



# Public Records Act 2005 Audit Report for Manukau Institute of Technology

**Prepared for Archives  
New Zealand**

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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

Manukau Institute of Technology (MIT) is one of the largest providers of technical, vocational, and professional education in New Zealand and has more than 14,000 students enrolled.

MIT creates high value public records in relation to:

- Qualifications and academic records of students;
- Records of programmes and courses;
- Student administration;
- Quality assurance;
- Board and academic board records;
- Industry and academic relationships.

SharePoint within Microsoft Office 365 has been the primary depository of information since 2019. MIT also maintains a student management system, a financial reporting system, a learning management system, and a student e portfolio system.

MIT employs 654 full time staff, and the responsibility for information management is delegated to MIT's various departments. These departments rely on the expertise of their Senior Legal Counsel and the Acting Head of Technology Services to provide advice on information management. MIT has both physical and digital records, with some physical documents stored offsite with a commercial storage facility.

From January 2023, MIT will operate in a single unified network of polytechnics and institutes of technology under Te Pūkenga. This transition will likely impact information management at MIT, with limited knowledge currently on what the implications will be. MIT has been clear that due to this uncertainty they are not planning to update or create information management documents ahead of this change but will continue to maintain records in accordance with existing policies and processes.

MIT'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.

<b>Beginning</b>	<b>5</b>
<b>Progressing</b>	<b>13</b>
<b>Managing</b>	<b>2</b>
<b>Maturing</b>	<b>0</b>
<b>Optimising</b>	<b>0</b>



## 2. Introduction

KPMG was commissioned by Archives New Zealand to undertake an independent audit of Manukau Institute of Technology (MIT) under section 33 of the Public Records Act 2005 (PRA). The audit took place in November 2021.

MIT'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 Manukau Institute of Technology including both physical and digital information. Due to alert levels being in place at the time of the audit, the audit was completed remotely.

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 MIT. Note that the Executive Sponsor is the senior responsible officer for the audit.

The audit reviewed MIT'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. MIT has reviewed the draft report, and a summary of their comments can be found in section 6.

The audit was undertaken during a period when Institutes of Technology and Polytechnics are going through a period of transition to a single unified network from January 2023.

## 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
<b>Governance</b>							
	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		●			
<b>Self-monitoring</b>							
	7	Self-monitoring		●			
<b>Capability</b>							
	8	Capacity and capability	●				
	9	IM roles and responsibilities		●			
<b>Creation</b>							
	10	Creation and capture of information		●			
	11	High-value / high-risk information	●				
<b>Management</b>							
	12	IM requirements built into technology systems		●			
	13	Integrity of information		●			
	14	Information maintenance and accessibility		●			
	15	Business continuity and recovery		●			
<b>Storage</b>							
	16	Appropriate storage arrangements		●			
<b>Access</b>							
	18	Information access, use and sharing		●			
<b>Disposal</b>							
	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

Beginning

#### *Summary of findings*

MIT does not have a documented information management strategy to provide strategic direction and support information management within the organisation. Information management is discussed in various policy documents such as the Records Management Policy and File Storage Protocols. However, these do not include the following topics that we would expect an information management strategy to include, such as:

- The objectives of information management
- Identification of long-term initiatives to improve information management and associated tasks
- Information management risks, and strategies to mitigate these risks.

#### *Recommendations*

Develop an information management strategy following Archives New Zealand's guidance. The information management strategy should be approved by the Executive Leadership Team (ELT).

### TOPIC 2 – IM policy and processes

Progressing

#### *Summary of findings*

MIT has a current and up-to-date Records Management Policy (Policy), approved by the Chief Executive, and last reviewed by the Senior Legal Counsel in April 2020. The policy details the roles and responsibilities of staff within the organisation and lists associated documents, such as the Information and Record Management Standard, but does not clearly link these to the PRA or the Archives New Zealand standard and requirements.

