



New Zealand Tourism Board

Public Records Act 2005 Audit Report

Prepared for Te Rua Mahara o te Kāwanatanga | Archives New Zealand

Final Report

September 2023



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1. Disclaimers

USE OF REPORT

This report has been prepared in accordance with the Consultancy Order Services dated 1 December 2020 and variation dated 23 September 2021. We have prepared this report solely for Te Rua Mahara o te Kāwanatanga Archives New Zealand (Te Rua Mahara) and New Zealand Tourism Board (NZTB). It was prepared at the direction of Te Rua Mahara and may not include all procedures deemed necessary for the purposes of the reader. The report should be read in conjunction with the disclaimers as set out in the Statement of Responsibility section. We accept or assume no duty, responsibility, or liability to any other party in connection with the report or this engagement, including, without limitation, liability for negligence in relation to the factual findings expressed or implied in this report.

INDEPENDENCE

Deloitte is independent of Te Rua Mahara in accordance with the independence requirements of the Public Records Act 2005. We also adhere to the independence requirements of the New Zealand Auditing and Assurance Standards Board’s Professional and Ethical Standard 1 (Revised): Code of Ethics for Assurance Practitioners. Other than this audit programme, we have no relationship with or interests in Te Rua Mahara.

STATEMENT OF RESPONSIBILITY

The procedures that we performed did not constitute an assurance engagement in accordance with New Zealand Standards for Assurance engagements, nor did it represent any form of audit under New Zealand Standards on Auditing, and consequently, no assurance conclusion or audit opinion is provided. The work was performed subject to the following limitations:

This assessment is based on observations and supporting evidence obtained during the review. This report has taken into account the views of NZTB and Te Rua Mahara, and both have reviewed this report.

Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. The procedures were not designed to detect all weaknesses in control procedures as the assessment was performed by interviewing relevant officials and obtaining supporting evidence in line with the guidelines of Te Rua Mahara Information Management (IM) Maturity Assessment.

The matters raised in this report are only those which came to our attention during the course of performing our procedures and are not necessarily a comprehensive statement of all the weaknesses that exist or improvements that might be made. We cannot, in practice, examine every activity and procedure, nor can we be a substitute for management’s responsibility to maintain adequate controls over all levels of operations and their responsibility to prevent and detect irregularities, including fraud. Accordingly, management should not rely on our deliverable to identify all weaknesses that may exist in the systems and procedures under examination, or potential instances of non-compliance that may exist.

We have prepared this report solely for the use of Te Rua Mahara and NZTB. The report contains constructive suggestions to improve some practices which we identified in the course of the review using the instructions and procedures defined by Te Rua Mahara. These procedures are designed to identify control weaknesses but cannot be relied upon to identify all weaknesses.

1. Executive Summary

NEW ZEALAND TOURISM BOARD (TOURISM NEW ZEALAND)

New Zealand Tourism Board (NZTB) is a Crown entity established under the New Zealand Tourism Board Act 1991. NZTB is governed by an appointed Board that reports directly to the Minister of Tourism. The primary function of NZTB is to develop strategies for tourism and provide advice to the Government and the New Zealand tourism industry.

NZTB focuses on ensuring that tourism contributes to four well-being pillars: the economy, nature, culture, and society. NZTB provides these contributions by raising awareness of New Zealand’s tourism opportunities to foreign and domestic markets through marketing campaigns.

NZTB holds high-value/ high-risk information, some examples include:

- Board papers, Executive Management Team papers
- Marketing planning, marketing activity results and brand development
- International public relations programme planning and programme results
- Consumer trade and business planning, event planning and reporting, and relationship management
- China market development planning, reporting, guidelines, and procedures
- Qualmark NZ and i-site subsidiary commitments including board papers, planning, reporting, brand, and marketing.

The Executive Sponsor (ES) is the General Manager Insights, Performance, & Technology, who has been responsible for the information management (IM) at NZTB for five years. There are 176 full-time employees (FTE) at NZTB including one full time IM manager who is responsible for all IM related activities and also the privacy officer. Staff are spread across 12 offices in 9 countries, with the New Zealand offices located in Auckland and Wellington.

This report includes NZTB’s subsidiary Qualmark. Qualmark is NZTB’s quality assurance provider that grades accreditation and tourism experiences throughout New Zealand.

