



Mana Mokopuna  
Children and Young People's  
Commission

Public Records Act 2005 Audit Report

Prepared for Te Rua Mahara o te Kāwanatanga  
Archives New Zealand

Final Report  
October 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 the Children and Young People's Commission (Mana Mokopuna). It was prepared at the direction of Mana Mokopuna 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 the Mana Mokopuna 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 the 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 Mana Mokopuna. 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.

## 2. Executive Summary

### MANA MOKAPUNA | CHILDREN AND YOUNG PEOPLE'S COMMISSION

Mana Mokopuna | Children and Young People's Commission (Mana Mokopuna) is an independent Crown entity, established in 1989 and governed by the Children's Commissioner Act 2003. Mana Mokopuna represents 1.2 million mokopuna (children and young people) in Aotearoa New Zealand (Aotearoa) under the age of 18. The vision of Mana Mokopuna is that every child in Aotearoa, regardless of background, is to grow up knowing they belong with their whānau and have the resources to succeed. Honouring and reflecting Te Tiriti o Waitangi is central to its work and is one of the core values of Mana Mokopuna.

The core strategic priorities of Mana Mokopuna include:

- Advocating for all mokopuna to have access to, and participate in, inclusive and equitable education
- Advocating for the mental wellbeing of mokopuna to be prioritised, so they thrive and flourish
- Advocating for an end to family violence and to help families heal
- Regularly monitoring places of detention and advocating for system change.

Mana Mokopuna employs approximately 40 employees at its office in Wellington with the Corporate Services Manager being the Executive Sponsor (ES) with IM responsibility and oversight at Mana Mokopuna.

The high-risk/high-value records that Mana Mokopuna holds is information relating to mokopuna and whānau on the following services provided:

- Care and protection services
- Adoptions
- Children with disabilities
- Youth justice
- Monitoring reports of care facilities
- Case files of children and families who are provided care and protection services.

### SUMMARY OF FINDINGS

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

#### Maturity Level and Number of Findings

<b>Beginning</b>	10
<b>Progressing</b>	10
<b>Managing</b>	0
<b>Maturing</b>	0
<b>Optimising</b>	0

## 3. 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 an annual 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 March 2023.

### OBJECTIVE

To identify areas of IM strengths and weaknesses within the public office, prioritising areas that need attention and what needs to be done to strengthen them. These audits are seen as an important mechanism for organisations to improve their IM maturity and to work more efficiently and effectively.

### SCOPE

Deloitte has undertaken an independent point-in-time assessment of the IM practices of Mana Mokopuna 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 the 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). The maturity levels for Mana Mokopuna for each topic areas is highlighted under each of the respective areas. Ratings were based on the responses to questions during online interviews and the supporting documents provided in line with the IM Maturity Assessment guidelines.

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 Mana Mokopuna. Te Rua Mahara is responsible for following up on the report's recommendations with Mana Mokopuna.

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 and focus groups. As such, this audit does not relate to an Audit as defined under professional assurance standards.

The feedback from Mana Mokopuna on this report is set out in Section 6.

## 4. Information Management Maturity Summary

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

### ASSESSMENT MATURITY LEVEL

#### Governance

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
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

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
7	Self-monitoring	●				

#### Capability

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
8	Capacity and Capability		●			
9	IM Roles and Responsibilities	●				

#### Creation

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
10	Creation and Capture of Information	●				
11	High-Value / High-Risk Information	●				

#### Management

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
12	IM Requirements Built into Technology Systems		●			
13	Integrity of Information		●			
14	Information maintenance and accessibility		●			
15	Business Continuity and Recovery		●			

#### Storage

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
16	Appropriate Storage Arrangements		●			

#### Access

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
18	Information Access, Use and Sharing		●			

#### Disposal

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
20	Current Organisation-specific Disposal Authorities	●				
21	Implementation of Disposal Decisions	●				
22	Transfer to Te Rua Mahara	●				

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

## 5. 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.	Beginning
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#### OBSERVATIONS

The IM Strategy (the Strategy) at Mana Mokopuna was last updated in 2013 and does not reflect its key current objectives. However, the PRA and other relevant legislation with IM principles and success indicators are included in the Strategy. Planning is currently underway for the Strategy to be updated in 2023.

