



New Zealand Trade and Enterprise
Te Taurapa Tūhono
Public Records Act 2005 Audit Report

Prepared for Archives New Zealand
September 2022



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1. Disclaimers

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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 New Zealand Trade and Enterprise and Archives NZ who 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 Archives NZ's 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 New Zealand Trade and Enterprise and Archives NZ. 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 Archives NZ. These procedures are designed to identify control weaknesses but cannot be relied upon to identify all weaknesses.

2. Executive Summary

New Zealand Trade and Enterprise

New Zealand Trade and Enterprise | Te Taurapa Tūhono (NZTE) is a Crown entity, formed in 2003, which operates under the Crown Entities Act 2004, the Public Finance Act 1989 and the New Zealand Trade and Enterprise Act 2003. NZTE functions as the government’s trade and economic development agency and operates locally and internationally. Their mission is to stimulate and grow the international competitiveness, profitability and capability of New Zealand businesses. NZTE’s strategy supports the government’s Business Growth Agenda, which is to create conditions that encourage successful businesses to grow globally.

Core functions of NZTE include providing strategic advice, access to networks and influencers, research and market intelligence. NZTE’s services align with the different stages of the business lifecycle including exporting. In addition, NZTE provides some services directly to clients while others are provided through external organisations such as Beachhead’s advisors and other expert advisors.

NZTE has 13 offices in New Zealand including its national office in Wellington and 41 overseas locations and employs 815 staff worldwide.

NZTE holds high-risk / high-value records including records relating to the customer information (including financial information), personnel information, funding initiatives, and joint initiatives.

Summary of Findings

We assessed NZTE’s IM maturity against the five maturity levels of Archives NZ’s IM Maturity Assessment model. The results are summarised below:

Maturity Level	Beginning	Progressing	Managing	Maturing	Optimising
No. of Findings	6	10	4		

3. Introduction

Background

Archives NZ 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 Archives NZ's monitoring of 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 for certain public offices.

Objective

The objective of these audits is 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. They 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 NZTE's IM practices against Archives NZ's IM Maturity Assessment Model. The IM Maturity Assessment aligns with the PRA and Archives NZ's mandatory Information and Records Management standard. Topics 17 and 19 of the Archives NZ 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). NZTE's maturity level for each topic area is highlighted under each of the respective areas. Ratings were based on NZTE officials' responses to questions during the interviews and the supporting documents provided in line with the IM Maturity Assessment guidelines.

Archives NZ 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 Archives NZ reviewed before release to NZTE. Archives NZ is responsible for following up on the report's recommendations with NZTE.

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.

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

4. Information Management Maturity Summary

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

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

Note: Topics 17 and 19 of the Archives NZ 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.

Progressing

Observations

NZTE has an outdated IM Strategy (the IM Strategy), which Senior Leadership Team (SLT) approved in 2012 but does not align with NZTE's current strategic direction.

NZTE has drafted a new IM Strategy, which SLT has yet to approve. The initial draft IM Strategy is more like a framework and currently includes roles and responsibilities, key IM principles and high-level guidelines. In addition, there are plans to include an implementation IM roadmap as part of a data strategy project, which is currently in draft.

Recommendation

1. Ensure the new IM Strategy aligns with Archives guidance and current business needs and includes an implementation plan of IM activities.

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

Observations

NZTE has an outdated IM Policy (the Policy), which the Chief Executive Officer (CEO) approved in 2012. The Policy outlines NZTE's IM principles and roles and responsibilities for all staff. The Policy is linked to other policies, such as the IT and Mobile Device Policy. NZTE acknowledges that the Policy does not align with the current NZTE strategy and is to be updated, as part of the data strategy project.

Staff interviewed know how to access the Policy and have some awareness of their roles and responsibilities, as these are communicated to them during the mandatory on-boarding and induction process. However, they were not aware of any supporting documentation associated with the Policy capturing IM processes and procedures such as, the 'Knowledge Management Guidelines and Standard' which is referred to in the Policy.