SUMMARY OF FINDINGS

We assessed NZTB’s IM maturity against the five maturity levels of the IM Maturity Assessment model of Te Rua Mahara. The results are summarised below:

Maturity Level and Number of Findings

Beginning	2
Progressing	5
Managing	12
Maturing	1
Optimising	-

2. Introduction

BACKGROUND

Te Rua Mahara provides IM leadership across the public sector. This is achieved through monitoring government organisations' IM practices to assure the New Zealand public that:

- Full and accurate records are created and maintained, improving business efficiency, accountability, and government decision-making, and in turn, enhancing public trust and confidence in government.
- Government is open, transparent, and accountable by making public sector IM practices known to the public.

Section 33 of the Public Records Act 2005 (PRA) requires that every public office has an independent audit of its record keeping practices every 5-10 years. The audit programme is part of Te Rua Mahara monitoring and reporting on the state of public sector IM. It is one of the key components of their Monitoring Framework, which also includes a biennial survey of public sector IM and the IM Maturity Assessment.

The Chief Archivist has commissioned Deloitte to undertake these audits of certain public offices and this audit was completed in August 2023.

OBJECTIVE

The objective of the audit is to identify IM strengths and weaknesses within the public office, prioritising areas that need attention and recommending improvements. These audits assist organisations to improve their IM maturity and to work more efficiently and effectively.

SCOPE

Deloitte has undertaken an independent point-in-time assessment of NZTBs IM practices against Te Rua Mahara IM Maturity Assessment model. The IM Maturity Assessment aligns with the PRA and Te Rua Mahara mandatory Information and records management standard (the Standard). Topics 17 and 19 of Te Rua Mahara IM Maturity Assessment are only applicable to local authorities and have therefore been excluded for the purposes of this audit.

The IM Maturity Assessment model classifies the maturity of IM practices from "Beginning" (least mature) to "Optimising" (highest maturity level). NZTBs maturity level for each topic area is highlighted under each of the respective areas. Ratings were based on the NZTB's staff responses to questions during in-person interviews and the supporting documents provided pre-audit.

Te Rua Mahara provided Deloitte with the framework including the specified audit plan, areas of focus for the PRA audits, and administrative support to Deloitte. Deloitte completed the onsite audit and audit report, which Te Rua Mahara reviewed before release to NZTB's. Te Rua Mahara is responsible for following up on the report's recommendations with NZTB.

Our audit was based on a sample of IM systems, the review of selected documentation on a sample basis, and interviews conducted with a selection of staff in focus groups. As such, this audit does not relate to an Audit as defined under professional assurance standards.

NZTB's feedback to this report is set out in Section 6.

Information Management Maturity Summary

This section lists the Information Management maturity level for each of the assessed topic areas. For further context refer to the relevant topic area in Section 5.

Assessed Maturity Level						
No.	Topic	Beginning	Progressing	Managing	Maturing	Optimising
Governance						
1	IM Strategy		•			
2	IM Policy			•		
3	Governance Arrangements & Executive Sponsor			•		
4	IM Integration into Business Processes			•		
5	Outsourced Functions and Collaborative Arrangements		•			
6	Te Tiriti o Waitangi		•			
Self-monitoring						
7	Self-monitoring		•			
Capability						
8	Capacity and Capability				•	
9	IM Roles and Responsibilities			•		
Creation						
10	Creation and Capture of Information			•		
11	High Value / High Risk Information	•				
Management						
12	IM Requirements Built into Technology Systems			•		
13	Integrity of Information			•		
14	Information Maintenance and Accessibility			•		
15	Business Continuity and Recovery			•		
Storage						
16	Appropriate Storage Arrangements			•		
Access						
18	Information Access, Use and Sharing			•		
Disposal						
20	Current Organisation-specific Disposal Authorities			•		
21	Implementation of Disposal Decisions		•			
22	Transfer to Te Rua Mahara	•				

Note: Topics 17 and 19 of Te Rua Mahara IM Maturity Assessment are only applicable to local authorities and have therefore been excluded.

