National Records of Scotland

PUBLIC RECORDS (SCOTLAND) ACT 2011

Report on Progress Update Review (PUR) submitted by Food Standards Scotland (FSS) on 11th June 2026

24th July 2026

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1. Progress Update Reviews (PUR)

Progress Update Reviews (PUR) are optional and allow named authorities to submit an update to the Public Records (Scotland) Act 2011 (PRSA) Implementation Team. They support the implementation of PRSA which promotes efficient and accountable record keeping by named Scottish public authorities. Visit the National Records of Scotland (NRS) website for up to date guidance on PURs. You can read more about the role of the PRSA Implementation Team on the National Records of Scotland website.

Please do not send evidence along with the PUR as it will not be considered.

Each Element is given a Red — Amber — Green (RAG) status rating as follows:

RAG status rating: Red

There is a serious gap in provision for this element with no clear explanation of how this will be addressed. If this were an RMP the Keeper may choose to return it, without agreement, on this basis.

RAG status rating: Amber

If this were an RMP the Keeper would consider agreeing this element under an ‘improvement model’. This means that the Authority demonstrates an ongoing commitment to closing a gap in provision.

RAG status rating: Green

If this were an RMP the Keeper would consider agreeing this element of an authority’s RMP.

The PRSA Implementation Team’s review of the completed PUR template does not change the formal RAG status of an authority’s agreed RMP Assessment Report.

2. Accessing Past Reports

Previous RMP assessment reports can be accessed as follows:

- Visit the National Records of Scotland (NRS) web archive for Records Management Plan Assessment Reports to December 2024. Then search for your authority's report by using the alphabetical table.

- Visit the NRS website for Records Management Plan Assessment Reports agreed after December 2024. On the left-hand side, under publication title, enter the name of your authority; under publications topic, select 'Records and archives'; under publications type, select 'Public Records (Scotland) Act').

If your authority has previously participated in PURs, finalised PUR reports can be accessed as follows.

- Visit the NRS web archive for Progress Update Review Reports to December 2024. Then search for your authority's report by using the alphabetical table.

- Visit the NRS website for Progress Update Review Reports after December 2024. On the left-hand side, under publication title, enter the name of your authority; under publications topic, select 'Records and archives'; under publications type select 'Public Records (Scotland) Act').

3. Progress Update on the Model Plan Elements

3.1 Element 1: Senior management responsibility

PRSA section 1(2)(a)(i) states that authorities must identify the individual who is responsible for management of the authority's public records. An individual senior staff member must be identified as holding corporate responsibility for records management.

RAG status rating: Green

3.1.1 Self-assessment Update

No change.

3.1.2 Progress Review Comments

No immediate action required. Update requested on any future change.

3.2 Element 2: Records manager responsibility

Section 1(2)(a)(ii) of PRSA specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. An individual staff member must be identified as holding operational responsibility for records management and has appropriate corporate responsibility, access to resources, and skills.

RAG status rating: Green

3.2.1 Self-assessment Update

No change.

3.2.2 Progress Review Comments

No immediate action required. Update requested on any future change.

3.3 Element 3: Records management policy statement

The Keeper requires 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.

RAG status rating: Green

3.3.1 Self-assessment Update

In view of the current emerging technologies, FSS have developed an Artificial Intelligence (AI) policy adapted from Scottish Government (SG) AI strategy. The AI policy provides opportunities and guardrails to sustainably and securely use AI technology in Food Standards Scotland (FSS).

3.3.2 Progress Review Comments

Thank you for this update. The PRSA Implementation acknowledge the work done to develop an Artificial Intelligence (AI) policy and to ensure guidance on emerging technologies is incorporated into working practices. As with FSS's records management policies and procedures, it would be expected that this new policy is made available to staff.

3.4 Element 4: Business classification

Records are known and are identified within a structure, ideally founded on function. 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, information asset register or similar.

RAG status rating: Green

3.4.1 Self-assessment Update

No change.

FSS is awaiting the development and release of the new SG Information Asset Register (IAR). In the meantime the Information Assets (IAs) are managed manually in the FSS IAR.

3.4.2 Progress Review Comments

The PRSA Implementation Team note that there has been no change under this element and that FSS's Information Assets (IAs) are managed manually in the IAR. It has also been noted that FSS are waiting for the development and release of the new SG IAR and that, after which, procedures around the IAR are likely to change.

