



Waka Kotahi

New Zealand Transport Agency

Public Records Act 2005 Audit Report

Prepared for Te Rua Mahara o te Kāwanatanga

Archives New Zealand

February 2023

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1. Disclaimers

USE OF REPORT

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

INDEPENDENCE

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

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 Waka Kotahi and Archives, and both have reviewed this report.

Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. The procedures were not designed to detect all weaknesses in control procedures as the assessment was performed by interviewing relevant officials and obtaining supporting evidence in line with the guidelines of the Archives' 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 Archives and Waka Kotahi. 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. These procedures are designed to identify control weaknesses but cannot be relied upon to identify all weaknesses.

2. Executive Summary

WAKA KOTAHI- NEW ZEALAND TRANSPORT AGENCY

Waka Kotahi - New Zealand Transport Agency (Waka Kotahi) is a Crown entity, established in 2008 and governed by the Land Transport Act 1998. Waka Kotahi regulates every aspect of the land transport system, from roads and rail to the people using them. Its core functions are:

- Promoting safe and functional transport by land, including the responsibility for driver and vehicle licensing; and
- Administering the New Zealand state highway network.

Waka Kotahi employs about 2500 staff in Wellington, its main office, and across 11 regional offices in the North and South Island.

Information of high-risk/high-value identified by Waka Kotahi includes:

- Records of a significant nature that document the development of policy papers,
- Public transport funding records and outcomes of Waka Kotahi funded research projects,
- Raw data relating to natural events which impact on roads; and
- Raw data relating to planned road closure events such as parades or maintenance.

Waka Kotahi Corporate Information and Records (CI&R) team provides IM services to the organisation. The team comprises of 11 people and focuses on day-to-day operations and policy and advice relating to IM.

SUMMARY OF FINDINGS

We assessed the IM maturity of Waka Kotahi against the five maturity levels of Archives' IM Maturity Assessment model. The results are summarised below:

Maturity Level and Number of Findings

Beginning	0
Progressing	15
Managing	5
Maturing	0
Optimising	0

3. Introduction

BACKGROUND

Archives 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' monitoring and reporting on the state of public sector IM. It is one of the key components of their Monitoring Framework, which also includes an annual survey of public sector IM and the IM Maturity Assessment.

The Chief Archivist has commissioned Deloitte to undertake these audits of certain public offices and this audit was completed in November 2022.

OBJECTIVE

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

SCOPE

Deloitte has undertaken an independent point-in-time assessment of Waka Kotahi IM practices of against Archives' IM Maturity Assessment model. The IM Maturity Assessment aligns with the PRA and Archives' mandatory Information and Records Management standard. Topics 17 and 19 of the Archives IM Maturity Assessment are only applicable to local authorities and have therefore been excluded for the purposes of this audit.

The IM Maturity Assessment model classifies the maturity of IM practices from "Beginning" (least mature) to "Optimising" (highest maturity level). The maturity level of Waka Kotahi for each topic area is highlighted under each of the respective areas. Ratings were based on Waka Kotahi officials' responses to questions during online interviews and the supporting documents provided in line with the IM Maturity Assessment guidelines.

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

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.

Waka Kotahi 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.

ASSESSMENT MATURITY LEVEL

Governance

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
1	IM Strategy		•			
2	IM Policy		•			
3	Governance arrangements & Executive Sponsor		•			
4	IM Integration into business processes		•			
5	Outsourced functions and collaborative arrangements		•			
6	Te Tiriti o Waitangi		•			

Self-monitoring

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

Capability

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

Creation

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
10	Creation and capture of information		•			
11	High value / high-risk information		•			

Management

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
12	IM requirements built into technology systems		•			
13	Integrity of information		•			
14	Information maintenance and accessibility		•			
15	Business continuity and recovery			•		

Storage

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
16	Appropriate storage arrangements			•		

Access

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
18	Information access, use and sharing		•			

Disposal

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
20	Current organisation-specific disposal authorities			•		
21	Implementation of disposal decisions		•			
22	Transfer to Archives New Zealand		•			

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

Audit Findings by Category and Topic

GOVERNANCE

The management of information is a discipline that needs to be owned top down within a public office. The topics covered in the Governance category are those that need senior level vision and support to ensure that government information is managed to ensure effective business outcomes for the public office, our government, and New Zealanders.

