

Food **Standards** **Scotland**

Inbhe **Bìdh Alba**

Records Management Plan

Information and Records Management
September 2017

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Records Management Plan

Summary

Food Standards Scotland is fully committed to compliance with the requirements of the Public Records (Scotland) Act 2011, which came into force on the 1st January 2013. Food Standards Scotland will therefore follow procedures that aim to ensure that all employees, contractors, agents, consultants and other trusted third parties who have access to any information held within the organisation are fully aware of and abide by their duties under the Act.

About the Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) came into force on the 1st January 2013, and requires Food Standards Scotland to submit a Records Management Plan (RMP) to be agreed by the Keeper of the Records of Scotland. This document is the Records Management Plan of Food Standards Scotland and is to be submitted to the Keeper of the Records of Scotland on Friday 29th September 2017.

About the Food Standards Scotland

Food Standards Scotland (FSS) is the competent food authority in Scotland responsible for ensuring food is safe to eat. FSS' over-arching strategic objective is consumer protection – that food is safe to eat, ensuring consumers know what they are eating and improving diet. The FSS strategy sets out the outcomes FSS is working towards to create a food and drink environment in Scotland that benefits, protects and is trusted by consumers.

Information underpins the work of FSS and helps us deliver our statutory objectives and outcomes. Our information supports us to:

- Protect the public from risks to health which may arise in connection with the consumption of food;
- Improve the extent to which members of the public have diets which are conducive to good health; and
- Protect the other interests of consumers in relation to food.

Information comes in many forms and is held in a variety of formats. To maximise the potential benefit from our information we need to manage it effectively, re-use it where we can, share it appropriately and ensure that it is adequately protected. Information that is not managed properly, may be lost or is not accessible to the right people at the right time.

The guiding principles of records management are to ensure that information is available when and where it is needed, in an organised and efficient manner, and in a well maintained environment.

FSS must adhere to all legislation, codes of practice and initiatives regarding information and records management. In addition, we are more accountable to

the public now than ever before through the increased awareness of openness and transparency within government.

Knowledge and Information Management (IKM) is now formally recognised as a function of government in the same way that Finance, IT and Communications are. It is expected that all areas of business within FSS will be fully committed to creating, managing, disclosing, protecting and disposing of information effectively.

The Plan

The scope of the Plan applies to all records irrespective of age, format, the technology used to create and store them, or the type of information they contain.

Each section lists evidence in support of FSS' activities. Where relevant, details of further development work to deliver the necessary requirements of the Act are outlined. An overview of all required actions to implement the Plan with timescales is at Appendix 1. The evidence package is included in Appendix 2. Once the improvement plan is complete, it is envisaged that all actions, including those to maintain and review the Plan, will be incorporated into day to day tasks within the organisation.

Review

This plan will be reviewed every year (or sooner if new legislation, codes of practices or national standards are to be introduced).

| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
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| <p>Element 1: Senior Management responsibility:</p> <p><i>Identify an individual at senior level who has overall strategic accountability for records management.</i></p> <p>Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority's public records. An authority's RMP <u>must</u> name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.</p> <p>It is vital that the RMP submitted by an authority has the approval and support of that authority's senior management team. Where an authority has already appointed a Senior Information Risk Owner, or similar person, they should consider making that person responsible for the records management programme. It is essential that the authority identifies and seeks the agreement of a senior post-holder to take overall responsibility for records management. That person is unlikely to have a day-to-day role in implementing the RMP, although they are not prohibited from doing so.</p> <p>As evidence, the RMP could include, for example, a covering letter signed by the senior post-holder. In this letter the responsible person named should indicate that they endorse the authority's record management policy (See Element 3).</p> <p>Read further explanation and guidance about element 1 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp</p> | <p>The Deputy Chief Executive Officer, Elspeth MacDonald, a member of the Senior Management Team has overall strategic responsibility for all aspects of Records Management in FSS, and is the corporate owner of this document.</p> <p>Elspeth MacDonald is the Senior Information Risk Owner (SIRO) of FSS and fully endorses this Plan and will ensure the required improvements to records management procedures are implemented corporately and monitored by the Records Manager through the assessment and review process.</p> | <p>E01: Covering letter from SIRO</p> <p>E02: Records Management Policy</p> <p>E03: Roles and Responsibilities of the SIRO</p> | <p>No additional actions have been identified in relation to the Senior management responsibility.</p> <p>All relevant information and records will be updated as part of the routine, on-going maintenance and review of FSS' Plan with any significant changes submitted to the Keeper as required by section 5(6)</p> |

| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
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| <p>Element 2: Records Manager Responsibility:</p> <p><i>Identify individual within the authority, answerable to senior management, to have day-to-day operational responsibility for records management within the authority.</i></p> <p>Section 1(2) (a)(ii) of the Act specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. An authority's RMP <u>must</u> name and provide the job title of the person responsible for the day-to-day operation of activities described in the elements in the authority's RMP. This person should be the Keeper's initial point of contact for records management issues. It is essential that an individual has overall day-to-day responsibility for the <u>implementation</u> of an authority's RMP. There may already be a designated person who carries out this role. If not, the authority will need to make an appointment. As with element 1 above, the RMP must name an individual rather than simply a job title. It should be noted that staff changes will not invalidate any submitted plan provided that the all records management responsibilities are transferred to the incoming post holder and relevant training is undertaken. This individual might not work directly for the scheduled authority. It is possible that an authority may contract out their records management service. If this is the case an authority may not be in a position to provide the name of those responsible for the day-to-day operation of this element. The authority must give details of the arrangements in place and name the body appointed to carry out the records management function on its behalf. It may be the case that an authority's records management programme has been developed by a third party. It is the person operating the programme on a day-to-day basis whose name should be submitted.</p> <p>Read further explanation and guidance about element 2 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp</p> | <p>Our existing Record Management Policies have Tigan Daspan as the Records Manager for Food Standards Scotland having day to day operational responsibility for Records Management.</p> <p>Tigan reports to Garry Mournian, Head of Corporate Services with the remit for the Information Management and Assurance function of the business.</p> <p>Overall responsibility for Records Management sits with our Senior Information Risk Owner (SIRO) Elspeth MacDonald</p> | <p>E01: Covering Letter from SIRO</p> <p>E02: Records Management Policy</p> <p>E04: Records Manager's Job description and responsibilities</p> | <p>No additional actions have been identified in relation to Records Manager responsibility.</p> <p>All relevant information and records will be updated as part of the routine, on-going maintenance and review of FSS' Plan with any significant changes submitted to the Keeper as required by section 5(6)</p> |