Audit Findings by Category and Topic

GOVERNANCE

The management of information is a discipline that needs to be owned 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

High-level statement outlining an organisation’s systematic approach to managing information across all operational environments of an organisation. Progressing

OBSERVATIONS

NZTB’s draft IM Strategy (the Strategy) has not yet been approved or communicated to the business. The Strategy is expected to be finalised before the end of 2023 but is still undergoing updates. The Strategy outlines NZTB’s current IM environment and its desired IM state, as well as the current gaps and high-level objectives. The objectives are focused on implementing retention and disposal in their systems, formal identification of their high-value assets and strengthening IM processes across NZTB. The Strategy is a high-level plan to be used alongside the IM policy and guidelines.

RECOMMENDATION

Finalise the Strategy and socialise with relevant staff.

Topic 2: IM Policy and Processes

An information management policy supports the organisation’s information management strategy and provides a foundation for information management processes. Managing

OBSERVATIONS

NZTB’s IM policy (the Policy) includes roles and responsibilities, guidelines on information sharing, storage, and IM practice. Staff are provided with training on the Policy through IM induction training. While the Policy was last updated in 2018, it still provides adequate guidance and support to staff and contractors joining the organisation while the new IM policy is being drafted.

The revised IM Policy is aligned to the Strategy. The revised IM policy provides greater guidelines for staff on:

- Where to store information
- What information should be kept
- Responsibilities based on the role of the user and references the IM Manager’s responsibilities with the PRA and other relevant legislation
- Document restrictions
- Internal and external sharing guidelines
- Use of personal USBs.

The draft IM policy is going to the next SLT meeting in September and is expected to be approved and socialised by the end of 2023.

RECOMMENDATION

Approve the draft IM policy and socialise to all staff and contractors.

Topic 3: Governance Arrangements and Executive Sponsor

The Executive Sponsor has strategic and executive responsibility for overseeing the management of information in a public sector organisation.	Managing
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OBSERVATIONS

The ES is the General Manager of Insights, Performance, & Technology and the Head of the Information Management Governance Group (IMGG). The IMGG has four members, the IM Manager, Head of Information Security (IS), Chief Financial Officer and General Manager of Insights, Performance, & Technology. The IMGG’s terms of reference state the purpose of the group is to ensure NZTB has appropriate policies, structures, and processes in place to handle IM effectively.

Both the IM and IS staff reported the ES actively champions IM initiatives and is effective at raising awareness of good IM practices throughout NZTB. The ES has been the lead for IM related initiatives and investments for five years and is aware of their oversight and monitoring role.

There is no formalised reporting on IM initiatives and programmes to the ES. Instead, the IM Manager and IS Manager meet weekly, the IS Manager and the ES meet fortnightly, and the IMGG meets quarterly to share progress and updates on the IM workplan. Only serious breaches of policies, security or privacy will be formally reported to the IMGG and then to the Risk Committee.

RECOMMENDATION

Establish a formalised process for regular reporting to the ES on IM activity.

Topic 4: IM Integration into Business Processes

All staff should be responsible for the information they create, use, and maintain. Business owners should be responsible for ensuring that the information created by their teams is integrated into business processes and activities. The IM team support business owners and staff.	Managing
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OBSERVATIONS

Kete is the main Electronic Document Management System (EDMS) used at NZTB, which is built on SharePoint online. The IM manager supports business owners to understand their IM responsibilities on Kete through training, demonstrating best practice, and providing support services. The staff indicated that they have a high level of trust in the IM Manager. In addition, all agreed they would consult the IM manager if there was a business or process change to ensure IM guidelines are being appropriately met. This would also include IM and privacy related matters on Kete. Further, the IM manager and IS staff were confident that user guides for all systems are regularly used and available on the NZTB intranet.

All staff and contractors’ responsibilities for IM are documented in both the Policy and revised IM Policy which is communicated to all staff and contractors joining NZTB. Related policies and guidelines are made available on the intranet for staff and contractors’ reference. These cover topics such as information privacy,

security, and confidentiality. Some staff reported that IM is included in their performance plans while others did not.

RECOMMENDATION

Consistently assign responsibility to business owners through communication of the revised IM Policy.

Topic 5: Outsourced Functions and Collaborative Arrangements

Outsourcing a business function or activity or establishing collaborative initiatives does not lessen an organisation’s responsibility to ensure that all requirements for the management of information are met.

Progressing

OBSERVATIONS

NZTB has several contracts with third parties for outsourced business functions and services. Contracts are managed by the Finance team, with support from an external law firm, however there is no regular monitoring.