Topic 1: IM Strategy

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

Waka Kotahi does not have a current Information Management (IM) strategy (Strategy) but a draft IM current state, which will be used to create a roadmap. The Chief Technology Officer has commissioned the drafting of a revised Strategy based on the 2019 draft. In addition, Waka Kotahi is currently finalising an IM monitoring and reporting framework.

There is also a Digital Strategy and supporting implementation roadmap, which while finalised at the Digital Group level has not been fully implemented across Waka Kotahi.

The Executive Sponsor (ES) is the Chief Digital Officer, who has been in the role for just over a year and is a strong advocate for IM at the senior leadership level.

RECOMMENDATION

Finalise and approve a Strategy ensuring it aligns to the Digital Strategy and business needs and follows Archives guidance.

Develop a roadmap to implement the Strategy.

Topic 2: IM Policy and Processes

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

Waka Kotahi has drafted an IM Policy (the Policy), which is awaiting final approval before it is implemented and will replace the Information and Data Management (I&DM) Policy dated June 2020. The I&DM Policy includes roles and responsibilities for all staff and managers and references to relevant legislation such as the PRA, Official Information Act 1982 (OIA) and the Privacy Act 2020. The I&DM Policy is available to staff and contractors on Waka Kotahi intranet and is supported by several IM guides and process documents. Compliance to the I&DM Policy is only partially monitored.

RECOMMENDATION

After approving the Policy, develop an implementation plan including review of guides and processes as necessary.

Topic 3: Governance arrangements and Executive Sponsor

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

Progressing

OBSERVATIONS

Waka Kotahi has no formal IM governance group and until recently used the Security Governance Group (SGG), as a governance group to cover IM matters. However, the SGG predominantly focusses on matters regarding security and so IM matters have not been considered a priority. Waka Kotahi is in the process of creating a new IM governance group, as an executive subcommittee, to discuss IM and security related matters. There will be standard reporting provided to this committee.

There is a Digital Risk forum with approximately 25 members from across Waka Kotahi, including the Digital Group, Risk & Assurance and Privacy teams. This forum meets bi-monthly and discusses IM related matters.

The ES and other senior leaders recently held a senior leadership hui and discussed the importance of the PRA and OIA. This has improved awareness of the PRA at a senior leadership level. The ES is aware of their role and the importance of IM. They promote the value of IM and continue to support CI&R to implement IM practices across the business. Further improvements to Waka Kotahi IM programme may be achieved by sharing good practice with other ES' in the public sector.

There is currently no formalised IM reporting to the ES. When issues and problems occur these are raised, as a standing item on the agenda of the Digital Risk forum. Furthermore, the IM team would alert the ES in the event of a breach of the I&DM Policy. However, the Chief Information Security Officer and their team would be the main point of contact in the event of a breach.

RECOMMENDATION

Finalise the new IM governance group and ensure the Terms of Reference refers to IM requirements.

Formalise regular IM reporting to the ES.

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

Responsibility for managing information within business units varies based on the team and business owner. While all staff interviewed believed they had good IM practice within their teams, concerns were raised about the consistency of these processes across the entirety of Waka Kotahi. Some staff had experience with

IM which was gained from prior roles in other organisations and staff noted that they knew where to find IM expertise if they required.

All staff undertake mandatory IM induction training, which includes awareness of the I&DM Policy. The I&DM Policy documents the responsibilities of staff and business owners regarding IM.

CI&R provides support on IM practices and use of Waka Kotahi recordkeeping systems, such as the main Waka Kotahi Enterprise Content Management (ECM) system, InfoHub. OpenText provides InfoHub, which has recently been moved to the Cloud. CI&R is also increasingly involved with the Microsoft-supplied Teams/SharePoint sites which are frequently used as a repository especially when collaboration is required.

