Public Records Audit Report for Te Wānanga o Aotearoa

Prepared for Te Rua Mahara o te Kāwanatanga Archives New Zealand

June 2024

Disclaimers

Inherent Limitations

This report has been prepared and is delivered by KPMG, a New Zealand partnership (KPMG, we, us, our) subject to the agreed written terms of KPMG's CSO with the Department of Internal Affairs (Client, you) dated 26 November 2020 (Engagement Contract).

Unless stated otherwise in the Engagement Contract, this report is not to be shared with third parties without KPMG's prior written consent. However, we are aware that you may wish to disclose to central agencies, relevant Ministers' offices, monitoring agencies/departments or other specific Crown Ministries or Departments consulted on this work elements of any report we provide to you under the terms of this engagement. In this event, we will not require central agencies, relevant Ministers' offices, monitoring agencies/departments or other Crown Ministries or Departments consulted on this work to sign any separate waivers.

The services provided under our Engagement Contract (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/information provided by the Department of Internal Affairs and Te Wānanga o Aotearoa. 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. Nothing in this report constitutes legal advice or legal due diligence and you should not act upon any such information without seeking independent legal advice.

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, Te Wānanga o Aotearoa management and personnel / stakeholders consulted as part of the process.

This report was based on information available at the time it was prepared. KPMG is under no obligation in any circumstance to update this report, in either oral or written form, for events occurring after the report has been issued in final form.

Third Party Reliance

This report is solely for the purpose set out in Section 2 and 3 of this report and for the Department of Internal Affairs 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 the Department of Internal Affairs, none of KPMG, any entities directly or indirectly controlled by KPMG, or any of their respective members or employees assume 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 Te Rua Mahara o te Kāwanatanga Archives New Zealand (Te Rua Mahara) in accordance with the independence requirements of the Public Records Act (PRA) 2005.

Contents

1. Executive summary

Te Wānanga o Aotearoa (TWoA) is one of three formally constituted Wānanga under s398D of the Education and Training Act 2020. TWoA, and its originating organisations, were created to increase Māori participation in tertiary education by taking education to the people. Waipā Kōkiri Arts Centre, established in 1984, provided programmes such as whakairo (carving), raranga (weaving), Te Reo Māori, office administration, computer technology studies and trades-training programmes in building and plumbing. In 1989, Waipā Kōkiri Arts Centre became the Aotearoa Institute, New Zealand's first private training establishment. In 1993, Aotearoa Institute gained tertiary status as a wānanga under s162 of the Education Act 1989, and in 1994, changed its name to Te Wānanga o Aotearoa. TWoA has multiple campuses throughout the country, as well as other learning centres in local communities. With a strong focus on Māori values and traditions, TWoA plays a crucial role in the preservation and promotion of Māori language and culture in New Zealand. Through this, TWoA creates high-value public records including research and analysis, monitoring information, reporting, and policy, and student records.

TWoA employs more than 1,350 staff across New Zealand. The Business Intelligence team, made up of three staff, is responsible for the management of information at TWoA as well as other tasks.

TWoA manages information in collaborative workspaces including the M365 environment which includes Teams, SharePoint and business systems such as Salesforce and Boardbooks. Most records are maintained electronically, however, there is a large number of physical records held on-site.

TWoA information management (IM) 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	13
Managing	0
Maturing	0
Optimising	0

2. Introduction

KPMG was commissioned by Te Rua Mahara to undertake an independent audit of Te Wānanga o Aotearoa under section 33 of the PRA.

Information management practices at TWoA were audited against the PRA and the requirements in the [Information and records management standard](#) (the Standard) as set out in the Te Rua Mahara IM Assessment.

Te Rua Mahara provides the framework and specifies the audit plan and areas of focus for auditors. Te Rua Mahara 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 and writing the audit report. Te Rua Mahara 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 TWoA including both physical and digital information.

The audit involved reviews of selected documentation, interviews with selected staff, including the Executive Sponsor, IM staff, the information technology team, and a sample of TWoA staff. The Executive Sponsor is the Senior Responsible Officer for the audit.

