



Tatauranga Aotearoa | Statistics New Zealand

Public Records Act 2005 Audit Report

Prepared for Te Rua Mahara o te Kāwanatanga | Archives New Zealand

Final Report

July 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 Statistics New Zealand (Stats NZ). 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 Stats NZ 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 Stats 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. These procedures are designed to identify control weaknesses but cannot be relied upon to identify all weaknesses.

# 1. Executive Summary

## TATAURANGA AOTEAROA | STATISTICS NEW ZEALAND

Tatauranga Aotearoa | Statistics New Zealand (Stats NZ) is New Zealand’s official data agency, established in 1956 and governed by the Data and Statistics Act 2022. Stats NZ’s role is to collect information from people and organisations using censuses and surveys. Information collected is used to publish insights and data about New Zealand.

In addition, Stats NZ is the Government’s Chief Data Steward (GCDS) and is responsible for leading the strategic direction for data management in the public sector. The GCDS partners with a range of New Zealand data leaders, including the Chief Archivist, to develop and implement a framework to enable government to use data sustainably.

Stats NZ employs approximately 1600 full-time employees (FTE) with its head office in Wellington and regional offices in Christchurch and Auckland.

A significant amount of information Stats NZ generates can be identified as being high-value or high-risk including:

- Records relating to the collection, processing, and dissemination of statistical outputs.
- Formal agreements for the shared development of generic data and analytical frameworks, models, methods, standards, tools, and processes.
- Records that document the process of collecting, processing, analysing, and preparing data for dissemination.
- The data, metadata and information collected and analysed as part of research projects including the ethical, access and confidentiality rules to be applied.

The Deputy Chief Executive and Deputy Government Statistician, Insights and Statistics is the Executive Sponsor (ES) responsible for overseeing IM. The ES has been in this role since March 2020.

IM and Data Management are the two teams responsible for managing information at Stats NZ (collectively referred to as the IM team). Both teams are part of Data, Information, and Publishing Services (DIPS).

## SUMMARY OF FINDINGS

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

### Maturity Level and Number of Findings

<b>Beginning</b>	1
<b>Progressing</b>	13
<b>Managing</b>	6
<b>Maturing</b>	-
<b>Optimising</b>	-

## 2. 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 a biennial 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 May 2023.

### OBJECTIVE

The objective of the audit is to identify IM strengths and weaknesses within the public office, prioritising areas that need attention and recommending improvements. These audits assist organisations to improve their IM maturity and to work more efficiently and effectively.

### SCOPE

Deloitte has undertaken an independent point-in-time assessment of Stats NZ's IM practices against Archives IM Maturity Assessment model. The IM Maturity Assessment aligns with the PRA and Archives mandatory Information and records management standard (the 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). Stats NZ's maturity level for each topic area is highlighted under each of the respective areas. Ratings were based on the Stats NZ's staff responses to questions during in-person interviews and the supporting documents provided pre-audit.

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 Stats NZ. Archives is responsible for following up on the report's recommendations with Stats NZ.

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

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

### 3. 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.

Assessed Maturity Level						
No.	Topic	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		•			

**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. Managing

#### OBSERVATIONS

Stats NZ has a Data and Information Management Strategic Response (the Strategy), which was approved in 2019 and focuses on the following five areas:

- Governing data and information as strategic assets and ensuring the monitoring of performance and investment through the Data Governance Group (DGG)
- Creating consistency in models, standards, and conventions for managing of data and information
- Maximising the utility of metadata
- Minimising data and process duplication
- Strengthening data literacy and mindfulness.

The DGG receives reports outlining progress and challenges relating to the Strategy, which has not been refreshed to align with the Stats NZ-wide strategy that was issued in 2021.

#### RECOMMENDATION

Update the Strategy to align with the organisation-wide strategy and business needs.

### 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. Managing

#### OBSERVATIONS

Stats NZ has a Data and Information Management Policy (the Policy), which the Executive Leadership Team (ELT) approved in April 2023.

The Policy aligns with the Strategy and states that information Stats NZ manages is subject to PRA requirements and other relevant legislation. This includes the Data and Statistics Act 2022, Privacy Act 2020, Official Information Act 1982, and Copyright Act 1994. The Policy outlines IM principles for good practice, values for data and information, and relevant IM roles and responsibilities. While roles and responsibilities are outlined in the Policy, formal IM requirements are not.

Staff are provided with training on the Policy through an annual training module.

Related policies and guidelines are made available on the intranet for staff and contractors' reference. These cover topics such as information privacy, security and confidentiality, Māori values and the Archives standard.

