



# Public Records Act 2005 Audit Report for the Te Aka Matua o te Ture | Law Commission

**Prepared for Archives  
New Zealand**

February 2022

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## **Independence**

We are independent of Archives New Zealand in accordance with the independence requirements of the Public Records Act 2005.



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# 1. Executive summary

The Te Aka Matua o te Ture | Law Commission (the Commission) reviews New Zealand law and makes recommendations to Government to improve the law. The Commission creates high value public records, including recommendation reports to Parliament, Issue Papers and public submissions.

All information created since 2013 is stored electronically in SharePoint by the Commission. The Commission migrated from shared drives to SharePoint in 2018 and all digital information dated between 2013 to 2018 was transferred to SharePoint. Prior to 2013, most of the information such as project workpapers and reports was created, captured and maintained in hard copy. This information is held by a third party provider.

The Commission has approximately 21 FTE, including one skilled and experienced Information Advisor. Due to the size of the Commission, there is no dedicated information management Governance Group. The responsibility for information management sits with the senior management team and the Board.

This audit was completed remotely as New Zealand was in the 'red' setting of the COVID 19 Protection Framework at the time.

The Commission's information management maturity is summarised below. Further detail on each of the maturity assessments can be found in sections 4 and 5 of this report.

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## 2. Introduction

KPMG was commissioned by Archives New Zealand to undertake an independent audit of the Te Aka Matua o te Ture | Law Commission (the Commission) under section 33 of the Public Records Act 2005 (PRA). The audit took place remotely in February 2022.

The Commission's information management practices were audited against the PRA and the requirements in the [Information and records management standard](#) as set out in Archives New Zealand's Information Management Maturity Assessment.

Archives New Zealand provides the framework and specifies the audit plan and areas of focus for auditors. Archives New Zealand also provides administrative support for the auditors as they undertake the independent component of the audit process. The auditors are primarily responsible for the onsite audit, assessing against the standard, and writing the audit report. Archives New Zealand is responsible for following up on the report's recommendations with your organisation.

## 3. This audit

This audit covers all public records held by the Te Aka Matua o te Ture | Law Commission including both physical and digital information.

The audit involved reviews of selected documentation, interviews with selected staff, including the Executive Sponsor, Information Management staff, the Information Technology team, and a sample of other staff members from various areas of the Commission. Note that the Executive Sponsor is the senior responsible officer for the audit.

The audit reviewed the Commission's information management practices against the PRA and the requirements in the Information and records management standard and provides an assessment of current state maturity. Where recommendations have been made, these are intended to strengthen the current state of maturity or to assist with moving to the next level of maturity.

The summary of maturity ratings can be found at section 4, with detailed findings and recommendations following in section 5. The Commission has reviewed the draft report, and a summary of their comments can be found in section 6.

## 4. Maturity Assessment

This section lists all assessed maturity levels by topic area. For further context about how each maturity level assessment has been made, refer to the relevant topic area in the report in Section 5.

Category	No.	Topic	Maturity				
			Beginning	Progressing	Managing	Maturing	Optimising
<b>Governance</b>							
	1	IM strategy		●			
	2	IM policy and processes		●			
	3	Governance arrangements & Executive Sponsor			●		
	4	IM integration into business processes				●	
	5	Outsourced functions and collaborative arrangements		●			
	6	Te Tiriti o Waitangi		●			
<b>Self-monitoring</b>							
	7	Self-monitoring		●			
<b>Capability</b>							
	8	Capacity and capability			●		
	9	IM roles and responsibilities			●		
<b>Creation</b>							
	10	Creation and capture of information			●		
	11	High-value / high-risk information		●			
<b>Management</b>							
	12	IM requirements built into technology systems			●		
	13	Integrity of information				●	
	14	Information maintenance and accessibility		●			
	15	Business continuity and recovery	●				
<b>Storage</b>							
	16	Appropriate storage arrangements				●	
<b>Access</b>							
	18	Information access, use and sharing				●	
<b>Disposal</b>							
	20	Current organisation-specific disposal authorities	●				
	21	Implementation of disposal decisions	●				
	22	Transfer to Archives New Zealand	●				

**Note:** Topics 17 and 19 in the Information Management Maturity Assessment are applicable to Local Authorities only and have therefore not been assessed.

# 5. Audit findings by category and topic

## Governance



The management of information is a discipline that needs to be owned from the top down within a public office. The topics covered in the Governance category are those that need senior-level vision and support to ensure that government information is managed to ensure effective business outcomes for the public office, our government and New Zealanders.