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| <p>Element 3: Records management policy statement:</p> <p><i>A records management policy statement underpins effective management of an authority's records and information. It demonstrates to employees and stakeholders that managing records is important to the authority and serves as a mandate for the activities of the records manager.</i></p> <p>The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority. The statement will properly reflect the business functions of the public authority. The Keeper will expect authorities with a wide range of functions operating in a complex legislative environment to develop a fuller statement than a smaller authority. The records management statement should define the legislative, regulatory and best practice framework, within which the authority operates and give an overview of the records management processes and systems within the authority and describe how these support the authority in carrying out its business effectively. For electronic records the statement should describe how metadata is created and maintained. It should be clear that the authority understands what is required to operate an effective records management system which embraces records in all formats.</p> <p>The records management statement should include a description of the mechanism for records management issues being disseminated through the authority and confirmation that regular reporting on these issues is made to the main governance bodies. The statement should have senior management approval and evidence, such as a minute of the management board recording its approval, submitted to the Keeper. The other elements in the RMP, listed below, will help provide the Keeper with evidence that the authority is fulfilling its policy.</p> <p>Read further explanation and guidance about element 3 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp</p> | <p>A consolidated and a revised Records Management Policy, reflective of the record keeping arrangements in place for Food Standards Scotland has been established.</p> <p>FSS recognises the importance of ensuring that the records they create or maintain comply with the requirements set out in its Record Management Policy. The records FSS keeps are public assets and it is the responsibility of everyone within the FSS to ensure records are held in appropriately secure conditions, depending on their classification.</p> <p>FSS is committed to a systematic and planned approach to the management of records within the organisation, from their creation to their ultimate disposal or archive.</p> <p>The Policy has been approved by the SIRO in Food Standards Scotland on 15th February 2016 and is available to FSS staff via Corporate SharePoint site and Intranet (Saltire).</p> <p>FSS uses Scottish Government (SG) Objective eRDM system and SCOTS services. SG policy is included under evidence</p> | <p>E01: Records Management Policy</p> <p>E05: Scottish Government Records Management Policy</p> <p>E06: Information Management and Record Management PowerPoint Presentations used for staff training on 14th April 2016</p> <p>E07: IKM posters on Records management</p> | <p>No additional actions have been identified in relation to Records Management.</p> <p>All relevant information and records will be updated as part of the routine, on-going maintenance and review of FSS' Plan with any significant changes submitted to the Keeper as required by section 5(6)</p> |

| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
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| <p>Element 4: Business classification</p> <p><i>A business classification scheme describes what business activities the authority undertakes – whether alone or in partnership.</i></p> <p>The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme or similar.</p> <p>A business classification scheme usually takes the form of a hierarchical model or structure diagram. It records, at a given point in time, the informational assets the business creates and maintains, and in which function or service area they are held. As authorities change the scheme should be regularly reviewed and updated.</p> <p>A business classification scheme allows an authority to map its functions and provides a structure for operating a disposal schedule effectively.</p> <p>Some authorities will have completed this exercise already, but others may not. Creating the first business classification scheme can be a time-consuming process, particularly if an authority is complex, as it involves an information audit to be undertaken. It will necessarily involve the cooperation and collaboration of several colleagues and management within the authority, but without it the authority cannot show that it has a full understanding or effective control of the information it keeps.</p> <p>Although each authority is managed uniquely there is an opportunity for colleagues, particularly within the same sector, to share knowledge and experience to prevent duplication of effort.</p> <p>All of the records an authority creates should be managed within a single business classification scheme, even if it is using more than one record system to manage its records. An authority will need to demonstrate that its business classification scheme can be applied to the record systems which it operates.</p> <p>Read further explanation and guidance about element 4 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp</p> | <p>The Food Standards Scotland Business Classification scheme is the bedrock of the records management function within the Food Standards Scotland. The Business Classification Scheme aims to provide the framework for managing the organisation's records and information.</p> <p>The Business Classification Scheme has been adapted from the Integrated Public Sector Vocabulary (IPSV) Scheme. The scheme has four levels of classification, the first three levels are subject based and the fourth level describes the activity undertaken.</p> <p>Every file that is created has a file type attached this tells you the type of file that is being created and what the retention and disposal is on that file.</p> <p>Food Standards Scotland do contract some of their functions to third parties and I have attached the contracts which contain details of what should happen to information that they produce.</p> <p>We have adopted Scottish Government terms and conditions for all contracts.</p> | <p>E08: Business Classification document</p> <p>E09: Food Standards Scotland Standard File type guidance</p> <p>E10: Scottish Government Casework File type guidance</p> <p>E11: Food Standards Scotland Archival Policy for Shared Drives</p> <p>E12: Food Standards Scotland Fileplan Level 1 to 3</p> <p>E13: Scottish Government Model Framework Agreement Terms and Conditions</p> <p>E14: Scottish Government Terms and Conditions 1 - conditions of</p> | <p>The SG has recently started a project to look at replacing the current eRDM system, as part of the project the SG is looking to rationalise the Business Classification Scheme.</p> <p>Once a decision has been made on the new Business Classification Scheme, FSS Records Management Plan will be updated to reflect the changes.</p> |