Information management processes occur at a department level, and as such, each team has different information management processes depending on their function. The processes are not always formally documented. Instead, information management processes are communicated to most staff through induction training or as they learn on the job. Staff interviewed had an awareness of their general roles and responsibilities for information management as their induction training referred them to MIT's policies and their day-to-day tasks involve information management practices. Some departments, such as the AskMe team, have received additional training on information management.

MIT has additional department-specific procedures, such as file storage protocols, to ensure consistency across the academic team's use of files and folders and naming conventions. All staff interviewed expressed knowledge of how to access these documents and the Policy on their intranet as required.

### *Recommendations*

Revise the Records Management Policy to ensure it is up to date and reflects the current legislation and the Archives New Zealand standard and requirements.

## **TOPIC 3 – Governance arrangements and Executive Sponsor**

**Progressing**

### *Summary of findings*

MIT does not have a separate information management governance group. However, the ELT discusses information management matters when shared by the Executive Sponsor.

The results of the Annual Legislative Compliance questionnaire are reported to the Executive Sponsor and members of the ELT. The questionnaire seeks to confirm that each department maintains full and accurate records and that these are maintained and/or disposed of in accordance with the PRA. MIT also conducts an Information Security Assessment, which is an audit of their physical records to confirm storage suitability. The results of this review are communicated verbally to the Executive Sponsor. If any matters needing attention are found, these are then passed on to the ELT for consideration. However, the ELT does not receive regular reporting on wider information management matters from the Executive Sponsor.

The Executive Sponsor performs their oversight and monitoring role in relation to information management. When required, the Executive Sponsor provides support to staff members in roles relating to information management, such as the Senior Legal Counsel and the Acting Head of Technology Services. The Executive Sponsor also actively champions information management within MIT, such as investing in the migration to SharePoint in 2019.

### *Recommendations*

Design and implement regular reporting that provides useful and actionable information to the Executive Sponsor that can be provided to the ELT.

## **TOPIC 4 – IM integration into business processes**

**Managing**

### *Summary of findings*

Staff interviewed were aware of their responsibilities for the management of information within their teams. New staff members receive induction training which includes some reference to information management processes and are provided ongoing support where needed. This has led to a good awareness in MIT of the information management practices in relevant departments.

As issues with the management of information that impact business processes and activities are identified by staff, the department managers address these issues directly with relevant stakeholders. If required, an issue may be escalated to the Senior Legal Counsel or the Technology Services team, depending on the nature of the issue.

Department managers are responsible for ensuring information management requirements are integrated into their teams' core business processes and activities. We note that MIT does not have an information management specialist. However, the Senior Legal Counsel and/or the Acting Head of Technology Services are consulted on information management matters as needed. Due to this structure, information management expertise has not been regularly included in business process change and development.

### *Recommendations*

Review the information management staff capacity against MIT's business needs to allow further involvement of information management expertise in wider MIT processes and strategic business activities.



***Summary of findings***

Two external contracts were identified by MIT, an IT helpdesk provider and a collaborative offsite storage and destruction of records contract. These do not meet the definition of a relevant outsourced function or collaborative agreement.

While they are not relevant in this instance, both contracts outline the management, retention, and security of the information. The IT provider contract is based on MIT's Contract for Supply of Goods and Service and therefore we find MIT would be in a good position by using this contract should they require outsourced functions or collaborative agreements in the future.

***Recommendations***

Ensure that where functions are outsourced or there are collaborative arrangements, include an additional information management clause in relation to the risks of non-compliance of either party, outlining the mitigation of these risks and the consequences of non-compliance.

***Summary of findings***

MIT has an internal Te Tari Mātauranga Māori (Māori Education Office), which monitors and manages Māori-specific information, data, and research.

The Deputy Chief Executive Māori has an awareness of the information held that is of importance to Māori, such as formal agreements and contracts with Māori stakeholders. While there is currently no register for this, the Deputy Chief Executive Maori was open to the possibility of developing a register in the future.

