms Tivey, who is a professional information manager (post-graduate qualification), is a member of the Information and Records Management Society: http://www.irms.org.uk/</p> <p>In the <i>Records Management Policy (see element 3)</i> SASA make the following commitment: “Training will be provided to all staff in order to highlight and increase awareness of their responsibilities with regard to records management.” The Keeper</p>

			<p>commends this commitment.</p> <p>It is a principle of the <i>Scottish Government Information Security Policy</i> that “Information security training will be available to all staff.” Part of the SASA induction process for new staff is mandatory information security training.</p> <p>Data protection training is available to SASA staff as an e-learning module. A screen-shot has been supplied showing access to this training. As well as specific data protection refreshers, SASA staff undertake the Scottish Government’s “Responsible for Information” training annually. This is also mandatory.</p> <p>A staff training records has been supplied in evidence.</p> <p>The <i>Records Management Improvement Plan</i> commits SASA to develop further records management training. This will, of course, be crucial if an EDRM is adopted (see element 4). The Keeper should be informed when this further training is made available to staff.</p> <p>The <i>Improvement Plan</i> also suggests that NRS staff may be involved in this training. The Keeper is open to this idea in principle.</p> <p>The Keeper should be able to agree that the individual who will carry the responsibility for having day-to-day responsibility for implementing the RMP will have appropriate skills for the role. Furthermore, the Keeper acknowledges that SASA considers records management training for appropriate staff.</p>
<p>13. Assessment and Review</p>	<p>A</p>	<p>G</p>	<p>It is a requirement of the Public Records (Scotland) Act 2011 that “An authority must— (a) keep its records management plan under review” (PRSA Part 1 5.1.a.).</p> <p>The SASA <i>Plan</i> is to be reviewed annually (<i>Plan</i> page 3) by the Librarian and Information Manager (see element 2). The review of the Plan’s implementation and</p>

			<p>the progress of the development projects will be reported to the Head of SASA (see element 1).</p> <p>However, the exact methodology for these reviews is not yet established. The <i>Plan</i> states “SASA’s Librarian & information Manager will establish and implement a Standard Operating Procedure to cover this area.” The <i>Records Management Improvement Plan</i> supports this (section 8): “A procedure needs to be established to ensure regular self-assessment and review of SASA’s records management systems.” The Keeper agrees this action.</p> <p>Clearly the development of a review ‘operating procedure’ is a matter of some urgency as it will be required for the first annual review.</p> <p>The <i>Records Management Policy</i> (see element 3) and the <i>Business Classification Scheme</i> (once implemented) will be reviewed annually.</p> <p>The Scottish Ministers registration with the Information Commissioner must be renewed by June 2017.</p> <p>The Keeper agrees this element of SASA’s <i>Records Management Plan</i> under ‘improvement model’ terms. This means that the Keeper acknowledges that having identified a gap in provision, the authority has committed to a project to close that gap (creating a standard information governance review methodology). The Keeper’s agreement is conditional on him receiving details of this methodology within the next year.</p>
14. Shared Information	G	G	<p>SASA have adopted the Scottish Government data sharing procedures with which the Keeper is familiar and which have previously been agreed as part of the <i>Scottish Government Records Management Plan</i>. A sample template and guidance have been provided to the Keeper in evidence.</p>

			<p>The Scottish Government employs a standard data sharing agreement template which includes information governance and security clauses section 6.1 and 6.2 of the guidance.</p> <p>Staff are provided with guidance on information sharing.</p> <p>The Keeper agrees that SASA properly considers records governance when undertaking data sharing projects.</p>
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**Science and Advice for Scottish Agriculture (Part of ‘Scottish Ministers’)
For brevity this authority will be referred to as ‘SASA’ in the assessment below.**

General Notes on RMP, Including Concerns:

Version:

This assessment is on the *Records Management Plan* (the *Plan*) of SASA, version 2 dated September 2016.

The *Plan* is accompanied by a forward action plan *SASA Records Management Improvement Action Plan* (version 2 September 2016) – The Keeper welcomes this inclusion.

SASA recognise records as a business asset (for example *Records Management Policy* page 3 and *Information Security Policy Statement*). The Keeper welcomes this recognition.

The *Plan* does not include records of the Inspections Section of the Plant Biosecurity & Inspections Branch. The records of this branch are managed as part of the Scottish Government main EDRM system and are covered by the, already agreed, *Scottish Government Records Management Plan*.

The *Plan* mentions the Act and is based on the Keeper's, 14 element, Model Plan <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan>.

6. Keeper's Summary

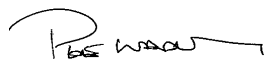
Elements 1 -14 that the Keeper considers should be in a public authority records management plan have been properly considered by Science and Advice for Scottish Agriculture (Part of 'Scottish Ministers'). Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of Science and Advice for Scottish Agriculture.

The Keeper recommends that Science and Advice for Scottish Agriculture 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 Science and Advice for Scottish Agriculture (Part of 'Scottish Ministers'). In agreeing this RMP, the Keeper expects Science and Advice for Scottish Agriculture to fully implement the agreed RMP and meet its obligations under the Act.



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Tim Ellis
Keeper of the Records of Scotland