Public Records Audit Report for the Retirement Commissioner (Te Ara Ahunga Ora Retirement Commission)

Prepared for Archives New Zealand

February 2023

kpmg.com/nz

Disclaimers

Inherent Limitations

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

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

The information presented in this report is based on that made available to us in the course of our work, publicly available information, and information provided by Archives New Zealand and the Retirement Commissioner (Te Ara Ahunga Ora Retirement Commission)[1] – henceforth referred to as the Retirement Commission. We have indicated within this report the sources of the information provided. Unless otherwise stated in this report, we have relied upon the truth, accuracy and completeness of any information provided or made available to us in connection with the Services without independently verifying it.

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

Third Party Reliance

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

Independence

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

---

[1] Although the name of the public office audited is 'Te Ara Ahunga Ora Retirement Commission', they are recognised as 'the Retirement Commissioner' by section 82 the New Zealand Superannuation and Retirement Income Act 2001. In practice, the 'Retirement Commissioner' serves as the job title of the office holder appointed to fulfil the relevant functions and requirements of the New Zealand Superannuation and Retirement Income Act 2001 and the Retirement Villages Act 2003. The Retirement Commissioner's duties are fulfilled through the Retirement Commission.

For the sake of clarity, this report addresses the public office as 'the Retirement Commission', and the 'Retirement Commissioner' refers to the current office holder appointed into the role.

Contents

1. Executive summary

The Retirement Commission is a Crown Entity that helps educate New Zealanders to improve their financial outcomes and prepare for retirement. The Retirement Commission also advises the Government on policies to enhance the general public's financial outcomes and monitors the effects of the retirement villages legal framework. The Retirement Commission creates high value public records including research and analysis, reports for stakeholders, and policy advice documents for the Government on retirement matters.

The Retirement Commission uses SharePoint as their Enterprise Content Management system (ECM). It was implemented in late 2019 and has a function based classification structure embedded where all information is saved in the relevant library.

The Retirement Commission employs 38 full time equivalent staff. The day to day responsibilities for information management are delegated to the Business Lead managing information technology and information management matters for the Retirement Commission. They are supported by three Administrators who work across the five major teams in the organisation. Staff members rely on the expertise of the Business Lead and Administrators to provide advice on information management. The Executive Sponsor provides oversight over information management and champions information management initiatives.

The Retirement Commission has both physical and digital records, with most physical records stored offsite with a third party storage provider.

The Retirement 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.

Beginning	**7**
Progressing	**9**
Managing	**4**
Maturing	
Optimising	

2. Introduction

KPMG was commissioned by Te Rua Mahara o te Kāwanatanga Archives New Zealand (Archives) to undertake an independent audit of the Retirement Commission under section 33 of the Public Records Act 2005 (PRA). The audit took place in November 2022.

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

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

3. This audit

This audit covers all public records held by the Retirement Commission including both physical and digital information.

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 Retirement Commission. Note that the Executive Sponsor is the Senior Responsible Officer for the audit.

The audit reviewed the Retirement Commission's information management practices against the PRA and the requirements in the Information management and records standard and provides an assessment of current state maturity. As part of this audit, we completed systems assessments over the Retirement Commission's key systems that act as a repository for public records. The systems assessed were SharePoint, Outlook, and the Retirement Commission's HR system. Where recommendations have been made, these are intended to strengthen the current state of maturity or to assist with moving to the next level of maturity.

The summary of maturity ratings can be found at Section 4, with detailed findings and recommendations following in Section 5. The Retirement 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 in a table format, refer to Appendix 1 for an accessible description of the table. For further context about how each maturity level assessment has been made, refer to the relevant topic area in the report in Section 5.

Category	No.	Topic	Maturity				
			Beginning	Progressing	Managing	Maturing	Optimising
Governance							
	1	IM strategy		●			
	2	IM policy and processes		●			
	3	Governance arrangements and 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	●				

Please note: Topics 17 and 19 in the Information Management Maturity Assessment are applicable to local authorities only and have therefore not been assessed.

5. Audit findings by category and topic

Governance

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

TOPIC 1 – IM strategy   Progressing

Summary of findings

The Retirement Commission has a current and up-to-date information management strategy called the 'Information and Communications Technology (ICT) Strategy', approved by the leadership team. This outlines the purpose, objectives and key planned ICT and information management focus areas. However, the ICT Strategy does not contain all the key components of an IM strategy as per Archives' guidance i.e., the ICT Strategy does not contain specific action plans or implementation activities. An 'Information Management and Technology Action Plan' is currently being developed and will contain these elements. The action plan is expected to be approved in March 2023 by the leadership team.