#### RECOMMENDATION

Update and finalise the Strategy to ensure business needs are accurately reflected and ensure alignment to Te Rua Mahara guidance.

#### 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.	Progressing
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#### OBSERVATIONS

The IM Policy (the Policy), which was updated in 2021, is set out in the Policy Handbook.

The Policy includes IM definitions, roles and responsibilities and digital information management processes. The processes around digital information management are inconsistent and only enforced by business unit managers as required.

There is a general awareness of the PRA throughout Mana Mokopuna. The staff induction training covers IM specific topics such as an overview of the IM system, processes, and responsibilities at Mana Mokopuna.

Induction training was previously provided by a business unit manager and broadly incorporated the IM processes and responsibilities at Mana Mokopuna. However, the training has ceased due to the staff member leaving the organisation. Induction is a shared responsibility between the team manager, HR and corporate services.



RECOMMENDATION

Document all digital information management processes with clear guidance for managers to ensure consistency of performance across business units.

**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.

Progressing
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OBSERVATIONS

Due to the organisational size of Mana Mokopuna, it is not expected that there is a dedicated IM team or IM governance group. All IM related issues are raised at Senior Leadership Team (SLT) meetings where the ES is a member with IM support provided by SLT members or business owners as needed.

The Corporate Services Manager, also the ES, is responsible for overseeing and managing IM and ICT corporate responsibilities. These responsibilities include managing service requests such as requests for access to systems and system reports with the Ministry of Social Development’s (MSD) ICT team.

MSD’s ICT team provides ICT services to Mana Mokopuna which requires a collaborative approach between the two organisations.

RECOMMENDATION

Ensure IM is regularly included in the standing agenda at SLT meetings.

**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.

Progressing
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OBSERVATIONS

IM roles, responsibilities, and requirements are broadly defined in the Policy with reference made in some job descriptions. As a result, some staff and business owners that were interviewed were not clear on their IM responsibilities.

Mana Mokopuna currently uses a shared network drive with MSD for file storage. The MSD ICT team are administrators for the network, which includes granting file access permissions. Neither Mana Mokopuna nor MSD staff have access to the other’s information in the shared drive.

The Policy outlines the requirements for managing information within the shared drive. However, there are occasional issues due to different business units and its staff developing informal file structures and naming conventions.

Mana Mokopuna will upgrade to an Electronic Document Management System (EDMS) in 2023. It has been recognised that collaboration with MSD during the transition is essential. The support of a third-party contractor during the upgrade is currently being considered.



## Public Records Act 2005 Audit Report | Audit Findings by Category and Topic

At the time of the upgrade, Mana Mokopuna will provide guidelines around naming convention standards and file structure to provide consistency of use across the organisation. These updated guidelines will be included in the Policy.

### RECOMMENDATION

Develop a detailed plan to transition from MSD's local network drive to an EDMS and ensure it meets Te Rua Mahara minimum requirements. This should include developing and agreeing naming convention standards and file structure.

## 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.

Beginning
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### OBSERVATIONS

MSD manages the main digital information storage system for Mana Mokopuna including data system management, information security, retention and disposal requirements, which are covered off in a Memorandum of Understanding (MoU) with MSD. The latter two requirements remain the responsibility of Mana Mokopuna.

Mana Mokopuna has an All of Government (AOG) contract with a third-party off-site storage provider for physical storage.

The human resources and payroll and (HR) cloud applications standard terms and conditions make no reference to the PRA and IM roles and responsibilities.

### RECOMMENDATION

Ensure that IM roles and responsibilities are detailed in any contracts for outsourced functions and collaborative agreements.