### TOPIC 1 – IM strategy

Progressing

#### *Summary of findings*

The Commission does not currently have an information management strategy to provide strategic direction and support over information management activities. Although there is no documented strategy, the Commission incorporates information management into the organisation's overall strategic direction by providing resourcing and support to the fullest extent possible. An example of this was the hiring of a short-term contractor to assist with the review of SharePoint in 2020.

The development of an information management strategy is on the Information Advisor's work plan for 2021-2022, and the Information Advisor has attended information management strategy training to support this.

#### *Recommendations*

As scheduled in the work plan 2021-2022, develop the information management strategy following Archives New Zealand's guidance. This does not have to be a standalone strategy, as the Commission is a very small organisation, but should incorporate the key elements of information management. The strategy should be approved by the senior management, communicated to all staff and contractors, and reviewed on a periodic basis to ensure it aligns with the Commission's business activity.

### TOPIC 2 – IM policy and processes

Progressing

#### *Summary of findings*

The Commission has a Records Management Policy (Policy). However, it has not been updated to reflect current information management roles and responsibilities. Updating the Policy is on the Information Advisor's work plan for 2021-2022, and a draft has been completed and is awaiting approval.

Information management processes are included in guidance documents for key business processes and are subject to regular reviews to ensure they remain up to date.

Staff and contractors are aware of their information management roles and responsibilities. Responsibilities are outlined in job descriptions and are communicated to new starters during the induction process and at weekly team meetings as needed. Staff member's information management responsibilities are also assessed as part of their performance reviews.

### *Recommendations*

Approve and finalise the updated Policy. Ensure it is regularly reviewed to remain up to date and to ensure it reflects the current legislation and the Archives New Zealand requirements.

## **TOPIC 3 – Governance arrangements and Executive Sponsor**

**Managing**

### *Summary of findings*

The responsibility for the Commission’s information management governance lies with the senior management team (which includes the Executive Sponsor) and the Board. The senior management team receives weekly reports from the Information Advisor, and the Board are provided with bi-monthly reports.

Through the interviews, it was noted that the Executive Sponsor provides appropriate support on any information management issues and is an advocate for good information management practices. However, due to the lack of an information management strategy (refer Topic 1 – *IM Strategy*), the Executive Sponsor is unable to provide active direction for improved information management practices within the organisation.

### *Recommendations*

In connection with Topic 1 – *IM strategy*, senior management team should actively provide direction on information management across all facets of the organisation in line with the IM strategy.

## **TOPIC 4 – IM integration into business processes**

**Maturing**

### *Summary of findings*

The responsibility for information management is assigned to project team leaders. Staff interviewed found that the team leaders work proactively with the Information Advisor to ensure all information management minimum requirements are met for each new project.

Information management is integrated into most business processes and activities. For example, SharePoint was rolled out to the whole organisation in 2018. Information management practices are regularly updated to support business processes and activities. An example of this was a review of SharePoint in 2020 to assess areas which needed improvement. Staff feedback resulted in the adoption of several recommendations.

The Information Advisor provides their expertise where new business processes are implemented. For example, the transition to a new Microsoft 365 product was reviewed by the Information Advisor and information management functions were subsequently restricted to ensure compliance with information management policy.

### *Recommendations*

Ensure the Information Advisor is included in all business process change and development initiatives. Ensure information management requirements and improvements are always considered in business process change.

## **TOPIC 5 – Outsourced functions and collaborative arrangements**

**Progressing**

### *Summary of findings*

Requirements for managing information are outlined in some but not all contracts where there are outsourced functions or collaborative arrangements. The two outsourced contracts sampled related to consulting and accounting functions. Only one of the contracts specified the contracted party's information management obligations, including creation, management, security and retention.



Although induction and training is provided for contractors, the Commission does not monitor information management compliance of contractors to the same standard as internal staff.

### ***Recommendations***

To increase maturity, the Commission should ensure that all contracts for outsourced or collaborative arrangements in the future include roles and responsibilities for information management. New approaches should be investigated to monitor contracted parties and ensure they are meeting their contractual requirements.

## **TOPIC 6 – Te Tiriti o Waitangi**

**Progressing**

### ***Summary of findings***

The Commission has identified information of importance to Māori. A register of information of interest to Māori is created and maintained by Information Management staff. In January 2021, the Commission identified and released past unpublished papers on Māori Custom Law and the Commission’s website includes a filter to search for such information. The Commission receives advice from a Māori liaison committee on projects, and the records are kept in a dedicated library “Te Ao Māori” in SharePoint. This library also houses files of engagement with other key Māori entities and individuals, such as Te Hunga Māori Roia o Aotearoa | Māori Lawyers Association.