MIT has a partnership agreement with the Waikato-Tainui in accordance with MIT's commitment to Te Tiriti o Waitangi. This agreement did not refer to information management within the Kawenata (Agreement) between MIT and Te Whakakitenga o Waikato Incorporated. It was noted during interviews that this document is currently under review.

***Recommendations***

Work with the Te Tari Mātauranga Māori to formally define and identify information of importance to Māori that MIT holds, and document this within an information asset register.

## 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

Progressing

#### *Summary of findings*

There is no regular, formal monitoring of information management compliance within MIT's departments. Instead, issues around information management are discussed with the team on an informal, as required basis. Staff interviewed noted they would feel empowered to speak up if there was any evidence of non-compliance with any of the organisation's policies, including the Records Management Policy.

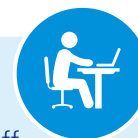
MIT has a formal Annual Legislative Compliance questionnaire that is distributed to managers of relevant departments of MIT to complete. The scope of the survey includes the key legislation that MIT is required to comply with. In relation to the PRA, participants are asked to confirm that their department maintains full and accurate records and that these are maintained and/or disposed of in accordance with the PRA. Staff complete the self-assessment, assessing their team's compliance with these factors across the year. The results of the self-assessment are reported to the Executive Sponsor and members of the ELT. If any issues were identified from the survey, they would be addressed in a timely manner, depending on the nature of the issue identified.

In addition to the survey, annual Information Security Assessments are carried out which assess the storage and security of physical records around MIT. We note that the last of these was carried out in 2019. If there are any issues identified from this assessment, they are promptly resolved by communicating with the relevant staff member. Findings from this assessment are not documented in a formal report, although a verbal report of the assessment is provided to the ELT.

#### *Recommendations*

Establish a regular and proactive approach to monitoring compliance throughout MIT, supplementing existing annual reports.

## 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

#### Beginning

#### *Summary of findings*

There is limited capacity for MIT to actively drive information management activities that would be required to improve the maturity of information management practices. The Senior Legal Counsel takes on MIT's primary information management activities, with other activities shared among staff. Due to the Senior Legal Counsel's day-to-day demands, they cannot actively champion information management within the different departments across MIT. We note, however, that the Senior Legal Counsel has previously provided training to staff around information management and would again upon request.

Due to resourcing constraints, information management activities are shared amongst staff and performed on an infrequent basis as business-as-usual tasks are prioritised. There has been no assessment undertaken to determine if more information management resources are needed at MIT, although interviewees acknowledged some lack of capacity within the organisation.

#### *Recommendations*

Assess information management capacity requirements against business needs and recruit information management staff if needed.

### TOPIC 9 – IM roles and responsibilities

#### Progressing

#### *Summary of findings*

Staff interviewed at MIT had an appropriate awareness of their information management responsibilities. There is a formal induction process for all new starters at MIT where staff are directed to their department's relevant policies and procedures. Additional training or training resources are provided when new systems are introduced into the business. For example, training was offered to all staff when SharePoint was introduced, which was compulsory for the academic department. Additional training resources were also emailed to staff. Additional training is provided to staff as required or when requested by team leaders. For example, the AskMe team handle public records and sought additional training. This was provided by the Senior Legal Counsel and supported by their Training and Development Lead.

All employment agreements at MIT include a statement outlining that compliance with MIT policies is required. This broad requirement doesn't explicitly reference the Records Management Policy, but this is a policy that staff must comply with. The job descriptions of some staff members, such as those in the AskMe team, includes an information management clause. Their information management compliance also forms part of their performance review. However, this reference to information management in job descriptions is rare across MIT.



## Recommendations

Develop and deliver information management specific induction training and regular refresher training to all staff.

### 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

MIT staff indicated that they understand and comply with their obligations to create full and accurate records.

