



Public Records Act 2005 Audit Report for the Commerce Commission of New Zealand

**Prepared for Archives
New Zealand**

June 2022

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Independence

We are independent of Archives New Zealand in accordance with the independence requirements of the Public Records Act 2005.

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1. Executive summary

The Commerce Commission of New Zealand (the Commission) is an independent Crown entity responsible for promoting market efficiency by enforcing and fostering healthy competition. The Commission creates high value public records, including:

- Research and analysis
- monitoring information
- market study reports
- policy and legislation that guides the New Zealand market.

The Commission houses most digital information in an Enterprise Content Management system (ECM) which is cloud based. However, some digital information (such as recordings and video files) cannot be stored in the ECM and is therefore stored in shared drives. Prior to the introduction of the ECM in 2013, most information was created, captured, and maintained in hard copy. This information is now stored offsite by a third party provider.

The Commission has approximately 320 full time equivalent staff members, including the Knowledge and Information team, which consists of three skilled and experienced information management staff. There is also a dedicated information management governance group, the Information Service and Security Governance (ISSG) Group, of which the Executive Sponsor is a member.

This audit was completed remotely as New Zealand was in the 'red' setting of the COVID 19 Protection Framework at the time.

The Commission's information management maturity is summarised below. Further detail on each of the maturity assessments can be found in sections 4 and 5 of this report.

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2. Introduction

KPMG was commissioned by Archives New Zealand to undertake an independent audit of the Commerce Commission of New Zealand (the Commission) under section 33 of the Public Records Act 2005 (PRA).

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

Archives New Zealand provides the framework and specifies the audit plan and areas of focus for auditors. Archives New Zealand also provides administrative support for the auditors as they undertake the independent component of the audit process. The auditors are primarily responsible for the onsite audit, assessing against the standard, and writing the audit report. Archives New Zealand is responsible for following up on the report's recommendations with your organisation.

3. This audit

This audit covers all public records held by the Commerce Commission of New Zealand including both physical and digital information. Note, the audit was conducted remotely due to the COVID-19 restrictions at the time of the audit.

The audit involved reviews of selected documentation, interviews with selected staff, including the Executive Sponsor, Information Management staff, the Information Technology team, and a sample of other staff members from various areas of the Commission. Note that the Executive Sponsor is the senior responsible officer for the audit.

The audit reviewed the Commission's information management practices against the PRA and the requirements in the Information and records management standard and provides an assessment of current state maturity. Where recommendations have been made, these are intended to strengthen the current state of maturity or to assist with moving to the next level of maturity.

The summary of maturity ratings can be found at section 4, with detailed findings and recommendations following in section 5. The Commission has reviewed the draft report, and a summary of their comments can be found in section 6.

4. Maturity Assessment

This section lists all assessed maturity levels by topic area. For further context about how each maturity level assessment has been made, refer to the relevant topic area in the report in Section 5.

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

Note: Topics 17 and 19 in the Information Management Maturity Assessment are applicable to Local Authorities only and have therefore not been assessed.

5. Audit findings by category and topic

Governance



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

TOPIC 1 – IM strategy

Optimising

Summary of findings

The Commission has a comprehensive information management strategy which was approved and implemented in June 2021. The executive sponsor engaged with other public offices and discussed information management strategies to ensure alignment with wider sector organisations. The strategy considers the information management implications of organisation-wide risks, which are documented in the Information Security Operational Risk Register. For example, the strategy provided direction during the recent organisational restructure, to ensure file plans and record & document schedules were updated to reflect organisational changes.

The information management strategy provides direction for the Commission's business activities. For example, the information management objective to 'Identify outcomes arising from Treaty of Waitangi/Te Tiriti o Waitangi Obligations', led to initiatives to improve Māori information identification and management. This included setting up a dedicated folder in the ECM to store information of importance to Māori, differentiating Māori information in the Retention and Disposal Schedule, and encouraging the use of the Māori keyboard and language when saving metadata.