The incorporation of Māori metadata into submissions and other consultation materials has been considered. However, the Commission decided that it is not practical to do so because Māori have an interest in all aspects of law reform.

Information management implications from Treaty of Waitangi agreements and other agreements with Māori are yet to be incorporated.

### ***Recommendations***

Work with an internal or external Māori adviser to formally define and identify information of importance to Māori and document information management implications from Treaty of Waitangi agreements and other agreements with Māori.

## **Self-monitoring**



Public offices are responsible for measuring and monitoring their information management performance for planning and improvement purposes. This helps to ensure that IM systems and processes are working effectively and efficiently. It also ensures that public offices are meeting the mandatory Information and records management standard as well as their own internal policies and processes.

## **TOPIC 7 – Self-monitoring**

**Progressing**

### ***Summary of findings***

There is some monitoring of information management through an annual legislative compliance audit. Apart from that, monitoring is completed on an inconsistent basis. For example, the Commission undertook a review on the post-migration of SharePoint in 2020. The results of monitoring activities are included in weekly reporting to the Executive Sponsor and bi-monthly reports to the board. Due to the size of the organisation, any information management issues are addressed quickly by informally raising the issue through one-to-one meetings, the staff weekly meeting, or all of staff emails.

## ***Recommendations***

In connection with Topic 2 – IM Policy and Processes, establish a regular and proactive approach to monitor compliance with the Public Records Act and Records Management Policy and a structured approach to addressing non-compliance.

## **Capability**

Information underpins everything our public offices do and impacts all functions and all staff within the public office. Effective management of information requires a breadth of experience and expertise for IM practitioners. Information is a core asset and all staff need to understand how managing information as an asset will make a difference to business outcomes.



## **TOPIC 8 – Capacity and capability**

### **Managing**

### ***Summary of findings***

The Commission has one Information Advisor who spends 40% of their time on information management work. The Information Advisor is well respected within the Commission and is the first point of contact for any queries or issues relating to information management. During interviews, staff indicated the Information Advisor is very accessible and helpful in resolving any information management-related issues. The Information Advisor is supported by the Commission with regular access to professional development, such as an information management governance course through the Records and Information Management Professionals Australasia (RIMPA).

Staff noted through interviews that the current capability and capacity for information management feels appropriate for their current organisational needs. Due to financial limitations, the Commission is unlikely to be able to increase the information management staff capacity in the future. However, previous resourcing issues have been addressed as required, for example a short-term contractor was hired to assist the SharePoint review project.

### ***Recommendations***

Information management capacity should be included in the Commission's long-term workforce planning.

## **TOPIC 9 – IM roles and responsibilities**

### **Managing**

### ***Summary of findings***

The Commission's staff and contractors have an appropriate awareness of their information management responsibilities. This is communicated through job descriptions, weekly meetings and induction training for new starters.

Information management duties are included in staff job descriptions and contractor's contracts. There is a formal induction for all new staff and contractors which includes how to correctly use SharePoint, the filing system, and naming conventions. However, there is no regular review and update on job descriptions to meet business needs.

### ***Recommendations***

Implement regular review of job descriptions to ensure the Commission are meeting information management requirements and business needs.

## Creation



It is important to take a systematic approach to the management of government information, and this starts with an understanding of what information must be created and captured. It is expected that public offices create and capture complete and accurate documentation of the policies, actions and transactions of government. Knowing what information assets are held by public offices is essential to IM practice.

### TOPIC 10 – Creation and capture of information

### Managing

#### *Summary of findings*

Information is managed in reliable and controlled environments including SharePoint for digital information and third-party storage facilities for physical information. The Commission discourages the storage of business records in uncontrolled environments, and multi-factor authentication is in place to access the system from untrusted environments. The staff interviewed were confident that information captured is reliable and trustworthy. This is because the creation, use and management of information processes are well understood within the Commission. Any information usability, reliability and trust issues are documented by the Information Advisor in the weekly and bi-monthly reports.

Information management practices are included as part of induction training for all new starters. Staff actively ensure that the right information is created and captured as part of all business functions and activities. It was noted that contractors have different attitudes towards compliance with information management practices as covered in Topic 5 - *Outsourced functions and collaborative arrangements*. However, no issues of non-compliance have been identified to date.