Information is routinely created and captured as part of all business functions and activities. All staff interviewed said they understood how to create and capture information in SharePoint, including saving documents. Each department has a varied filing structure to store records. Some departments rely on other systems to capture information, such as the AskMe team, which uses a customer relationship management (CRM) system for managing enrolments.

Digital information is primarily created in controlled environments, such as SharePoint, to ensure usability and reliability. However, there is no structured approach to monitoring and addressing information usability, reliability, and trust issues within systems used at MIT. Staff can use personal hard drives on MIT computers to transfer information. Hard drives are uncontrolled, and there is no monitoring or oversight performed over what information is created and saved on these drives.

SharePoint captures all the minimum metadata required by Archives New Zealand to support usability, reliability and trustworthiness of the information.

### Recommendations

Formalise oversight and monitoring over personal hard drives to ensure staff keep information in controlled environments.

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

Beginning

### Summary of findings

There is an understanding of what information may be considered high-value or high-risk across MIT. However, there is no formal identification of or management plan for MIT's high-value or high-risk information assets.

Some departments document the information that they store. For example, the Legal team has a Contracts Database, which is a document that outlines the contracts that MIT currently has, and those that have expired. However, this level of documentation is not consistent throughout MIT.

Without an inventory of this information, it is not possible to have a long-term management plan for this type of information.

## Recommendations

Create an information asset register that identifies the information that is high-value or high-risk to MIT and develop a plan for the long-term management of this information across the organisation.

## 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

In the absence of an information management specialist, the Senior Legal Counsel and the Acting Head of Technology Services take on information management activities, where they coincide with their business-as-usual activities. However, the Senior Legal Counsel and the Acting Head of Technology Services have inconsistent involvement in new and upgraded business systems. This is because their roles at MIT are largely consultative and therefore, their involvement in information management is contingent on the relevant department actively seeking their advice. These staff members are typically relied on by the different departments, and their knowledge would likely be sought in the future in relation to new and upgraded business systems. For example, the Acting Head of Technology Services and his team were involved in the development of the business case for the ECM transition to SharePoint.

MIT does not currently document standardised information management requirements for new and upgraded business systems. Ensuring that all necessary project developments (and the information management implications) are documented is vital to the introduction of new systems.

SharePoint captures all of the minimum metadata requirements set out by Archives New Zealand. However, MIT's other systems such as their learning management system were not designed to capture such metadata and therefore do not meet the Archives New Zealand standard.

### Recommendations

Create standardised information management requirements for new and upgraded business systems and ensure the formal inclusion of information management expertise as part of this process.

## TOPIC 13 – Integrity of information

Progressing

### Summary of findings

There are localised information management practices across MIT. The information management approaches are decided upon within each department. While there are staff with knowledge on information management, such as the Senior Legal Counsel and the Acting Head of Technology Services, who assist when consulted, there is a risk that the quality of information management differs across MIT.

Staff provided variable experiences when trying to find and retrieve information within SharePoint. These experiences highlighted that they were not always confident that the information was comprehensive and complete, often relying on advice from other staff members to give them confidence. The academic schools within MIT have a detailed file structure and naming conventions in SharePoint, which are highly regarded and allow for efficient document sourcing. However, the file structure is not documented in other areas of MIT.

### *Recommendations*

Formally define and implement information processes across MIT's departments to ensure the quality of information management practices.

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## **TOPIC 14 – Information maintenance and accessibility**

**Progressing**

### *Summary of findings*

Preservation needs for physical information are considered by keeping physical files in a filing system on MIT's premises or in a commercial storage facility. The legal team keep a register of high-value physical information such as contracts. However, new contracts are now digitised once signed, with the physical copies filed securely. In contrast, other departments maintain their physical records using undocumented filing methods.

During the recent migration to SharePoint, all digital records were migrated from the old ECM system. The migration was planned, and file sizes being transferred were monitored as a proxy for whether all documents were successfully migrated.