The audit reviewed TWoA IM practices against the PRA and the requirements in the Standard and provides an assessment of current state maturity. As part of this audit, we completed systems assessments over TWoA key systems that act as a repository for public records. The systems assessed were M365 Teams, SharePoint, Salesforce, and Boardbooks. 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. TWoA 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 Te Rua Mahara	●				

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   Beginning

Summary of findings

TWoA does not have an IM strategy in place to provide strategic direction for IM within the organisation. There has been some internal discussion around producing an IM strategy as senior management acknowledge that this is an important focus for TWoA, however, there are no documented plans to develop an IM strategy.

TWoA has a Digital Strategy that documents a general roadmap to guide digital activities. However, this does not cover elements of an IM strategy expected by Te Rua Mahara:

- The responsibilities for information and records management

- The risks of not managing information and records

- How the strategy fits with applicable laws, standards, business plans and other strategic requirements for your organisation

- How the strategy covers information and records in all formats and locations.

Recommendation

Develop a plan and timeline for completion and approval of an IM strategy.

Summary of findings

TWoA has a Data, Information, and Records Management Policy (the Policy) that was approved by Te Ohu (Policy Committee), Te Arai Tupono (Audit and Risk Committee), and Te Mana Whakahaere (TWoA Council). The Policy was last reviewed in 2021. The Policy is introduced to all staff during their induction process, however, changes made to the Policy are not communicated to staff. The Policy is available to all staff on the intranet.

TWoA have identified risks of non-compliance with the Policy, and as a result, an implementation plan was developed to carry out activities to meet the Policy requirements. The implementation plan encompasses the following phases:

- Prepare: the prepare phase is about foundational work on which further IM capability can be built. It includes setting up the minimum required IM governance mechanisms, understanding digital information landscape and establishing consistent ways to organise digital information.

- Deliver: the deliver phase is about building, configuring, and implementing IM systems and processes to make managing information easier for kaimahi.

- Sustain: sustain phase is about ensuring kaimahi know how to use the systems and processes, and that through monitoring and review.

TWoA are currently undergoing the 'Prepare' phase and developing process documents to support the Policy.

Recommendations

Create process documentation to support the Policy.

Regular review the Policy to ensure IM roles and responsibilities are up-to-date.

TOPIC 3 – Governance arrangements and Executive Sponsor   Beginning

Summary of findings

The incumbent of the Executive Sponsor is new to the role, and new to TWoA. Nine weeks into the role, the Executive Sponsor is still to understand the oversight expectations of the role.

Recommendations

Seek support from Executive Sponsors in similar organization to increase understanding of the role of the Executive Sponsor.

Establish or include within an existing group a governance group, which includes the Executive Sponsor, that can champion IM within the organisation.

TOPIC 4 – IM integration into business processes   Progressing

Summary of findings

Information management responsibilities are not assigned to business owners. TWoA staff that are subject to frequent audits of their business functions, such as HR and Finance, demonstrated an understanding of their IM responsibilities. These responsibilities include ensuring their business functions retain key information and maintain restricted access to sensitive information. Overall consensus from group interviews is managers are helpful and supportive.

Part of the implementation plan as mentioned in Topic 2 – *IM Policy and processes,* includes the identification of business owners and their IM responsibilities, reviewing core business processes and activities to identify IM requirements and gaps. It is recognised that IM personnel have high capability to assist but low capacity currently to administer their plans.

Recommendation

Educate all business owners on their roles and responsibilities for IM.

TOPIC 5 – Outsourced functions and collaborative arrangements   Beginning

Summary of findings

TWoA has a standard records management clause included as part of the 'Contractor Record Keeping Appendix' in the standard service contract template. This clause requires contractors to *meet the statutory responsibilities detailed in the Data, Information, and Records Management Tikanga Whakahaere*. This is in reference to the DIRM policy.

Information management staff do not have oversight over whether additional information management and record keeping requirements are included in contracts developed by TWoA.

TWoA does not monitor contracted parties to ensure IM requirements are met.

Recommendation

Ensure sufficient detail is included in contracts to protect information creation and management.

TOPIC 6 – Te Tiriti o Waitangi   Progressing

Summary of findings

TWoA is currently identifying information of importance to Māori by developing an appraisal report for the disposal schedule. This involves identifying critical, high value, high risk and special significance to Māori. They are nearly done with the appraisal process and starting to ID specific records series of significance. These assets will be flagged in the Information Asset Register once the first phase is complete. The significance of protecting Māori rights and driving positive outcomes is well recognised within TWoA.

Once the current information inventory is completed, there are plans to formally identify information of importance to Māori via MS Tooling within the Microsoft Environment. TWoA is considering using the Māori subject headings from the National Library for tagging information.