### RECOMMENDATION

Ensure the Policy includes expected IM practices aligned to Archives standards 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.

Progressing
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### OBSERVATIONS

The DGG is responsible for leading and coordinating work to manage data and information as a strategic asset within the context of key strategic focus areas (outlined in Topic 1). The DGG is responsible for ensuring initiatives align to strategic focus areas and provides advice to the ELT and the Investment Board (IB) on priorities for data and IM.

Evidence sighted on a report to the DGG showed updates on progress of the Strategy in 2022. This update included a roadmap outlining initial states, foundations to be built on, improvements to be made, and the future state for IM. The DGG has not met since the end of 2022 due to a governance group refresh. The key governance board for IM functions currently is the Systems and Standards Committee.

Feedback from staff consistently indicated that the ES advocates for IM and is effective in raising awareness of good IM practice throughout Stats NZ. Furthermore, the ES advocated for investment into an information environment and ensuring IM training was part of the induction process. The ES understands their role and has oversight of IM at Stats NZ. However, there is no regular direct reporting to the ES on IM practices.

### RECOMMENDATION

Establish a process for regular reporting to the ES on IM activity.

## Topic 4: IM Integration into Business Processes

All staff should be responsible for the information they create, use, and maintain. Business owners should be responsible for ensuring that the information created by their teams is integrated into business processes and activities. The IM team support business owners and staff.

Progressing
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### OBSERVATIONS

The IM team supports business owners to understand their IM responsibilities through training, new system demonstrations and providing guidelines that outline good practice. The IM team attend team meetings to help upskill staff and handle enquiries relating to systems when asked. The IM team aims to be more involved in projects and the development of new systems to ensure IM requirements are built in.

Staff noted that business owners have an inconsistent understanding of their IM responsibilities. Some teams have clear and established processes and IM is embedded in day-to-day operations. However, because IM requirements aren't identified it is uncertain if they are met. Business owners do not always prioritise IM in projects or change initiatives.



## RECOMMENDATION

Ensure business owners understand and perform their IM responsibilities.

### 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
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## OBSERVATIONS

Stats NZ has several contracts with third parties for outsourced business functions and services. Contracts are managed in a contract management system, which the Contracts team oversees with consultation from the Legal team as well. The standard All of Government templates are used, where possible.

A sighted contract between a third-party research company and Stats NZ contains general IM details and requirements and clauses relating to confidentiality, data integrity and security. However, all contracts sighted do not explicitly outline roles and responsibilities for IM practices.

## RECOMMENDATION

Ensure that roles and responsibilities for IM within contracts for outsourced functions 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
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## OBSERVATIONS

Stats NZ has entered into a Mana Ōrite agreement to improve collaboration with the Data Iwi Leaders. This is to improve accessing, identifying and resolving gaps in Māori data, and meeting the data needs and aspirations of Māori more effectively.

While there has been no formal identification of information of importance to Māori, IM staff recognised the relevance of information regarding population statistics and Māori business.

Access for Māori researchers to the Integrated Data Infrastructure (IDI) is recognised as important. The Integrated Data Infrastructure (IDI) is a large research database, which holds de-identified microdata about people and households. Te Tiriti o Waitangi principles and values are embedded into the application process for accessing IDI. 'Five Safes' and 'Nga Tikanga Paihere' frameworks are used to manage safe access to the rich source of information about New Zealand people, households, and businesses available from the integrated data at Stats NZ. This includes researchers consulting with iwi and considering the potential risks and implications for Māori before undertaking the research.

## RECOMMENDATION

Building on the work with the Data Iwi Leaders Group, formally identify and document information of importance to Māori and document within an Information Asset Register (IAR) or similar system.

## 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.

Progressing
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#### OBSERVATIONS

Stats NZ has an internal review process for the monitoring of legislative compliance. This is managed by the Risk Senior Advisor and was implemented to provide more detail on the nature of compliance issues than could be previously determined using external compliance tools.

The last review of IM compliance was carried out in 2018 and is currently overdue for assessment.

#### RECOMMENDATION

Regularly monitor compliance with PRA requirements and standards.

## 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

The IM team currently consists of six FTE. There are also four vacancies. While the IM team is technically capable, issues with resource capacity impact services delivered. Additionally Stats NZ uses Colectica (a repository for statistical metadata), which requires additional technical skills any new IM staff need to be trained on, further restricting resourcing.