The Retirement Commission considers information management when evaluating business needs in the medium to long term. This is demonstrated by the rollout of the ECM in late 2019, and the recent drafting of an information management (IM) Policy and organisation-specific disposal authority.

Recommendations

Finalise and approve the Information Management and Technology Action Plan, ensuring it contains specific action plans and implementation activities.

TOPIC 2 – IM policy and processes   Progressing

Summary of findings

The Retirement Commission has a draft information management (IM) policy that has been reviewed by the Executive Sponsor and is expected to be finalised in March 2023. It will then be communicated to all staff and contractors. The draft IM policy outlines the responsibilities of all staff, contractors and the Risk and Information Management Committee, with specific responsibilities assigned to the Executive Sponsor.

Currently, staff refer to a wider ranging 'Policies and Procedures Manual' for guidance on information and communications technology including software, hardware, and external drives. The Manual was last reviewed and approved in June 2022. However, this document does not contain all the key components of an IM policy as per Archives' guidance.

The staff members interviewed said that they were aware of where to find the Policies and Procedures Manual and other relevant organisation-wide and business unit specific process documents for information management.

Recommendations

Finalise and approve the Information Management Policy in line with Archives guidance.

TOPIC 3 – Governance arrangements and Executive Sponsor   Progressing

Summary of findings

There is a Risk and Information Management Committee which is responsible for information management matters at a governance level. Both the Executive Sponsor and Business Lead are members of this committee. The Executive Sponsor understands the importance of their oversight and monitoring role. Information management concerns and developments are reported to the Risk and Information Management Committee by the Business Lead as needed. However, regular reporting of information management activity such as compliance with information management requirements is yet to be formalised for this committee.

Recommendation

In line with *Topic 7 – Self-monitoring*, decide on which information management activity needs monitoring and develop a plan to report on it to the Executive Sponsor.

TOPIC 4 – IM integration into business processes   Managing

Summary of findings

Information management requirements are integrated into business processes and activities. Although information management responsibilities are not well documented, staff have been trained to use the ECM in accordance with integrated business processes and the functionality of the system, e.g., capture of metadata, which encourages correct use of information. Refresher training and notices in team meetings are also provided to staff when there are updates to convey or practices that need to be reinforced. The Administrator for each team has the responsibility for providing oversight and guidance to their respective teams for the management of information. Administrators receive regular information management training from the Business Lead. As a result, the Administrators understand and act upon these responsibilities.

Recommendation

Ensure that the Policies and Procedures Manual is aligned with the new Information Management Policy when approved.

TOPIC 5 – Outsourced functions and collaborative arrangements   Progressing

Summary of findings

The Retirement Commission uses All-of-Government (AoG) contracts and Government model contract (GMC) templates for most of its agreements with external parties. External legal advice is sought before finalising contracts which do not use AoG or GMC templates e.g., lease agreements. Requirements for managing information were outlined in both contracts reviewed for outsourced functions and collaborative arrangements. These contracts specify the contracted party's information management obligations, cover information ownership, management, security, retention, return and disposal of information at the termination of the contract. There was no evidence that the Retirement Commission monitors the information management obligations detailed in these contracts for compliance. However, no issues have been noted in the past.

Recommendation

Develop a process to monitor information management requirements where public records are shared with and managed by outsourced functions and collaborative arrangements.

TOPIC 6 – Te Tiriti of Waitangi   Beginning

Summary of findings

While some research assets focussed on Māori people and communities have been identified, the Retirement Commission has not fully identified information of importance to Māori yet. Information management implications within Te Tiriti o Waitangi settlement agreements and other agreements with Māori are not known. However, the Retirement Commission have a Kaihautu/Director - Māori Development who is leading the development of the Māori Strategy which includes plans to identify further information which may be of importance to Māori.

Recommendation

Identify information of importance to Māori.