#### *Recommendations*

Actively ensure contractors create and capture right information as part of business functions and activities.

### TOPIC 11 – High-value / high-risk information

### Progressing

#### *Summary of findings*

The high-value or high-risk information is identified in the disposal authority, although the disposal authority has not yet been formally finalised. There is an inventory of some of the information held in physical and digital systems, but not all.

#### *Recommendations*

Develop and maintain an information asset register which covers both digital and physical information, and which identifies all information that is of a high-value or high-risk nature.

## Management



Management of information should be designed into systems to ensure its ongoing management and access over time, including following a business disruption event. Information must be reliable, trustworthy and complete and managed to ensure it is easy to find, retrieve and use, as well as protected and secure.

### TOPIC 12 – IM requirements built into technology systems

#### Managing

#### *Summary of findings*

The Information Advisor is involved in system upgrades and decommissioning document management systems. For example, the Information Advisor oversaw migration of the shared drives to SharePoint. The SharePoint systems' design and configuration are documented in a spreadsheet maintained by the IT Advisor. The systems meet minimum metadata requirements. However, SharePoint does not incorporate the organisation-specific disposal authority, which is yet to be finalised.

#### *Recommendations*

Integrate and embed the General Disposal Authorities requirements into SharePoint and add the disposal requirements from the organisation-specific disposal authority once approved.

### TOPIC 13 – Integrity of information

#### Maturing

#### *Summary of findings*

The Commission has organisation-wide information management practices, such as naming conventions, file mapping guidance and version control. These practices are routinely followed by staff and most of the contractors to ensure information held by the Commission is reliable and trustworthy. Information management controls are in place and regularly tested by the Information Advisor to maintain information integrity, accessibility and usability. Examples of this are SharePoint's ability to record audit trails and the practice of including descriptive metadata with documents. The Commission has initiatives to ensure all information is reliable, usable, comprehensive and complete. For example, the Commission undertook a project to compare files between the shared drives and SharePoint to ensure the migrated files were complete and had accurate metadata.

During the focus group interview, staff were confident that the information they find and retrieve from across the organisation is comprehensive and complete. Any issues that arise when finding and retrieving information are reported to the Information Advisor and addressed on a timely basis.

#### *Recommendations*

Due to the assessment of maturing for this topic, and given the small nature of the organisation, we have not made a recommendation for this topic.



***Summary of findings***

Historical paper records are listed in a catalogue and are held off-site with an approved third-party provider. There are no paper records held on the Commission's premise. Digital information is stored in SharePoint which is backed up three times a day and the backups are stored offsite.

The Commission has strategies to manage and maintain the accessibility of digital information during some business and system changes. During the migration to SharePoint, all old information was kept in the shared drives in case there were issues transferring files to SharePoint.

Some technology obsolescence risks have been identified and addressed, but not all.

***Recommendations***

Create and document a plan for managing and maintaining digital and physical information during all business and system changes.

Identify and document all risks relating to technology obsolescence.

***Summary of findings***

The Commission does not have a business continuity and recovery plan to identify the information required for business continuity following a business disruption event. The Board is aware that the Commission requires a business continuity and recovery plan, and it is in the long-term work plan after this audit has been finalised. A cyber risk assessment is currently being commissioned to assess what is required for this plan.

All digital information is backed up three times a day and managed by a third-party provider who conducts regular security testing. The backup is currently retained indefinitely. Ideally, back-ups should only be kept for a period of two years. Long-term retention of back-ups creates additional risks for the Commission including the risk of retaining information longer than necessary leading to Privacy Act non-compliance. The Commission is also considering adding another third-party backup provider to ensure there are multiple recovery options for their digital information.

***Recommendations***

Prioritise formally developing and documenting a business continuity and recovery plan, incorporating information management considerations such as what critical information is required to ensure business continuity.

## Storage



Good storage is a very important factor for information protection and security. Appropriate storage arrangements for both physical and digital information ensures information remains accessible and usable for as long as it is required for business and legal purposes and for accountable government.

### TOPIC 16 – Appropriate storage arrangements

Maturing

#### *Summary of findings*

The Commission has protection and security controls in place for physical and digital information. Digital information is stored in SharePoint and is accessible based on restrictions set by the IT Advisor. Unauthorised access notifications are sent from Microsoft and monitored by IT Advisor. Physical files are stored offsite through an approved third-party storage provider which provides protection against unauthorised access, loss, deletion or destruction.

The Commission has not currently experienced any loss of information. All information protection and security risks are reported to the Board bi-monthly. Staff understand the protection and security requirements of information through job descriptions and induction.