IM staff reported having access to IM specific professional development training and resources which includes access to webinars and online courses. Stats NZ has a budget for professional development and further study opportunities for staff to build knowledge.

#### RECOMMENDATION

Complete the recruitment process to fill the vacant IM roles.

### Topic 9: IM Roles and Responsibilities

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

New staff at Stats NZ are provided guidance around IM good practice which is covered in the initial welcome booklet. Induction also includes information on IM roles, responsibilities, and practices. There is also a mandatory annual refresher on the IM training module which all staff, including contractors must complete.

IM roles and responsibilities are generally well understood by staff but are not outlined in job descriptions. Instead, roles and responsibilities are communicated to staff through the Policy, guidelines, mandatory IM training modules and the Code of Conduct.

#### RECOMMENDATION

Regularly promote IM responsibilities as a part of normal business practice.

## 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

Stats NZ use a range of systems for the storage of information. These include Colectica, a statistical metadata repository; Salesforce, a customer relationship management tool; Ahumoni, a system capturing financial invoices and contract management; shared drives; and an EDMS on SharePoint called Kohinga Kōnae.

Kohinga Kōnae and Ahumoni meet Archives' minimum metadata requirements, however shared drives do not.

Staff have some understanding of their responsibilities to create and capture information and are provided with training in this area through their induction as well as an annual training module.

While staff reported a general confidence in their ability to capture full and accurate records, this varied between business units. Some staff noted that collaborating with other business units created barriers to the capture of information due to different naming conventions and folder structures. Also, when working across teams, files were sometimes saved locally before being sent to a different business unit. This was identified as a source of confusion over the reliability of information due to multiple copies being created.

The use of USBs is prohibited, and staff are required to store information in approved systems only.

Information usability, reliability, and trust issues relating to Stats NZ's EDMS have been identified. These issues are being addressed in Kohinga Kōnae through the use of systems such as AvePoint and Pingar. Introducing these systems aims to provide mechanisms for better protection and classification of information through data backups and automatic application of metadata in Kohinga Kōnae.

#### RECOMMENDATION

Identify barriers to using information across the organisation such as inconsistent naming conventions and folder structures and implement improvements.

**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
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**OBSERVATIONS**

Stats NZ does not have a current IAR which formally identifies information assets that are high-value/high-risk. Work started in 2018 to develop one but was not completed.

It was indicated by senior staff that identifying the level of risk associated with information has proven difficult as data is Stats NZ’s core business. Classification and risk mitigation of information is largely in the context of prioritised statistical outputs.

**RECOMMENDATION**

Identify the resource requirements to continue the work started in 2018 and develop a plan to continue the identification of high-value/high-risk information.

## 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

Archives minimum metadata requirements are built into Kohinga Kōnae and Ahumoni.

There was a recent data migration from a content management system into Kohinga Kōnae. To check whether data was appropriately migrated, the IM team ran tests against the transferred information and inquired with business owners to ensure it was complete and accurate.

Stats NZ follows a certification and accreditation process during design and configuration for new systems. Despite this process having IM considerations, the IM team noted that it was not sufficient to effectively incorporate IM. The IM team also noted that their expertise was only included after a project has started or at the end. IM staff noted that the extent to which their expertise is involved in new or change projects largely depends on the business owner of the system.

IT staff advised that while IM staff are helpful, IM requirements are not an active consideration when decommissioning business systems. Staff acknowledged that this is an area requiring maturing in an IM sense. Furthermore, IT staff stated that there is no documentation available for all systems design and configuration due to the large number of legacy systems at Stats NZ.

#### RECOMMENDATION

Ensure there is a formal requirement to include IM expertise in decisions about new and upgraded business systems and when decommissioning systems.

### Topic 13: Integrity of Information

Information should be managed so that it is easy to find, retrieve and use, while also being secure and tamper-proof.

Progressing

#### OBSERVATIONS

While staff were generally aware that information created should be comprehensive and complete, variable experiences were reported regarding the integrity of information. IM practices to ensure that information is reliable and trustworthy, are localised and depend on the business unit. Naming conventions vary by team causing retrieval of information from other teams to be difficult. Some staff were confident finding information from other business units, while others placed reliance on the information owner to send a link to its location.

## RECOMMENDATION

Implement standardised IM practices across business units to ensure user-experience issues with finding and retrieving information are identified and addressed.

### 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

General accessibility to Stats NZ's physical information is maintained through its off-site third-party storage provider. There are well-defined processes for retrieving, distributing, and returning physical information to the provider.

Digital information stored in legacy systems has been identified and a process is in place to address this.

