Public Records Audit Report for Te Whare Wānanga o Awanuiārangi

Prepared for Te Rua Mahara o te Kāwanatanga Archives New Zealand

June 2023

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Independence

We are independent of Archives in accordance with the independence requirements of the Public Records Act (PRA) 2005.

Contents

1. Executive summary

Established in 1991, Te Whare Wānanga o Awanuiārangi (TWWOA), is a Wānanga hosting students across three campuses based in Whakatāne, Tāmaki Makaurau Auckland, and Te Tai Tokerau.

TWWOA creates and maintains high-value public records in relation to:

- Qualifications and academic records of students

- Records of programmes and courses

- Student administration

- Audit and governance documents

- Board and committee meeting minutes, including those of TWWOA's Board

- Historic documents from the founding of TWWOA.

TWWOA maintains its information on various systems including a student management system, financial management system, student or public enquiries system and Microsoft 365 (e.g. SharePoint, Teams, Word and Outlook).

TWWOA employs 250 full-time staff and follows a decentralised approach to information management. Responsibility for information management is delegated to TWWOA's various departments. TWWOA's Human Resources (HR) Manager, the Library and Records Manager and the IT Manager all support TWWOA's departments' information management.

TWWOA maintains a mix of physical and digital information. Physical information, such as student records that are being digitised, is stored onsite. However, student records that have already been digitised are stored offsite using a third-party.

TWWOA'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.

Beginning	17
Progressing	2
Managing	1
Maturing	0
Optimising	0

2. Introduction

KPMG was commissioned by Archives to undertake an independent audit of Te Whare Wānanga o Awanuiārangi (TWWOA) under section 33 of the PRA. The audit took place in May and June 2023.

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

Archives provides the framework and specifies the audit plan and areas of focus for auditors. Archives 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 and writing the audit report. Archives is responsible for following up on the report's recommendations with your organisation.

3. This audit

This audit covers all public records held by TWWOA 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 TWWOA staff. The Executive Sponsor is the Senior Responsible Officer for the audit.

The audit reviewed TWWOA information management practices against the PRA and the requirements in the Standard and provides an assessment of current state maturity. As part of this audit, we completed systems assessments over TWWOA's key systems that act as a repository for public records. The systems assessed were TWWOA's SharePoint, the student management system and student or public enquiry system. 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. TWWOA 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 in a table format, refer to Appendix 1 for an accessible description of the table. 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
Governance							
	1	IM strategy	●				
	2	IM policy and processes	●				
	3	Governance arrangements and 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 Archives	●				

Please 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   Beginning

Summary of findings

TWWOA does not have an information management strategy in place to provide direction and support for information management activities within the organisation.

The Executive Sponsor is new to the role and showed an awareness of the need to incorporate information management into the organisation's overall strategic direction. In addition, TWWOA has invested in information technology (IT) improvements, such as migrating to a new student management system and using SharePoint to increase information management capability across the organisation.

Recommendation

Develop an information management strategy following Archives guidance. The strategy should be approved by senior management, communicated to all staff and contractors, and reviewed on a periodic basis to ensure it continues to support TWWOA's business needs and the strategic direction of the organisation.

TOPIC 2 – IM policy and processes   Beginning

Summary of findings

There is no current information management policy or associated processes in place. Roles and responsibilities for information management have not been identified and staff do not have guidance on information management practices. Some staff had a general awareness of their roles and responsibilities for information management, but this is not formally documented.

There are two out of date information management policies, 'Determining the Public Record Policy' and 'Records Management Policy for Corporate Records'. These documents were

endorsed by the TWWOA Council in 2009 and 2012 respectively. Both are overdue for review and have not been updated to reflect current information management requirements.

Recommendation

Develop an information management policy, and associated processes and guidance. Ensure these are communicated throughout the organisation.

TOPIC 3 – Governance arrangements and Executive Sponsor   Beginning

Summary of findings

TWWOA does not have a governance group with overall responsibility for information management. Instead, senior managers work with the Executive Sponsor to undertake this function. There is a plan to establish a governance group that will be responsible for overseeing information management (among other things).

The Executive Sponsor is aware of their duties involving the oversight and monitoring of information management at TWWOA. Due to the breadth of the Executive Sponsor's role, they do not have capacity to actively champion information management within the organisation (refer to Topic 8 – *Capacity and capability*). There is no regular reporting of information management activities to the Executive Sponsor.