IM requirements are integrated into new systems as part of the system development lifecycle. A CI&R representative has a seat on the Architecture Review Board which allows for input during the architectural design process and a seat during the final approvals.

CI&R has limited oversight over SharePoint, as it is not well controlled compared with InfoHub. Many teams use SharePoint, including Microsoft Teams, alongside InfoHub for working versions of documents. While InfoHub should be used for the storage of final versions of records such as contracts, the number of final documents stored in SharePoint is increasing.

RECOMMENDATION

Assign responsibility for managing information within business units to business owners.

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

Waka Kotahi includes requirements for managing information, IM roles and responsibilities in some contracts for outsourced functions and collaborative arrangements. However, Waka Kotahi was unable to confirm if this applied to all contracts. CI&R is currently drafting IM guidelines with the Enterprise Project Management Office (EPMO) and Procurement to ensure IM requirements are embedded in the project management lifecycle and procurement activities.

In addition, CI&R has been working directly with several Alliances (e.g., Let’s Get Wellington Moving) and Partnerships to test draft IM guidelines and requirements and improve the advice provided to the business and external partners when functions are outsourced.

Contracts sampled included clauses that Waka Kotahi is subject to the OIA or New Zealand law but not specifically the PRA.

The sample contracts have clauses allowing Waka Kotahi the right to audit the parties’ performance under the contract. However, there is no regular monitoring over the contracts in place to ensure compliance with the PRA.

The OIA requirements are included in a Memorandum of Understanding (MoU) with other public sector entities. However, there is no specific reference to the PRA in the MoU viewed.

RECOMMENDATION

Ensure that IM responsibilities, including the PRA, within contracts for outsourced services/functions and collaborative arrangements are clearly identified and monitored.

Topic 6: Te Tiriti o Waitangi

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

Progressing

OBSERVATIONS

Waka Kotahi has started to identify information of importance to Māori. This includes being aware it holds some personal and land-related information, which is likely to be of significance to Māori. This information is not documented or formally recorded in the Information Asset Register (IAR). Waka Kotahi has established a Māori Data Working Group. This is to assist with furthering their understanding of the impact of data sovereignty on Māori information and establish a framework to manage Māori data including collection. The group is building on work from Statistics NZ and the wider sector. However, this work is currently on hold due to a lack of resources.

There is a Māori Engagement and Partnership team, who assist in assessing the implications of Te Tiriti o Waitangi settlement agreements and other agreements with Māori. A member of this team is a key member of the Māori Data Working Group.

RECOMMENDATION

Develop a plan to complete identification of 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.

Managing

OBSERVATIONS

Waka Kotahi previously monitored compliance with the PRA requirements, standards, and other relevant legislation through an annual ComplyWith survey, though this has not been completed since 2020. As part of this PRA audit, Waka Kotahi completed an assessment, based on the Archives IM Maturity Assessment. In addition, staff completed a survey on IM practices and attitudes as part of the discovery work for the IM strategy. As a result, Waka Kotahi intends to undertake a similar survey annually.

CI&R has created a monitoring framework to monitor IM maturity, based off the Archives Monitoring Framework. This monitoring framework is used to track the level of maturity of Waka Kotahi IM capabilities, practices, and behaviours. However, it is still in the implementation phase.

CI&R investigate IM incidents in conjunction with the Security and Privacy teams, who lead these investigations. CI&R is responsible for following up any incidents after they have been addressed to educate the relevant staff. Issues notified to the ES are added the Digital Risk forum agenda. However, as stated earlier, IM incident reporting to the ES is ad-hoc and only occurs when an issue arises.

There is, as previously mentioned in Topic 5, currently limited monitoring over third-party contracts and sharing agreements.

RECOMMENDATION

Implement the new Monitoring Framework and report on compliance to the ES.

CAPABILITY

Information underpins everything our public offices do and impacts all functions and all staff within the public office. Effective management of information requires a breadth of experience and expertise for IM practitioners. Information is a core asset, and all staff need to understand how managing information as an asset will make a difference to business outcomes.