Maintaining digital information during a system change is seen as the responsibility of the system's business owner. To date, Stats NZ has not identified technology obsolescence risks and does not have a digital continuity plan for managing its information.

## RECOMMENDATION

Identify and formally document a digital continuity plan.

### 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

Stats NZ has an organisation-wide Business Continuity Plan (BCP). The BCP outlines prioritised critical services and business activities, targeted recovery times and roles and responsibilities. Recovery actions involve the activation of the Incident Management Team (IMT) and communication with staff and stakeholders. The outlined response to business disruptions involves coordination through the IMT with a focus on maintaining and resuming prioritised functions.

IT staff and the responsible business owner are involved in deciding what information is required following a business disruption event.

Standard data backups have been implemented for digital information. Backup testing generally happens on a semi-regular basis and timeframes are dependent on system needs.

## RECOMMENDATION

Ensure that 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
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#### OBSERVATIONS

The majority of all physical information is held at Stats NZ's off-site third-party storage provider. Stats NZ has adequate controls in place to prevent unauthorised access to physical information temporarily held on-site before being transferred to the storage provider. This information is locked and held securely in an appropriately sized cabinet and can only be accessed by authorised staff. Documents and storage containers are labelled to ensure findability and the IM team has oversight of the content.

Hazards at the Wellington office have been identified for onsite storage. The building is physically secure and appropriate measures are in place to minimise the impacts of hazards such as earthquakes, floods and fires.

Windows Active Directory groups control access to critical digital information and raw data. Standard deletion protections are in place and retention is built into Kohinga Kōnae and Government Chief Digital Officer (GCDO) assessments are completed for new cloud-based systems.

While there is some reporting from the IM team on trends of privacy and security incidents, risks are not routinely considered or analysed.

#### RECOMMENDATION

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



## ACCESS

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

### Topic 18: Information Access, Use and Sharing

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

Progressing
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#### OBSERVATIONS

Stats NZ regularly shares information in the IDI with external researchers. A range of IM processes are involved in these agreements. These include compulsory confidentiality training as well as requiring researchers to access data only in secure data labs.

Internally, staff reported that access permissions were generally applied appropriately. Data custodians are assigned to areas with responsibility for access permissions. Despite this, some staff advised that there were instances where controls are insufficient due to staff maintaining their access when changing roles and moving laterally through Stats NZ. Staff reported that Stats NZ's taxonomy differs from team to team.

#### RECOMMENDATIONS

Consistently apply access permission controls and monitor these to ensure appropriate access to information required for their current role.

Develop and implement a taxonomy to support consistent management and discovery of information.

## DISPOSAL

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

Stats NZ has a current and approved agency-specific Disposal Authority (DA). The DA covers all information and business functions and was authorised in December 2018. The DA is assessed annually as prompted by the Archives survey, however, the ES stated that the DA would benefit from a review to ensure it is up to date.

#### RECOMMENDATION

Regularly review the organisation-specific DA to ensure that it reflects business and legislative changes.

### 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

Information is disposed of in accordance with the DA and General Disposal Authorities (GDAs). This disposal is documented and approved by senior management and the relevant business owner. Disposal occurs at least once a year on average.

There are plans to apply retention and destruction attributes in Kohinga Kōnae. Disks and hard drives are destroyed, as appropriate, to ensure that no information is recoverable.

#### RECOMMENDATION

Develop and apply a disposal implementation plan to include all 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

Stats NZ has identified the digital and physical information held that is over 25 years old. The digital information is managed through a data archive which preserves statistical datasets of long-term value.

Stats NZ has engaged with Archives regarding the transfer of historical records. Transfer has not been possible, however, prior to the passing of the Data and Statistics Act 2022 as this altered the requirements for transferring statistical records.

## RECOMMENDATION

Develop and agree a plan with Archives to transfer appropriate digital and physical records.

## 4. Summary of Feedback

Tatauranga Aotearoa Stats NZ would like to thank the Deloitte reviewers and Archives NZ for the audit and their flexible and constructive approach. We accept that the findings are an accurate reflection of our IM maturity. The findings and the recommendations provide clear direction for our future IM work programme.

We have now completed the recruitment of three additional IM staff members, which fulfils the recommendation made under Topic 8: Capacity and Capability. Stats NZ has recently made significant investment in our IM systems (through the Future of Information Management Project). With this investment and the clear direction provided by the report we are well placed to improve our compliance with the Public Records Act and the Information and Records Management Standard issued under it.