The ISSG and Executive Sponsor receive monthly reports from the Knowledge and Information team that highlights and discusses information management issues and initiatives. For example, following one of the key strategic goals to improve access to and use of the Commission's information, the Knowledge and Information team proposed new classification principles and frameworks which were endorsed by the ISSG.

Recommendations

Due to the assessment of optimising for this topic, we have not made a recommendation.

TOPIC 2 – IM policy and processes

Maturing

Summary of findings

The Commission has a current information management policy which was approved in June 2021. Information management processes and procedures are included in staff training documents which are updated on a regular basis. The last update was made during the recent organisational restructure. Both the policy and processes are available on the intranet and are communicated to all staff members as part of induction training.

Breaches of the information management policy are reported to the ISSG through monthly reports and are addressed on a timely basis. The Knowledge and Information team indicated there have only been minor breaches, relating to version controls and email filing for example. Individual training has been provided to address these breaches.

The Knowledge and Information team is involved in all new business system procurement processes such as the new HR system. This involvement ensures the information management policy is actively considered in relation to new systems and processes.

All staff and contractors understand their information management responsibilities as these are documented in job descriptions and evaluated during performance review. In addition, they are actively encouraged to meet their information management responsibilities through induction and refresher trainings.

Recommendations

Due to the assessment of this topic and the nature of the organisation, we have not made a recommendation.

TOPIC 3 – Governance arrangements and Executive Sponsor

Maturing

Summary of findings

The Commission has a dedicated information management governance group, the Information Service and Security Governance (ISSG) Group, of which the Executive Sponsor is a member. The ISSG receives monthly reports from the Knowledge and Information team and provides support in addressing issues as they arise. For example, the ISSG reviewed and supported a proposal by the Knowledge and Information team to adopt a framework to address an issue relating to the identification of confidential information.

The Executive Sponsor actively promotes the value and importance of information management to the senior leadership team and the wider organisation. Interviews highlighted that the Executive Sponsor is supportive of information management matters and creates opportunities for the Knowledge and Information team to communicate directly with the organisation, including the senior leadership team. In addition, the Executive Sponsor networks regularly with Executive Sponsors from other organisations to share experience and knowledge in information management. Most recently, they met with another Executive Sponsor to discuss information management related issues.

Recommendations

Due to the assessment of this topic and the nature of the organisation, we have not made a recommendation.

TOPIC 4 – IM integration into business processes

Optimising

Summary of findings

Responsibilities for information management are clearly communicated to all staff and contractors through induction and refresher training and is further discussed as part of staff performance reviews.

Staff interviewed noted that the Knowledge and Information team are considered trusted partners throughout the organisation. Each team works proactively with the Knowledge and Information team to ensure all information management minimum requirements are met. It was also noted that staff frequently refer to the Information Management Policy to ensure appropriate information management practices are followed and feel comfortable approaching the Knowledge and Information team for further clarification or support as needed.

Information management is integrated into all business processes and activities. For example, all teams are required to store work-related documents in the ECM and share documents within the organisation via document links rather than copies of the document.

During business processes changes, the Knowledge and Information team works cohesively with relevant business owners to ensure information requirements and improvements are considered. For example, the Knowledge and Information team was heavily involved during the organisational restructure to ensure information management practices were compatible with, and supported the new structure.

Recommendations

Due to the assessment of optimising for this topic, we have not made a recommendation.

Summary of findings

Requirements for managing information are included in some but not all contracts for outsourced functions or collaborative arrangements. For example, in the two outsourced contract samples provided for this audit, only one of the contracts specified the contracted party's information management obligations, including creation, management, security and retention.

All parties engaged by the Commission must sign and accept the Commission's Information Security Acceptable Use Policy before commencing work. This policy specifies the public record status of the information they hold and the restrictions for the use of the Commission's information. Once a contract is finished, the Knowledge and Information team perform exit checks on all files created by the contracted party to ensure their access to Commission files is removed.

Recommendations

Ensure all contracts for outsourced functions or collaborative arrangements include information management requirements, roles and responsibilities.