Topic 8: Capacity and Capability

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

CI&R is responsible for IM management and along with the ES reported having sufficient staff for providing IM activities. However, CI&R is increasingly acting as the business owner of SharePoint, which is starting to impact its resourcing levels. Waka Kotahi does regular workforce planning but this does not specifically consider IM needs.

CI&R has access to professional development opportunities to support the organisation’s direction and their own professional development. The ES supports access to professional development.

RECOMMENDATIONS

Regularly assess and monitor IM capacity and capability against business needs, particularly if considering large-scale system changes.

Topic 9: IM Roles and Responsibilities

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

Manager and staff obligations for managing, supporting, and monitoring information are included in the I&DM Policy. The Code of Conduct includes broad terms such as staff being accountable for using organisation information and using resources “carefully and only for the purpose it was intended.” Job descriptions include varying levels of information about responsibilities for document creation and maintenance, depending on role.

All staff undertake mandatory IM induction training, where the importance of IM is communicated, though no refresher training is provided. Senior staff understand their obligations, particularly regarding OIAs and ensuring information is findable in that event. However, they are not confident whether they are meeting good IM practice.

RECOMMENDATION

Provide refresher training for staff to increase confidence and knowledge of IM.

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.

Progressing

OBSERVATIONS

Staff have a general understanding of their responsibility to create full and accurate information to support their business function. This is due to the induction training, nature of their roles, OIA requests and the availability of the I&DM Policy on the intranet. Feedback indicated that while staff were confident that their teams were creating and capturing all information required, there was uncertainty around the consistency of this across the organisation. Staff were aware of duplicated information and had some concerns about versioning, particularly whether documents were the latest versions.

Some new systems and the main repository, InfoHub, meet minimum metadata requirements. SharePoint is considered a somewhat uncontrolled environment due to reduced CI&R oversight and different versioning controls to InfoHub. Information is also stored in corporate systems such as Heat, Jira, and Confluence, which are corporate systems with specific functions. Some information may also be stored in personal drives such as OneDrive, H:Drives, and Outlook inboxes. While it varied in use across teams, additional metadata could be added to documents in InfoHub and SharePoint to increase findability/useability.

RECOMMENDATION

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.

Progressing

OBSERVATIONS

The Information Management Group (TIMG) maintains a register of Waka Kotahi physical information stored with them, which includes some high-value information such as driver licensing information.

Waka Kotahi has an out-of-date IAR and are aware they hold high-value/high-risk information assets. This includes such information as drivers' licences and records of road events such as weather-related closures and planned maintenance or events.

There has been some assessment and mitigation of the risks to the information, including through the Digital Risk forum.

A new disposal schedule is with Archives for review and consultation, which includes new class of records, some of which are high-value and/or high-risk.

RECOMMENDATION

Review and update the IAR.

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
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OBSERVATIONS

CI&R regularly advises on any new technology solutions and upgrades, due to their role on the Digital Architecture Board. The CI&R team works closely with the IT, Privacy and Security teams in managing information as part of technology solutions.

InfoHub meets minimum metadata requirements. However, there are inconsistencies in other systems, such as Jira and Confluence, with metadata fields not being mandatory or covering all Archives required fields. The Security team is currently reviewing certifications of core enterprise systems which manage information. CI&R has published a list of Waka Kotahi minimum mandatory IM requirements for systems.

IM requirements are sometimes built into the process of decommissioning systems, including decisions around back-ups and storage.

System design and configuration are not fully documented or maintained for all business systems.

RECOMMENDATION

Ensure system design and configuration is fully documented and maintained for all business systems that manage information.

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
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OBSERVATIONS

The reliability and trustworthiness of information varies across teams. Staff that were interviewed noted that they have a mostly consistent experience trying to find specific information though this could vary between systems. InfoHub was noted as having a non-intuitive search function by some staff. There was also some confusion regarding finding the latest versions of documents, despite it having autosave versioning. However, others found both SharePoint and InfoHub very easy to find information in. All staff were aware that information created should be comprehensive and complete.