Self-monitoring

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

Summary of findings

Although the deletion of information from the ECM and staff email inboxes is monitored, there is no monitoring of compliance with information management requirements. A high-level legislative compliance checklist is completed every six months so the Retirement Commission can make a declaration on their compliance with various legislation, to the best of their collective internal understanding. However, testing against information management requirements is not completed as the Business Lead and Administrators have limited capacity (refer to *Topic 8 – Capacity and Capability*). Once the IM policy is finalised, there are plans to implement self-monitoring for compliance with the IM policy.

Recommendation

In connection with *Topic 3 - Governance arrangements and Executive Sponsor*, decide on which information management activity needs monitoring and develop a plan to report on it to the Executive Sponsor.

Capability

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

TOPIC 8 – Capacity and capability   **Progressing**

Summary of findings

The Business Lead has appropriate information management capability to support day-to-day business needs. External contractors have been engaged in the past, where further information management capability has been required.

Given the size of the organisation and the Business Lead and Administrators having responsibilities which are not related to information management, there has been limited capacity for them to support all the Retirement Commission's information management requirements. Once the ICT strategy, IM policy and organisation-specific disposal authority are finalised, information management capacity requirements will be re-assessed to enable the disposal of information and self-monitoring (refer to *Topic 7 – Self-monitoring*).

Assess what information management resourcing is required to support the Retirement Commission's needs on an ongoing basis, and how that is best sourced.

TOPIC 9 – IM roles and responsibilities   **Progressing**

Summary of findings

Staff interviewed showed an appropriate awareness of their information management responsibilities. Information management responsibilities are communicated to all staff and contractors through induction training including one-on-one sessions with the Business Lead about how to use the ECM, refresher training, and notices in team meetings.

Roles and responsibilities for information management are not documented in all job descriptions. In the sample of three job descriptions reviewed, the descriptions for the Finance Lead and Performance Accountability Specialist included reference to the PRA and to information management respectively. However, information management responsibilities were not outlined.

Information management is only covered in the performance development plans of staff members whose roles involve a high level of focus on information management e.g., Administrators.

Recommendation

Include IM responsibilities in all staff job descriptions and performance plans going forward.

Creation

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

TOPIC 10 – Creation and capture of information   **Progressing**

Summary of findings

Information is routinely created and captured as part of all business functions and activities. Information is managed in reliable and controlled environments including the ECM. There has not been any information with usability, reliability and trust issues of note. Uncontrolled environments are not used for storing business records, with the Business Lead notified via email if staff tried to use a USB stick or external hard drive. Information such as draft

documents and personal notes may be saved by staff on their desktop. However, all final records are expected to be saved in the ECM.

Staff have some awareness of legal obligations when creating records, however, no instances of non-compliance have been noted.

Recommendation

Ensure that staff are aware of all legal obligations for the creation and capture of records.

Assess staff use of OneDrive and encourage staff to use the ECM for creation of all business documents.

TOPIC 11 – High-value / high-risk information   Beginning

Summary of findings

There has been no formal identification process of high-value and high-risk information assets. There is no inventory of the information held in digital and physical formats.

Recommendation

Create an information asset register which identifies all information of high-value or high-risk based on the work done to develop an organisation-specific disposal authority.

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   Progressing

Summary of findings

The Business Lead is consistently involved in the design, configuration, and implementation of new and upgraded business systems as well as the decommissioning of older business systems. Where additional information management expertise is required, external contractors are engaged e.g., a consultant was engaged for assistance with the design and configuration decisions for the ECM.

System design and configuration is fully documented and maintained for business systems. The Retirement Commission's ECM automatically captures the minimum metadata requirements set out by Archives.

Information about proposed new or upgraded business systems relating to data privacy, security, functionality, and risks is gathered in an ICT Business Case which gets reviewed by

the Business Lead. The Microsoft Cloud App assessment tool is also used to get a snapshot of different cloud solutions' specifications. Using these measures, the Business Lead examines the suitability of new and upgraded systems from an information management standpoint. However, standardised information management requirements for new and upgraded systems are not currently documented by the Retirement Commission.

Recommendation

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

TOPIC 13 – Integrity of information   Managing

Summary of findings

The Retirement Commission has organisation-wide information management practices in place which are socialised during staff induction and refresher trainings. These are routinely followed by staff and contractors, which means information held by the Retirement Commission is reliable and trustworthy.

Staff and contractors are confident that the information they are accessing is comprehensive and complete. There are management controls in place including audit trails, requirements for descriptive metadata e.g., title of document, automatic capture of metadata such as author and edit date, and document versioning.