Summary of findings

The Commission has produced a plan for improving its processes to locate and identify information of importance to Māori. For example, they are setting up a dedicated folder in ECM to store Māori information, differentiating Māori information in the Retention and Disposal Schedule, and encouraging the use of the Māori keyboard and language for saving metadata. In addition, the Knowledge and Information team have identified some information of importance to Māori, such as Māori market study investigations. However, the information management implications within Te Tiriti o Waitangi settlement agreements and other agreements with Māori are not yet widely known across the Commission.

Recommendations

In conjunction with the activities already underway, work in consultation with Māori to identify and assess whether there is further information of importance to Māori and document this within the information asset register. The outcome of this exercise will inform the Commission as to whether further actions are required to address this topic.

Self-monitoring



Public offices are responsible for measuring and monitoring their information management performance for planning and improvement purposes. This helps to ensure that IM systems and processes are working effectively and efficiently. It also ensures that public offices are meeting the mandatory Information and records management standard as well as their own internal policies and processes.

TOPIC 7 – Self-monitoring

Maturing

Summary of findings

Information management issues are documented in the Information Security Operational Risk Register and actively followed up by the Knowledge and Information team. In addition, the ISSG and Executive Sponsor receive monthly information management activity and compliance reports. These reports outline compliance issues that have been identified and the corrective actions that have been undertaken.

The Executive Sponsor actively raises awareness of information management compliance and advocates good information management practices across the organisation. For instance, the Executive Sponsor proactively liaised with the HR team to ensure all job descriptions included information management roles and responsibilities.

The information management manager and Executive Sponsor attest to compliance with the Public Records Act annually as part of the legislative compliance monitoring process. The results of this self-monitoring exercise are considered in organisation-wide initiatives. For example, initiatives were planned to support Māori information identification following the most recent attestation process.

Recommendations

Due to the assessment of maturing for this topic, and given the nature of the organisation, we have not made a recommendation for this topic.

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

Maturing

Summary of findings

Information management capacity is considered as part of the Commission's annual budget process. Currently, the Information and Knowledge Management team is made up of three information management professionals. It was noted during interviews that there is not currently enough capacity to perform the retention and disposal project scheduled for mid-2024. However, staff indicated that the project is likely to receive additional resources closer to the time which will be addressed in the annual budget process.

The job descriptions for information management staff are regularly reviewed and updated to meet current and future organisational needs.

Information management staff have opportunities and are encouraged to upskill and attend external training. For example, one information management staff member recently attended training provided by Records and Information Management Professional Australasia (RIMPA).

Recommendations

Due to the assessment of maturing for this topic, and given the nature of the organisation, we have not made a recommendation for this topic.

TOPIC 9 – IM roles and responsibilities

Optimising

Summary of findings

Staff interviewed noted that job descriptions, performance plans and the code of conduct are regularly reviewed and updated to ensure they are meeting information management requirements and business needs. Staff also noted they understand they are handling confidential information daily and managing information well is central to the integrity of government.

Information management responsibilities are embedded in the organisation's business activities, and information management responsibilities are regularly promoted by the Knowledge and Information team. For example, information management is included in mandatory induction training and information management reminders and tips are regularly distributed via email and on the intranet.

The senior leadership team exemplifies good information management practices, including championing information management training. For example, with the support from Executive Sponsor, the Knowledge and Information team provided ECM search training to all staff during COVID-19 lockdown in March 2020. One-on-one training is also available on request.

Recommendations

Due to the assessment of this topic and the nature of the organisation, we have not made a recommendation.

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

Maturing

Summary of findings

Commission staff and contractors actively ensure that the right information is created and captured as part of all business functions and activities. During interviews it was noted that due to the collaborative work environment in the Commission, any incorrect information management practices, such as inappropriate filing, will be picked up by other colleagues and corrected subsequently.

Information is managed in reliable and approved environments and the use of uncontrolled environments is actively discouraged. For example, the Chief Information Officer stated in interviews that personal computers are not

allowed to be used in the Commission's office, and personal phones need to be registered to access the Commission's Outlook emails.

