



Public Records Audit Report for Callaghan Innovation

Prepared for Te Rua Mahara o te Kāwanatanga Archives
New Zealand

April 2023



Disclaimers

Inherent Limitations

This report has been prepared in accordance with our Consultancy Services Order with Te Rua Mahara o te Kāwanatanga Archives New Zealand (Archives) dated 26 November 2020. Unless stated otherwise in the CSO, this report is not to be shared with third parties. However, we are aware that you may wish to disclose to central agencies and/or relevant Ministers' offices elements of any report we provide to you under the terms of this engagement. In this event, we will not require central agencies or relevant Ministers' offices to sign any separate waivers.

The services provided under our CSO ('Services') have not been undertaken in accordance with any auditing, review or assurance standards. The term "Audit/Review" used in this report does not relate to an Audit/Review as defined under professional assurance standards.

The information presented in this report is based on that made available to us in the course of our work, publicly available information, and information provided by Archives and Callaghan Innovation. We have indicated within this report the sources of the information provided. Unless otherwise stated in this report, we have relied upon the truth, accuracy and completeness of any information provided or made available to us in connection with the Services without independently verifying it.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by, Callaghan Innovation management and personnel consulted as part of the process.

Third Party Reliance

This report is solely for the purpose set out in Section 2 and 3 of this report and for Archives and Callaghan Innovation's information, and is not to be used for any other purpose or copied, distributed or quoted whether in whole or in part to any other party without KPMG's prior written consent. Other than our responsibility to Archives, neither KPMG nor any member or employee of KPMG assumes any responsibility, or liability of any kind, to any third party in connection with the provision of this report. Accordingly, any third party choosing to rely on this report does so at their own risk. Additionally, we reserve the right but not the obligation to update our report or to revise the information contained therein because of events and transactions occurring subsequent to the date of this report.

Independence

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

Contents

1. Executive summary	1
2. Introduction	2
3. This audit	2
4. Maturity Assessment	3
5. Audit findings by category and topic	4
Governance	4
Self monitoring	7
Capability	8
Creation	9
Management	10
Storage	12
Access	14
Disposal	15
6. Summary of feedback	18
7. Appendix 1	19



1. Executive summary

Callaghan Innovation is a Crown Entity, established in 2013 to support science and technology based innovation and its commercialisation by business. Callaghan Innovation has approximately 499 staff. Callaghan Innovation creates high value records including scientific data sets, papers and presentations, analytical techniques specific to the organisations' laboratories, and records relating to marketing of Callaghan Innovation's services and the development of the client base.

Callaghan Innovation uses Google Drive and an integrated EDRMS as its primary system to store digital corporate information. Due to the range of activities undertaken by Callaghan Innovation, several other systems are used to capture and manage information.

At the time of this audit, Callaghan Innovation had no dedicated information management staff, but had begun the recruitment process for two information management roles. The Data Strategy Lead had taken on some of the information management responsibilities in the absence of dedicated information management staff.

Records are maintained electronically and physically, with most of the physical information stored at a third party storage provider.

Callaghan Innovation'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	10
Progressing	10
Managing	0
Maturing	0
Optimising	0



2. Introduction

KPMG was commissioned by Archives to undertake an independent audit of Callaghan Innovation under section 33 of the Public Records Act 2005 (PRA). The audit took place in February 2023.

Callaghan Innovation'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, assessing against the standard, 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 Callaghan Innovation including both physical and digital information. Callaghan Innovation Research Limited and the Measurement Standards Laboratory of New Zealand Limited are wholly owned subsidiaries and its information management is integrated with Callaghan Innovation's. Glycosin Technologies Limited, another wholly owned subsidiary, uses some core Callaghan Innovation systems in addition to separate systems. Information management of the subsidiaries was discussed as part of this audit.

The audit involved reviews of selected documentation, interviews with selected staff, including the Executive Sponsor, Information Management staff, the Information Technology (digital) team, and a sample of other staff members from various areas of Callaghan Innovation. The Executive Sponsor is the Senior Responsible Officer for the audit.