Recommendations

Establish a governance group or incorporate information management within another governance group to oversee IM and support the Executive sponsor to champion information management in the organisation.

Design regular reporting that provides useful and actionable information to the Executive Sponsor to monitor performance and address potential risks.

TOPIC 4 – IM integration into business processes   Beginning

Summary of findings

Information management responsibilities have not been formally assigned to staff due to the absence of an information strategy, policy, and associated processes. Information management requirements are not clearly integrated into business processes and activities across the organisation. As a result, there is an inconsistent approach to information management at TWWOA which depends on the localised practices of each department. For example, SharePoint usage is not standardised across TWWOA.

Expectations for some aspects of information management are communicated to staff members, such as file naming conventions and process maps are available on the intranet for a range of business processes. However, information management requirements are not consistently identified or are only included at a high level. For example, an application and

contacts process requires an application pack to be completed and signed, but it does not detail requirements around accuracy or completeness of the information included within the pack.

Recommendation

Assign and document responsibility for creating and managing information in business processes to business owners. In connection with Topic 8 – *Capacity and capability*, ensure there is sufficient support for business owners to fulfil these responsibilities.

TOPIC 5 – Outsourced functions and collaborative arrangements   Beginning

Summary of findings

Requirements for managing information are included in some, but not all contracts where there are outsourced functions or collaborative arrangements. All three contracts sampled identified requirements for managing information as TWWOA includes them in its standard terms and conditions. For example, one of the contracts required the third-party to hold information for seven years after the contract ends, unless the information has been provided to TWWOA.

Information management roles and responsibilities are also identified in some, but not all contracts for outsourced functions or collaborative arrangements. For example, one contract required the third party to ensure that information created for TWWOA is securely managed and destroyed as appropriate.

Staff confirmed not all contracts include these standard terms and conditions, and not all parties are aware of the public record status of the information they hold. There was no evidence of monitoring over contracted parties to ensure information management requirements were met.

Recommendations

Ensure that information management requirements are identified when creating contracts for outsourced functions and collaborative agreements where public records are created and managed.

Conduct monitoring of contracted parties to ensure information management requirements, as specified in the relevant contacts, are being met.

TOPIC 6 – Te Tiriti o Waitangi   Beginning

Summary of findings

Due to capacity and capability constraints, TWWOA has not identified the degree of importance of its various classes of information to Māori, noting that its information is created in support of delivering services to Māori. TWWOA has not been able to actively improve access to and use of information of importance to Māori.

Staff have a good understanding of TWWOA's agreements with Māori, but the information management implications of these agreements are not well understood.

Recommendation

Establish the information management processes that are required to identify information of importance to Māori, considering the role of TWWOA.

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   Beginning

Summary of findings

There is no regular, formal monitoring of information management practice, due to there being no established policy or processes in place. Instead, monitoring of information management happens within the teams on an informal, ad hoc basis.

TWWOA conducts self-monitoring activities to comply with reporting requirements under legislation other than the PRA, such as academic registry reports.

Recommendation

Design and agree on what information management practices should be monitored and report the findings to the senior leadership team through the Executive Sponsor.

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 Beginning

Summary of findings

There is limited capacity for TWWOA to work on and drive information management activities. The Executive Sponsor takes on information management duties for TWWOA but is new to their role. The Executive Sponsor has a wide range of duties, and due to the daily demands on their position, they have limited capacity and capability to work on information management activities. There is no information management expert within the organisation.

Based on the overall information management maturity of TWWOA, there are significant capacity and capability requirements to be addressed. TWWOA acknowledges this and is aware of the lack of capacity and capability. There is funding available for training, as the organisation budgets two percent of annual salary for learning and development initiatives for all staff.

Recommendation

Assess TWWOA's information management capacity and capability requirements against business needs and plan to address these internally or with external assistance.

TOPIC 9 – IM roles and responsibilities Beginning

Summary of findings

TWWOA staff have limited awareness of their information management responsibilities. Because information management policies and processes are not yet documented, staff understanding of information management is inconsistent and relies on their personal experience.

Three job descriptions were sampled as part of this audit. All three contained limited reference to information management responsibilities and the PRA. Sampled job descriptions included the need to create complete and accurate records.

Staff have not been provided with induction or ongoing training relating to information management. Once capacity and capability issues have been addressed (refer to Topic 8 – *Capacity and capability*), TWWOA intends to undertake information management training with all staff and make training compulsory for new starters.