A sighted contract between a third-party and NZTB contains general IM details and requirements and clauses relating to confidentiality, data integrity and security. However, not all contracts reviewed explicitly outline roles and responsibilities for IM practices.

RECOMMENDATION

Ensure that roles and responsibilities for IM within contracts for outsourced functions are consistently identified and monitored.

Topic 6: Te Tiriti o Waitangi

The Public Records Act 2005 and the information and records management standard supports the rights of Māori under Te Tiriti o Waitangi/Treaty of Waitangi to access, use and reuse information that is important to Māori.

Progressing

OBSERVATIONS

The IM manager is currently working with NZTB Māori advisors to identify information of importance to Māori. Both the IM manager and ES are aware that this is an area of IM that requires improvement and NZTB has a specific focus group that are working to identify and catalogue information that is of importance to Māori. The focus group will enable NZTB to identify the current and future information, so they are able to improve the handling and access to this information.

RECOMMENDATION

Identify information of importance to Māori and include in the Information Asset Register (IAR).

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 internal policies and processes.

Topic 7: Self-Monitoring

Organisations should monitor all aspects of their information management.

Progressing

OBSERVATIONS

NZTB does not use any legislative compliance tools to monitor their compliance with legislation such as the PRA. However, the IM manager does biennial survey of public sector information management by Te Rua Mahara, and completes the Information Management Maturity Assessment annually, and uses it as a basis to identify where they should focus their efforts and investments.

Breaches of the IM, privacy or security policy are identified through self-disclosure and the IM manager provides support on a case-by-case basis. The IS team does monitor the use of discouraged systems such as drop-box. If employees have been using personal systems, the IM Manager will provide further training and education on the use and functionality of Kete.

RECOMMENDATION

Decide what aspects of IM should be monitored and reported and implement regular reporting on these items to the ES.

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

Organisations should have IM staff or access to appropriate expertise to support their IM programme.

Maturing

OBSERVATIONS

There is one FTE responsible for the IM activities at NZTB. Each year, the ES reviews the capacity and capability for IM, which forms part of the NZTB’s annual resourcing plan. This allows the ES to identify if NZTB has the current capacity and capability in-house to meet the upcoming IM programmes, which is currently the case.

All employees have access to a professional development budget that is part of the yearly personal development plans. Staff including the ES mentioned that professional development is actively promoted and encouraged. The IM manager stated that they have attended IM specific seminars and IM networking events.

RECOMMENDATION

Assess capacity and capability needs against the approved Strategy.

Topic 9: IM Roles and Responsibilities

Staff and contractors should be aware of their responsibility to manage information.

Managing

OBSERVATIONS

New staff and contractors at NZTB are provided with mandatory IM induction training that the IM Manager facilitates. Staff reported that they have attended the training, though some staff mentioned refresher training would be useful.

IM roles and responsibilities are generally well understood by staff, though responsibilities are not outlined in job descriptions or the code of conduct, instead there is a general statement that employees must comply with NZTB policies. The previous and new draft IM policy include role-based responsibilities for the management of information.

RECOMMENDATION

Assess the need for refresher training and deliver as needed.

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

Every public office and local authority must create and maintain full and accurate information documenting its activities.

Managing

OBSERVATIONS

NZTB uses Kete as the main document management system and the standard process is for staff to share a link to the document via email or Microsoft Teams. Staff understand their responsibilities to create and capture full and accurate records through the IM training and NZTB policies. All staff interviewed reported they follow this process and store information they create in Kete.

The IS team is currently decommissioning the Auckland shared drive which is expected to be finished by the end of 2023. The Wellington shared drive has already been decommissioned.

Staff reported a high-level of collaboration between business units and reported no issues when creating and capturing information. Kete follows a standardised file taxonomy across NZTB which makes it easy to identify where information should be created and captured, even across business units.

The use of personal OneDrive and external systems such as Dropbox is discouraged and monitored. If an employee uses drop-box the IM Manager will have a learning session explaining why these systems should not be used and the benefits of using Kete.

Kete is setup to automatically capture the minimum metadata requirements from Te Rua Mahara. The IM Manager does perform spot checking on Teams' Kete files, however, these are not formally documented and infrequently performed.