The audit reviewed Callaghan Innovation's information management practices against the PRA and the requirements in the Information Management and Records Standard and provides an assessment of current state maturity. As part of this audit, we completed systems assessments over Callaghan Innovation's key systems that act as a repository for public records; Google Drive, the integrated EDRMS, and the Customer Relationship Management (CRM) 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. Callaghan Innovation 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 & 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

Progressing

Summary of findings

Callaghan Innovation does not have an information management strategy in place currently to provide strategic direction and support over information management activities. A strategy has been recently drafted but has not yet been finalised or socialised. This is planned to take place once the vacant role of Information Manager has been filled.

The Executive Sponsor understands the importance of raising awareness of information management at the senior management level but advised there is limited championing and awareness of information management at this level.

Recommendation

Finalise and implement the draft information management strategy. The information management strategy should be approved by senior management and communicated to all staff and contractors.

TOPIC 2 – IM policy and processes

Progressing

Summary of findings

Callaghan Innovation's current Information Management Policy is outdated and is no longer fit for purpose; it refers to staff and teams that no longer exist. Most staff interviewed advised that they were aware that a policy existed but had not read it. A policy refresh programme is currently underway which includes reviewing and updating the Information Management Policy. This programme is due to be completed by mid-2023.

Some process documentation exists providing guidance on managing and disposal of records, however this was created prior to changes in information management systems and is therefore out of date. Localised information management process documentation exists in

some business units dealing with sensitive information, such as the Funding Engagement team and the Research and Development Tax Incentive (RDTI) team.

Most staff are aware of general information management requirements; however roles and responsibilities are inconsistently communicated to staff. Additionally, as the policy is outdated, this cannot be utilised as a resource for understanding roles and responsibilities.

Recommendation

Refresh the Information Management Policy and create associated process documents that support the information management strategy. These documents should be approved by senior management and communicated to all staff and contractors.

TOPIC 3 – Governance arrangements and Executive Sponsor

Beginning

Summary of findings

Callaghan Innovation does not currently have a governance group to oversee information management, however there is a plan to establish one. This plan includes a list of proposed members and a terms of reference. The establishment of the Data and Information Governance Group has been paused until the outcome of this audit.

The Executive Sponsor is aware of their duties involving the oversight and monitoring of information management and is supported in this role by the Executive Lead Health, Safety, Environment, Audit and Risk (HSEAR). However, as there is currently no information management strategy or up to date policy, no dedicated information management staff, and the Executive Sponsor does not receive any formal regular reporting on information management, they are not able to perform their oversight and monitoring role. Because of this, the Executive Leadership Team (ELT) does not receive reporting on information management matters from the Executive Sponsor.

Regular reporting, along with the establishment of the Data and Information Governance Group, would enable ELT to support the Executive Sponsor in successfully implementing the new information management strategy.

Recommendations

Establish the Data and Information Governance Group, which includes the Executive Sponsor as a member.

Design and implement regular information management activity reporting to the Executive Sponsor.

TOPIC 4 – IM integration into business processes

Progressing

Summary of findings

The responsibility for the management of information within business units has been inconsistently assigned to business owners. There is no process in place to formally assign this

responsibility. However, in some business units, particularly in the commercial side of Callaghan Innovation such as the Legal, Risk and Assurance and Funding Engagement teams, business owners have assumed responsibility for information management where required by other legislation or business requirements. The responsibilities for business owners are not formally documented.

Callaghan Innovation has identified the need to provide business owners with more support to ensure they understand their information management requirements, but does not currently have the capacity to do this due to not having any dedicated information management staff.

Requirements for managing information have been integrated into some business processes, however this is dependent on the business unit and is not consistent across the organisation. For example, in the Funding and Contract Management team, checklists are used to capture references to files relevant to the application and ensure information management requirements are met. The Risk and Assurance team follow a process for how information is recorded and held as evidence.

Recommendations

Consistently assign the responsibility for the management of information within business units to business owners.

Provide training to business owners so they can understand and act upon their information management responsibilities.

TOPIC 5 – Outsourced functions and collaborative arrangements Beginning

Summary of findings

Requirements for managing information were included in some but not all contracts for outsourced functions and collaborative arrangements reviewed during the audit. One Memorandum of Understanding (MOU) in relation to cloud services includes a section on responsibilities under the Public Records Act. Two other contracts for IT services, however, do not include specific requirements for the management, access and use, security, retention, or disposal of information.

Staff with information management responsibilities are sometimes consulted as part of the preparation and management of contracts, but this is not part of a formalised process.