The preservation requirements of digital information have been considered, giving some thought to technology obsolescence. For example, MIT uses Microsoft 365, which is an 'evergreen' product to mitigate some obsolescence risks, alongside a hardware refresh every five years.

### *Recommendations*

Undertake a formal and periodic review to identify whether any business or process changes are likely to impact the accessibility of information, giving proactive thought to the preservation of systems.

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

**Progressing**

### *Summary of findings*

MIT has two business continuity plans (BCP), the 'Learning and Teaching Business Continuing Plan v2 for Covid-19', last reviewed on 26 March 2020, and the 'ICTS Business Continuity Plan', last updated on 26 August 2019.

The ICTS Business Continuity Plan provides an overview of MIT's ICT requirements during a period of disruption, particularly how to access information systems remotely. The BCP also includes potential scenarios, their impact, the actions required to remedy the issues, and who holds responsibility. In addition, the Learning and Teaching Business Continuing Plan v2 for Covid-19 provides an overview of MIT's academic continuity plan which outlines access to relevant teaching and learning management systems.

The BCPs do not outline the plan for accessing physical documents. However, the staff interviewed outlined that documents filed in their physical formats are rarely required in day-to-day tasks. The information required during a business disruption is stored digitally to ensure accessibility, which is outlined in the ICTS Business Continuity Plan.

### *Recommendations*

Test the business continuity plans regularly, ensuring that backups of digital information are working and that SharePoint and other information systems are accessible remotely.



## 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

Progressing

#### *Summary of findings*

MIT has protection and security controls in place for physical and digital information. Physical information is stored locally within MIT's premises\*. Information is appropriately labelled and protected against hazards such as fire, with storage rooms having sprinkler systems installed, and a halogen fire suppression system in the data centre. Physical information is under swipe access, with access limited to approved personnel. MIT also has an offsite commercial storage provider where historical information is kept using a filing system.

Digital information is largely stored in SharePoint, with additional information saved to relevant systems such as the student and learning management systems. Access to data in SharePoint requires two-factor authentication and is restricted to permissions set by IT staff or the folder owner. For example, the personal information of staff can only be accessed by the People and Culture team.

There is currently no regular reporting of information protection and security risks to the Executive Sponsor. Without regular reporting, the Executive Team cannot effectively support the remediation of any of MIT's information protection and security risks.

#### *Recommendations*

Periodically review the physical and digital storage environments and the protection and security in place to confirm controls are effective, appropriate, and relevant and report the findings to the Executive Sponsor.

*\*Note that KPMG were unable to examine the physical storage sites as Auckland was in alert level 3 during the field work and the audit team was not able to access the building. Therefore, the assessment has been performed based on information obtained during the interviews.*

## 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

Progressing

#### *Summary of findings*

Staff understand how to use MIT's business and information systems as this is covered as part of their onboarding or ongoing on-the-job training. MIT takes a decentralised approach to information management where each department is responsible for maintaining their folders, leading to varying quality. For example, the schools within

MIT follow a strict file plan outlining correct filing structures and naming conventions. In contrast, other departments use logical yet undocumented structures that are learnt on-the-job. Where staff require information from different departments, these differing information management processes can slow the process of accessing required files, as staff are often reliant on their colleagues sourcing the information on their behalf. SharePoint meets Archives New Zealand's minimum metadata requirements, and staff should make use of this metadata to improve findability across the organisation.

Staff interviewed were knowledgeable on how to use systems and when their roles required them to create, control and facilitate access to information. If they identified information management issues, staff understood that the individual departments are responsible for information management and that guidance could be sought from the Senior Legal Counsel and the Acting Head of Technology Services as needed.

Information is controlled by restricted access to systems and folders by the file owners. Access may be requested at any time to the IT team or the file owner on SharePoint, with access being revoked once the documents are no longer required. For example, MIT's internal auditor may require access to a People and Culture folder for their work, but their access is revoked once the information is no longer required for the audit. Physical documents in file rooms also have restricted access, which is controlled by the security department, who can grant and revoke access. For example, the location of contracts may only be accessed by the legal team, limited IT and security staff by using their swipe access. When sharing physical information with MIT's commercial storage facility, there are department-designed information management processes to ensure future findability.