Recommendation

1. Renew the IM Policy to align with the relevant legislation and Archives New Zealand's standard and requirements.

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.

Beginning

Observations

NZTE does not have an IM governance group. IM governance is not captured in any other existing governance groups or committees. There is also no regular reporting of IM activities to any governance groups or to the Executive Sponsor (ES), however, the ES advocates for IM at a senior management level.

Recommendation

1. Establish an IM governance group or ensure there is a governance group that covers IM.

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

Observations

Business owners have some understanding of the need to create and manage information. IM roles and responsibilities are mentioned at a high level in NZTE's procedural documentation called 'The Fine Print' and the Policy. Certain teams, such as Legal, have effectively integrated the management of information into their business activity and processes. Some business units have adopted an established naming and filing structure, whereas for others it is ad hoc.

There are no IM specialists within NZTE instead Administration staff, Legal and the Knowledge team performs this role. This includes providing general advice and support to business owners and units for managing information. The ES provides oversight of IM.

Recommendation

1. Ensure that responsibility for the management of information within business units is consistently assigned to business owners and actioned.

Topic 5: Outsourced Functions and Collaborative Arrangements

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

Progressing

Observations

NZTE relies on the All of Government contracts and its master service agreement templates to ensure that requirements for managing information with third parties are met. Contracts and agreements with external parties that were reviewed referenced mandatory compliance with the PRA, and outline IM, confidentiality, and intellectual property obligations. Some of the requirements outlined specifically included information about storage, privacy and security. NZTE also has collaborative arrangements with other government agencies and Crown entities.

Where NZTE is engaging with other government agencies and Crown entities, NZTE relies on a Memorandum of Understanding (MoU) template to ensure that IM requirements are documented. The MoU references the PRA, and IM, privacy, confidentiality, security obligations as well as roles and responsibilities.

There is no regular monitoring over the contracts in place to ensure IM requirements are met.

Recommendation

1. Develop a periodic monitoring process to ensure suppliers are compliant with IM requirements under the PRA.

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 (ToW) to access, use and reuse information that is important to Māori.

Progressing

Observations

NZTE is currently identifying whether it holds information of importance to Māori. Once identified, a process will be developed to ensure the information is appropriately labelled and stored. For example, NZTE has established a secure folder within its customer relationship management system (CRM) to capture its customers' iwi affiliations to ensure that this information remains discoverable and accessible.

The ES and IM staff interviewed acknowledged that there is limited understanding of the IM implications within the ToW settlement agreements and other agreements with Māori.

Recommendation

1. In consultation with Māori stakeholders, develop a procedure to identify information 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

There is no monitoring of compliance with the Policy and processes. However, there is monitoring of compliance with the PRA and other relevant legislation through NZTE's annual ComplyWith compliance survey.

Significant legislation and policy breaches are reported to the NZTE Lead Team and Board, as well as the Legal team. The latter develops a roadmap with an action plan, which the Lead Team or Board reviews and approves (depending on the context of the breach).

Recommendation

1. Develop a review process to monitor compliance with the new IM 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.

Beginning

Observations

The Knowledge team provides IM advice as required to staff, as NZTE has no dedicated IM team. In addition, there is limited capacity and capability across other business units for NZTE to actively deliver IM activities. This means IM development activities are performed on an ad-hoc basis, as business-as-usual tasks take priority.

NZTE has acknowledged its limited capacity and capability and are planning to address this once the IM Strategy is refreshed.

Recommendation

1. Assess and address IM capability and capacity requirements as part of the IM Strategy and roadmap.

Topic 9: IM Roles and Responsibilities

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

Progressing

Observations

Staff and contractor IM responsibilities are outlined in the Policy and some job descriptions. NZTE's policies and procedures are contained within 'The Fine Print' and associated guidelines including IM policies and procedures and is used as a communication tool to inform all staff and contractors of their IM responsibilities.