RECOMMENDATION

Develop a structured approach to monitoring Kete and reporting issues to the ES.

Topic 11: High-Value/High-Risk Information

Staff and contractors should be aware of their responsibility to manage information. Every public office and local authority must create and maintain full and accurate information documenting its activities.

Beginning

OBSERVATIONS

NZTB has recently started developing an IAR. To inform the development of the IAR, there are forms on the intranet where business owners can self-report their high-risk/high-value information. The IM Manager will assess this information and document assets in the IAR.

RECOMMENDATION

Work with business owners to identify high-risk/high-value information assets and develop an IAR to formally identify and track this information.

MANAGEMENT

Management of information should be designed into systems to ensure its ongoing management and access over time, including following a business disruption event. The 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 Solutions

IM requirements must be identified, designed, and integrated into all of your organisation’s business systems.

Managing

OBSERVATIONS

There are user guides available for the majority of core systems at NZTB. Furthermore, NZTB purchases out-of-the box software and does not customise it, therefore there is a large degree of documentation available online making user guides easy to access and find.

Te Rua Mahara minimum metadata requirements are built into Kete. As, NZTB does not customise their software solutions, complying with the minimum metadata requirements of Te Rua Mahara may not be possible for all systems.

Due to the members involved in the IMGG, the IM Manager is regularly consulted and updated on new systems being proposed. Any new software being implemented must be approved by the IMGG to ensure that IM requirements are being met. IM and privacy needs are included in the purchasing of all new technology systems to ensure they are suitable for NZTB’s IM needs. The IM requirements are included in the documented process for acquiring new systems.

The IM Manager was involved in the recent decommissioning of the NZTB’s old finance system. During the migration of financial data to the new system the IM Manager ensured that the finance team was supported and provided advice on the IM requirements for managing this information.

RECOMMENDATION

Ensure that there is system documentation available on the intranet for all systems in use at NZTB.

Topic 13: Integrity of Information

Information should be managed so that it is easy to find, retrieve and use, while also being secure and tamper-proof.

Managing

OBSERVATIONS

Staff interviewed were confident in the integrity of information available on Kete due to the metadata and version control available for each document. The IM Manager set up the Kete taxonomy to ensure there is a consistent structure at NZTB. Also, staff reported no barriers to identifying which document is the most recent version. Due to the collaborative working nature of teams at NZTB, staff reported no barriers to finding information outside of their own business units.

The IM Manager and staff reported that if issues are identified with documents that the former would address these on a case-by-case basis.

RECOMMENDATION

Ensure experience issues for finding and retrieving information are identified, documented, and addressed.

Topic 14: Information Maintenance and Accessibility

Information maintenance and accessibility cover strategies and processes that support the ongoing management and access to information over time.

Managing

OBSERVATIONS

The IM Manager maintains a register of information 25 years and older. The information is catalogued based on the broad category and stored at the off-site third-party storage provider. However, NZTB is not aware of the exact contents held within the boxes. The IM Manager is aware they need to identify and assess the information within the boxes.

NZTB is currently decommissioning their outdated shared drives and the rest of their systems are cloud-based. The current cloud-based set up ensures that NZTB’s systems and the information they hold is easily accessible. Furthermore, the IS Manager and IM Manager keep the systems regularly updated.

There is a general culture of over-retention of information at NZTB. There was a recent programme to remove minor and duplicate documents from their systems. However, outside of this programme, the IM Manager and staff do not regularly assess or delete documents or identify their preservation needs under the PRA.

RECOMMENDATION

Ensure that preservation and digital continuity needs for digital information are addressed.

Topic 15: Business Continuity and Recovery

This covers the capability of the organisation to continue delivery of products or services, or recover the information needed to deliver products or services, at acceptable pre-defined levels following a business disruption event.

Managing

OBSERVATIONS

NZTB has an organisation-wide Business Continuity Plan (BCP), which is out of date and references the former IM Manager. The BCP outlines priority of the key systems and information needed to operate during a disruption event, including targeted recovery times, and roles and responsibilities. Recovery actions included a detailed timeline that covers what to do from the first hour of an outage through to long term recovery actions.

Standard daily, weekly, monthly, and yearly back-ups are kept across all systems. Further, separate backups are kept in a separate cloud-environment to ensure NZTB can recover and restore their information during a business disruption event.