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| | | <p>contract for the purchase of goods</p> <p>E15: Scottish Government Terms and Conditions 2 (SGTC2)</p> <p>E16: Scottish Government Terms and Conditions 3 - conditions of contract for consultancy services (other than works consultancies)</p> <p>E17: Scottish Government Terms and Conditions 4 - conditions of contract for the supply of goods (and any related services)</p> <p>E18: Scottish Government Terms and Conditions 5 - conditions of contract for the sale of goods</p> <p>E19: FSS Information Asset Register</p> | |
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| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
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| <p>Element 5: Retention schedules <i>A retention schedule is a list of records for which pre-determined disposal dates have been established.</i></p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> demonstrate the existence of and adherence to corporate records retention procedures. The procedures should incorporate retention schedules and should detail the procedures that the authority follows to ensure records are routinely assigned disposal dates, that they are subsequently destroyed by a secure mechanism (see element 6) at the appropriate time, or preserved permanently by transfer to an approved repository or digital preservation programme (See element 7).</p> <p>The principal reasons for creating retention schedules are:</p> <ul style="list-style-type: none"> • to ensure records are kept for as long as they are needed and then disposed of appropriately • to ensure all legitimate considerations and future uses are considered in reaching the final decision. • to provide clarity as to which records are still held by an authority and which have been deliberately destroyed. <p>"Disposal" in this context does not necessarily mean destruction. It includes any action taken at the agreed disposal or review date including migration to another format and transfer to a permanent archive.</p> <p>A retention schedule is an important tool for proper records management. Authorities who do not yet have a full retention schedule in place should show evidence that the importance of such a schedule is acknowledged by the senior person responsible for records management in an authority (see element 1). This might be done as part of the policy document (element 3). It should also be made clear that the authority has a retention schedule in development.</p> <p>An authority's RMP <u>must</u> demonstrate the principle that retention rules are consistently applied across all of an authority's record systems.</p> <p>Read further explanation and guidance about element 5 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp</p> | <p>Food Standards Scotland has a detailed, Retention and Disposal Policy. This is based on the key record types held by the organisation as well as their recommended minimum retention periods, in line with statutory and legislative obligations, and business needs.</p> <p>The retention and disposal schedules have been mapped to file types which are then used against the files created within in eRDM. These are the standard retention schedules that all users of eRDM in Scottish Government and other non-ministerial bodies use.</p> <p>Before the introduction of eRDM, FSS were using the Food Standards Agency Corporate Retention Schedules. A copy is attached under evidence (E21). These are still used to review and securely dispose of pre-eRDM records.</p> <p>At the moment we do not use retention and disposal schedules on shared drives, pts files and public folders, but the Scottish Government and iTECS (ISIS) our network providers have an on-going project to look at applying these to our information that does not form part of our corporate record. NRS are part of the board that has been set up for this project.</p> | <p>E09: Food Standards Scotland Standard File type guidance</p> <p>E10: Scottish Government Casework File Type Guidance</p> <p>E20: Scottish Government Archival Project - Analysis and Interim Progress Report</p> <p>E21: FSA Corporate Retentions Schedules</p> <p>E22: FSS Operations Retentions Schedules</p> <p>E23: FSS Food Crime and Intelligence Unit Retentions Schedules</p> <p>E24: FSS Records for Permanent Preservation at NRS</p> <p>E25: MoU between FSS</p> | <p>We are in the process of signing off an MoU with NRS for the permanent retention and disposal of FSS records of enduring value.</p> <p>The Operations Delivery and Food Crime and Intelligence Unit Schedules will be subject to review every three years. Changes to the Records Retention and Disposal Schedule will be discussed and recorded at future FSS' Senior Management Team Meetings.</p> <p>Any significant changes to be submitted to the Keeper as required by section 5 (6).</p> |

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| | <p>Some core regulatory businesses conducted by FSS are unique to the organisation. Separate retentions schedules have been created for Operations Delivery and Scottish Food Crime and Intelligence unit functions of the business</p> <p>FSS Records selected by NRS for Permanent Preservation at NRS is attached</p> | <p>and NRS for the permanent preservation of FSS records of enduring value.</p> | |
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| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
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| <p>Element 6: Destruction arrangements <i>It is not always cost-effective or practical for an authority to securely destroy records in-house. Many authorities engage a contractor to destroy records and ensure the process is supervised and documented.</i></p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP <u>must</u> demonstrate that proper destruction arrangements are in place.</p> <p>A retention schedule, on its own, will not be considered adequate proof of disposal for the Keeper to agree a RMP. It must be linked with details of an authority's destruction arrangements. These should demonstrate security precautions appropriate to the sensitivity of the records. Disposal arrangements must also ensure that all copies of a record – wherever stored – are identified and destroyed.</p> <p>Read further explanation and guidance about element 6 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp</p> | <p>All paper records are subject to secure disposal under contract to Restore Datashred:</p> <ul style="list-style-type: none"> • Datashred contract details, ISO accreditation, insurance certificate and employer's liability available on Datashred website - http://www.shredding.info/ • Datashred dispose of confidential documents on collected directly from our head office in Aberdeen. Disposal is on site. • FSS has adopted Scottish Government retention schedules on all electronic records and regularly review these. • When records are destroyed on eRDM we are left with a stub for the file name, document name and metadata that was attached. • Computer media is disposed of securely and through approved Scottish Government procedures • Paper based records are kept and maintained by an external contractor – Iron Mountain Limited. The disposal of the records are in line with FSS, and Food Standards Agency's Corporate Retentions Schedules | <p>E09: Food Standards Scotland Standard File type guidance</p> <p>E10: Scottish Government Casework File type guidance</p> <p>E26: Collection and Destruction note from Datashred</p> <p>E27: Screenshot of a destroyed file on eRDM.</p> <p>E28: Iron mountain Certificate of the destruction of Pollution Prevention Control (PPC) records in 2010</p> <p>E29: SCOTS Back up and Destruction procedures</p> <p>E30_Destruction of SCOTS Hardware -</p> | <p>As part of SG project looking at a replacement for our current eRDM system we will need to make sure that the functionality we currently have in respect to destroying files will be maintained in a new system.</p> <p>Ensure that the on-going sustainable system of collecting and disposing of paper records (Daybooks) from our field based offices continues at the end of each financial period.</p> |

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| | | <p>Process and Procedures - NVTGroup</p> <p>E21: FSA Corporate Retentions Schedules</p> <p>E22: FSS Operations Retentions Schedules</p> <p>E23: FSS Food Crime and Intelligence Unit Retentions Schedules</p> | |
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| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
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| <p>Element 7: Archiving and transfer arrangements <i>This is the mechanism by which an authority transfers records of enduring value to an appropriate archive repository, specifying the timing of transfers and other terms and conditions.</i></p> <p>Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP <u>must</u> detail its archiving and transfer arrangements and ensure that records of enduring value are deposited in an appropriate archive repository. The RMP will detail how custody of the records will transfer from the operational side of the authority to either an in-house archive, if that facility exists, or another suitable repository, which <u>must</u> be named. The person responsible for the archive should also be cited.</p> <p>Some records continue to have value beyond their active business use and may be selected for permanent preservation. The authority's RMP <u>must</u> show that it has a mechanism in place for dealing with records identified as being suitable for permanent preservation. This mechanism will be informed by the authority's retention schedule which should identify records of enduring corporate and legal value. An authority should also consider how records of historical, cultural and research value will be identified if this has not already been done in the retention schedule. The format/media in which they are to be permanently maintained should be noted as this will determine the appropriate management regime.</p> <p>Read further explanation and guidance about element 7- http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp</p> | <p>Food Standards Scotland records which are identified as being of historical interest and of enduring value to the wider Scottish community are to be transferred to the National Records of Scotland for permanent preservation.</p> <p>Agreement in place for the periodic archiving of FSS website. The agreement is referenced in the MoU between FSS and NRS.</p> <p>Specific FSS records have been selected by NRS for permanent preservation – E24.</p> <p>Food Standards Scotland use Enterprise Vault to archive emails from all employees mailboxes.</p> <p>SG have started an archiving project that is looking at information which currently does not form part of the corporate record but needs to be managed better through retention and disposal</p> | <p>E31: Scottish Government Email Archiving</p> <p>E32 NRS Selection Policy on SG Electronic and Paper Records</p> <p>E20: Scottish Government Archival Project - Analysis and Interim Progress Report</p> <p>E24: FSS Records for Permanent Preservation at NRS</p> <p>E25: MoU between FSS and NRS for the permanent preservation of FSS records of enduring value.</p> | <p>Regular contact is to be kept with NRS with regards to record transfers once an agreement is reached.</p> <p>When records are transferred to the NRS, a Transfer Certificate or confirmation note will be generated.</p> <p>An outcome of SG Archiving project will be a SG/ Food Standards Scotland Archiving Policy will be developed to cover all types of records.</p> |

| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
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| <p>Element 8: Information Security <i>Information security is the process by which an authority protects its records and ensures they remain available. It is the means by which an authority guards against unauthorised access and provides for the integrity of the records. Robust information security measures are an acknowledgement that records represent a risk as well as an asset. A public authority should have procedures in place to assess and contain that risk.</i></p> <p>Section 1(2) (b)(ii) of the Act specifically requires a RMP to make provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> make provision for the proper level of security for its public records.</p> <p>All public authorities produce records that are sensitive. An authority's RMP <u>must</u> therefore include evidence that the authority has procedures in place to adequately protect its records. Information security procedures would normally acknowledge data protection and freedom of information obligations as well as any specific legislation or regulatory framework that may apply to the retention and security of records.</p> <p>The security procedures <u>must</u> put in place adequate controls to prevent unauthorised access, destruction, alteration or removal of records. The procedures will allocate information security responsibilities within the authority to ensure organisational accountability and will also outline the mechanism by which appropriate security classifications are linked to its business classification scheme.</p> <p>Information security refers to records in all or any format as all are equally vulnerable. It refers to damage from among other things:</p> | <p>Food Standards Scotland has a number of well-established information security policies and procedures which all staff are required to comply with. The policies are approved and are reviewed on a regular basis.</p> <p>Food Standards Scotland is pro-active in its approach to information risk through the corporate risk register</p> <p>All Information Asset Owners ("IAOs") have been trained and have been provided with guidance on the role.</p> <p>All employees are required to undertake Protecting information training alongside specific data protection e-learning training. This annual awareness training reminds employees of the importance of data security and associated risks.</p> <p>Food Standards Scotland's Corporate Services Team are responsible for ensuring that adequate physical controls are put in place to ensure the security and confidentiality of all business sensitive data whether held manually or electronically.</p> <p>FSS has adopted SG/iTECS IT code of conduct and other supporting documents.</p> | <p>E33: Food Standards Scotland Information Security Policy Statement</p> <p>E34: SG Data Handling Policy</p> <p>E35: FSS Clear Desk Policy</p> <p>E36: FSS Risk Management Policy</p> <p>E37: Information Asset Register Guidance</p> <p>E38: FSS Information Security Policy</p> <p>E39: FSS Information Risk Register</p> <p>E40: Restricting files and documents in eRDM – use of security groups</p> <p>E41: eRDM Document Restrictions</p> <p>E42: SG/iTECS IT Code of Conduct</p> <p>E43: Email Correspondence</p> | <p>No action on some of the policies as they are reviewed regularly.</p> <p>Further awareness campaign around information security will be organised in each reporting year.</p> |

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| <p>computer viruses, flood, fire, vermin or mould.</p> <p>Current or semi-current records do not normally require archival standard storage. Physical records will however survive far better in a controlled environment. In broad terms the environment for current records should not allow large changes in temperature or excess humidity (as increased high temperatures and humidity are more likely to cause mould). If records are not adequately protected then the risk that the records could be damaged and destroyed is potentially higher and could lead to significant reputational and financial cost to the business.</p> <p>Read further explanation and guidance about element 8 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement8.asp</p> | <p>FSS uses SCOTS hardware and IT services.</p> <p>It is recognised there are improvements that could be made to information security corporately, in particular in relation to paper records, home working and the use of mobile equipment. The month of May 2017 was called “Infomaynagement”, a number of sessions, workshops and activities were organised to create awareness around FSS Access Control Policy, Government Security Classification Scheme, General Data Protection Regulation (GDPR) and Record Management Plan etc.</p> | <p>Protecting Information and Data Protection Training and intranet site: Protecting Information</p> <p>E44: FSS Access Control Policy</p> <p>E45: FSS IT Security – Incident Reporting form</p> <p>E46: Infomaynagement email to staff</p> <p>E47: How to select an appropriate Protective Marking Flow chart</p> <p>E48: Saltire(Intranet) Articles</p> | |
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| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
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| <p>Element 9: Data protection <i>An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 1998.</i></p> <p>The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations. This might be a high level statement of public responsibility and fair processing.</p> <p>If an authority holds and process information about stakeholders, clients, employees or suppliers, it is legally obliged to protect that information. Under the Data Protection Act, an authority must only collect information needed for a specific business purpose, it must keep it secure and ensure it remains relevant and up to date. The authority <u>must</u> also only hold as much information as is needed for business purposes and only for as long as it is needed. The person who is the subject of the information <u>must</u> be afforded access to it on request.</p> <p>Read further explanation and guidance about element 9 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp</p> | <p>The Food Standards Scotland has in-place wide-ranging data protection controls including high-level procedures, mandatory staff data protection training and guidance for specific activities.</p> <p>The Food Standards Scotland's Data Protection Policy is a statement of public responsibility and demonstrates the organisation's commitment to compliance with the Act and the safeguarding and fair processing of all personal data held.</p> <p>In addition to a specific DPA eLearning package for all staff, 'Protecting Information' eLearning training packages are directed at three different levels of management.</p> <p>On-going preparatory work and staff awareness sessions on GDPR</p> | <p>E49: Data Protection Registration Certificate</p> <p>E50: FSS Data Protection Policy</p> <p>E51: FSS Data Sharing Template and Guidance</p> <p>E43: Email Correspondence Protecting Information and Data Protection Training and intranet site: Protecting Information</p> <p>E52: Data Protection Registration found on ICO's Data Protection Public Register</p> <p>E53: FSS Privacy Impact Assessment Policy</p> <p>E54: FSS Privacy Impact Assessment Checklist</p> <p>E55: GDPR – Data Protection Law is Changing + PowerPoint slides</p> | <p>Food Standards Scotland Staff will continue to undertake "Protecting Information" and Data Protection refresher courses on an annual basis.</p> <p>Work is on-going to review the new data protection legislation which will come into force in May 2018 (the General Data Protection Regulation). FSS will be expected under GDPR to demonstrate data protection by "design and default" for systems and processes that process personal data. At the very least, this is likely to require a review of existing contracts.</p> <p>In preparation for GDPR, FSS Records Manager will attend a 4 day GDPR Practitioner course in Glasgow 23 – 26 October 2017</p> |

| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
|---|---|--|--|
| <p>Element 10: Business continuity and vital records <i>A business continuity and vital records plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an authority.</i></p> <p>The Keeper will expect an authority's RMP to indicate arrangements in support of records vital to business continuity. Certain records held by authorities are vital to their function. These might include insurance details, current contract information, master personnel files, case files, etc. The RMP will support reasonable procedures for these records to be accessible in the event of an emergency affecting their premises or systems.</p> <p>Authorities should therefore have appropriate business continuity plans ensuring that the critical business activities referred to in their vital records will be able to continue in the event of a disaster. How each authority does this is for them to determine in light of their business needs, but the plan should point to it.</p> <p>Read further explanation and guidance about element 10 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp</p> | <p>FSS has identified vital records as part of the work on the 2016 review and update of FSS Business Continuity Plan. These records are listed as an Appendix to the Business Continuity Plan.</p> <p>FSS considers that Business Continuity Management is a fundamental component of good corporate governance. The Business Continuity Plans document how core business functions can be restored following any interruption. The completed plans are stored on, and available to all staff on, eRDM, FSS SharePoint Site and on Saltire.</p> <p>The Food Standards Scotland has Business Continuity that includes the steps required towards a generic disaster recovery plan.</p> <p>Information and Technology Services (iTECS) Business Continuity Plan includes records management function.</p> <p>All records and data held on the SCOTS network are subject to regular back up and associated recovery procedures.</p> | <p>E56: FSS Business Continuity Plan</p> <p>E57: eRDM Business Continuity Plan</p> <p>E58: iTECS Business Continuity Plan</p> <p>E29: SCOTS Back up and Destruction procedures</p> | <p>The Business Continuity Plans to be reviewed regularly.</p> <p>The eRDM Business Continuity Plan will need to be reviewed once SG made a decision on a replacement eRDM System.</p> |

| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
|--|---|--|---|
| <p>Element 11: Audit trail <i>An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities.</i></p> <p>The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record. For the purpose of this plan 'changes' can be taken to include movement of a record even if the information content is unaffected. Audit trail information must be kept for at least as long as the record to which it relates.</p> <p>This audit trail can be held separately from or as an integral part of the record. It may be generated automatically, or it may be created manually.</p> <p>Read further explanation and guidance about element 11 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp</p> | <p>The eRDM's system provides electronic audit trails as evidence of viewing, modifying and deletion of records and the files that the records are contain in. IT systems and databases provide audit logs that record usage and update to records.</p> <p>Paper records are maintained off-site at Iron Mountain (IM) and are identified within the IM Connect Records centre Filing System, which tracks the movements of the records; whether files have been destroyed or if the files have been recalled for review (checked out of IM).</p> <p>The system also tracks records that have been reviewed and securely disposed of in the office using Restore Datashred. Such records appear on the system as "permanently removed from IM"</p> <p>FSS is currently storing electronic records on eRDM and on SharePoint. Paper records in IM are being monitored and securely disposed of when they reach their retention period.</p> <p>Records for permanent preservation, will be reviewed in due course and passed to NRS .</p> | <p>E59: FSS Audit Trail</p> <p>E60: Extract from offsite Paper Filing system</p> <p>E28: Iron Mountain Certificate for the destruction of Pollution Prevention Control (PPC) records in 2010</p> | <p>FSS to transfer records identified for permanent preservation to NRS in the future</p> |

| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
|--|--|---|---|
| <p>Element 12: Competency framework for records management staff <i>A competency framework lists the core competencies and the key knowledge and skills required by a records manager. It can be used as a basis for developing job specifications, identifying training needs, and assessing performance.</i></p> <p>The Keeper will expect an authority's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP. It is important that authorities understand that records management is best implemented by a person or persons possessing the relevant skills.</p> <p>A competency framework outlining what the authority considers are the vital skills and experiences needed to carry out the task is an important part of any records management system. If the authority appoints an existing non-records professional member of staff to undertake this task, the framework will provide the beginnings of a training programme for that person.</p> <p>The individual carrying out day-to-day records management for an authority might not work for that authority directly. It is possible that the records management function is undertaken by a separate legal entity set up to provide functions on behalf of the authority, for example an arm's length body or a contractor. Under these circumstances the authority must satisfy itself that the supplier supports and continues to provide a robust records management service to the authority.</p> <p>The authority's RMP must confirm that it is satisfied by the standard of the records management provided by the supplier and name the organisation that has been appointed to carry out records management on the authority's behalf.</p> <p>Where an authority's records management system has been put in place by a third party, but is operated on a day-to-day basis by a member of staff in the authority, it is the competencies of that member of staff which should be confirmed, not those of the third party supplier of the system.</p> | <p>Core competencies, key knowledge and skills required by FSS staff with responsibilities for Records Management have been clearly defined within the Records Management Competency Framework, ensuring that staff understand their roles and responsibilities and can offer expert advice and guidance. The Records Management Competency Framework (RMCF) has identified that the Records Manager will have a degree or post graduate level qualification in information/records management or be working towards such a professional qualification.</p> <p>'Protecting Information' training has been rolled out to all staff and is mandatory. In addition specific DPA training for all staff has been rolled-out and is mandatory.</p> <p>Information assurance is achieved through the FSS assurance mapping process which is based on Scottish Government internal control checklist. This feeds into FSS CEO's Annual Internal Control Report</p> <p>eRDM Training is mandatory for all Food Standards Scotland staff before they get access to the system.</p> <p>Non completion of training means no access to the system.</p> <p>Records Manager is a member of Information Records Management Society (IRMS)</p> | <p>E61: Records Management Competency Framework</p> <p>E43: Email Correspondence Protecting Information and Data Protection Training and intranet site: Protecting Information</p> <p>E68: FSS Assurance Map Template</p> | <p>Identify training for current Records Manager, so they can work towards obtaining a professional qualification</p> <p>Continue organising training sessions for FSS to give them a better understanding of their records management responsibilities.</p> <p>Further records management, data protection and information security training will be delivered to staff as and when training needs are identified</p> <p>All relevant information and records will be updated as part of the routine, on-going maintenance and review of FSS' Plan with any significant changes submitted to the Keeper as required by section 5(6)</p> <p>.</p> |