Recommendation

Assess what should be covered in information management induction training and design and implement the training

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   Beginning

Summary of findings

Staff and contractors are not well supported to understand their obligation to create and capture full and accurate records due to the lack of training and guidance.

Information is routinely created and captured as part of some, but not all, business functions and activities. For example, information relating to student enrolments is routinely captured in the student management system. However, information relating to projects, such as the recent SharePoint upgrade, is not routinely documented. SharePoint is used to create and maintain corporate information across the organisation, including policies.

TWWOA uses OneDrive and shared network drives, and staff can use personal hard drives on organisation computers. Personal drives are uncontrolled, and there is no monitoring of what information is created and saved on these drives. There is no formal and documented guidance to discourage the use of uncontrolled environments.

Recommendations

Document and communicate the organisational requirements for the creation and capture of information.

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

Summary of findings

There is no formalised approach to identify high-value or high-risk information assets held by TWWOA. However, there is some understanding of what is considered high-risk or high-value information. For example, information relating to student administration, programmes and courses, and governance. There is no inventory of the information held in digital and physical systems.

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 Beginning

Summary of findings

Information management expertise is not regularly, proactively involved in the design and configuration of new and upgraded business systems. Instead, those with information management expertise are engaged on an ad hoc and informal basis. For example, during the implementation of a new student management system, data integrity issues were identified, and information management expertise was included during the migration phase because of this issue.

No standardised information management requirements are used to inform the implementation or upgrading of systems. There is no standardised process to ensure that the minimum metadata requirements specified by Archives are incorporated into the design and implementation of new or upgraded business systems.

Recommendation

Create standardised information management requirements for new and upgraded business systems and ensure that information management expertise is included as part of the system change process. The requirements should specify the minimum metadata that is needed to align with the Standard.

TOPIC 13 – Integrity of information Progressing

Summary

Staff interviewed largely understood their responsibilities to create information that is comprehensive and complete. Staff noted some localised information management practices across business units, but these are not documented

Some staff shared they generally had a positive experience when trying to find and retrieve information. Staff are typically aware of the records their team creates. But when staff require information from other departments, the inconsistent information management approaches can

slow the process of accessing required files and make staff reliant on their colleagues sourcing the information.

Recommendation

Identify integrity issues that staff have around finding, retrieving, and using information across the organisation and develop a plan to address these.

TOPIC 14 – Information maintenance and accessibility   Beginning

Summary of findings

There are no documented strategies in place to manage and maintain physical information during business and system change projects. In addition, ongoing accessibility risks to either physical or digital information have not been identified. It was also noted that during business and system changes information management considerations were not generally considered.

Preservation needs for physical information are inconsistently identified and addressed. For example, there is a digitisation project underway for student administrative records. The need for digitising corporate records has not been assessed.

Recommendations

Identify risks to ongoing accessibility to physical and digital information.

TOPIC 15 – Business continuity and recovery   Beginning

Summary of findings

TWWOA does not have a business continuity and recovery plan in place. Therefore, critical information that would require restoration after a business disruption event has not been identified. There are draft departmental business continuity plans, but these have not been formally adopted and revised since they were developed. Key IT systems are accessible remotely.

Recommendation

Prioritise formally developing and documenting a business continuity and recovery plan, including critical information.

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   Progressing

Summary of findings

TWWOA has some protection and security controls to protect physical information against unauthorised loss or destruction. TWWOA holds information both onsite and offsite in a storage shed managed by a third-party. The third-party provider is not a specialist information management storage provider, and their storage does not have sprinklers.

TWWOA also has secure onsite storage for physical student records which are being digitised. Some boxes in the onsite storage room are stored on the floor. Access to the room is granted to a small group of relevant staff.

There is protection and security in place for digital information against unauthorised access, loss, or destruction. Digital information is backed up daily and stored on two servers, (located in Whakatāne and Tāmaki Makaurau Auckland) and in the cloud. There is only a soft delete option on SharePoint and access controls restrict unauthorised personnel from accessing records.

Recommendations

Regularly test the physical and digital storage environments to ensure that protection and security measures are effective and appropriate. Report the findings to the governance group when formed (refer to Topic 3 – *Governance arrangements and Executive Sponsor*).

Review the physical information storage environment to ensure it is fit for purpose.

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.

Summary of findings

TWWOA takes a decentralised approach to information management, where each department is responsible for managing information on the systems they use.