There is no monitoring done of contracted parties to ensure information management requirements are met.

Recommendations

Review all existing major outsourced and collaborative contracts where public records are created and identify what information management requirements need to be addressed.

Include information management requirements, roles and responsibilities for all new contracts for outsourced functions and collaborative agreements.

Summary of findings

Callaghan Innovation has not identified whether any information that they hold is of importance to Māori and does not incorporate metadata to label information of importance to Māori. Callaghan Innovation has identified that its general classification system for information needs improvement and do not have the information management capacity to classify this information currently. This has been identified as a focus for 2023.

Callaghan Innovation does have a Chief Māori Engagement Officer whose role is to identify what aspects of Callaghan Innovation’s activities are of importance to Māori. Callaghan Innovation is working towards undertaking processes to locate and understand the importance of information to Māori.

Recommendation

Identify whether any information held by Callaghan Innovation 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 own internal policies and processes.

Summary of findings

Due to capacity constraints and the lack of a current information management policy and processes as mentioned in Topic 2, there is no formal periodic monitoring of compliance with internal information management requirements, or with the Public Records Act requirements, standards and other relevant legislation. As a result, the Executive Sponsor and senior management are not able to understand if Callaghan Innovation is complying with information management requirements and cannot take corrective actions that may be needed to address possible non-compliance.

Recommendation

When the Information Management Policy is updated, develop a plan to monitor compliance with it and with the Public Records Act, standards and other relevant legislation.

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

Progressing

Summary of findings

As previously stated, Callaghan Innovation currently has no dedicated information management staff. The Data Strategy Lead has taken on some information management responsibilities in the absence of dedicated information management staff. Given the breadth of the role, the Data Strategy Lead has limited capacity to actively work on and drive information management activities. Callaghan Innovation is working to address these capacity and capability requirements and has begun the recruitment process for two information management positions: an Information Manager and an Information Advisor.

Some staff across the business have obtained information management knowledge through day-to-day activities and are acting as unofficial information management “champions” within their business units. This includes activities such as being involved in projects or initiatives that require information management input.

Recommendation

Appoint information management staff as planned to address Callaghan Innovation’s information management capacity and capability requirements.

TOPIC 9 – IM roles and responsibilities

Beginning

Summary of findings

Most Callaghan Innovation staff and contractors understand their general roles and responsibilities for information management. Information management roles and responsibilities are not included in the standard job description template, and staff interviewed advised that these roles and responsibilities will be covered in the updated policy rather than in individual job descriptions. The only job descriptions to specify information management responsibilities are for roles that have a specific focus on records and information management. These include roles that focus on privacy, Official Information Act requests, the law, procurement, and records management.

The inclusion of an information management component in inductions for new staff and contractors is inconsistent, with some not receiving any information management training during induction. There is no ongoing training provided to staff and contractors.

Recommendation

Provide mandatory information management training as part of the induction process and regular refresher training on information management roles and responsibilities.

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

Progressing

Summary of findings

Within some business units, staff understand the need to create full and accurate records, however this is often based on their awareness of obligations outside of the Public Records Act. For example, the Finance team ensures they create full and accurate records to assist with the financial audits they are subject to.

Information is routinely created and captured as part of all business functions and activities. Most information is managed in controlled environments such as the EDRMS and the CRM system. In some business units, other systems are used to store and manage data specific to that business unit's activities, including a payroll system, a compliance management system, a health and safety platform and a grants application and workflow system.

Staff advised they sometimes save information on local drives. This is sometimes due to the type of data being saved, especially in science teams. For example, scientific design schematics are saved on local drives and kept on individual devices as they are not easily stored on the centrally controlled environments Callaghan Innovation uses. There is no monitoring or oversight performed over what information is created and captured in uncontrolled environments.

Recommendations

Outline guidance on the creation and capture of information for all staff and contractors, including advising against the use of uncontrolled environments. These should be included in information management procedure documents, in connection with *Topic 2 – IM Policy and Processes*.

Assess whether the systems used for storing high-value/ high-risk information can adequately control that information, including supporting appropriate metadata.

Summary of findings

Callaghan Innovation has not conducted formal identification of, or developed a means of classifying, the high-value or high-risk information assets it maintains. Without an inventory of this information, such as an asset register, it is not possible to have a long-term management plan for this information.