#### *Recommendations*

Due to the assessment of this topic and the small nature of the organisation, we have not made a recommendation.

## Access



Ongoing access to and use of information enables staff to do their work and the public to hold government accountable. To facilitate this, public offices need mechanisms for finding and using this information efficiently. Information and/or data sharing between public offices and with external organisations should be documented in specific information sharing agreements.

### TOPIC 18 – Information access, use and sharing

Maturing

#### *Summary of findings*

The Commission regularly updates metadata schema in SharePoint to ensure it is appropriate and enables easy access to documents for staff. SharePoint was reviewed in 2020 in consultation with staff to ensure it continued to be suitable for the Commission's business activities. Metadata is automatically applied wherever possible. For example, SharePoint automatically generates document ID, creator and created date, however, metadata such as file names need to be updated manually.

Staff interviewed reported having the right access to all the information they need to perform their job. Only authorised staff can access sensitive files, and audit trails show who has accessed or modified documents. There is also training available to improve their ability to find information through advanced search techniques.

## Recommendations

Due to the assessment of this topic and the small nature of the organisation, we have not made a recommendation.

### Disposal

Disposal activity must be authorised by the Chief Archivist under the Public Records Act. Public offices should have their own specific disposal authority as well as actively use the General Disposal Authorities for disposal of general or more ephemeral information. Disposal should be carried out routinely. Information of archival value, both physical and digital, should be regularly transferred to Archives New Zealand (or have a deferral of transfer) and be determined as either “open access” or “restricted access”.



## TOPIC 20 – Current organisation-specific disposal authorities

Beginning

### Summary of findings

The Commission does not have an approved organisation-specific disposal authority. This is currently on the 2021-2022 workplan. The previous draft was submitted to Archives for review and after receiving some substantive feedback the Commission did not advance the drafting any further.

### Recommendations

Prioritise the development of an organisation-specific disposal authority based on the feedback received from the Chief Archivist in 2018 and obtain approval from Archives New Zealand.

## TOPIC 21 – Implementation of disposal decisions

Beginning

### Summary of findings

The Commission does not have a current, approved organisation-specific authority. Therefore, it is only permitted to dispose of records under the General Disposal Authority (GDA). The only records disposed of in the last two years were employee’s personal, non-work related records discovered during an audit of the archived Commissioner files. Disposal of information is not routinely carried out and information is generally retained for as long as possible.

The implementation of disposal decisions will be addressed when the organisation-specific disposal authority is approved.

### Recommendations

Once a disposal authority has been approved and implemented as per *Topic 20 – Current Organisation-Specific Disposal Authorities*, ensure disposals are routinely actioned and documented.

## TOPIC 22 – Transfer to Archives New Zealand

Beginning

### Summary of findings

There have been no transfers of physical or digital information to Archives New Zealand since 2004. The Commission does not have digital records that are over 25 years old. Some physical records over 25 years old have been identified as of archival value by the Commission. However, there is no formal plan in place to transfer

information to Archives New Zealand, and there is no deferral or transfer agreement held by the Commission. The Commission has not determined what information they hold should be classified as open or restricted access.

### ***Recommendations***

Once a disposal authority has been finalised and approved (Refer Topic 20 – *Current organisation-specific disposal authorities*), the Commission should identify any records of archival value that are nearing or over 25 years old. A deferral of transfer agreement should be put in place or the records should be transferred to Archives New Zealand as required.





## 6. Summary of feedback

Te Aka Matua o te Ture | Law Commission thanks the auditors and Archives NZ for a comprehensive and informative audit process. We found the IM Maturity Assessment tool to be very useful, and the audit report will help us to better focus our work to improve our IM maturity.

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15 July 2022

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Tēnā koe Amokura

### **Public Records Act 2005 Audit Recommendations**

This letter contains my recommendations related to the recent independent audit of the Law Commission Te Aka Matua o te Ture (the Commission) by KPMG under section 33 of the Public Records Act 2005 (PRA). Thank you for making your staff and resources available to support the audit process.

#### ***Introduction***

Archives New Zealand (Archives) is mandated by the PRA to regulate public sector information management (IM). The audit programme is a key regulatory tool in our Monitoring Framework.

Monitoring IM practice across the public sector gives assurance that the government is open, transparent and accountable by providing visibility of public sector IM practices. Full, accurate and accessible information improves business efficiency and government decision-making and accountability, which in turn enhances public trust and confidence. Information that is well managed unlocks the value of government information for the benefit of everyone.