3.5 Element 5: Retention schedules

The Keeper expects an authority to have allocated retention periods to its public records and for those records to be retained and disposed of in accordance with a retention schedule.

RAG status rating: Green

3.5.1 Self-assessment Update

No change.

The Scottish Food Crime Unit and Incidents team is currently in the process of reviewing their Standards Operating Procedure (SOP) documents.

3.5.2 Progress Review Comments

The PRSA Implementation Team note that there has been no change under this element.

Thank you for informing us that Scottish Food Crime Unit and Incidents team is currently in the process of reviewing their Standards Operating Procedure (SOP) documents. It assumed this includes SOPs relating to retention. A retention schedule is a living document liable to amendments in response to changing business needs. It is clear that FSS recognise the need for periodic review to address this.

3.6 Element 6: Destruction arrangements

Records are destroyed in a timely and appropriate manner and records of their destruction are maintained. Section 1(2)(b)(iii) of PRSA specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.

RAG status rating: Green

3.6.1 Self-assessment Update

No change.

3.6.2 Progress Review Comments

No immediate action required. Update requested on any future change.

3.7 Element 7: Archiving and transfer arrangements

Records that have enduring value are permanently retained and made accessible in accordance with the Keeper's 'Supplementary Guidance on Proper Arrangements for Archiving Public Documents'. Section 1(2)(b)(iii) of PRSA specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.

RAG status rating: Green

3.7.1 Self-assessment Update

No change.

At the final stage on agreeing an Memorandum Of Understanding (MOU) with National Records of Scotland (NRS).

3.7.2 Progress Review Comments

The PRSA Implementation Team note that there has been no change under this element. However, we acknowledge the positive update that work to secure an updated transfer agreement for the transfer of records to NRS for permanent preservation is nearing conclusion.

3.8 Element 8: Information security

Records are held in accordance with information security compliance requirements. An authority's RMP must make provision for the proper level of security for its public records. Section 1 (2)(b)(ii) states and authority's RMP must include provision about maintaining security of information contained in the authority's public records.

RAG status rating: Green

3.8.1 Self-assessment Update

No change.

However, we are working on our cybersecurity posture through an external engagement with HEFESTIS - Chief Information Security Officer (CISO) Shared Service. In particular we are reviewing and monitoring supply chain and third party assurance.

3.8.2 Progress Review Comments

The PRSA Implementation Team note that there has been no change under this element.

Thank you for providing an update on ongoing work around cybersecurity arrangements.

No immediate action required. Update requested on any future change.

3.9 Element 9: Data Protection

Records involving personal data are managed in compliance with data protection law. The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations.

RAG status rating: Green

3.9.1 Self-assessment Update

No change.

We are pleased to note that we reported two data breaches to the ICO since 2024 with no further actions required. ICO considered the information FSS provided and decided to close these cases and provided FSS with advice to take reasonable steps to contain the incidents and to consider any steps to mitigate the impact and support the individuals affected.

3.9.2 Progress Review Comments

The PRSA Implementation Team note that there has been no change under this element.

Thank you for providing an update on reported data breaches and outcomes.

No immediate action required. Update requested on any future change.

3.10 Element 10: Business continuity and vital records

An authority's business continuity arrangements should include the recovery of records made temporarily unavailable due to an unexpected event.

RAG status rating: Green

3.10.1 Self-assessment Update

No change.

In May 2025 a tabletop exercise was designed and tested. Lessons learnt have been included in the relevant policies procedures and business continuity playbooks. FSS also, took part in the UK wide exercise Pegasus. We did the following during the exercise:

- Activated the Incident Management Framework and Business Continuity Framework
- Linked the Incident Response and Business Continuity functions
- Attended the Food Standards Agency Incident Management Coordinating Group and Scottish Government meetings
- Submitted Daily Situation Reports on staffing, impact, and food safety

3.10.2 Progress Review Comments

The PRSA Implementation Team note that there has been no change under this element.

Thank you for the update on the results of testing FSS's business continuity arrangements. This indicates FSS's commitment to ensuing practices remain up to date and that policies and procedures reflect the results of testing and review.

No immediate action required. Update requested on any future change.

3.11 Element 11: Audit trail

The location of records is known and changes recorded.

