National Records of Scotland

Public Records (Scotland) Act 2011

Quality Meat Scotland
Assessment Report

The Keeper of the Records of Scotland

2 October 2014

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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 Quality Meat Scotland by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 1 August 2014.

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

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

3. Authority Background

QMS is the public body responsible for helping the Scottish red meat sector improve its efficiency and profitability, and maximise its contribution to Scotland's economy.

QMS market the PGI labelled Scotch Beef and Scotch Lamb brands in the UK and abroad and promote Scottish pork products under the Specially Selected Pork Banner. Their assurance schemes cover more than 90% of livestock farmed for meat in Scotland and offer consumers the legal guarantee that the meat they buy has come from animals that have spent their whole lives being raised to some of the world's strictest standards.

Scotland's beef, lamb and pork producers make an important contribution to the country's rural economy, contributing over £1,500m to the annual GDP of Scotland and supporting in excess of 30,000 jobs in the farming, agricultural supply and processing sectors.

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 Quality Meat Scotland's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key:

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

5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer *Compulsory element*	**G**	**G**	Quality Meat Scotland's (QMS) Records Management Plan (RMP) states that Stuart Ashworth, Head of Economics Services, has overall strategic responsibility for records management within QMS. Mr Ashworth reports to the Chief Executive. This is confirmed by his job description which is included as an annex to the RMP. The Keeper agrees that this is a suitable individual to have senior management responsibility for records management within QMS.
2. Records Manager	**G**	**G**	Susan Kinniburgh, Executive Assistant, has been named as the individual with operational responsibility for records management within QMS. Ms Kinniburgh

Compulsory element			reports to the Chief Executive. This is confirmed by her job description which is included as an annex to the RMP. The Keeper agrees that this is a suitable individual to have operational responsibility for records management within QMS.
3. Policy *Compulsory element*	**G**	**G**	QMS have submitted their Records Management Policy as an annex to the RMP. The policy, as stated in the RMP, was approved by the senior management team on 30 October 2013. The policy sets out QMS's corporate approach to records management and also the roles and responsibilities of staff. It also sets out their definitions of records. The Records Management Policy commits QMS to review it on an annual basis. This review will be carried out by the Senior Management Team. The Keeper agrees that QMS has a records management policy in place which sets out their corporate approach to records management.
4. Business Classification	**G**	**G**	QMS have submitted their business classification scheme as a PDF document accompanying the RMP. It employs a hierarchical structure based on the business areas within QMS, then is further classified by the activities undertaken to achieve each function, and below that a chronological structure. The records management policy commits the records management officer to 'establishing and maintaining a central records management structure for semi-current and archived records' and ensuring that staff 'have an effective filing system for current records'. Additionally, all staff are responsible for 'maintaining a suitable file management structure for their current records'. This shows a commitment that staff will adhere to the file structure as set out in the business classification scheme.

			The Keeper agrees that QMS has developed a suitable business classification scheme which provides a structure for their record keeping systems.
5. Retention schedule	**G**	**G**	QMS have provided their retention schedule which was drawn up with the input of senior management. The Keeper commends this approach to achieving buy-in from senior staff. The schedule appears to cover the record creating activities of QMS and sets out the retention actions to be taken against each type of record. It also sets out who has responsibility for these records. The RMP states that the retention schedule is a new framework for QMS and has committed to review how it is operating in March 2015, and annually thereafter. The Keeper commends this approach. The RMP also explicitly states that the schedule applies to both electronic and paper records. The Keeper agrees that there is an appropriate retention framework in place to allow QMS to take the appropriate actions with regards to their records at the right time.
6. Destruction Arrangements *Compulsory element*	**G**	**G**	QMS has set out its destruction arrangements in the RMP. The vast majority of paper and optical media are destroyed in-house using a paper/CD shredder to DIN 32757-1 Level 3 standard. **Paper records** The landlords of the building in which QMS is based provides a secure waste disposal service as part of a contract for the whole building. Records shredded in-house are disposed of by the contractor. The contractor also provides a service for the bulk destruction of paper records. A sample destruction certificate has been included as a PDF accompanying the RMP. **Hardware** The RMP also states that the contractor provides a similar service for hardware. QMS have submitted a spreadsheet detailing obsolete hardware requiring

			destruction. Also submitted was a destruction certificate. This shows that QMS maintains records of obsolete hardware and has appropriate procedures in place for its secure destruction. **Electronic records** QMS has confirmed that back-ups of electronic records are destroyed after 3 months. This ensures that deleted records are disposed of on a regular basis, ensuring that unwanted electronic information is not kept longer than necessary. **Email** QMS sets out its email destruction procedures in the Internet, Email & Computer Systems Policy. **Back-ups** QMS has provided comprehensive details of its back-up procedures in the document entitled QMS Server Back-up Procedure. The Keeper agrees that robust procedures are in place for the secure destruction of records at the end of their life-cycle.
7. Archiving and Transfer *Compulsory element*	**G**	**G**	QMS is currently in contact with the Client Management Team at National Records of Scotland (NRS) with the aim of developing a Memorandum of Understanding (MoU) to enable the transfer of records selected for permanent preservation from QMS to NRS. As evidence, QMS have submitted the draft MoU which is currently being used as the basis for discussions. The MoU appears as an Annex to the RMP. The Keeper agrees that QMS is currently developing a MoU with NRS to facilitate the transfer of records selected for permanent preservation. **The Keeper requests that once the MoU has been agreed he is sent a copy of the MoU for inclusion**