Staff interviewed were knowledgeable on how to use the business and information systems they use regularly. But SharePoint is inconsistently used across TWWOA's departments and there is no file plan.

Access to information is controlled by restricted access to systems. For example, there are access controls within OneDrive folders that prevent staff from accessing information that is not relevant to their roles. Staff interviewed confirmed that they have adequate access to systems to find and use the information they need. They can request access through the IT team at any time, but this would also require approval from the relevant business owner. There is limited information sharing with external parties.

IT staff have a good understanding of the different levels of access controls. However, these access controls have not been documented, and there is no comprehensive list of roles with different levels of access.

Some systems comply with of Archives' minimum metadata requirements, such as SharePoint and the contracts and procurement system. However, OneDrive does not. Staff interviewed also noted that there is no consistent approach to using metadata to find and manage information.

Recommendations

Agree on and implement file plans as applicable for all new or updated business systems.

Ensure that Archives' minimum metadata requirements are met as applicable for all new or updated business systems.

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 (or have a deferral of transfer) and be determined as either "open access" or "restricted access".

TOPIC 20 – Current organisation-specific disposal authorities   Managing

Summary of findings

TWWOA's information is covered by Disposal Authority (DA424) which applies to Te Pūkenga New Zealand Institute of Skills and Technology. DA424 was authorised in May 2010, and the next review is scheduled for May 2024 on its expiry. The disposal authority covers all information formats, faculties, and service divisions.

However, TWWOA did not indicate an intention to participate in the review and update of DA424.

Recommendations

Ensure that any business or legislative changes that affect information management that should trigger a change to the disposal authority are documented.

TOPIC 21 – Implementation of disposal decisions   Beginning

Summary of findings

TWWOA is authorised to dispose of information under DA424 and the two General Disposal Authorities. However, no disposal decisions have been documented, and staff interviewed were not aware of when the last disposal of physical or digital information had occurred.

Undocumented disposals of physical information were possible, but TWWOA are not able to identify any instances where this had occurred as there is no monitoring programme. There is a digitisation project to upload physical student records to the student management system. However, there is no plan to dispose of the physical copy of the digitised student record. As a result, information is being duplicated across physical and digital formats.

Staff use of uncontrolled environments increases the risk that digital information may have been disposed of in a manner inconsistent with DA424.
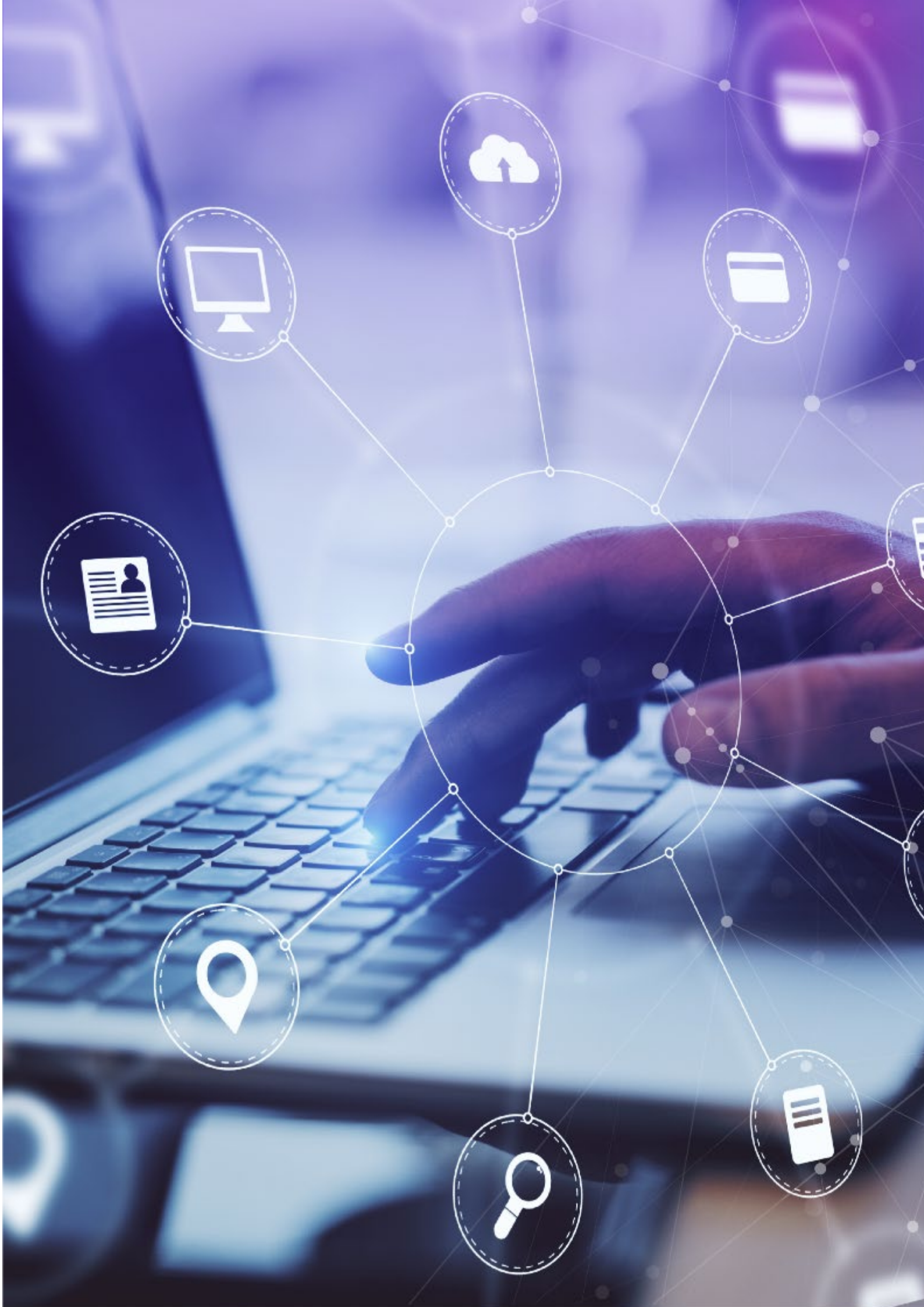
Recommendation