Staff interviewed were aware of their individual obligations and the key IM documents. IM is part of the mandatory onboarding for new staff and contractors. Each business unit is responsible for training on IM responsibilities and how to use their core IM systems. However, there is no formal ongoing IM training programme delivered to all staff and contractors. Staff interviewed believe that they may benefit from IM refreshers especially around confirming IM roles and responsibilities.

Recommendation

1. Identify ongoing IM training needs for staff and implement a formal organisation-wide IM training programme.

Creation

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

Topic 10: Creation and Capture of Information

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

Managing

Observations

Staff have a general understanding of their responsibility to create full and accurate information to support their business function. All new information is created digitally. NZTE's corporate functions, which create board papers, financial information and other important documents are aware of their IM requirements.

NZTE uses SharePoint Online as its document management system, which meets minimum metadata requirements of Archives NZ. Access controls and permissions ensure that the information is controlled. NZTE's other core systems are the Customer Relationship Management System (CRM) and iManage, an archival system.

The use of uncontrolled and individual environments is actively discouraged. If staff attempt to access other storage systems, such as Dropbox, the systems are designed to generate a prompt this is not permissible.

All staff reported confidence in the reliability and integrity of information. There are clear structured approaches to IM within each business unit. However, there is currently no monitoring of information usability or reliability.

Recommendation

1. Develop a structured approach to monitoring and addressing information usability, reliability and trust issues.

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

Staff have some understanding of the information assets NZTE holds and what constitutes high-value/high-risk information. Information considered high-value/high-risk includes client information and reporting, and investment management reporting. Most of this information is stored within CRM, which is protected by access and control permissions. However, NZTE does not have a formal information asset register (IAR).

Recommendation

1. Identify all high-value/high-risk information and document these in an IAR or similar.

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

Although not formally required by the Policy or 'The Fine Print', IM expertise and advice is usually sought and involved in new technology solutions and/or upgrades through migration and data tracking processes. The ES is involved with any new technology roll out in their role as the Chief Digital Officer.

An example of IM requirements being considered in a new technology solution, was the change from Cohesion to SharePoint Online. Reviews were completed on SharePoint after the transfer to ensure all information had been successfully migrated.

Recommendation

1. Formalise the requirement to involve IM expertise in all new business system implementations, system upgrades and system decommissioning.

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 reported a high level of confidence in the reliability, findability and trustworthiness of information created and captured within NZTE systems. There is a variation of IM processes between business units, as each team have developed their own informal IM practices. Also, there is limited active monitoring of the integrity of information.

The Fine Print IM guidance is available on the intranet along with the IM Strategy and Policy.

Recommendation

1. Formally define and implement standardised information processes, in line with the new Policy when developed.

Topic 14: Information Maintenance and Accessibility

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

Managing

Observations

The majority of NZTE's physical information is stored offsite with a third-party storage provider. NZTE maintains a summary of information held in storage and can request information back at any time.

NZTE has undergone a digital transformation and adopted digital technologies to manage and store information. There are strategies in place to manage and maintain digital information during business and system changes. This includes using a testing environment during system implementations, to ensure quality of information is not impacted. In addition, the Digital team minimises technology obsolescence risks by ensuring that systems are updated as new versions are released.

The preservation and digital continuity need for digital information have not been formally identified.

Recommendation

1. Assess and document the risks to ongoing accessibility of digital information.

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

Each NZTE office has its own business continuity plan (BCP); and the 2022 Wellington Crisis Management Plan was developed for the Wellington office. This plan identified some critical information for business continuity, for example financial records for payroll and internal communications. However, the plan does not identify critical information required for business function, which systems are a priority to gain access and how this would be ensured.