### ***Recommendations***

MIT should perform active maintenance of metadata and file plans in the ECM through periodic testing to ensure minimum metadata is being captured and appropriate file plans are followed across the organisation, to support the reliable management and discovery of information.

## **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**

## **Managing**

### ***Summary of findings***

MIT is part of a General Disposal Authority that applies to all institutes of technology & polytechnics (ITPs) in New Zealand with the exception of Southern Institute of Technology. This disposal authority covers all information formats and business functions. The disposal authority is due to expire in 2022, but there is an expectation that this will be extended to 2024 as the industry transitions to Te Pūkenga.

Given this is a general disposal authority relevant to ITPs, MIT does not have a regular review cycle to ensure that the disposal authority reflects business and legislative changes.

While staff and contractors have a general awareness of their responsibilities relating to disposal of information, training on disposal requirements for MIT is not consistently provided as part of their induction. Staff regularly consult MIT's Senior Legal Counsel to confirm disposal requirements for documents, and the disposal authority is shared with these staff members.

### *Recommendations*

Provide formal refresher training to staff and contractors on disposal requirements relevant to the information they create and use.

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## **TOPIC 21 – Implementation of disposal decisions**

**Beginning**

### *Summary of findings*

MIT can dispose of records under their current general disposal authorities. Disposal actions have been carried out historically for physical and digital information, but not routinely. No recent disposal actions have been taken against physical and digital records. During the recent migration to SharePoint, no disposal decisions were made. Physical documents held in storage are not regularly reviewed for disposal.

MIT staff understand that their records must be retained for a minimum period, following their general disposal authorities. However, MIT has identified that more resourcing is required to review older content to identify what may be disposed of under the disposal authority.

### *Recommendations*

Develop a plan to ensure adequate resources are assigned to carry out disposal actions routinely, for both physical and digital information.

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## **TOPIC 22 – Transfer to Archives New Zealand**

**Beginning**

### *Summary of findings*

Based on Archives New Zealand's requirements, records older than 25 years should be transferred to Archives New Zealand. As MIT is over 25 years of age, they are required to identify if they have information of this age that can be transferred. However, MIT has not undertaken a recent assessment to identify what physical or digital records over 25 years are in their possession. They are currently completing an audit to identify what records are held by the commercial storage facility, providing an opportunity to identify the age of records held.

### *Recommendations*

MIT should identify records that are over 25 years. Records older than 25 years should either be transferred to Archives New Zealand, or a deferral of transfer should be agreed with Archives New Zealand.





## 6. Summary of feedback

We have a strong compliance culture at MIT and our teams pride themselves on managing information well. However, we generally accept the recommendation for improvement regarding documenting our processes and information. We also accept that there needs to be an increasing focus on disposing of information and sending information to Archives New Zealand (in addition to MIT's current focus on managing and retaining key business information).

As noted in the Executive Summary, MIT will be merged into Te Pūkenga by 31 December 2022. As we prepare for the merger, we are receiving increased policy guidance and operational input from Te Pūkenga. With only a year left in existence for MIT as a standalone organisation, any significant changes are unlikely to be implemented.

[kpmg.com/nz](https://kpmg.com/nz)





19 May 2022

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Tēnā koe Gus

### **Public Records Act 2005 Audit Recommendations**

This letter contains my recommendations related to the recent independent audit of the Manukau Institute of Technology (MIT) 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. Manukau Institute of Technology's IM is assessed as being mostly at the 'Progressing' maturity level. We have prioritised the recommendations from the audit report in the Appendix.