The requirement to maintain full and accurate records of information is a clause included in Waka Kotahi contracts. However, because contracted organisations or businesses often save information in their own separate/external systems, this can be hard for Waka Kotahi to monitor.

A key improvement staff reported, which would increase the integrity of information, is a focus on improving naming conventions. This should include the CI&R team developing guidance for each business unit and providing refresher training on good practice.

RECOMMENDATION

Ensure that user-experience issues with finding and retrieving information are identified and addressed including best practice with naming conventions.

Topic 14: Information Maintenance and Accessibility

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

Progressing

OBSERVATIONS

CI&R is regularly involved in some business and system changes, though at an advisory level.

General accessibility to physical information is ensured through long-term storage, which is retained off-site with a commercial storage provider. Waka Kotahi also has a small amount of onsite storage in the Wellington office, and this is kept in either a secured room or in the HR filing room. This information is believed to be largely duplications of electronic information. This physical information is currently in the process of being re-sorted and filed for eventual transfer to TIMG. Physical information is stored in the Palmerston North regional office which is subject to monthly destruction as it contains personal information.

Preservation needs for physical information are not identified, but potential access breaches would be reported to the Security team.

Security processes and continuous updates of systems, such as InfoHub’s move to the Cloud, helps ensure digital information remains accessible over time. Back-ups are in place for InfoHub and SharePoint, both daily and monthly.

RECOMMENDATION

Ensure preservation and digital continuity needs for digital information are identified and plans are in place to address these.

Topic 15: Business Continuity and Recovery

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

Managing

OBSERVATIONS

Waka Kotahi has an Incident Management Plan (IMP), along with function specific Business Continuity Plans (BCPs). The IMP and sample BCP identify key roles and responsibilities and some critical information for business functions, particularly system requirements and vital records. The sample BCP was last updated in August 2022 and the IMP in 2021. Salvage plans for physical information outside of TIMG are not included in the IMP or BCP.

Regular testing of the BCPs occur, with a recent exercise of a BCP in September 2022 and live testing in October 2021. Digital back-ups occur daily, monthly, and yearly. The previous year's back-ups are stored offsite and are easily retrievable. Currently yearly back-ups are kept for seven years. Frequent restores are utilised by Waka Kotahi so back-ups are not regularly tested.

RECOMMENDATION

Ensure all critical information is identified in business continuity and recovery plans.

STORAGE

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

Topic 16: Appropriate Storage Arrangements

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

Managing

OBSERVATIONS

The majority of physical information Waka Kotahi owns is stored at an off-site third-party provider.

Physical information kept onsite is stored in a lockable ‘working room’ and on another floor in a secure storage room. Both rooms are in an office environment, which includes fire safety, flood mitigation and access control. In Waka Kotahi regional offices formal file collections are listed but some are held in cabinets or other locations. Any physical and information security breaches are reported to the Security team and investigated. CI&R is responsible for following-up breaches including appropriate focus on educating and uplifting IM knowledge.

When moving to cloud systems, Waka Kotahi will complete a GCDO cloud risk assessment. A large portion of digital information storage is managed through third-party providers in the Cloud. Information security and protection requirements are built into IT service contracts. Information is stored either in Australia or onshore.

Ad-hoc incident-based reporting is undertaken when security or privacy exposure occurs. There is a dedicated Cyber Security team responsible for digital protection, though all staff have a responsibility to ensure information is secure.

RECOMMENDATION

Ensure that information protection and security risks are identified and regularly reported to the appropriate group.

ACCESS

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

Topic 18: Information Access, Use and Sharing

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

Progressing

OBSERVATIONS

Access controls are in place across all digital systems, though what the control is varies. Some include multi-factor authentication, and it is possible to restrict access to folders within InfoHub and SharePoint. Access permissions are managed by site owners via a ticketing request system and there is the ability to restrict certain areas of InfoHub and SharePoint to specific groups or teams. The CI&R team has administrator level access.