Information management implications from within ToW settlement agreements and other agreements with Māori are acknowledged but the practical application of them for IM practices are not documented and well understood.

Recommendation

Identify all information of importance to Māori considering the role of TWoA.

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

Business unit process reviews include IM in that they check the correct information has been created and stored within official record keeping repositories. However, these reviews are often done without reference to the IM team. Business needs may be met but compliance is not assured, e.g. the process includes saving documents to a shared drive without required metadata. This monitoring is not done against the PRA and the Standard.

An internal audit report was generated in 2022 to provide a 'snapshot' of records and information management processes as at the time of the review. They found significant weaknesses in the control environment and/or instances of non-compliance with the PRA and the Standard, such as "Uepū and/or individual kaimahi creating their own systems for managing information, as well as creating sets of non-standardised data and then extracting that information for their use". Additionally TWoA identified instances where "information and data are not stored in TWoA controlled systems and/or information repositories being stored on desktops and in other external spaces like GoogleDrive, Dropbox, and online apps".

Recommendation

Implement corrective actions to address instances of non-compliance identified in the internal audit report.

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

TWoA had performed a self-assessment of IM maturity in September 2021. However, since then, there has been a loss of IM capacity due to staff vacancy and the increase in volume of information has been exponential. TWoA has recognised the need to recruit more IM staff to increase capacity.

Information management staff said that they have enough IM capability. Each year, the IM team submit and record key performance indicators (KPIs) for each staff member and subsequently identify any training needs to help achieve those KPIs. HR has a fund for training that can be applied for anytime through a formal approval process.

Recommendation

Ensure that IM capability and capacity is regularly assessed and monitored against business needs.

Summary of findings

TWoA has made the decision to not include IM responsibilities in all job descriptions.

TWoA has training modules uploaded to their Intranet that cover basic IM practices such as the importance of IM and guidance on retention and disposal responsibilities. These are reviewed to provide more depth of guidance, and some will soon be uploaded. However, while this training is not compulsory, a request has been lodged with HR to make it compulsory. IM staff are unsure if IM responsibilities are commonly discussed as part of Kaimahi Ora (performance conversations).

Recommendation

Include mandatory IM training as part of the induction process.

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

Generally, staff and contractors are aware that they need to create records of their business activities and TWoA knows the evidence which needs to be captured.

Most of the information is captured within controlled environments, including business systems and also in shared drives. As well, some information is captured in uncontrolled environments such as personal drives, iCloud storage, Dropbox, and various Google solutions. As a result, it is more difficult to manage access and record keeping.

Appropriate metadata is sometimes created to support the usability, reliability, and trustworthiness of information. This is because metadata must be manually applied for the most part for information held within business systems and shared drives.

Recommendation

Educate staff on using correct systems and formalise oversight and monitoring over their shared drive platforms and personal drives.

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

Summary of findings

TWoA has an inventory of some information assets created and maintained across the organisation, this inventory is maintained on the intranet. TWoA acknowledged that this is an incomplete inventory and are still in the process of identifying all information assets.

High-value/high-risk assets have not been formally identified within the inventory.

Recommendation

Complete the stocktake of high-value/high-risk information assets created and maintained across the organisation and document this within the inventory.

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

Information management expertise is sometimes involved in decisions relating to new and upgraded business systems. The Business Intelligence Team has been involved with an internally developed moderation application.

Information management expertise is involved in the decommissioning of systems. TWoA are currently decommissioning an internal server that holds student resources, and the Business Intelligence Team are responsible for advising on how long information is required to be retained and how information can remain useable and accessible when this information is migrated to the new system.

TWoA business systems sometimes include minimum metadata requirements where applicable. Information stored on Teams creates a unique identifier, name, date created, and creator but does not have metadata associated with actions carried out on the record, identification of the persons or systems carrying out these actions, and the dates these actions were carried out.

In decommissioning a SaaS system currently, they had discussions on how long information is to be retained and mechanisms to ensure future usability. In terms of overall IM requirements, these are not standardised for new systems and only considered as part of business cases, where IM considerations may be overturned due to business needs.

Recommendation

Assess where possible existing systems can be improved to include minimum metadata requirements and make required changes.