			in QMS's evidence package.
8. Information Security *Compulsory element*	**G**	**G**	QMS submitted evidence of the procedures it has in place for protecting its information against unauthorised access and use. An extract from QMS' Internet, E-mail & Computer Systems Policy sets out that the policy applies to all staff and to all third parties using QMS systems. Access to secure areas of the QMS server is controlled by password. The server is backed up daily and tapes are kept on-site in a locked fireproof safe as well as in an off-site location. The policy also sets out the procedures for allocating access rights to QMS systems. The policy also sets out the security arrangements for remote working. Paper records, such as signed contracts, are kept locked in the on-site fireproof safe, which has been tested and approved in fire resistance by the SP Swedish National Testing and Research Institute (approval certificate 16:49:01). The Keeper agrees that the security of QMS's information has been properly considered.
9. Data Protection	**G**	**G**	QMS submitted details of its registration with the UK Information Commissioner's Office (registration number Z1283397). This shows that QMS is aware of its responsibilities with regard to the Data Protection Act. QMS also provided its Data Protection Policy as an Annex (page 33) to the RMP. The policy states QMS's corporate approach to Data Protection and also sets out its expectations for staff to follow when dealing with personal and sensitive information. It also lays out the procedures for making a subject access request for staff. The Keeper agrees that QMS takes its responsibilities under the Data Protection Act

			seriously.
10. Business Continuity and Vital Records	**G**	**G**	QMS provided their Business Continuity Plan (BCP) as evidence for this element as an Annex of their RMP. The BCP sets out the actions to be taken in the event of an interruption to service in a variety of scenarios. The effects of these scenarios have been categorised into three levels of impact and the BCP details what actions should be taken, and by whom, in each level of disaster. QMS also has a Business Continuity Group which comprises representatives from each business area and is headed by the Chief Executive. The BCP sets out the responsibilities of each representative of the Group. Information necessary to action the BCP is stored offsite in the form of recovery boxes. There are 3 of these and they are stored in different locations. As stated in Element 8, paper records (such as signed contracts) are kept locked in a secure fire proof safe. QMS also provided details of its back-up procedures in terms of its electronic information which will aid recovery in the event of a disaster. The Keeper agrees that QMS has procedures in place to restore its business in the event of an interruption to service. Additionally, evidence has been provided showing that provisions have been put in place to protect both paper and electronic records.
11. Audit trail	**G**	**G**	QMS has provided details of its audit trail provision within the main body of the RMP. The RMP states ‘All members of staff have been issued with guidance to apply filenames as footers on electronic documents to assist in document and version control.’ QMS have submitted evidence to show that staff have been made aware of

			how to ensure that file names and version control is applied to relevant documents. The Keeper commends this approach. All records are created on QMS's central server and saved onto the central filing area following the structure of the Business Classification Scheme. The Keeper has been provided with part of a policy document relating to QMS IT procedures. This includes instructions on e-mail housekeeping. The Keeper commends the recognition of the risks e-mail poses to effective records management. Audit notes are applied to files which track the movement of records/documents from and to that file. The Keeper would like to know if there is a similar way of tracking the file as a whole. The Keeper agrees that QMS has properly considered the provision of audit trail functionality in its record keeping systems provided he sees the guidance document as referenced above and receives clarification regarding the tracking of files.
12. Competency Framework for records management staff	**G**	**G**	The job descriptions have been submitted for the individuals named in Elements 1 and 2 above as having senior and operational responsibility for records management. These job descriptions were submitted as Annexes to the RMP. The RMP states that if any records management training needs are identified during the staff appraisal process then staff will be assisted in undertaking training to meet these needs. The Keeper welcomes this commitment. Additionally, QMS have stated that the individual with operational responsibility for records management (**see Element 2**) will be undertaking a day of records management training in the near future. The Keeper commends QMS's commitment to staff training. The Keeper agrees that the relevant staff have been identified as having

			responsibility for records management and that this is reflected in their job descriptions.
13. Assessment and Review	**G**	**G**	The RMP states that it will be reviewed annually by senior management. The Keeper would welcome further details as to how the RMP will be reviewed and which tools will be used to measure compliance with the requirements of the RMP. The Records Management Policy **(see element 3)** commits QMS to review it on an annual basis. QMS has detailed how they propose to assess and review their RMP. Any issues relating to records management can be raised at weekly Senior Management Team meetings and actioned accordingly. In addition, details have been submitted as to how the annual review will take place, conducted by the Senior Management Team. The RMP states that the Retention Schedule **(see element 5)** will be reviewed in March 2015, and annually thereafter. The Keeper agrees that QMS have robust mechanisms in place to ensure that the RMP and associated policies and procedures are kept up to date.
14. Shared Information	**G**	**G**	The RMP specifically states that QMS does not routinely share information with other public bodies or third parties. In the event that it is required to share information for a legal purpose or with the Scottish Government QMS will only share personal and sensitive information if the data subject has given their approval for this to happen. The Keeper accepts that QMS does not regularly share information with other organisations and that if and when it is required to do so it will have regard to the requirements of the Data Protection Act. The Keeper accepts that, currently QMS do not share information with third parties

			as part of their statutory functions. He would remind QMS of the importance of including provision of records governance should any such data sharing project be initiated.

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 Quality Meat Scotland. Policies and governance structures are in place to implement the actions required by the plan.

Elements that require development by Quality Meat Scotland are as follows:

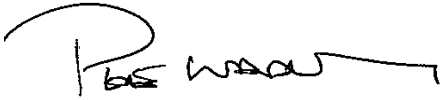
Element 7 – Submission of Memorandum of Understanding once agreed with client managers at National Records of Scotland

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper agrees the RMP of Quality Meat Scotland.

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

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



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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 Quality Meat Scotland. In agreeing this RMP, the Keeper expects Quality Meat Scotland 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