RAG status rating: Green

3.11.1 Self-assessment Update

Continuing to monitor our paper records that are kept on offsite storage and the plan is to transition to digital records on eRDM.

An audit trail is kept for all eRDM files to be permanently destroyed.

3.11.2 Progress Review Comments

Thank you for this update. It is noted that paper records continue to be monitored, and it assumed the tracking of these records through the use of a spreadsheet remains in place. The PRSA Implementation Team acknowledge FSS's plan to transition to digital records on eRDM. As noted in 2018 at the time of the Keeper's agreement, the eRDM system in use at FSS will provide audit trails for viewing, modifying, and deleting records.

It is noted that an audit trail is kept for all eRDM files to be permanently destroyed.

3.12 Element 12: Records management training for staff

Staff creating, or otherwise processing records, are appropriately trained and supported.

RAG status rating: Green

3.12.1 Self-assessment Update

Not a member of IRMS at the moment.

All FSS staff are required annually to complete the mandatory training for Data Protection.

3.12.2 Progress Review Comments

Thank you for providing this update on staff training and for confirming that mandatory data protection training remains in place for all staff.

3.13 Element 13: Assessment and review

Records Management arrangements are regularly and systematically reviewed with actions taken when required. Section 5(1)(a) of PRSA says that an authority must keep its RMP under review.

RAG status rating: Green

3.13.1 Self-assessment Update

No change.

Knowledge and Information Management (KIM) policies and procedures are being reviewed annually. FSS has now an AI policy that was adapted by SG.
FSS staff is kept informed through presentations (Data Protection, Records Management) and regular updates on any changes (eRDM updates, AI)

3.13.2 Progress Review Comments

The PRSA Implementation Team note that there has been no change under this element. This is understood to indicate that FSS continue to keep its RMP under review as required by the Act.

Thank you for the update confirming the annual review cycle of FSS's Knowledge and Information Management (KIM) policies and procedures, the new AI policy and how updates are communicated to staff. This demonstrates a commitment to ensuring records management arrangements are regularly reviewed and that staff are kept up to date.

No immediate action required. Update requested on any future change.

3.14 Element 14: Shared information

Information sharing, both within the authority and with other bodies or individuals, is necessary, lawful, and controlled.

RAG status rating: Green

3.14.1 Self-assessment Update

No change.

eRDM Connect remains the default tool for sharing documents and records with relevant external stakeholders up to Official Sensitive classification.

Records management team is working with teams across FSS to ensure the we are sharing or receiving accurate records from our stakeholders. We are also using secure and encrypted file transfer solutions to migrate data from on-premises data centres to cloud storage.

3.14.2 Progress Review Comments

The PRSA Implementation Team note that there has been no change under this element.

The update provided indicates that FSS are continuing to manage information sharing both within the authority and with external stakeholders in a necessary, lawful, and controlled manner.

No immediate action required. Update requested on any future change.

3.15 Element 15: Public records created by third parties

Adequate arrangements must be in place for the management of public records created and held by third parties who carry out any functions of the authority, see section 3 of PRSA.

RAG status rating: N/A

3.15.1 Self-assessment Update

All public records created by our third party contractors, data processors or delivery partners are held and managed on our line of business applications and database. Reports and records created by third parties on our behalf are securely kept on eRDM or published on the FSS website.

Contracts, MOUs, Data Protection Impact Assessments (DPIAs), Data Sharing Agreements (DSAs) are also produced to govern the creation and processing of public records by third party organisations on behalf of FSS.

3.15.2 Progress Review Comments

Thank you for this update.

As this Element was not assessed separately in 2018, at the time of the Keeper's agreement, no RMP baseline RAG-status exists. However, the PRSA Implementation Team acknowledge that the update indicates FSS is aware of responsibilities under this element.

If you would like more information around this please contact public_records@nrscotland.gov.uk.

4. PRSA Implementation Team's Summary

The PRSA Implementation Team has reviewed Food Standards Scotland (FSS) PUR submission and recognises this authority's efforts to manage their records.

The PUR RAG status for each element is indicative only of the situation as outlined by the authority in the PUR. The PUR RAG statuses do not change the RAG status of elements that have been formally agreed by the Keeper in an RMP assessment report.

The PRSA Implementation Team recommends authorities consider publishing PUR reports on their websites as an example of continued good practice both within individual authorities and across the sector.