We are confident that you and your organisation are committed to delivering high-quality, trusted information to decision-makers, other government organisations, customers and stakeholders. We trust that the audit process will support this commitment. The audit report and this letter recommend changes to support improvement of your organisation's IM practices.

#### ***Audit findings***

In the audit report, the auditor has independently assessed your information maturity against the framework of our IM Maturity Assessment. Prior to the audit, your organisation completed the Maturity Assessment. This provided a self-assessment of IM maturity for your own use and as context for the auditor about your organisation.

#### ***Kia pono ai te rua Mahara – Enabling trusted government information***

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Organisations that are assessed as having a maturity level of 'Managing' across all IM topics are broadly meeting the minimum requirements expected by the PRA and Archives' mandatory Information and records management standard. The Commission is well placed for a very small organisation, with sound management of its IM systems and formal IM induction and support for staff. The higher maturity levels show that the organisation values its information and that its management is trusted. Development of a strategy would assist with understanding the capacity requirements for the areas needing improvement, mostly around disposal of information.

### *Prioritised recommendations*

The audit report lists 18 recommendations to improve your organisation's IM maturity.

We endorse all recommendations as appropriate and relevant. To focus your IM improvement programme, we consider that your organisation should prioritise the six recommendations as identified in the Appendix.

### *What will happen next*

The audit report and this letter will be proactively released on the Archives website shortly. We would be grateful if you would advise of any redactions that your organisation considers are necessary for the release within 10 working days.

As required by the PRA, I will also provide the Minister of Internal Affairs with a report on the results of the audit programme for each financial year, which is tabled in the House of Representatives.

We will follow up this letter with a request to your Executive Sponsor that your organisation provides us with an action plan to address the prioritised recommendations. Our follow up process will track your progress against the action plan.

Thank you again for your support with the audit. We would greatly appreciate further feedback on the audit process and the value it provides to organisations, and we will contact your Executive Sponsor shortly in relation to this.

Nāku noa, nā



Stephen Clarke  
Chief Archivist Kaipupuri Matua  
**Archives New Zealand Te Rua Mahara o te Kāwanatanga**

Cc Sindy Gallen, General Manager Pou Whakahaere Matua (Executive Sponsor),  
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## APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
<b>Governance</b>	1: IM strategy	<i>As scheduled in the work plan 2021-2022, develop the information management strategy following Archives New Zealand's guidance. This does not have to be a standalone strategy, as the Commission is a very small organisation, but should incorporate the key elements of information management, The strategy should be approved by the senior management, communicated to all staff and contractors, and reviewed on a periodic basis to ensure it aligns with the Commission's business activity.</i>	The IM strategy will provide direction for future improvement and an agreed workplan. This will inform the organisations understanding of the capacity requirements for the improvement work.
<b>Governance</b>	Outsourced functions and collaborative arrangements	<i>To increase maturity, the Commission should ensure that all contracts for outsourced or collaborative arrangements in the future include roles and responsibilities for information management. New approaches should be investigated to monitor contracted parties and ensure they are meeting their contractual requirements.</i>	There is already induction and training provided for contractors to assist understanding of the Commission's requirements. Ensuring the contracts have appropriate requirements and monitoring of these would provide added IM assurance to the Commission.
<b>Governance</b>	6: Te Tiriti o Waitangi	<i>Work with an internal or external Māori adviser to formally define and identify information of importance to Māori and document information management implications from Treaty of Waitangi agreements and other agreements with Māori.</i>	Further investigation into the use of additional metadata to support accessibility to information of interest to Māori is recommended.
<b>Creation</b>	11: High-value/high-risk information	<i>Develop and maintain an information asset register which covers both digital and physical information, and which identifies all information that is of a high-value or high-risk nature.</i>	This should be completed in conjunction with the development of an organisation-specific disposal authority in Topic 20.

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
<b>Management</b>	15: Business continuity and recovery	<i>Prioritise formally developing and documenting a business continuity and recovery plan incorporating information management considerations such as what critical information is required to ensure business continuity.</i>	The Information Advisor will be able to contribute to this work to ensure that critical information is identified.
<b>Disposal</b>	20: Current organisation-specific disposal authorities	<i>Prioritise the development of an organisation-specific disposal authority based on the feedback received from the Chief Archivist in 2018 and obtain approval from Archives New Zealand.</i>	With the Information Advisor being 0.4 FT in the IM role, external support may be needed to complete this work, which is foundational for improvement in other topics.