Read further explanation and guidance about element 12 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement12.asp>

| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
|--|--|--|---|
| <p>Element 13: Assessment and review <i>Regular self-assessment and review of records management systems will give an authority a clear statement of the extent that its records management practices conform to the Records Management Plan as submitted and agreed by the Keeper.</i></p> <p>Section 1(5) (i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>An authority's RMP <u>must</u> describe the procedures in place to regularly review it in the future.</p> <p>It is important that an authority's RMP is regularly reviewed to ensure that it remains fit for purpose. It is therefore vital that a mechanism exists for this to happen automatically as part of an authority's internal records management processes.</p> <p>A statement to support the authority's commitment to keep its RMP under review must appear in the RMP detailing how it will accomplish this task.</p> <p>Read further explanation and guidance about element 13 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp</p> | <p>Each of the policies and procedures produced in line with the requirements of the Public Records (Scotland) Act 2011 have been done so in consultation with colleagues across the organisation and in Scottish Government.</p> <p>Each policy has been reviewed in detail in order to ensure compliance with all business as well as legal obligations.</p> <p>The Records Manager will be responsible for overseeing the Records Management Plan and making sure that the supporting documentation is kept up to date. It forms part of the Records Manager's objectives and if documentation is required to be updated it will be updated by the Records Manager or they will ask the relevant area in the Food Standards Scotland to review and update.</p> <p>The review and update of the Records Management Plan will be reported to the Head of Corporate Services and any updates will be signed off by the SIRO.</p> | <p>E62: Food Standards Scotland Assessment and Review Process</p> <p>E04: Records Manager's Job description and responsibilities</p> | <p>All policies and procedures will be regularly reviewed to ensure that the Records Management Plan is kept up to date and current.</p> <p>The Records Management Plan will also be reviewed if the Scottish Government replaces or upgrades the current eRDM system that the Food Standards Scotland uses to store corporate records and documents.</p> |

| RMP Element Description | Food Standards Scotland (FSS) Statement | Evidence | Further Development |
|---|--|---|--|
| <p>Element 14: Shared Information <i>Under certain conditions, information given in confidence may be shared. Most commonly this relates to personal information, but it can also happen with confidential corporate records</i></p> <p>The Keeper will expect an authority's RMP to reflect its procedures for sharing information. Authorities who share, or are planning to share, information must provide evidence that they have considered the implications of information sharing on good records management.</p> <p>Information sharing protocols act as high level statements of principles on sharing and associated issues, and provide general guidance to staff on sharing information or disclosing it to another party. It may therefore be necessary for an authority's RMP to include reference to information sharing protocols that govern how the authority will exchange information with others and make provision for appropriate governance procedures.</p> <p>Specifically the Keeper will expect assurances that an authority's information sharing procedures are clear about the purpose of record sharing which will normally be based on professional obligations. The Keeper will also expect to see a statement regarding the security of transfer of information, or records, between authorities whatever the format.</p> <p>Issues critical to the good governance of shared information should be clearly set out among parties at the earliest practical stage of the information sharing process. This governance should address accuracy, retention and ownership. The data sharing element of an authority's RMP should explain review procedures, particularly as a response to new legislation. Read further explanation and guidance about element 14 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceEle</p> | <p>Food Standards Scotland shares data in accordance with the Data Protection Act 1998 and Freedom of Information (Scotland) Act 2002.</p> <p>FSS has an Open Data Publication Plan that outlines and links to the information the FSS has and will routinely publish and make available.</p> <p>In addition to undertaking the training on Protecting Information, all FSS staff are provided with guidance concerning the procedures and considerations for electronic and hard copy handling and sharing of information.</p> <p>A standard data access agreement template is also in existence which can be modified to reflect the specific requirements and circumstances for sharing information.</p> <p>An easy to follow guide was produced to help FSS staff understand the Government Security Classifications and how to select the appropriate protective marking when capturing or sharing information within FSS and to external stakeholders.</p> <p>FSS is one of the pathfinder organisations to trail the use of Connect across Scottish Government – Objective Connect is a collaborative tool to share information up to OFFICIAL- SENSITIVE with anyone outside of FSS or the SCOTS network. Deployment of Connect in FSS scheduled for October 2017.</p> | <p>E38: FSS Information Security Policy</p> <p>E50: FSS Data Protection Policy</p> <p>E51: FSS Data Sharing Template and Guidance</p> <p>E63: Open Data Publication Plan</p> <p>E64: Government Security Classification Portal http://saltire/my-workplace/it-and-information-management/it-security/Pages/government-security-classifications.aspx</p> <p>E65: Restricting files and document in eRDM – use of security groups</p> <p>E66: Data Sharing Agreement - Between FSS and The Scottish Government (Agriculture, Food and Rural Communities)</p> <p>E67: DSA between FSA and FSS</p> <p>E47: How to select an appropriate Protective Marking Flow chart</p> <p>E69: Screenshot of FSS, SG, and Objective Connect Project Workspaces</p> | <p>No further action</p> <p>All relevant information and records will be updated as part of the routine, on-going maintenance and review of FSS' Plan with any significant changes submitted to the Keeper as required by section 5(6)</p> |

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Appendix 1

Records Management Plan (RMP) Improvement Plan

1 Introduction

- 1.1 To give the Keeper National Records Scotland information on the progress FSS has made in completing the authority's Records Management Plan (RMP), and to provide an overview of all required actions to implement the RMP across all FSS' business areas.
- 1.2 14 elements of the model RMP are complete with substantial evidence to support the statements made against each element.
- 1.3 A high level Improvement plan has been developed which aims to have the key building blocks for compliance implemented by December 2018. The improvement plan is at **Annex A** together with the current status of each task. It should be noted that the technical tasks require the majority of policy tasks to be completed before they can be started.

2 Background

- 2.1 The Public Records (Scotland) Act 2011 (the Act) requires named authorities to produce a Records Management Plan. FSS is named in the legislation and will submit a Records Management Plan to the Keeper of the Records of Scotland on Friday 29th September 2017.
- 2.2 The Records Management Plan has 14 elements, which are based on a model plan, all of which must be approved by the Keeper. While all elements of FSS' Records Management Plan are ready for submission, 3 elements (Elements 4, 7, & 11) require further improvement work to enable FSS to sufficiently comply with the Act.
- 2.3 The 14 elements ready to be submitted to the Keeper with substantial evidence are:
 - Element 1 – Senior Officer
 - Element 2 – Records Manager
 - Element 3 – Records Management Policy
 - Element 4 – Business Classification
 - Element 5 – Retention Schedules
 - Element 6 – Destruction Arrangements
 - Element 7 – Archiving and Transfer
 - Element 8 – Information Security
 - Element 9 – Data Protection
 - Element 10 – Business Continuity and Vital Records
 - Element 11 – Audit Trail
 - Element 12 – Competency Framework
 - Element 13 – Assessment and Review
 - Element 14 – Shared Information

3 Progress to Date

- 3.1 All 14 elements on FSS RMP have substantial evidence to support the statements made against each element.
- 3.2 FSS will be required to keep the RMP up to date as well as to keep the Keeper informed of progress with delivering the outstanding elements, and will be subject to a formal review under the Act when the RMP is approved. The review date will be communicated by the Keeper after the submission of the RMP in September 2017.
- 3.3 The Integrated Public Sector Vocabulary Scheme (IPSV) is the default business classification scheme underpinning eRDM and FSS SharePoint file structures. The scheme has four levels of classification, the first three levels are subject based and the fourth level describes the activity undertaken under each subject area.
- 3.4 Work is on-going to agree a Memorandum of Understanding (MoU) between FSS and National Records of Scotland (NRS) for the permanent preservation of FSS records of enduring value. The MoU will substantiate the statements made under Element 7 – 'Archiving and Transfer', and Element 11 – 'Audit Trail'.