Waka Kotahi has no enterprise search functionality. Staff reported that it could be difficult to find information though experiences varied. SharePoint has easier search functions compared to InfoHub however CI&R believe InfoHub has a superior search discovery function. Both SharePoint and InfoHub meet minimum metadata requirements and InfoHub includes some customised metadata fields also. It is possible to add additional metadata to created documents, but staff reported that this is rarely done, though there is some variation within teams. Access controls for third party systems used by Waka Kotahi staff are not monitored but requirements are built into contracts.

Emails may not be 'filed' appropriately and there is potential for information to be stored in shared drives, in other systems or in private Teams channels.

Staff with longer tenure noted that a refresher course of IM training would be beneficial, particularly around metadata and the retention requirements of emails. Waka Kotahi is currently addressing these training needs.

Physical onsite information is restricted through swipe card access or a pin code.

RECOMMENDATION

Assess the need for further training for staff on metadata use and search techniques.

DISPOSAL

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

Topic 20: Current Organisation-Specific Disposal Authorities

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

Managing

OBSERVATIONS

Waka Kotahi has a current approved Disposal Authority (DA), which is due to expire in 2024. The DA covers information relating to core business areas, with 10 classes of record covered, and applies to all formats.

Staff were aware of the disposal schedule and can access it via InfoHub but were uncertain around key aspects, such as how to implement the schedule in practice. It was stated that it was likely that Waka Kotahi is retaining more information than was required.

A revised DA has been finalised in draft and submitted to Archives for review and consultation.

RECOMMENDATION

Work with staff to improve understanding of disposal requirements relevant to the information they create and use.

Topic 21: Implementation of Disposal Decisions

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

Progressing

OBSERVATIONS

The DA has been applied to InfoHub at set-up using retention tags, though these have not been applied to all folders. Permission from a CI&R Record Manager is required to delete information in certain folders. The main Waka Kotahi concern stated in this area is the triggering of disposals as the process is not currently automated. Digital information prior to deletion is included on a subject-specific disposal register.

Waka Kotahi has a culture of over retention of information and not implementing disposal. Staff interviewed acknowledged that while they had knowledge of the disposal schedule, they were aware that this understanding was not consistent across the organisation. Some staff also noted that they did not delete anything themselves. Emails were noted as a particularly difficult area regarding disposal, due to the large volumes of daily email transactions and emails stored in personal inboxes.

OneDrive accounts are kept for 365 days for people who have left the organisation. Ex-staff's managers are prompted prior to deletion to review the leaver's OneDrive account and ensure all relevant information has been removed and saved elsewhere.

Physical disposal is implemented by a third-party provider, with certificates of destruction provided. These disposals are performed under the General Disposal Authority (GDAs) and with business unit and IM manager approval, communicated to TIMG along with the intended retention when transferred.

RECOMMENDATION

Plan for routine disposal actions and implement across repositories and formats.

Topic 22: Transfer to Archives New Zealand

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

Progressing

OBSERVATIONS

Waka Kotahi has not identified information that is older than 25 years old or of archival value. A physical transfer to Archives occurred in 2016 but no digital transfer has taken place.

Waka Kotahi had a transfer pilot planned for 2021, which was unable to be completed due to a lack of resources and a requirement to prioritise the InfoHub move to Cloud project. There is currently a deferral of transfer agreement in place with Archives which expires in 2025.

RECOMMENDATION

Identify information that is older than 25 years old or of archival value to store appropriately until it can be transferred to Archives.

6. Summary of Feedback

Waka Kotahi appreciates the findings of the report and the process that was undertaken. We believe it provides a fair reflection of the state of information management practices at the agency and aligns with our perspective.

Waka Kotahi is an organisation that understands the value of good information management and are looking to continue to improve our capability and practice.

We are investing time and resources into the uplift of our information management maturity and the report will provide a key mechanism for clearly defining our future roadmap. There are a number of key improvement areas identified, most of which already feature in our work programme. We will continue to work with our business groups and Archives NZ continue to increase our maturity in these areas.