RECOMMENDATION

Update the BCP to ensure that it is current and accurately names the key personal needed during a disruption event.

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

Appropriate storage arrangements for both physical and digital information ensures information remains accessible and usable throughout its life.

Managing

OBSERVATIONS

The majority of physical information that NZTB holds is at its off-site third-party storage provider. NZTB does store around 20 boxes of physical information on-site in a key controlled basement with access to the key requiring the IM Manager’s approval. The basement has fire controls, pest control and information is stored on shelves in boxes.

NZTB has offices overseas and the IS team is confident that all information is secure and stored appropriately. All staff, including on and offshore, must have the same security measures and follow the same IM guidelines and processes as NZ offices. Further, the overseas teams utilise the same IS environment as the New Zealand teams. The IS team completes GCDO assessments for all new cloud-based systems.

When documents are deleted from Kete, the IM Manager will receive a notification highlighting the disposed document. The IM Manager will then coordinate with the document owner to ensure it was suitable for destruction.

There is no formalised reporting to the IMGG about destruction and the storage arrangements. However, if incidents do occur regarding security, privacy or breaches of the IM policies these will be reported.

RECOMMENDATION

Identify risks to information storage and monitor and report on these risks.

ACCESS

Ongoing access to and use of information enables staff to do their jobs. To facilitate this, organisations will need mechanisms to support the findability and usability of information. Information and data that is shared between organisations is identified and managed.

Topic 18: Information Access, Use and Sharing

Staff and contractors are able to easily find and access the information they need to do their work. Access controls for information is documented and consistently applied and managed. Metadata facilitates discovery and use of information. Information and data received or shared under information sharing agreements is managed according to IM policies and processes.

Managing

OBSERVATIONS

Access controls are set in Windows Active Directory on a role-based permissions structure. When an employee changes roles all previous access is removed, and the new role is assigned updating their privileges. The role-based permissions ensures that employees do not gain too many privileges across teams to NZTB’s IS environment. Staff interviewed corroborated they have appropriate access to the information they need, but no access to information they should not have access to.

Staff that were interviewed reported a consistent file taxonomy present in the Kete system. Furthermore, Kete automatically captures the minimum metadata requirements of Te Rua Mahara. Links to files and documents within Kete can be shared so employees are certain they are working on the correct document. Kete supports a search function across the system which can be siloed into individual sites and libraries for targeted searches. However, sensitive information is only searchable if the user is added to the correct Windows Active Directory group.

The IM Manager does perform ad-hoc reviews of business units’ taxonomy and IM. However, these are not formalised or reported to the IMGG.

RECOMMENDATION

Actively maintain the taxonomy and metadata schema to ensure reliable management and discovery of information.

DISPOSAL

Disposal activity must be authorised by the Chief Archivist under the PRA. 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 (or have a deferral of transfer) and be determined as either “open access” or “restricted access”.

Topic 20: Current Organisation-Specific Disposal Authorities

This is about an organisation having its own specific disposal authority, not the implementation of the disposal actions authorised by the authority. It is not about the General Disposal Authorities.

Managing

OBSERVATIONS

NZTB has a current and approved agency-specific Disposal Authority (DA). The DA covers all information and business functions and was authorised in July 2018. The DA is annually checked at a high level, as prompted by Te Rua Mahara survey.

RECOMMENDATION

Changes identified in the regular DA review cycle are incorporated into the organisation-specific DA.

Topic 21: Implementation of Disposal Decisions

This is about the implementation of disposal decisions, whether from organisation-specific disposal authorities or the General Disposal Authorities.

Progressing

OBSERVATIONS

NZTB does not regularly dispose of information unless it is a duplicate or minor versions of a document. This has led to NZTB over retention of digital information.

There are General Disposal Authorities (GDAs) and DA guidelines configured on Kete; however, these are not in use. As mentioned by the IM Manager and the IT Manager, Microsoft is releasing new functionality for their suite of products in 2024. The new functionality will allow for users to implement retention and destruction controls on Microsoft products.

The draft Strategy does identify the current gaps that NZTB has for disposal of information. The Strategy has noted that they are actively investigating solutions that can automate the GDAs and DA guidelines.