4 Moving Forward with the RMP

- 4.1 The RMP should deliver significant business benefits as well as ensure compliance to The Public Records (Scotland) Act 2011. A summary of the main tasks ahead of submission of the RMP are:
 - Develop a Corporate SharePoint File Plan to assist all staff especially Operations field staff to file information in the new structure across the organisation. This will also allow the consistent application of metadata and naming convention which will improve system performance and functionality; - **Completed**
 - Implement procedures for the archiving of legacy paper records. This will enable the transfer of electronic records to archive, again with minimal staff input;- **on-going – target December 2018**
 - Implement a policy to document actions and decisions across all business areas and to store the records on eRDM/SharePoint to assist with audit trails – an index of the corporate records of value on SharePoint to be held on eRDM; – **on-going -target December 2018**
 - Organise an Information and Knowledge Management month in May 2017 to raise the profile of information and records management in FSS. The month will aim to ensure that policies and procedures are not created just to follow the letter of the law, but to demonstrate to staff that we all need to take our responsibilities for data protection, information security and records management seriously – **Completed. Further awareness campaign to be organised in 2018.**

5 Further Considerations – Requirement of the General Data Protection Regulation (GDPR)

- 5.1 The new data protection regulation will come into force in May 2018. The GDPR is already in place, it is just that member states are not obligated to apply it until May 2018. Achieving compliance with the GDPR is likely to have significant resource implications although FSS already have comprehensive policies and procedures which will provide a good basis to work from. The new requirements have also been taken into consideration when developing the project plan to deliver the RMP. The key elements of the legislation that are likely to require action by FSS are [listed at the end of Appendix A]:
- a. The need to identify and publish the legal basis for processing all personal data (meaning organisations must demonstrate the justification for processing personal data using specific provisions provided for in the legislation);
 - b. Changes to privacy notices and the use of consent. The major shift in the new law is about giving consumers control over their data;
 - c. Mandatory data breach reporting – what category or level of data breach should the FSS report;
 - d. A number of exemptions that FSS use under existing legislation to process data will require additional domestic (UK) legislation to be passed. One example is the processing of personal data for research purposes. FSS will need to keep the progress of secondary legislation under review;
 - e. FSS must be able to demonstrate data protection by “design and default” for systems and processes that process personal data. At the very least, this is likely to require a review of existing contracts;
 - f. The appointment of a Data Protection Officer, who will have duties defined by the Regulation.

6 Conclusion

- 6.1 The Records Management Plan and GDPR offers the FSS an opportunity to improve our practices on how we create, process, store, handle, manage, and share our corporate data. A great opportunity and encouragement to look at the issues afresh.
- 6.2 It is envisaged that all actions in this Improvement plan when completed, will be incorporated into day to day tasks within the organisation.

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Appendix A: RMP – High Level Improvement Plan

| RMP Element | Policy Tasks/Activities | Technical (IT & Professional) Tasks/Activities |
|--------------------------------------|---|--|
| 1. Senior Management Responsibility | - | - |
| 2. Records Management Responsibility | - | - |
| 3. Records Management Policy | <ul style="list-style-type: none"> To be reviewed and updated with any significant changes in legislation | - |
| 4. Business Classification | <ul style="list-style-type: none"> Review the BCS and information asset register– Completed. Establish a cross office technical group to help develop our metadata standard and propose options for where FSS open data should be hosted by 31 August 2017 - Completed. Develop a SharePoint Corporate File Plan and apply keyword metadata – Completed. Migrate information to new SharePoint file plan – In Progress (phase migration) – target March 2018. Review of hard copy records and identify those that require scanning – not started. Target 31 August 2018. | <ul style="list-style-type: none"> Develop an FSS metadata standard format and Open data wireframes by 31 August 2017 - Completed. Populate 20 open datasets on FSS Open Data Portal – Target March 2018. Investigate ‘scan to file’ facilities to make the task of scanning hard copy records as easy as possible, e.g., appointing iTECS/eRDM scanning team to scan documents to eRDM files – not started. Target 31 August 2018 |
| 5. Retention Schedules | <ul style="list-style-type: none"> Review and update schedules as required – completed. Develop Operations SharePoint Retention Schedules– completed. | - |
| 6. Destruction Arrangements | <ul style="list-style-type: none"> To be reviewed and updated with any significant changes in legislation, or service provider for the secure disposal of FSS records. | - |
| 7. Archiving and Transfer | <ul style="list-style-type: none"> Liaise with NRS to agree a list of records for permanent preservation, what records will be | <ul style="list-style-type: none"> Implement procedures for transferring electronic records to NRS. Need to comply with Depositor Guidance, available from the NRS |

| RMP Element | Policy Tasks/Activities | Technical (IT & Professional) Tasks/Activities |
|---|--|--|
| | <p>transferred, the frequency of transfer and any other required arrangements – in progress.</p> <ul style="list-style-type: none"> • Implement procedure for NRS to harvest FSS records of enduring value from FSS Website -- harvesting website in progress. Procedure referenced in MOU. • Implement review procedures for electronic records before sending to NRS – in progress, target December 2018 • Implement procedures for the transfer of hard copy records to NRS – not yet started target March 2018. | <p>website – In Progress</p> |
| 8. Information Security | <ul style="list-style-type: none"> • Review and update policy as required - completed | <ul style="list-style-type: none"> • Ensure SharePoint can support information security policy and in particular, the implementation of security classifications, possibly through metadata or restricted access to, and share of classified documents - completed |
| 9. Data Protection | <ul style="list-style-type: none"> • Review and update as required – completed • Review and consider the requirements of GDPR - in progress (refer to No. 15) | <ul style="list-style-type: none"> • Records Manager to attend GDPR training on 23rd -26th October 2017 |
| 10. Business Continuity and Vital Records | <ul style="list-style-type: none"> • Verify list of vital records is correct – completed. • Request updated eRDM and ISIS/iTECS Business Continuity Plans - completed | <ul style="list-style-type: none"> • Develop resilient storage facilities for vital records - completed • Test the business continuity plan – in progress target 31 March 2018. |
| 11. Audit Trail | <ul style="list-style-type: none"> • Develop a naming convention for SharePoint – completed. • Develop procedures for version control – completed – automated into each document library | <ul style="list-style-type: none"> • Assuming it will support the policy, automate the application of the naming convention. in progress target 31 March 2018. |
| 12. Competency Framework | <ul style="list-style-type: none"> • Organise an Information and Knowledge Management month in May 2017 to raise the profile of information and records management in FSS. The month will aim to highlight our collective responsibilities (Management and Staff) for data protection, | <ul style="list-style-type: none"> • Identify training for current Records Manager, so they can work towards obtaining a professional qualification – in Scope • Re-run SG Information Asset Owner training for all Senior Management Team and Branch Heads - Completed • Appoint an information and records management consultant to |