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10 May 2023

Te Rua Mahara o te Kāwanatanga Archives New Zealand

10 Mulgrave Street

Wellington

Phone +64 499 5595

Websites www.archives.govt.nz

www.dia.govt.nz

Nicole Rosie
Chief Executive
Waka Kotahi New Zealand Transport
Agency
Nicole.rosie@nzta.govt.nz

Tēnā koe Nicole

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the Waka Kotahi New Zealand Transport Agency completed by Deloitte under section 33 of the Public Records Act 2005 (PRA). Thank you for making your staff and resources available to support the audit process.

Introduction

Te Rua Mahara o te Kāwanatanga Archives New Zealand (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. Waka Kotahi's IM maturity is assessed as mostly at 'Progressing' level (75%) with 25% of topics at 'Managing'. There is substantial IM work reported as currently in development, such as an IM monitoring and reporting framework, which will support maturity rise to the 'Managing' level.

As information is a key asset, it is of concern that new environments such as SharePoint and OneDrive are somewhat unmanaged. This highlights the need for strategic decisions before a system or solution is implemented.

Waka Kotahi is clearly aware of the challenges of the volume and complexity of information it generates. Collaboration across the organisation is essential to manage this. The Corporate Information and Records Team must have support from the leadership level, business owners and groups to ensure information is effectively created, managed, used, reused, and shared.

Prioritised recommendations

The audit report lists 22 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 Liz Maguire, Chief Technology Officer (Executive Sponsor) liz.maguire@nzta.govt.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives' Comments
Governance	1: IM Strategy	<i>Finalise and approve a Strategy ensuring it aligns to the Digital Strategy and business needs and follows Archives guidance.</i>	This work and the subsequent roadmap will assist Waka Kotahi to prioritise their IM improvement and to understand the impact on resourcing.
Governance	3: Governance arrangements and Executive Sponsor	<i>Finalise the new IM governance group and ensure the Terms of Reference refers to IM requirements.</i>	Establishment of this group will provide a useful forum for regular reporting on IM matters and help raise the profile and awareness of IM in the organisation.
Governance	4: IM Integration into Business Processes	<i>Assign responsibility for managing information within business units to business owners.</i>	There are issues with control of information with the reported limited oversight of SharePoint by the CI&R. Business owners have an IM role in assisting with the control of environments within their operational area.
Governance	5: Outsourced Functions and Collaborative Arrangements	<i>Ensure that IM responsibilities, including the PRA, within contracts for outsourced services/functions and collaborative arrangements are clearly identified and monitored.</i>	It is reported that there is already work progressing with several alliances. Considering the extent of Waka Kotahi's contractual work, the clarity of guidance around responsibilities for public records is essential as is targeted monitoring.
Capability	8: Capacity and Capability	<i>Regularly assess and monitor IM capacity and capability against business needs, particularly if considering large-scale system changes.</i>	Although this is assessed at 'Managing' there are important areas of work reported as not being able to be addressed due to insufficient capacity including oversight of the increasing use of SharePoint.

Category	Topic Number	Auditor's Recommendation	Archives' Comments
Creation	11: High-Value/High-Risk Information	<i>Review and update the IAR.</i>	This can be done in conjunction with updating the organisation-specific disposal authority and will help the organisation understand their information and support prioritisation of effort.
Management	12: IM Requirements built into Technology Solutions	<i>Ensure system design and configuration is fully documented and maintained for all business systems that manage information.</i>	To be effective, IM needs to be designed in and integrated with relevant systems and focused on strategic objectives and long-term outcomes.
Disposal	21: Implementation of Disposal Decisions	<i>Plan for routine disposal actions and implement across repositories and formats.</i>	Over retention of information presents risks to the organisation. Supporting staff understanding of what can be disposed of would also be useful (refer to Topic 20: <i>Current Organisation-Specific Disposal Authorities</i> As a priority, investigate automated disposal in systems where possible.