Recommendation

Develop a testing plan to assess the effectiveness and functionality of management controls, and to ensure that final documents can be identified in the ECM (in connection with *Topic 7 - Self-monitoring).*

TOPIC 14 – Information maintenance and accessibility   Progressing

Summary of findings

Risks to ongoing accessibility for physical and digital information have been identified and are being mitigated. There are strategies in place for managing and maintaining digital information during business and system changes. For example, a migration tool was used to check whether all files from the server decommissioned two years ago were migrated successfully to the ECM. However, preservation needs of physical information are only starting to be addressed, with the third-party storage provider assisting the Retirement Commission by identifying information held on its behalf which lacks sufficient descriptive metadata. Once the physical information has been identified, preservation needs for the information will be determined by the Retirement Commission.

Recommendation

Finish implementing the plan to identify the preservation needs of physical information held by the third-party storage provider.

TOPIC 15 – Business continuity and recovery   **Beginning**

Summary of findings

The Retirement Commission has a current Incident Management Plan which outlines the members of the Incident Management Team and their delegated responsibilities. The Plan also outlines the procedures for handling information management and data breach incidents and potential recovery options. The Business Lead advised that key IT systems can be made available remotely on staff's personal devices, if required. However, critical information required for business continuity is not identified in the Plan.

Recommendation

Identify critical information required for business continuity.

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 Retirement Commission has protection and security controls in place for physical and digital information. The only physical information retained onsite is kept in locked cabinets and has digitised copies available on the ECM. Older physical information is stored at a third-party facility.

Digital information is stored with cloud providers with data centres based in Australia and the jurisdictional risk of this has been considered. Information is accessible based on user access restrictions set by the Business team. Digital security is regularly monitored and tested with annual penetration tests carried out by the Retirement Commission's external IT support provider.

Recommendation

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

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	**Managing**

Summary of findings

The Retirement Commission consistently uses metadata to facilitate the management and identification of information. Archives' minimum metadata requirements are embedded into the ECM and the Retirement Commission has added additional metadata fields applicable to the respective libraries within the ECM e.g., incident/reported date, vulnerability impact for the IT – Security library, to further increase usefulness and accessibility of information.

Staff and contractors know how to use the ECM to facilitate access to information, as this is incorporated into induction and refresher training. If an issue with finding information was encountered, the Administrators and Business Lead will provide support and advice.

Access controls for physical information are not documented as there are a minimal number of physical records kept at the Retirement Commission's premises. Users' access to digital information can be viewed and extracted from the ECM. Due to the ECM only having been implemented in late 2019, there has not been a need to regularly maintain user access for the different role profiles.

Recommendation

Regularly review metadata values to facilitate reliable discovery and use of information, for example, when information of importance to Māori is identified.

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   Beginning

Summary of findings

There is no current approved organisation-specific disposal authority. The Retirement Commission has never had an organisation-specific disposal authority in place.

The Retirement Commission currently has a draft organisation-specific disposal authority and appraisal report with Archives which is at the final review stage.

Recommendation

Establish a regular review cycle for the organisation-specific disposal authority, once approved. Incorporate any business and legislative changes when they arise.

TOPIC 21 – Implementation of disposal decisions   Beginning

Summary of findings

The Retirement Commission does not have an organisation-specific disposal authority under which they are permitted to dispose of records. Therefore, they are only permitted to dispose of records under the General Disposal Authority (GDA).

There have been no disposal actions executed by the Retirement Commission. The third-party storage provider has been assisting the Retirement Commission by classifying the physical information held on its behalf and this will aid in making disposal decisions once the organisation-specific disposal authority is in place.

Recommendation

Create a plan to regularly action disposal across physical and digital information once the organisation-specific disposal authority has been approved (as discussed in *Topic 20 – Current organisation-specific disposal authorities*).