Recommendation

1. Ensure all critical information is identified in the BCPs and the Wellington Crisis Management Plan.

Storage

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

Topic 16: Appropriate Storage Arrangements

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

Managing

Observations

Most of NZTE's historical physical records have been transferred to its third-party storage provider. There are a handful of boxes being stored in the Wellington office containing cassette tapes, which need to be digitised before being transferred to Archives NZ.

There are appropriate storage requirements in place for digital information against unauthorised access, loss or deletion. Confidential or sensitive information is restricted to specific staff and NZTE advised of no major incidents of unauthorised access. Digital information is stored in both Australia and New Zealand, with encrypted data which is designed to be unusable if accessed inappropriately.

Protection and security processes are not tested regularly and NZTE advised of no breaches or concerns regarding the protection and security of its information.

Recommendation

1. Identify, document, and monitor NZTE's information protection and security risks.

Access

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

Topic 18: Information Access, Use and Sharing

Staff and contractors are able to easily find and access the information they need, in order 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

Observations

NZTE applies access and permission controls for both physical and digital information. The physical building is only accessible through access card control. A role based-access control is also applied to all NZTE digital systems to ensure that employee's access only information to do their jobs. Access permission requests follow a documented process and requires manager approval but is not subsequently monitored.

SharePoint automatically meets metadata requirements, though it was acknowledged that taxonomy could be improved. Staff noted that SharePoint and CRM have reliable version control and search function allowing staff to easily find and access information they require. However, as the Policy is out of date and The Fine Print is at a high-level, each business units has developed their own informal IM processes.

NZTE uses a MoU template with other Government agencies when information is transferred between them to ensure information is managed according to the PRA. However, there is no oversight of incoming and outgoing data shared with external parties.

Recommendation

1. Improve the SharePoint taxonomy to improve consistency across the organisation.

Disposal

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

Topic 20: Current Organisation-Specific Disposal Authorities

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

Managing

Observations

NZTE has a current approved Disposal Authority (DA) which is set to expire in September 2022. This DA is currently being reviewed to ensure that it covers information relating to all business functions in all formats. We understand that the staff member responsible for reviewing and updating the DA has left the organisation temporarily and NZTE has sought an extension from Archives NZ for its current DA to September 2023.

Recommendation

1. Ensure that the new DA addresses all business functions and formats, and Archives NZ approve before September 2023.

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

No recent disposal actions have been taken against physical and digital records. SharePoint has in-built functionality to ensure alignment with the DA and the General Disposal Authorities (GDA), however, this has not been fully utilised. All information is retained and not routinely assessed for disposal. Currently, SharePoint is set to retain information for 25 years. There are no formal plans to dispose of physical or digital information and no processes currently in place to consider how disposal would be documented.

All staff reported a culture of retaining, and not actively disposing, of information using the DA or the GDA's.

Recommendation

1. Once the DA is updated and approved, establish a plan for regular disposal for both digital and physical information.

Topic 22: Transfer to Archives New Zealand

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

Beginning

Observations

NZTE has identified some physical information that is of archival value and older than 25 years old and the last recorded transfer to Archives NZ was in 2018. The cassette tapes in the Wellington office have not been transferred as Archives NZ is not accepting physical information. NZTE wishes to digitise this information to be transferred but do not currently have the resources to do this.

Recommendations

1. Identify all physical and digital information of archival value or over 25 years old.
2. Transfer digital information or apply for a deferral of transfer.

6. Summary of Feedback

This section sets out NZTE's feedback pursuant to this PRA audit.

NZTE would like to thank Deloitte for this report and for the opportunity to comment on its findings.

NZTE is a comparatively small Government agency with a different operating model to many other public sector agencies. In particular NZTE has a very streamlined back-office function. This approach is critical to ensure that resources are being allocated to further NZTE's customer-facing purpose, which is to grow New Zealand companies bigger, better, and faster for the good of New Zealand. This means that NZTE has a very small knowledge function responsible for knowledge management.