| RMP Element | Policy Tasks/Activities | Technical (IT & Professional) Tasks/Activities |
|------------------------------|---|---|
| | information security and records management across FSS' business areas. Completed | deliver practical workshop on RMP/GDPR/Information Security for office staff and field based representatives in Pilgrim House as part of the IKM month in May 2017- completed. Head of SG Data Protection and Information Asset team delivered IAO training and GDPR seminar in May 2017. Further awareness campaign to be organised in 2018. • Use new Saltire Pages to create awareness of IKM – on-going. |
| 13. Assessment and Review | • Initiate an internal audit programme in 2018 to ensure that the RMP and supporting documentation remain fit for purpose – not yet started. Target August 2018. | |
| 14. Shared Information | • Review templates for contracts and update as required – on-going. • Review of the information security policy – completed. | (Not essential for compliance therefore optional) • Provision of extranet or secure collaborative facilities for working with third party organisations. • Integrate policy for sharing information with third parties to provide audit trail including the justification. Working with eRDM Programme team to use Objective Connect. FSS is the pathfinder for the use of Connect across Scottish Government – rollout of Connect scheduled for October 2017 |
| 15. Requirements of the GDPR | • The need to identify and publish the legal basis for processing all personal data (meaning organisations must demonstrate the justification for processing personal data using specific provisions provided for in the legislation); • Changes to privacy notices and the use of consent. The major shift in the new law is about giving consumers control over their data; • Mandatory data breach reporting – what category or level of data breach should the FSS report; • A number of exemptions that FSS use under existing legislation to process data will require | • FSS must be able to demonstrate data protection by “design and default” for systems and processes that process personal data. At the very least, this is likely to require a review of existing contracts. In progress. Target May 2018 |

| RMP Element | Policy Tasks/Activities | Technical (IT & Professional) Tasks/Activities |
|-------------|---|--|
| | <p>additional domestic (UK) legislation to be passed. One example is the processing of personal data for research purposes. FSS will need to keep the progress of secondary legislation under review;</p> <ul style="list-style-type: none"> • The appointment of a Data Protection Officer, who will have duties defined by the Regulation. <p><i>In progress. Target May 2018</i></p> | |

Appendix 2

| Evidence Package | |
|------------------|---|
| Evidence 01 | Covering Letter from FSS Deputy CEO and SIRO |
| Evidence 02 | Records Management Policy |
| Evidence 03 | Roles and responsibilities of the SIRO |
| Evidence 04 | Records Manager's Job description and responsibilities |
| Evidence 05 | Scottish Government Records Management Policy |
| Evidence 06 | Information Management and Record Management PowerPoint Presentations used for staff training on 14th April 2016 |
| Evidence 07 | Info graphics on Records management (4 documents) |
| Evidence 08 | Food Standards Scotland (FSS) Business Classification document |
| Evidence 09 | FSS Standard File type guidance |
| Evidence 10 | Scottish Government Casework File Type Guidance |
| Evidence 11 | Food Standards Scotland Archival Policy for Shared Drives |
| Evidence 12 | Food Standards Scotland File plan Level 1 to 3 |
| Evidence 13 | Scottish Government Model Framework Agreement Terms and Conditions |
| Evidence 14 | Scottish Government Terms and Conditions 1 - conditions of contract for the purchase of goods |
| Evidence 15 | Scottish Government Terms and Conditions 2 (SGTC2) |
| Evidence 16 | Scottish Government Terms and Conditions 3 - conditions of contract for consultancy services (other than works consultancies) |
| Evidence 17 | Scottish Government Terms and Conditions 4 - conditions of contract for the supply of goods (and any related services) |

| Evidence Package | |
|------------------|--|
| Evidence 18 | Scottish Government Terms and Conditions 5 - conditions of contract for the sale of goods |
| Evidence 19 | FSS Information Asset Register |
| Evidence 20 | Scottish Government Archival Project - Analysis and Interim Progress Report |
| Evidence 21 | Food Standards Agency (FSA) Corporate Retentions Schedules |
| Evidence 22 | FSS Operations Retentions Schedules |
| Evidence 23 | FSS Food Crime and Intelligence Unit Retentions Schedules |
| Evidence 24 | FSS Records for Permanent Preservation at NRS. |
| Evidence 25 | MoU between FSS and NRS for the permanent preservation of FSS records of enduring value |
| Evidence 26 | Collection and Destruction note from Datashred |
| Evidence 27 | Screenshot of a destroyed file on eRDM |
| Evidence 28 | Iron mountain Certificate of the destruction of Pollution Prevention Control (PPC) records in 2010 |
| Evidence 29 | SCOTS Back up and Destruction procedures |
| Evidence 30 | SG ISIS-NRS Service Level Agreement |
| Evidence 31 | Scottish Government Email Archiving |
| Evidence 32 | NRS Selection Policy on SG Electronic and Paper Records |
| Evidence 33 | Food Standards Scotland Information Security Policy Statement |
| Evidence 34 | Scottish Government Data Handling Policy |
| Evidence 35 | FSS Clear Desk Policy |
| Evidence 36 | FSS Risk Management Policy |
| Evidence 37 | Information Asset Register Guidance |

| Evidence Package | |
|------------------|--|
| Evidence 38 | FSS Information Security Policy |
| Evidence 39 | FSS Information Risk Register |
| Evidence 40 | Restricting files and documents in eRDM – use of security groups |
| Evidence 41 | eRDM Document Restrictions |
| Evidence 42 | SG/iTECS IT Code of Conduct |
| Evidence 43 | Email Correspondence Protecting Information and Data Protection Training and intranet site: Protecting Information |
| Evidence 44 | FSS Access Control Policy |
| Evidence 45 | FSS IT Security – Incident Reporting form |
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