Recommendation

Create an information asset register which identifies the information that is high-value or high-risk to Callaghan Innovation.

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.

***Summary of findings***

As Callaghan Innovation currently has no dedicated information management staff, there is limited capacity for information management expertise to be involved in the design and configuration decisions regarding new and upgraded business systems. Staff did advise, however, that staff in the digital team who introduce and upgrade business systems have a good understanding of information management requirements. In addition, the digital team sometimes involves the Data Strategy Lead to obtain information management expertise when introducing new systems.

Callaghan Innovation recently transitioned from Microsoft products to the Google Suite. This included the migration of documents from SharePoint to an EDRMS that is integrated with Google Drive. The EDRMS contains the minimum metadata requirements to allow for findability of records.

Recommendation

Create and document standardised information management requirements for new and upgraded business systems.

Summary of findings

Callaghan Innovation has localised information management practices across the organisation. Some business units have clear processes for managing its information to ensure the information is reliable and trustworthy by using consistent file structures and naming conventions. However, these conventions are not consistently followed within all business units, and staff noted that this can make finding information from across the business time consuming and challenging. Specifically, documents migrated from previous systems can take several days to locate, as naming conventions and metadata are not standard between systems and teams.

Staff interviewed noted variable experiences when trying to find and retrieve information. Information created and managed in business units with clear information management practices is easy to locate and access. Examples of this include the Government Engagement team, who use file identification numbers for all documents they save, and the Risk and Assurance team, who use consistent naming conventions.

Staff also mentioned that duplicate versions of files are sometimes created due to limitations with the shared drives used. If staff need to share files located in a restricted access folder with a customer, a duplicate version must be created outside the restricted access folder. This creates the risk that staff may not be accessing the most current version of the document if changes are made.

Recommendation

Create standardised practices for creation and capture of information, including the use of metadata and naming conventions.

Summary of findings

There are no formal strategies to manage and maintain physical information during business changes. Callaghan Innovation does not maintain an asset register with access controls or list and location registers. Risks to the ongoing accessibility of physical information were outlined in a 2022 ELT paper, including risks associated with the indexing and labelling used.

Migration plans are used during some digital system changes to address the maintenance and preservation of digital information, for example during the recent transfer of information from SharePoint to the EDRMS integrated with Google Drive. During this transfer, all information was archived and migrated across to the new system, metadata was maintained, and integrity checks were done. However, metadata conventions are not standard between the systems which makes accessing information difficult once it has been transferred or archived.

Preservation needs for some physical information, such as photographs, have been identified, however further work on preservation is required once information management capacity increases.

Technology obsolescence risks are identified as a risk in the Enterprise Risk Register.

Recommendations

Develop strategies to manage and maintain physical information during business changes, such as list and location registers.

Establish periodic reviews of ongoing accessibility risk and preservation needs for physical and digital information.

TOPIC 15 – Business continuity and recovery

Beginning

Summary of findings

Callaghan Innovation does not have an enterprise level business continuity and recovery plan in place. However, each function has its own business continuity plan which uses a template for consistency. The business continuity plan template and example reviewed as part of this audit do not identify critical information required for business continuity and do not include the restoration and recovery of physical or digital business information. No formal testing of the business continuity plans occurs.

All digital information is backed up and retained indefinitely.

Recommendations

Update the business continuity plans and the template to incorporate information management considerations such as what critical information is required to ensure business continuity and plans for the restoration and recovery of physical and digital business information.

Review the approach of keeping digital backups indefinitely as this presents the risk of retaining information for longer than is needed.

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

Callaghan Innovation has protection and security controls in place for most physical information. An offsite third-party storage facility is used to store most physical information which provides appropriate protection and security against unauthorised access, loss or destruction. However, staff advised that some physical information is stored in boxes in staff offices, and the Data

Security Lead has limited knowledge of what these records are. These records are accessible to all staff with access to the offices, and there is no register or inventory of the information stored in this way.

Many of the systems that store digital information have access controls to prevent unauthorised access. Examples include the CRM system, which prevents access without an approved login, Google Drive, which has been configured so that document folders are restricted to the teams and staff members who require access and a pop up that is presented when sharing documents externally from Google Drive. Most digital information is stored on the cloud, and backup systems are in place to protect against accidental loss or destruction. Protection and security processes are not tested or documented regularly by Callaghan Innovation, however some of the cloud-hosted backup systems automatically run tests and monitoring.