Staff interviewed consider records to be reliable, and any issues around usability and reliability are discussed at monthly ISSG meetings. However, auto-classification of documents is not in place yet.

Recommendations

In connection with *Topic 18 - Information access, use and sharing*, investigate auto-classification of documents to support their discovery and use..

TOPIC 11 – High-value / high-risk information

Maturing

Summary of findings

The Commission has an information asset register that documents current and legacy information assets. The register is a Microsoft Excel document, and high-value and high-risk documents are formally recorded in the register. The register is updated regularly to make changes and add new records. The Knowledge and Information team reviews the information asset register semi-annually to identify any missed records.

Some risks to high-value and high-risk information assets are identified. For example, natural disasters and loss of devices containing information are both risks that have been identified as part of business continuity planning.

Recommendations

Due to the assessment of this topic and the nature of the organisation, we have not made a recommendation.

Management

Management of information should be designed into systems to ensure its ongoing management and access over time, including following a business disruption event. Information must be reliable, trustworthy and complete and managed to ensure it is easy to find, retrieve and use, as well as protected and secure.



TOPIC 12 – IM requirements built into technology systems

Maturing

Summary of findings

The Knowledge and Information team is routinely involved in the design, configuration, and implementation of new and updated business systems. The Knowledge and Information team is part of the project team and engaged from the procurement phase through to the design and deployment phases. An IS project checklist is used to ensure information management requirements are actively addressed in the business systems. For example, retention and disposal requirements have been set up in systems.

The Knowledge and Information team is also regularly involved in decommissioning business systems to ensure information management requirements are met. An example of this is the Knowledge and Information team's involvement in decommissioning the former timesheet system.

The ECM system restricts staff from deleting information, with deletion permission restricted to the Knowledge and Information team. This ensures that information of long-term value is retained appropriately.

Risks relating to business systems that do not meet information management requirement are identified and addressed. For example, during interviews it was noted that all staff share document links instead of the documents to mitigate the risk of external information leakage.

Recommendations

Due to the assessment of this topic and the nature of the organisation, we have not made a recommendation.

TOPIC 13 – Integrity of information

Maturing

Summary of findings

The Commission has organisation-wide information management practices such as the use of version controls, and naming conventions. These practices are routinely followed by staff and contractors to ensure that information held by the Commission is reliable and trustworthy. As a result, staff interviewed were confident that the information they find and retrieve from across the organisation is comprehensive and complete.

The leadership team place high value on ensuring the information created and managed within the Commission is trustworthy, findable and retrievable. For example, team leaders will follow up with individuals when the incorrect naming conventions have been used.

Information management controls are in place to maintain the integrity, accessibility, and usability of information. The Knowledge and Information team has the ability to run ECM user activity reports to find who has or has not been creating documents and managing emails appropriately. If the report highlights unusual user activity, the Knowledge and Information team will contact the user to confirm that documents and emails have been filed appropriately. There were undesired practices identified and education sessions were provided.

Recommendations

Due to the assessment of this topic and the nature of the organisation, we have not made a recommendation.

TOPIC 14 – Information maintenance and accessibility

Managing

Summary of findings

The Knowledge and Information team are routinely included in business and system change planning. For example, the team set up a migration plan to ensure information is complete and usable in the updated ECM during migration.

Preservation needs for physical and digital information are addressed. All physical information held by the Commission is stored and managed by an approved third-party provider. Most of digital information is stored in the cloud-based ECM which is backed-up weekly. Digital information such as recordings, video, etc cannot be stored in ECM is stored in shared drives and backed-up weekly.

Risks to the ongoing accessibility of physical and digital information are identified but not yet mitigated. The Commission has recognised some risks of technology obsolescence. For example, a plan is in place to move information stored on shared drives to cloud-based Microsoft 365 One Drive to prevent data loss.

Recommendations

Undertake the planned migration of shared drives to cloud-based storage and ensure that technology obsolescence risks are assessed regularly and addressed promptly.