## 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.

Beginning
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### OBSERVATIONS

Mana Mokopuna incorporates Te Tiriti principles into its decision-making processes. There is high awareness of Te Tiriti o Waitangi settlement agreements with a clear view of information that is of importance to Māori.

Mana Mokopuna has not identified information of importance to Māori.

### RECOMMENDATION

Design processes to locate and identify all information that is of importance to 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 internal policies and processes.

### Topic 7: Self-Monitoring

Organisations should monitor all aspects of their information management.

Beginning

#### OBSERVATIONS

Business owners are responsible for ensuring that their teams' IM meets requirements. However, there is no self-monitoring or reporting on the performance of IM against the Policy or processes.

Mana Mokopuna is alerted of all security breaches including IM by the MSD ICT team, which are reported to the ES and shared with SLT. However, the process is not outlined in the Policy.

#### RECOMMENDATION

Develop and agree a plan to self-monitor IM against the Policy and processes.

## 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.	Progressing
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#### OBSERVATIONS

Staff have access to a professional development budget which can be used for IM related training. There is also a general awareness that the ES is available to provide support on IM matters to staff.

Mana Mokopuna does not have an IM team and sometimes outsources requirements to third-party IM contractors for support. In the past, third-party IM contractors have supported with the Policy and the Strategy development and Mana Mokopuna is considering using contractors to support in the commissioning of the EDMS system.

#### RECOMMENDATION

Regularly assess IM capability and capacity and monitor the ability to meet business needs.

### Topic 9: IM Roles and Responsibilities

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

Staff and contractors are required to comply with IM requirements. As previously stated, some staff were unclear of their responsibilities to meet the requirements to comply with the PRA and other relevant legislation.

Training requirements related to the EDMS transition will be identified closer to the time of system implementation.

#### RECOMMENDATION

Re-instate a formal induction training and identify training requirements to enable the planning and implementation of a training module.

## 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.

Beginning

#### OBSERVATIONS

Staff have a good understanding of their responsibilities to create full and accurate information to support business functions. However, there are occasional version control issues and difficulty with information findability due to inconsistent filing structures and naming conventions. A further filing and findability challenge is presented when staff save documents on their computer desktops instead of the shared drive.

Metadata is limited on the MSD shared drive due to its default settings which cannot be edited or added. The current metadata also does not meet Te Rua Mahara minimum requirements. This issue will be addressed in the upcoming transition to an EDMS.

#### RECOMMENDATION

Ensure the new EDMS meets Te Rua Mahara minimum metadata requirements.

### 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

Mana Mokopuna does not have an information asset register (IAR) that identifies key information assets.

Most of the operational information that Mana Mokopuna obtains is high value/high-risk which includes interview notes, care plans and data relating to mokopuna. Staff are aware of the high value/high-risk nature of the information and keep physical copies of identifying personal data in secure storage cabinets. Digital information of the same classification is stored in the appropriate access-controlled folders and only accessible by relevant staff members.

#### RECOMMENDATION

Create an IAR to record high value/high-risk information assets.

## 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.

Progressing

#### OBSERVATIONS

SLT members support organisation-wide IM changes and make decisions when required. The ES and SLT are in the process of determining the support requirements and transition plan for implementing the new EDMS.

PRA requirements are a main consideration in the update or implementation of any new system for which the ES is involved in the implementation, change and decommission stages. However, not all system designs and configurations are accurately documented and maintained.

#### RECOMMENDATION

Identify and document standardised IM requirements for any new or upgraded business systems.

### 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.

Progressing

#### OBSERVATIONS

Staff noted issues in finding, retrieving, and identifying information which includes ensuring that the information accessed is the most recent version. There are localised IM processes to manage this using archive folders.

With the exception of version control issues and the findability of information, Mana Mokopuna has a high level of confidence in the integrity of its information. There is a strong focus to ensure information is reliable and trustworthy. Due to the nature of its work and the requirements of the Children's Commissioner Act 2003, staff have a good understanding that all information created and used should be comprehensive, complete, and meet relevant legislative requirements.