We are aware that the restructure of the Institutes of Technology and Polytechnics (ITPs) sector and the merger of individual ITPs into the New Zealand Institute of Skills and Technology (Te Pūkenga) entity in 31 December 2022 will impact the implementation of IM activity.

Once well established, it is probable that Te Pūkenga will support the adoption of new systems and platforms from a common set of interoperable applications and tools. It is expected that the operations, systems and activities of ITPs will continue unchanged for some time while Te Pūkenga is being established. Therefore, work to improve IM maturity can be started at MIT where it is useful and pragmatic to do so while keeping the future in mind. Our comments in the Appendix are intended to support that approach and we will assist in the follow up phase to ensure that work related to the recommendations is fit for the changing environment.

As one of the largest providers of technical, vocational and professional education in Aotearoa New Zealand, MIT will have a significant contribution to make to any IM maturity development across the sector.

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

### ***What will happen next***

The audit report and this letter will be proactively released on the Archives website shortly. We would be grateful if you would advise of any redactions that your organisation considers are necessary 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



Honiana Love  
Acting Chief Archivist Kaipupuri Matua  
**Archives New Zealand Te Rua Mahara o te Kāwanatanga**

Cc Michelle Teirney, Chief Financial Officer and Director Corporate Services  
[michelle.teirney@manukau.ac.nz](mailto:michelle.teirney@manukau.ac.nz) (Executive Sponsor)

## APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
<b>Governance</b>	1: IM strategy	<i>Develop an information management strategy following Archives New Zealand's guidance. The information management strategy should be approved by the Executive Leadership Team (ELT)</i>	Working with Te Pūkenga to develop, implement and monitor an IM strategy for physical and digital information including an associated roadmap would be a pragmatic start to improving IM across the organisation and sector. It would also help to determine the staffing capacity needed within the organisation and potentially assist understanding of the level of staffing required across the sector.
Governance	3: Governance arrangements and Executive Sponsor	Design and implement regular reporting that provides useful and actionable information to the Executive Sponsor that can be provided to the ELT.	Regular proactive reporting from self-monitoring is important in making IM issues visible to the ELT and to manage identified risks.
<b>Capability</b>	8: Capacity and capability	Assess information management capacity requirements against business needs and recruit information management staff if needed.	This is fundamental to support IM improvement. Identification of requirements should consider BAU needs and the strategic roadmap in consultation with Te Pūkenga.
Creation	10: Creation and capture of information	Formalise oversight and monitoring over personal hard drives to ensure staff keep information in controlled environments.	Staff use of hard drives should be controlled and monitored and any impediments to the consistent use of SharePoint addressed.
<b>Creation</b>	11: High-value/high-risk information	Create an information asset register that identifies the information that is high-value or high-risk to MIT and develop a plan for long-term management of this information across the organisation.	This will enable a shared understanding of what is high-value / high-risk information and enable risks to information to be identified and managed. This would be valuable for use across Te Pūkenga.

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
<b>Management</b>	12: IM requirements built into technology systems	<i>Create standardised information management requirements for new and upgraded business systems and ensure the formal inclusion of information management expertise as part of this process.</i>	IM expertise is necessary for this work and MIT should ensure that the requirements are understood so that any new and upgraded systems meet the requirements as appropriate.
<b>Access</b>	18: Information access, use and sharing	<i>MIT should perform active maintenance of metadata and file plans in the ECM through periodic testing to ensure minimum metadata is being captured and appropriate file plans re followed across the organisation, to support the reliable management and discovery of information.</i>	To ensure ease of use and sharing across the organisation, a consistent approach to file structures should be encouraged and monitored.
<b>Disposal</b>	21: Implementation of disposal decisions	<i>Develop a plan to ensure adequate resources are assigned to carry out disposal actions routinely, for both physical and digital information</i>	MIT acknowledges in Section 6: <i>Summary of feedback</i> of the audit report that there needs to be an increasing focus on disposal including transfer to Archives New Zealand. This work should be included when assessing IM capacity requirements.