Develop a disposal process and implementation plan to ensure information is disposed of appropriately.

TOPIC 22 – Transfer to Archives   Beginning

Summary of findings

TWWOA has not identified physical or digital information over 25 years of archival value. There have been no transfers of physical or digital information to Archives, and there is no plan in place to make a transfer. TWWOA does not hold a deferral of transfer agreement.

Recommendation

Identify physical and digital information of archival value that is over 25 years old.

6. Summary of feedback

The Information Assessment was thorough and supportive, and we agree with the findings. All recommendations will be included in our action plan for improvement.

It is intended that topics 1 – IM strategy, 2 – IM policy and process and 3 – Governance arrangements and Executive Sponsor recommendations are actioned before the end of 2023. This includes recruitment of an IM specialist and engagement of external expertise to assist with these three areas.

Topic 1 – We agree with the recommendation and will have an approved information management strategy in place by 15 December 2023. Strategy review will align to our strategic planning cycles. The strategy will be communicated to staff and contractors early in 2024. Currently considering contracting expertise into assist us with actioning recommendations.

Topic 2 – We agree with the recommendation and will have developed an information management policy and associated processes and guidance by 15 December 2023. These will be communicated in early 2024.

Topic 3 – We agree and will decide whether we establish a governance group or combine with an existing governance group by 31 October 2023. An information management position has been approved and recruitment will commence during August 2023 to fill this position. This position will assist with the design of regular reporting to monitor performance and address potential risks.

Topic 4 – We agree and will build this into the job description for the information management position and it will form part of our action plan to build capacity and capability during 2024.

Topic 5 – We agree and will review where information management is not occurring in contracts and ensure the recommendations are included in processes moving forward.

Topic 6 – We agree and will include recommendation as part of our capability building in information management.

Topic 7 – As per response to Topic 3.

Topic 8 – We agree and are considering external assistance as well as committing to an information management role. We also recognise that there may be further commitment including development plans for all staff in the area of information management.

Topics 9 – We agree and information management will be added to our induction process once we have assessed what needs to be covered.

Topic 10 to 14 – We agree and will include the recommendations in our action plan moving forward.

Topic 15 – We agree and will give this topic priority. This has been discussed and we are currently considering contracting in expertise to finalise our business continuity plan and recovery.

Topic 16 – We agree and will include the recommendations in our monitoring and reporting. We will also undertake a review of our physical information storage against and make recommendations for change if appropriate.

Topic 18 – 22 – We agree and will include the recommendations in our action plan.