#### RECOMMENDATION

Assess IM practices around information reliability and trustworthiness to identify and implement improvements as necessary such as version control.

## 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.

Progressing

### OBSERVATIONS

Mana Mokopuna relies on MSD's ICT team's managing the shared drive including weekly and annual backups, regular cyber security testing. If staff delete information, it will remain accessible in the weekly and annual system back up.

With the upcoming EDMS transition, a plan around information maintenance and accessibility has not been created to ensure an accurate and complete migration.

### RECOMMENDATION

Develop a plan for the migration of digital information to an EDMS.

## 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.

Progressing

### OBSERVATIONS

Mana Mokopuna has a current Business Continuity Plan (BCP) was last updated in August 2021 and tested in June 2022. The BCP includes recovery plans and strategies, maintenance tasks with the identification of specific roles and responsibilities. Critical systems, digital and physical information are not referenced in the BCP.

MSD is responsible for the BCP relating to shared network drives of Mana Mokopuna. For the payroll and HR systems that Mana Mokopuna use, the respective third parties are responsible for BCP and recovery.

### RECOMMENDATION

Refresh the BCP to include critical information required for 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

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

Mana Mokopuna stores a minimal volume of physical information in the Wellington office and primarily uses an off-site storage provider that maintains an index of all stored Mana Mokopuna documents. There is no further inventory of digital or physical information in addition to the index used by the storage provider.

There are a small number of secure storage cabinets for physical information located in the office with limited access for staff, however, there is no index of this information. The cabinets used to store the physical information are included in the BCP and further protected by the building’s safety features such as fire alarms.

All digital systems have access controls in place.

#### RECOMMENDATION

Create an index for the physical information stored on-site and ensure that information protection and security risks are documented and reported on.



## 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.	Progressing
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#### OBSERVATIONS

Mana Mokopuna applies IM processes for incoming and outgoing data that is shared with external parties such as other public offices. For example, Mana Mokopuna sometimes shares information with Oranga Tamariki for purposes relevant to the Children’s Commissioner Act 2003. The Commissioner will review and approve the information before sharing.

As previously mentioned, Mana Mokopuna system’s metadata is limited and with no ability for additional metadata to be added. It does not meet Te Rua Mahara metadata requirements.

Mana Mokopuna applies access controls for all digital information of a sensitive nature to the appropriate staff folders. This information includes HR records, financial records and high-risk/high value mokopuna information. The ES oversees and manages the other systems however, these processes are not outlined in the Policy.

#### RECOMMENDATION

Develop and outline formalised IM processes in the Policy to increase transparency and support discovery of digital 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 Te Rua Mahara (or have a deferral of transfer) and be determined as either “open access” or “restricted**

### 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.

Beginning

#### OBSERVATIONS

Mana Mokopuna does not have an organisation-specific disposal authority (DA).

#### RECOMMENDATION

Develop an organisation-specific DA and submit to Te Rua Mahara for approval.

### 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.

Beginning

#### OBSERVATIONS

There have been no reported instances of disposal under the General Disposal Authorities (GDAs). Mana Mokopuna has a culture of retaining all information and rarely undertakes disposal activity.

#### RECOMMENDATION

Develop an implementation plan for disposal under the GDAs.

### 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

Mana Mokopuna only has physical information available from 2000, which is stored at the offsite physical storage location. All physical information before 2000 was damaged beyond repair/rescue following a flood in a basement where it was stored.

Digital information that is over 25 years old has not been identified.

## RECOMMENDATIONS

Mana Mokopuna to inform Te Rua Mahara on the incident that occurred in 2000.

When the organisation-specific disposal authority is completed develop a plan to identify digital information that is over 25 years old or of archival value.