RECOMMENDATION

Ensure that there is a process to ensure information is retained for as long as required for business use.

Topic 22: Transfer to Te Rua Mahara

Information of archival value, both physical or digital, should be regularly transferred to Te Rua Mahara or a deferral of transfer should be put in place.

Beginning

OBSERVATIONS

NZTB has information held that is over 25 years old at their off-site third-party storage provider. However, the IM Manager is not aware of the contents of this information.

NZTB does not have a plan regarding the transfer of this information to Te Rua Mahara.

RECOMMENDATION

Identify digital records that could be transferred and discuss transfer with Te Rua Mahara.

Summary of Feedback

The findings of the PRA Audit report are largely consistent with our own information management maturity self-assessment. We had already identified the need for an information management strategy (with a first draft done) and had started to work on an information asset register including what information that NZTB holds that is of importance to Māori. Many of the recommendations align with the FY24 Information Management workplan and will be addressed within the current financial year.

There is also an opportunity for us to further enhance the work of the Information Management Governance Group to better monitor IM performance and progress against the IM Annual workplan.



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Tēnā koe René

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the New Zealand Tourism Board (NZTB) completed by Deloitte 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

Te Rua Mahara o te Kāwanatanga Archives New Zealand (Te Rua Mahara) 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

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 the mandatory Information and records management standard. NZTB's IM is assessed as mostly at the 'Managing' level which is commendable and shows the organisation's commitment to managing its information. It is encouraging to see from the audit report Section 6: *Summary of Feedback* that the organisation is already planning to address some topics that are rated lower than 'Managing' in the 2024 financial year IM workplan.

With relatively few recommendations we encourage NZTB to proactively share good practice with other organisations in related sectors. NZTB's development of a desired IM state, as part of the IM Strategy, should consider which topics would ideally exceed the 'Managing' level of maturity.

Prioritised recommendations

The audit report lists 20 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 seven recommendations as identified in the Appendix.

What will happen next

The audit report and this letter will be proactively released on our website shortly. We would be grateful if you would advise of any redactions that your organisation considers are necessary 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. We have sent a feedback survey link for the attention of your Executive Sponsor in the accompanying email.

Nāku noa, nā



Anahera Morehu
Poumanaaki Chief Archivist
Te Rua Mahara o te Kāwanatanga Archives New Zealand

Cc Brendan Downey Parish, General Manager Customer Experience, Technology and Data (Executive Sponsor), Brendan.Downey-Parish@tnz.govt.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Governance	1: IM Strategy	<i>Finalise the Strategy and socialise with relevant staff.</i>	With the IM Strategy already drafted NZTB is well positioned to finalise this work. It will help the organisation understand the IM resourcing required. Consider which topics should have maturity higher than 'Managing'.
Governance	5: Outsourced Functions and Collaborative Arrangements	<i>Ensure that roles and responsibilities for IM within contracts for outsourced functions are consistently identified and monitored.</i>	It is essential that where public information and records that are created under contracts or agreements are well managed and monitored. The organisation must ensure it has adequate oversight of this information.
Governance	6: Te Tiriti o Waitangi	<i>Identify information of importance to Māori and include in the Information Asset Register (IAR).</i>	This is a topic that generally needs uplift across most public offices and NZTB may benefit from working on this with other similar organisations.
Governance	7: Self-Monitoring	<i>Decide what aspects of IM should be monitored and reported and implement regular reporting on these items to the ES.</i>	This will ensure that the organisation has control over the use of its systems rather than relying on 'self-disclosure' for insight.
Creation	11: High-Value/High-Risk Information	Work with business owners to identify high-risk/high-value information assets and develop an IAR to formally identify and track this information.	Work has already started on developing the IAR in collaboration with the business owners which is a useful approach.
Disposal	21: Implementation of Disposal Decisions	<i>Ensure there is a process to ensure information is retained for as long as required for business use.</i>	Information that does not need to be retained should be disposed of under the appropriate authority. This ensures that the organisation is managing the risks of over retention and supports efficient retrieval of information.

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Disposal	22: Transfer to Te Rua Mahara	<i>Identify digital records that could be transferred and discuss transfer with Te Rua Mahara.</i>	Work should also be done to identify the physical records suitable for transfer to the Auckland regional repository. This would lessen the need for storage and realise the benefit of the current DA.