TOPIC 22 – Transfer to Archives New Zealand   Beginning

Summary of findings

As the Retirement Commission was established over 25 years ago, it is required to identify records older than 25 years that should be transferred to Archives, as per Archives' requirements. The Retirement Commission has never transferred information in physical or digital format to Archives. Physical and digital records of archival value over 25 years will be identified upon the approval of the organisation-specific disposal authority.
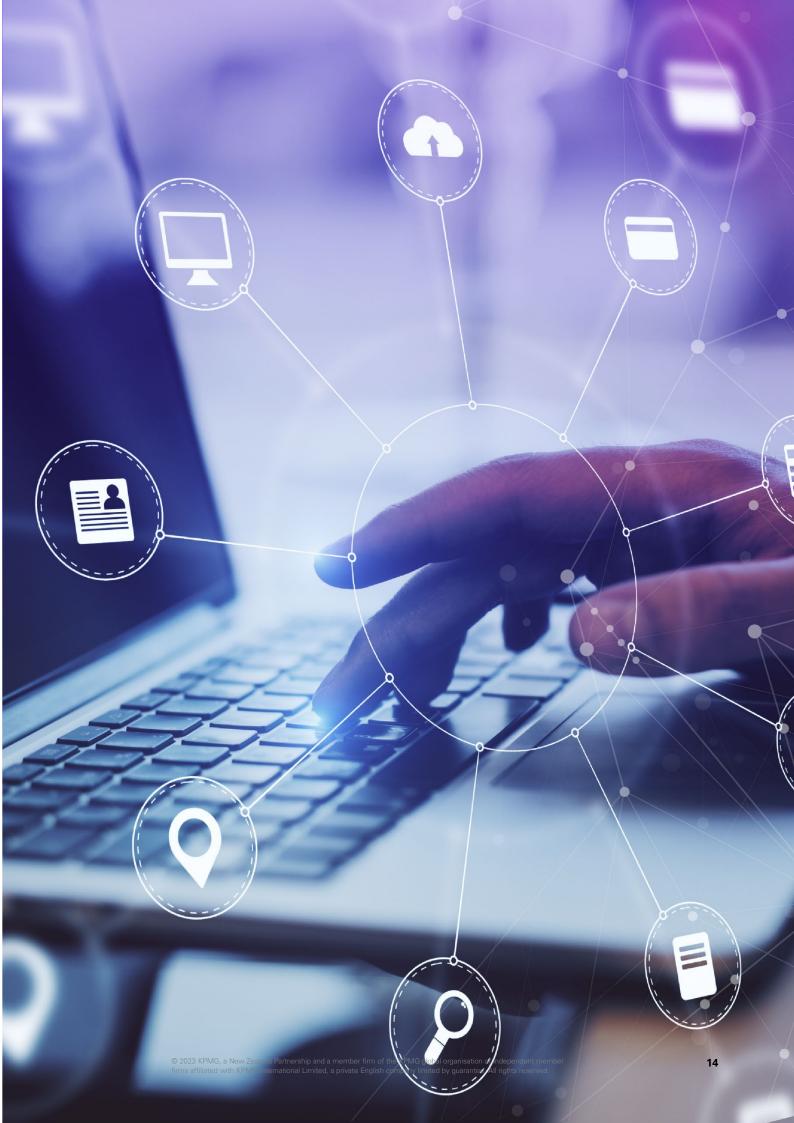
Recommendation

Develop a plan to identify digital and physical information of archival value.

6. Summary of feedback

Te Ara Ahunga Ora Retirement Commission would like to thank KPMG for their work and making our Public Records Act audit a pleasant experience for all who participated.

While we have made significant changes and improvements in recent years, we know there is still work to be done to increase compliance. We can see the benefits of what we've already achieved in our day-to-day operations, and are excited to reach our full potential in this area.

This audit has been very timely and we really appreciate the constructive feedback received. Some of which aligns to work we already have underway or planned and so this reinforces that we are on the right path.

Some of the works include:

- Implement an Information Management and Technology Action Plan which will prioritise recommendations from the PRA audit.
- Review and update existing documents incl. BCP and all job descriptions.
- Review and update existing onboarding training resources with IM responsibilities and ECM use underway as part of implementation of new Learning Management System ("LMS").
- Disposal actions across digital information should be automated following the approval of an organisation-specific disposal authority and ECM fully configured.
- Training resources for ECM and team onboarding being updated and created for new learning management system.
- Agenda items for next Risk & Information Management Committee meeting:
  - Discussion on self-monitoring
  - Endorsement of draft IM Policy for the Retirement Commissioner's sign-off
- Phase 1 to review and classify off-site archives is underway with phase 2 to digitise and dispose of in accordance with the relevant disposal authority.