Along with the Mana Ōrite relationship agreement with the Data Iwi Leaders Group, Tatauranga Aotearoa also has active engagements with 31 iwi, a number of whom we have relationship agreements with. Given the nature of these engagements being relationship focused, it is a priority to ensure that the data and information we hold is managed appropriately. Data empowers Māori to make informed decisions for iwi, hapū and whānau outcomes, therefore we must maintain trust and confidence when it comes to stewarding information and data for Aotearoa New Zealand.



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Tēnā koe Mark

## Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the Tatauranga Aotearoa Statistics New Zealand (Stats NZ) 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 (Te Rua Mahara) is mandated by the PRA to regulate public sector information management (IM). The audit programme is a key regulatory tool in our Monitoring Framework.

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

We are confident that you and your organisation are committed to 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 Te Rua Mahara mandatory Information and records management standard. Stats NZ's IM is reported to be mostly at the 'Progressing' level with a third of the topics at 'Managing' level.

It is pleasing to read in Section 4: *Summary of Feedback* that recruitment of three additional staff members has been completed. With a reported 40% of staffing positions vacant at the time of audit the organisation was very lean in IM support. Also from Section 4, clearly of significance to Stats NZ is Māori information and data. Further work on developing the Information Asset Register will ensure that that information is fully identified in corporate and line-of-business systems.

Further integration of IM staff and expertise into projects and new or updated system development would ensure IM requirements are built into systems and processes early in the design phase which would benefit the organisation.

### **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 nine recommendations as identified in the Appendix.

### **What will happen next**

The audit report and this letter will be proactively released on Te Rua Mahara 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

Poumanaaki Chief Archivist

**Te Rua Mahara o te Kāwanatanga Archives New Zealand**

Cc Rachael Milicich, Deputy Chief Executive Insights and Statistics (Executive Sponsor)

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## APPENDIX

Category	Topic Number	Auditor's Recommendation	Te Rua Mahara Comments
<b>Governance</b>	3: Governance Arrangements and Executive Sponsor	<i>Establish a process for regular reporting to the ES on IM activity.</i>	If the Data Governance Group is no longer active it is critical that the Systems and Standards Committee is aware of its role over IM governance and that regular reporting is required.
<b>Governance</b>	4: IM Integration into Business Processes	<i>Ensure business owners understand and perform their IM responsibilities.</i>	Business owners have a role in leading their team in their IM and in supporting consistency across the organisation which improves their team's user experience.
<b>Governance</b>	5: Outsourced Functions and Collaborative Arrangements	<i>Ensure that roles and responsibilities for IM within contracts for outsourced functions are clearly identified and monitored.</i>	Stats NZ has a pivotal role with sharing information and data, and contracts should clearly identify roles and responsibilities with monitoring across contracts as identified.
<b>Governance</b>	6: Te Tiriti o Waitangi	<i>Building on the work with Data Iwi Leaders Group, formally identify and document information of importance to Māori and document within an Information Asset Register (IAR) or similar system.</i>	This is essential work for Stats NZ and acknowledged as such.
<b>Self-Monitoring</b>	7: Self-Monitoring	Regularly monitor compliance with PRA requirements and standards.	Stats NZ should identify what IM is to be monitored and reported as the results will inform the ES and the governance group of any issues to be addressed. Monitoring should be against both external requirements and internal policies.
<b>Creation</b>	10: Creation and Capture of Information	<i>Identify barriers to using information across the organisation such as inconsistent naming conventions and folder structures and implement improvements.</i>	This will improve user experience and is similar to the recommendation for Topic 13: <i>Integrity of Information</i> .



Category	Topic Number	Auditor's Recommendation	Te Rua Mahara Comments
Creation	11: High-Value/High-Risk Information	<i>Identify the resource requirements to continue the work started in 2018 and develop a plan to continue the identification of high-value/high-risk information.</i>	This information asset work needs to be re-invigorated and resourced for a better outcome. Including information and data of importance to Māori would also be an objective here.
Management	12: IM Requirements built into Technology Solutions	<i>Ensure there is a formal requirement to include IM expertise in decisions about new and upgraded business systems and when decommissioning systems.</i>	This, along with documented requirements for systems, would be useful in raising understanding of IM requirements with IT staff and project staff. It will ensure that Stats NZ is well set up for future system changes by early involvement in changes that affect IM.
Management	14: Information Maintenance and Accessibility	<i>Identify and formally document a digital continuity plan.</i>	This should be done in conjunction with IT staff to ensure that digital information is well managed for as long as is needed and to mitigate risks of digital obsolescence.