TOPIC 13 – Integrity of information   Progressing

Summary of findings

TWoA current IM practices localised to business functions e.g., HR requirements and processes ensure reliable and trustworthy information such as consistent naming conventions and restricted access to information. These localised IM practice ensure integrity, but the same rigorous processes aren't replicated across the organisation so cannot guarantee organisation-wide information integrity. There is also a lack of appropriate metadata.

Staff experience with retrieving physical information relevant to their business function is easy to find but have noted during internal surveys that finding digital information and information from other business functions can be difficult e.g. unsure on where/how information saved.

The IT team is developing data quality processes by sifting through student information to have information verified via a 'tick' process. This 'tick' verifies the integrity for high value information for example, student address details are given tick verifying accuracy to ensure it is reliable and trustworthy.

Staff and contractors are aware that the information they create and manage should be comprehensive and complete as a requirement of their role.

Recommendation

Identify which IM practices need to be improved to ensure that information is reliable and trustworthy and develop a plan for implementation.

TOPIC 14 – Information maintenance and accessibility   Beginning

Summary of findings

There are no documented strategies in place to manage and maintain physical or digital information during business and system changes. There are no specific strategies documented by IM or IT. TWoA have informal process when changing a system where they decide how to achieve it case-by-case based on the significance and complexity of the change.

Some risks to the ongoing accessibility of digital information are identified during system change (e.g. keeping old system active in case information isn't migrated correctly).

Preservation needs for physical information have been identified in their Physical Storage Policy.

Digital recovery is addressed in the ICT Disaster Recovery Plan regarding servers, local hardware, and software. However, there is no digital continuity plan.

Recommendation

Develop strategies to manage and maintain digital information during business and system change.

Summary of findings

The Business Continuity Plan (BCP) which covers all business functions initially looks at people and safety, then re-starting digital systems. Critical information is not identified in the BCP. The BCP does not include the salvage and restoration of physical business information.

The BCP has no specific input from IM team, it was created in June 2023 with the next review scheduled for June 2024 as an annual review. An ICT Disaster recovery plan exists covering on-premise WLAN/WIFI, software, physical hardware and servers. Business systems and physical records are out of scope in that document. Parts of the BCP are tested regularly, with several aspects tested.

Recommendation

Identify critical information and include this in the business continuity plan.

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

There is protection and security in place for some physical information against unauthorised access, loss, or destruction. Access to storage areas that contain physical information held on-site are under lock or key cards assigned through the Security team. Only relevant personnel have access to physical storage, and access is only provided if required for a business function e.g., HR for student records.

There is appropriate security in place for digital information against unauthorised access with role-based access controls. These are frequently changed so there is consistent oversight, however there are no detailed tests to assess the effectiveness of access controls. There are no controls in place to prevent unauthorised deletion of digital information on shared drives. There are also no audit logs available to record what information has been deleted off shared drives.

Information protection and security risks are recorded in a risk register which includes information and records management risks, information security risks, privacy related information risks and general IT related risks which can include risks to systems of record. Physical records are boxed and tagged in transit using the industry provider for transfer to offsite storage. Digital information is encrypted in transit to Azure servers holding data offsite.

Recommendation

Migrate digital information to controlled environments to mitigate the risk of unauthorised deletion of digital information.

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 are generally able to find and access the information they require day-to-day; most files are on read-only access. However, finding digital information created by different departments can be difficult. As there are no standardised naming conventions, this creates cross-functional issues with findability and accessibility across different departments.

Access controls are available in systems but are not documented.

Minimum metadata requirements are not met, as metadata excludes the business activity type across all systems. There is no taxonomy or file plan consistent across SharePoint. There is currently no training provided on the use of metadata, however, TWoA staff demonstrated a willingness to engage in metadata training.

Recommendation

Develop a taxonomy/file plan to ensure all information captured on appropriate systems meets Te Rua Mahara minimum metadata requirements.

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 Te Rua Mahara (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

TWoA has an organisation-specific disposal authority that has been extended to 2025, however this does not cover all functions. TWoA are currently reviewing the disposal authority to address this.

There is a culture at TWoA to retain all information. There is currently no staff training regarding their disposal requirements relevant to the information they create and maintain.

Recommendations

Update the organisation-specific disposal authority to cover all functions.

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

TOPIC 21 – Implementation of disposal decisions | Progressing

Summary of findings

The general policy at TWoA is that everything is kept (certainly for digital information); there is no formal disposal of digital information in line with general or organisation-specific disposal authorities. TWoA acknowledged that it holds a significant amount of data, and senior management is aware that disposal actions are required to be performed.