## 6. Summary of Feedback

Mana Mokopuna will be able to implement a new EDRMS, Objective, provided through MSD, in 2023. Only documents related to the new Children's and Young People's Commission will be stored in Objective. A process will be determined and followed to ensure that all Mana Mokopuna files/documents is safely stored until such time it can be disposed of under the appropriate RDS or transferred to Te Rua Mahara.

The new EDRMS will ensure proper filing/storage and metadata applied to all documents.

Over the next few months, the ES will ensure that all recommendations are implemented and reported on to SLT.

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Tēnā koe Claire

## Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the independent audit of the Children's Commissioner (and the Office of the Children's Commissioner) completed by Deloitte under section 33 of the Public Records Act 2005 (PRA). This audit was done before the commencement of the Children and Young People's Commission Act 2022 on 1 July 2023. Although the role of the Children's Commissioner has changed, the supporting organisation largely remains and this audit, although applied to the previous organisation, will still be applicable to Mana Mokopuna. 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 new organisation will be 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.

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

## **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.

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. Mana Mokopuna IM practice is assessed as operating at the lower end of the maturity scale although the importance and sensitivity of its information is well understood.

Analysis of the level of IM resource needed to improve maturity along with an IM Strategy would be useful in conjunction with MSD who provide some IM support currently. The implementation of a new system that will enable better control of information is planned and will be beneficial if IM expertise is involved in its set up and configuration.

## **Prioritised recommendations**

The audit report lists 21 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 eight 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 organisation's 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

A handwritten signature in black ink, consisting of stylized initials and a surname, likely 'AR Morehu'.

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

Cc Patrick Labotsky, Corporate Services Manager (Executive Sponsor),  
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## APPENDIX

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
<b>Governance</b>	1: IM Strategy	<i>Update and finalise the Strategy to ensure business needs are accurately reflected and ensure alignment to Te Rua Mahara guidance.</i>	As a small organisation it is still useful to understand what the IM issues are, what needs to be done to address them and plan to resource and implement improvements. The appropriate degree of alignment with and difference from MSD's IM strategy should be considered.
<b>Governance</b>	5: Outsourced Functions and Collaborative Arrangements	<i>Ensure that IM roles and responsibilities are detailed in any contracts for outsourced functions and collaborative agreements.</i>	Mana Mokopuna is responsible for the information created and managed under contracts or agreements. The IM requirements should be clear to all parties and monitoring should ensure that these are met.
<b>Governance</b>	6: Te Tiriti o Waitangi	<i>Design processes to locate and identify all information that is of importance to Māori.</i>	Considering the work of the organisation this would be relevant and could be done in collaboration with MSD who currently supports the IM function.
<b>Capability</b>	9: IM Roles and Responsibilities	<i>Re-instate a formal induction training and identify training requirements to enable the planning and implementation of a training module.</i>	Induction training ensures consistent understanding of IM requirements across the organisation.
<b>Creation</b>	10: Creation and Capture of Information	<i>Ensure the new EDMS meets Te Rua Mahara minimum metadata requirements.</i>	There are some other identified issues that the new EDMS will also be able to address, such as version control from Topic 13: Integrity of Information.
<b>Creation</b>	11: High-Value/High-Risk Information	<i>Create an IAR to record high-value/high-risk information assets.</i>	Identifying information assets means that IM tasks can be prioritised depending on the importance of the information.

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
<b>Disposal</b>	21: Implementation of Disposal Decisions	<i>Develop an implementation plan for disposal under the GDAs.</i>	A disposal plan needs to also include any continuing mechanisms that protect information related to the Royal Commission of Inquiry into Abuse in Care but it would be useful to start developing an approach to disposal.
<b>Disposal</b>	22: Transfer to Te Rua Mahara	<i>Mana Mokopuna to inform Te Rua Mahara on the incident that occurred in 2000.</i>	It is important that details about what was accidentally destroyed in 2000 under the Archives Act 1957 are shared with Te Rua Mahara.