In spite of this, and as the report demonstrates, there are areas where NZTE is progressing well in its information management maturity, relative to its size (for example: creation and capture of information, Information maintenance and accessibility, and appropriate storage arrangements). However, we accept that NZTE's decentralised information management model has meant that there is room for improvement. This report has been helpful in highlighting those areas and we will work with Archives NZ to improve these to the extent that we can (with the resources that we have).

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17 November 2022

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Tēnā koe Pete

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of New Zealand Trade and Enterprise Te Taurapa Tūhono (NZTE), prepared by Deloitte under section 33 of the Public Records Act 2005 (PRA). Thank you for making your staff and resources available to support the audit process.

Introduction

Te Rua Mahara o te Kāwanatanga Archives New Zealand (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

Auckland Regional Office, 95 Richard Pearse Drive, Mangere, Auckland
Christchurch Regional Office, 15 Harvard Avenue, Wigram, Christchurch
Dunedin Regional Office, 556 George Street, Dunedin

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.

Currently NZTE is operating mostly at the 'Progressing' level but is well placed with its digital transformation and work on its disposal authority to improve maturity in the areas identified. When the drafted IM Strategy is approved, and an associated road map developed the organisation will be able to assess the level of resource needed for implementation and general IM uplift. I also note that the disposal authority extension referred to under Topic 20 of the audit report has been approved.

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 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, and we will contact your Executive Sponsor shortly in relation to this.

Nāku noa, nā



Anahera Morehu
Chief Archivist

Te Rua Mahara o te Kāwanatanga Archives New Zealand

Cc Richard Kay, Chief Digital Officer (Executive Sponsor), Richard.kay@nzte.govt.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Governance	1: IM Strategy	<i>Ensure the updated IM Strategy aligns with Archives guidance and current business needs and includes an implementation plan of IM activities.</i>	The strategy should prioritise IM activity and the roadmap will help NZTE plan for the necessary resource support.
Governance	2: IM Policy and Processes	<i>Renew the IM Policy to align with the relevant legislation and Archives New Zealand's standard and requirements.</i>	A current IM Policy supports staff understanding of their roles and responsibilities in managing the organisation's information.
Governance	3: Governance arrangements and Executive Sponsor	<i>Establish an IM governance group or ensure that there is a governance group that covers IM.</i>	This group would support the ES in their role and receive regular reporting on agreed IM monitoring activity to ensure that they are aware of trends and issues for remediation (Topic 7: <i>Self-Monitoring</i>)
Governance	5: Outsourced Functions and Collaborative Arrangements	<i>Develop a periodic monitoring process to ensure suppliers are compliant with IM requirements under the PRA.</i>	NZTE MOUs for example reference IM requirements, roles and responsibilities are identified but monitoring that those are met is needed.
Self-Monitoring	7: Self-Monitoring	<i>Develop a review process to monitor compliance with the new IM Policy and processes.</i>	Planning and agreement on what self-monitoring would be useful to the organisation is a first step to improving the maturity of this topic.
Capability	8: Capacity and Capability	<i>Assess and address IM capability and capacity requirements as part of the IM Strategy and roadmap</i>	The resources needed to support BAU (including training as identified in Topic 9: IM Roles and Responsibilities and taxonomy improvement in Topic 18: <i>Information Access, Use and Sharing</i>), as well as implementation of the strategic roadmap should be understood.

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Creation	11: High-Value/High-Risk Information	<i>Identify all high-value/high-risk information and document these in an IAR or similar.</i>	In conjunction with the Disposal Authority, this activity is useful in prioritising the work that needs to be done in managing information according to its value.
Disposal	21: Implementation of Disposal Decisions	<i>Once the DA is updated and approved, establish a plan for regular disposal of both digital and physical information.</i>	Storage of more information than is necessary presents risks for the organisation. The organisation is in a good position with a current DA and should take advantage of the work that was done to develop that and actively dispose of unnecessary information.