TOPIC 15 – Business continuity and recovery

Maturing

Summary of findings

The Commission has a business continuity and recovery plan last updated in February 2022. The plan outlines the processes and information critical to its continued operation during or immediately following a business disruption event. All identified critical information is stored digitally. The Knowledge and Information team was involved in

verifying vital records which were recorded in the information asset register and business continuity and recovery plan.

There is confidence that the Commission will be able to operate following a business disruption event. For example, the Disaster Recovery Plan requires that the Auckland office houses a backup server in case the main server in Wellington breaks down. The Disaster Recovery Plan is tested on a regular basis, with the next test scheduled in May 2022.

Recommendations

Due to the assessment of this topic and the nature of the organisation, we have not made a recommendation.

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

Managing

Summary of findings

The Commission has protection and security controls for physical and digital information. All physical information is stored with a third-party provider. While most digital records are stored in the ECM, some information such as recordings and videos are stored in shared drives. Accessibility of digital information is restricted by the Information Technology (IT) and Knowledge and Information teams. A report on unauthorised external access to the ECM is available to the IT team. However, this report is not reviewed regularly and does not include unauthorised access to information stored in shared drives.

The Commission has not experienced any loss of information. The Information Security team in the Commission is responsible for monitoring and managing information security issues. Information protection and security risks are reported by the Information Security team to ISSG monthly. Protection and security responsibilities in relation to information are communicated with staff through job descriptions and induction training.

Recommendations

Regularly monitor the ECM unauthorised access report and respond to any incidents.



Access

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

TOPIC 18 – Information access, use and sharing

Maturing

Summary of findings

The Knowledge and Information team actively maintain the ECM taxonomy and file plan to ensure reliable management and discovery of information. For example, folders and file structures for new projects can only be created by the Knowledge and Information team to ensure metadata is consistent and accurate. The ECM metadata complies with Archives New Zealand's minimum metadata requirements and is automatically applied wherever possible. For instance, the ECM automatically generates a document ID, creator and created date. Staff may also add metadata manually to facilitate reliable discovery and use of information, such as marking completed documents as "Final". However, document auto-classification is not yet in place.

Access rights to ECM documents are set up by the Knowledge and Information team and any access controls issues are addressed promptly. For example, the Knowledge and Information team prepared and presented a memorandum to the senior leadership team for approval to change the Commissioners' access from ready-only to edit in ECM. Staff interviewed reported having the proper access to all the information they need to perform their job. Only authorised staff can access sensitive files, and audit trails show who has accessed or modified documents.

Training is available to improve staff members' ability to find information through advanced search techniques. Training on searching and finding information in the ECM was given to all staff at the start of the March 2020 COVID-19 lockdown and is also available upon request.

Recommendations

Investigate auto-classification of documents to support their discovery and use.



Disposal

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

TOPIC 20 – Current organisation-specific disposal authorities

Progressing

Summary of findings

The Commission has a current and approved organisation-specific disposal authority covering all information formats and business functions. The authority was approved in 2015 and expires in 2025. Staff and contractors understand that disposal is handled by the Knowledge and Information team.

The Knowledge and Information team review the disposal authority as part of their daily duties to ensure it reflects business and legislative changes. There is no formal, regular review.

Recommendations

Establish a formal review cycle and ensure changes identified during the review are incorporated into the organisation-specific disposal authority.

TOPIC 21 – Implementation of disposal decisions

Managing

Summary of findings

A delegation system is in place for disposal actions to be performed. The appropriate authority must sign off every disposal. Once appropriate approval has been obtained for a disposal, it will be actioned by the Knowledge and Information team and documented in the list of disposal information. The destruction of physical and digital information is secure, complete and irreversible.

Disposal actions are routinely implemented manually across most systems such as the ECM and shared drives, where Knowledge and Information team periodically review and dispose information that is not of archive value. However, some business systems have not yet implemented regular disposal actions, such as the new HR system. In addition, disposal functionality is not yet built into the ECM system where manual disposal actions are required.

Staff interviewed noted that disposal policies are included in the information management policy, and guidance can be obtained from the Knowledge and Information team.

Recommendations

Ensure the appropriate disposal actions are routinely carried out for all business systems.