7. Appendix 1

The table in Section 4, on page 3 lists all assessed maturity levels by topic area in a table format. This table has been listed below for accessibility purposes:

Topic 1, IM strategy – Progressing

Topic 2, IM policy and processes – Progressing

Topic 3, Governance arrangements and Executive Sponsor – Progressing

Topic 4, IM integration into business processes – Managing

Topic 5, Outsourced functions and collaborative arrangements – Progressing

Topic 6, Te Tiriti o Waitangi – Beginning

Topic 7, Self-monitoring – Beginning

Topic 8, Capability and capacity - Progressing

Topic 9, IM roles and responsibilities - Progressing

Topic 10, Creation and capture of information - Progressing

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

Topic 12, IM requirements built into technology systems - Progressing

Topic 13, Integrity of information - Managing

Topic 14, Information maintenance and accessibility - Progressing

Topic 15, Business continuity and recovery – Beginning

Topic 16, Appropriate storage arrangements – Managing

Topic 18, Information access, use and sharing – Managing

Topic 20, Current organisation-specific disposal authorities – Beginning

Topic 21, Implementation of disposal decisions – Beginning

Topic 22, Transfer to Archives New Zealand – Beginning

5 May 2023

Jane Wrightson
The Retirement Commissioner
Te Ara Ahunga Ora - The Retirement
Commission
jane@retirement.govt.nz

Tēnā koe Jane

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the Retirement Commissioner (Te Ara Ahunga Ora Retirement Commission) completed by KPMG under section 33 of the Public Records Act 2005 (PRA). Thank you for making your staff and resources available to support the audit process.

Introduction

Te Rua Mahara o te Kāwanatanga Archives New Zealand (Archives) is mandated by the PRA to regulate public sector information management (IM). The audit programme is a key regulatory tool in our Monitoring Framework.

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

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

Audit findings

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

Kia pono ai te rua Mahara – Enabling trusted government information

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.

Although mostly operating at 'Progressing' level, the Retirement Commissioner is well placed to improve IM maturity around disposal with the organisation-specific disposal authority drafted and the work being progressed on appraisal by the third-party storage provider. Other areas are also in progress with documentation drafted and awaiting approval.

Prioritised recommendations

The audit report lists 20 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 seven 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 Nisha Keetels, Director Corporate Services (Executive Sponsor) nisha@retirement.govt.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Archive's Comments
Governance	1: IM strategy	*Finalise and approve the Information Management and Technology Action Plan, ensuring it contains specific action plans and implementation activities.*	This will direct improvement activity and assist the organisation to understand the required resourcing.
Governance	2: IM policy and processes	*Finalise and approve the Information Management Policy in line with Archives guidance.*	Communication will be needed to ensure staff are aware of this Policy sitting alongside the Policies and Procedures Manual which is widely known. Alignment of Policy documentation is important.
Self-monitoring	7: Self-monitoring	*In connection with Topic 3 – Governance arrangements and Executive Sponsor, decide on which information management activity needs monitoring and develop a plan to report on it to the Executive Sponsor.*	This activity will connect the organisation around their IM performance and should highlight areas for improvement. Monitoring of use of OneDrive for instance would be useful.
Capability	8: Capacity and capability	*Assess what information management resourcing is required to support the Retirement Commission's needs on an ongoing basis, and how that is best sourced.*	The finalising of the Plan for Topic 1: IM Strategy will inform this along with an assessment of BAU. Acquiring in-house IM expertise is not always practicable and external expertise can be used for more specialist work as the Commission has done previously.
Creation	11: High-value/high-risk information	*Create an information asset register which identifies all information of high-value or high-risk based on the work done to develop an organisation-specific disposal authority.*	Work already done on the draft organisation-specific disposal authority draft (Topic 20 can be repurposed and used for development of the register.

Category	Topic Number	Auditor's Recommendation	Archive's Comments
Disposal	20: Current organisation-specific disposal authorities	*Establish a regular review cycle for the organisation-specific disposal authority, once approved. Incorporate any business and legislative changes when they arise.*	This was in draft stage during audit and with Archives for review. Note: this has just been signed off by the Chief Archivist and once the organisation establishes a review cycle for keeping the DA up to date the organisation will be at Managing maturity level.
Disposal	21: Implementation of disposal decisions	*Create a plan to regularly action disposal across physical and digital information once the organistion-specific disposal authority has been approved.*	This activity lessens the organisational risk of over-retention of information and carries on from the appraisal work already being done by third party storage providers.