7. Appendix 1

The table in Section 4, on page 3 lists all assessed maturity levels by topic area in a table format. This table has been listed below for accessibility purposes:

Topic 1, IM strategy – Beginning

Topic 2, IM policy and processes – Beginning

Topic 3, Governance arrangements and Executive Sponsor – Beginning

Topic 4, IM integration into business processes – Beginning

Topic 5, Outsourced functions and collaborative arrangements – Beginning

Topic 6, Te Tiriti o Waitangi – Beginning

Topic 7, Self-monitoring – Beginning

Topic 8, Capability and capacity - Beginning

Topic 9, IM roles and responsibilities - Beginning

Topic 10, Creation and capture of information - Beginning

Topic 11, High-value / high-risk information - Beginning

Topic 12, IM requirements built into technology systems - Beginning

Topic 13, Integrity of information - Progressing

Topic 14, Information maintenance and accessibility - Beginning

Topic 15, Business continuity and recovery – Beginning

Topic 16, Appropriate storage arrangements – Progressing

Topic 18, Information access, use and sharing – Beginning

Topic 20, Current organisation-specific disposal authorities – Managing

Topic 21, Implementation of disposal decisions – Beginning

Topic 22, Transfer to Archives – Beginning

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Tēnā koe Wiremu

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the Te Whare Wānanga o Awanuiārangi (TWWOA) completed 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

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 developing systems that will deliver 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 our mandatory Information and records management standard. Te Whare Wānanga o Awanuiārangi is at the beginning of its journey to improve IM. It is encouraging that in Section 6: *Summary of feedback* the intention to improve is clearly stated and planning has begun.

It is especially encouraging to see commitment to resourcing an internal IM role as well as considering external assistance. This will support the Executive Sponsor with specialist advice and enable the development of policies, procedures, and IM training as an improvement starter.

Prioritised recommendations

The audit report lists 24 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 nine 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. This plan may well be an update on the strong start you have outlined in section 6 of the audit report. 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 Helen Cook, HR Manager (Executive Sponsor), helen.cook@wananga.ac.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Governance	1: IM Strategy	*Develop an information management strategy following archives guidance. The strategy should be approved by senior management, communicated to all staff and contactors, and reviewed on a aperiodic basis to ensure it continues to support TWWOA's business needs and the strategic direction of the organisation.*	Understanding where improvement is needed and setting goals and a roadmap are good starting points to plan the future direction. This will mean that the TWWOA management have a shared understanding of what is needed, when and the relevant resource. [Information and records management strategy](#)
Governance	2: IM policy and processes	*Develop an information management policy, and associated processes and guidance. Ensure these are communicated throughout the organistion.*	These set the foundation for staff training and consistent understanding of IM throughout the organisation. This also covers the recommendation for Topic 10: *Creation and capture of information*.
Governance	3: Governance arrangements and Executive Sponsor	Establish a governance group or incorporate information management within another governance group to oversee IM and support the Executive Sponsor to champion information management in the organisation.	This group is responsible for oversight and monitoring the IM systems. Relevant reporting for this group also needs to be agreed.
Governance	4: IM integration into business processes	Assign and document responsibility for creating and managing information in business processes to business owners. In connection with Topic 8 – *Capacity and capability*, ensure there is sufficient support for business owners to fulfil these responsibilities.	Business owners must understand their responsibilities and be supported to fulfil them. The planned IM resource can provide the expertise and monitoring.
Capability	8: Capacity and capability	*Assess TWWOA's information management capacity and capability requirements against business need and plan to address these internally or with external assistance.*	This role is essential to lifting the maturity of the organisation and supporting the staff to increase their understanding and application of IM.

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Capability	9: IM roles and responsibilities	*Assess what should be covered in information management induction training and design and implement the training.*	Once the policy and processes are established this would be useful to promote increased awareness and understanding for all staff.
Management	15: Business continuity and recovery	*Prioritise formally developing and documenting a business continuity and recovery plan, including critical information.*	This is joint IM and IT work to ensure that information and systems are understood and prioritised for business continuity and recovery.
Access	18: Information access, use and sharing	*Agree on and implement file plans as applicable for all new or updated business systems.*	How information is organised impacts findability and supports efficient use of the information and systems. TWWOA should also prioritise assessment of the set-up of SharePoint to promote more consistent use.
Disposal	21: Implementation of disposal decisions	*Develop a disposal process and implementation plan to ensure information is disposed of appropriately.*	Alongside the wider disposal process under the PRA, the digitisation of records is also facilitated by the Contract and Commercial Law Act 2017, as outlined in Authority to retain public records in electronic form only