Recommendations

Identify what physical information is stored in boxes in staff offices, and implement appropriate physical protection against unauthorised access, loss, deletion or destruction.

Periodically review the physical and digital storage environments and appropriate protection and security controls.



Access

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

TOPIC 18 – Information access, use and sharing

Beginning

Summary of findings

The title of a document is the main piece of information relied on by staff to search for information. As mentioned in Topic 13 there is no standard naming convention in place for files, with some teams developing their own processes for categorising and structuring information within the shared network drives.

There is no initial formal or on-going training on metadata search techniques, but most staff felt that they have adequate knowledge on search functions within the systems they use regularly. There are online modules available to all staff on how to use some systems at Callaghan Innovation.

Access controls for digital information can be obtained for all managed platforms. System owners are responsible for managing access controls for each system, and access is approved by managers. Access controls for physical information, such as which staff members are able to access and retrieve information from the third-party storage provider are not centrally available. There is no evidence of regular maintenance of access controls for physical and digital information being carried out.

Recommendations

Include training on the proper use of systems that contain and facilitate access to information in inductions and regular refresher training for staff.

Periodically maintain access controls for digital and physical information to ensure they remain appropriate.

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

Progressing

Summary of findings

Callaghan Innovation has a current and approved organisation-specific disposal authority in place covering some information formats and business functions. However, due to limited information management resources, there is no regular review cycle to ensure that the organisation-specific disposal authority remains current and covers all current information formats and business functions. There is no plan in place to update the organisation-specific disposal authority.

Recommendations

Update the organisation-specific disposal authority to cover all information formats and business functions.

Implement a regular review process for the organisation-specific disposal authorities.

TOPIC 21 – Implementation of disposal decisions

Beginning

Summary of findings

Callaghan Innovation do not routinely dispose of physical or digital records and advised that it would usually archive information rather than disposing of it. During the migration to the new cloud-based EDRMS, all information was retained and migrated to the new system. Physical documents held on-site and at the third-party location are not regularly reviewed for disposal.

The only recent disposal that has occurred was for records of COVID-19 vaccination certificates of staff held, as staff deemed these were no longer required by Callaghan Innovation. The disposal action was signed off by the relevant ELT member with legal advice and consultation with the Chief Executive.

Callaghan Innovation has identified that more resourcing is required to review and identify information suitable for disposal under the current organisation-specific disposal authority.

Recommendation

Develop an implementation plan for regular physical and digital disposal.

TOPIC 22 – Transfer to Archives

Beginning

Summary of findings

As per Archives requirements, records older than 25 years should be transferred to Archives. Callaghan Innovation holds information that is over 25 years old, however these records have not been formally identified. Callaghan Innovation have transferred information to Archives in the past, but there have been no recent transfers of information.

Recommendation

Develop a plan to identify physical and digital information of archival value in accordance with Archives requirements.



6. Summary of feedback

This audit is a fair and accurate assessment which agrees with self-assessment work conducted over the last year.

Callaghan Innovation has been working to understand and remediate our information management issues. These audit findings align with our internal work which found that we have generally low maturity in information management. Callaghan Innovation management recognises our low maturity and has committed to support and resource improvements.

We've already started making progress to improve our information management maturity. We have hired an experienced Information Manager to ensure we have the required capability in-house and will hire a further position to build capacity in that new team. The recommendations from this audit will be incorporated into a roadmap for that team's work programme, aligned with Callaghan Innovation's strategic priorities.

There will be significant opportunities to improve our information management in the medium term during changes to our digital environment, including changes to our productivity suite and enterprise resource planning software. The new information management team will be closely involved in the design and implementation of those changes.