Where possible, build automated disposal functionality into all new and upgraded business systems such as the ECM system.

Summary of findings

The Commission has previously transferred physical information over 25 years old to Archives New Zealand, the last time being 2017. No other physical or digital information held by the Commission is over 25 years old. There is a plan to transfer digital records to Archives New Zealand in the next two years.

Recommendations

Continue to engage with Archives New Zealand and finalise the plan for future transfers of physical and digital information.



6. Summary of feedback

Thanks for the Public Records Act 2005 Audit Report for the Commerce Commission. We enjoyed engaging with KPMG and Archives New Zealand and learned a lot through the audit process.

We are pleased with our results and look forward to building on our information management practices in the suggested areas.

kpmg.com/nz



8 July 2022

Archives New Zealand, 10 Mulgrave Street, Wellington
Phone +64 499 5595

Websites www.archives.govt.nz
www.dia.govt.nz

Adrienne Meikle
Chief Executive
The Commerce Commission of New
Zealand
Adrienne.meikle@comcom.govt.nz

Tēnā koe Adrienne

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of The Commerce Commission of New Zealand (the Commission) by KPMG under section 33 of the Public Records Act 2005 (PRA). Thank you for making your staff and resources available to support the audit process.

Introduction

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. With most maturity level assessments in the Optimising and Maturing levels, the Commission exemplifies sector best practice in many areas and is an example of what committed organisations can achieve in management of their information.

The Commission's ongoing commitment to implementing disposal decisions and archival transfers is also commendable. We look forward to working with you on your intended digital transfers, noting the current restrictions on physical transfers.

Your Executive Sponsor's engagement with other public offices to discuss IM strategies when developing your own IM strategy is an exemplar in strengthening IM capability and knowledge across the sector. This commitment has delivered a very high level of IM maturity, and I commend you on your excellent achievement. With your permission, I would also like to explore with your Executive Sponsor how your organisational commitment to IM maturity has been established and maintained, with a view to further sharing these successful approaches with other public offices.

Prioritised recommendations

The audit report lists 10 recommendations to improve your organisation's IM maturity even further.

We endorse all recommendations as appropriate and relevant. To focus your IM improvement programme, we consider that your organisation should prioritise the five 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 for the release 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



Stephen Clarke
Chief Archivist Kaipupuri Matua
Archives New Zealand Te Rua Mahara o te Kāwanatanga

Cc Geoff Williamson, General Manager Organisational Performance,
Geoff.williamson@comcom.govt.nz (Executive Sponsor)

APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Governance	5: Outsourced functions and collaborative arrangements	<i>Ensure all contracts for outsourced functions or collaborative arrangements include information management requirements, roles and responsibilities.</i>	This would ensure that the contracted party was advised of their responsibilities early in the relationship. It supports the monitoring role that the Commission already performs on information at the end of the relationship.
Governance	6: Te Tiriti o Waitangi	<i>In conjunction with the activities already underway, work in consultation with Māori to identify and assess whether there is further information of importance to Māori and document this within the information asset register, The outcome of this exercise will inform the Commission as to whether further actions are required to address this topic.</i>	The Commission should note the guidance provided by Te Arawhiti to support building capability to meaningfully engage with Māori.
Management	14: Information maintenance and accessibility	<i>Undertake the planned migration of shared drives to cloud-based storage and ensure that technology obsolescence risks are assessed regularly and addressed promptly.</i>	Replacement of shared drives with a more controlled system is recommended.
Disposal	20: Current organisation-specific disposal authority	<i>Establish a review cycle and ensure changes identified during this review are incorporated into the organisation-specific disposal authority.</i>	The Commission has a current disposal authority. This recommendation would not only help to keep on top of authorised disposal but would lessen the work involved when renewing the DA by being on top of changes since its development.
Disposal	21: Implementation of disposal systems	<i>Where possible build automated disposal functionality into all new and upgraded business systems such as the ECM system.</i>	As the Commission has a current disposal authority, automated application could assist the intended digital transfers.