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 – Progressing

Topic 2, IM policy and processes – Progressing

Topic 3, Governance arrangements & Executive Sponsor – Beginning

Topic 4, IM integration into business processes – Progressing

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 - Progressing

Topic 9, IM roles and responsibilities - Beginning

Topic 10, Creation and capture of information - Progressing

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

Topic 12, IM requirements built into technology systems - Progressing

Topic 13, Integrity of information - Progressing

Topic 14, Information maintenance and accessibility - Progressing

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 – Progressing

Topic 21, Implementation of disposal decisions – Beginning

Topic 22, Transfer to Archives – Beginning

kpmg.com/nz



27 July 2023

Te Rua Mahara o te Kāwanatanga Archives New Zealand
10 Mulgrave Street
Wellington

Stefan Korn
Chief Executive
Callaghan Innovation
Stefan.korn@callaghaninnovation.govt.nz

Phone +64 499 5595
Websites www.archives.govt.nz
www.dia.govt.nz

Tēnā koe Stefan

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the Callaghan Innovation 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 (Archives) is mandated by the PRA to regulate public sector information management (IM). The audit programme is a key regulatory tool in our Monitoring Framework.

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

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

Audit findings

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

Kia pono ai te rua Mahara – Enabling trusted government information

Organisations that are assessed as having a maturity level of 'Managing' across all IM topics are broadly meeting the minimum requirements expected by the PRA and Archives' mandatory Information and records management standard. Callaghan Innovation is well placed to improve its current level of Beginning/Progressing with its organisation-specific disposal authority and new IM staff appointments. Section 6: *Summary of feedback* in the audit report gives a commitment from Callaghan Innovation to IM improvement with the planned development of a roadmap from audit recommendations.

From the audit report, the summary of findings for Topic 21: *Implementation of disposal decisions* gives details of disposal of COVID-19 related information. Archives had advised on our website that approval for the disposal of staff vaccination records was covered by the General Disposal Authority 6 class 3.5.7. While internal legal advice was a commendable approach from Callaghan Innovation, it appears that the decision might not have taken account of class 3.5.7. This specifies a minimum seven-year retention period, which should be adhered to in the future.

Prioritised recommendations

The audit report lists 29 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 the Archives 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
Chief Archivist

Te Rua Mahara o te Kāwanatanga Archives New Zealand

Cc Nicola Vibert, Chief Risk and Sustainability Officer (Executive Sponsor)
nicola.vibert@callaghaninnovation.govt.nz

APPENDIX

Category	Topic	Auditor's Recommendation	Archive's Comments
Governance	1: IM Strategy	<i>Finalise and implement the draft information management strategy. The information management strategy should be approved by senior management and communicated to all staff and contractors.</i>	This will provide direction for IM improvement and must be supported by a roadmap and assigned resourcing.
Governance	2: IM policy and processes	<i>Refresh the Information Management Policy and create associated process documents that support the information management strategy. These documents should be approved by senior management and communicated to all staff and contractors.</i>	Up-to-date information will help the staff to understand what is required of them in the management of information.
Governance	3: Governance arrangements and Executive Sponsor	<i>Establish the Data and Information Governance Group, which includes the Executive Sponsor as a member.</i>	Overview and development of IM in the organisation needs to be championed and supported by senior management through this group.
Governance	5: Outsourced functions and collaborative arrangements	<i>Include information management requirements, roles and responsibilities for all new contracts for outsourced functions and collaborative arrangements.</i>	Public records that are created and maintained through contracts outsourced functions and collaborative arrangements are still the responsibility of Callaghan Innovation. It is important that where these contracts are significant Callaghan Innovation controls and monitors the information.
Capability	8: Capacity and capability	<i>Appoint information management staff as planned to address Callaghan Innovation's information management capacity and capability requirements.</i>	Callaghan Innovation at around 500FTE is a reasonably sized organisation. To ensure that its IM resourcing meets business needs and supports IM improvement, regular assessment of IM capacity and capability is necessary.

Category	Topic	Auditor's Recommendation	Archive's Comments
Creation	11:High-value/high-risk information	<i>Create an information asset register which identifies the information that is high-value or high-risk to Callaghan Innovation.</i>	This will assist the organisation to understand and manage its information effectively and can be done based on work completed for the disposal authority.
Access	18: Information access, use and sharing	<i>Include training on the proper use of systems that contain and facilitate access to information in inductions and regular refresher training for staff.</i>	IM training at induction is essential to assist staff and contractors understand their role in managing the information they create and in using systems effectively. Control over filing structures and environments will also make for more consistent experience for staff when searching for information.
Disposal	21: Implementation of disposal decisions	<i>Develop an implementation plan for regular physical and digital disposal.</i>	Migration to new systems is the ideal time to do disposal and helps the organisation manage risk associated with over-retention of information. Newly appointed IM staff will be able to assist with this work.