Disposal actions are documented for physical information in the Physical Disposal Register. Destruction of physical information is performed by a third-party provider.

TWoA digital systems are not configured to apply retention labels or to capture disposal metadata. Any personal deletions on local or personal drives by staff are not known as this is not monitored. There is no functionality to perform compliant disposal actions in digital systems, therefore staff tend to retain all information. TWoA noted that MS365 has the functionality to apply retention labels on information but this has not been actioned.

Recommendation

Develop a disposal implementation plan for digital information and physical information.

TOPIC 22 – Transfer to Te Rua Mahara | Beginning

Summary of findings

Physical information over 25 years old and of archival value has not been transferred to Te Rua Mahara. Physical information of archival value over 25 years old is identified and recorded in the Physical Records Database, but this information has not been determined as open or restricted access. TWoA has had discussions with Te Rua Mahara and concluded they will classify information over 25 years old and of archival value when they plan their future transfer of information to Te Rua Mahara. TWoA intends to transfer to Te Rua Mahara in the future but do not have the capability to do so currently.

TWoA has not formally identified or flagged digital records over 25 years old or of archival value.

Recommendations

Establish what digital records are over 25 years old and of archival value in accordance with Te Rua Mahara requirements and create a plan with Te Rua Mahara to transfer this information.

Discuss transfer of relevant physical information with Te Rua Mahara Auckland regional office.

6. Summary of feedback

The recent assessment of our information management (IM) practices, commissioned by Te Rua Mahara, has provided valuable insights. We appreciate the thorough and professional approach taken by the auditors throughout this process.

We are dedicated to addressing the identified areas for improvement and will develop a work plan to act on the provided recommendations. We highly value our ongoing relationship with Te Rua Mahara and are committed to continuously improving our IM practices. We look forward to your continued support and guidance as we work on these enhancements.

Governance
We recognise the need for a formal IM strategy and stronger governance arrangements. Strong consideration will be given to developing an IM strategy, improving IM policies and processes, integrating IM responsibilities into business processes, and ensuring detailed IM requirements in contracts. We will also place importance on the significance of Te Tiriti o Waitangi within our IM practices.

Self-Monitoring
Our internal self-monitoring processes need strengthening. We aim to ensure that the IM team receives internal audit reports that include an IM component in order to identify and develop corrective actions to improve compliance with the Public Records Act and our internal standards.

Capability
We recognise the temporary capacity constraint and are working to remove the constraint. Efforts will be made to incorporate mandatory IM training into the induction process to ensure all staff understand their IM responsibilities.

Creation
We plan to educate staff on using correct systems. Completing the inventory of high-value and high-risk information assets is intended to ensure comprehensive management.

Management
We intend to enhance our systems to include minimum metadata requirements and develop strategies to manage digital information during business and system changes. Integration of critical information into our business continuity plans is considered to ensure accessibility during disruptions.

Storage
We plan to implement measures to secure our digital information and prevent unauthorised deletion. Physical records are expected to continue being protected with proper security measures.

Access
We will develop a taxonomy and file plan to standardise information access and sharing, aiming to ensure compliance with the minimum metadata requirements.

Disposal
Updating our disposal processes to cover all functions is under consideration, alongside providing training on disposal requirements and developing a comprehensive disposal implementation plan for both digital and physical information. Additionally, plans are being made to transfer archival information to Te Rua Mahara.

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 – Beginning

Topic 2, IM policy and processes – Progressing

Topic 3, Governance arrangements & Executive Sponsor – Beginning

Topic 4, IM integration into business processes – Progressing

Topic 5, Outsourced functions and collaborative arrangements – Beginning

Topic 6, Te Tiriti o Waitangi – Progressing

Topic 7, Self-monitoring – Progressing

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 - Progressing

Topic 14, Information maintenance and accessibility - Beginning

Topic 15, Business continuity and recovery – Beginning

Topic 16, Appropriate storage arrangements – Progressing

Topic 18, Information access, use and sharing – Progressing

Topic 20, Current organisation-specific disposal authorities – Progressing

Topic 21, Implementation of disposal decisions – Progressing

Topic 22, Transfer to Te Rua Mahara – Beginning

20 August 2024

Te Rua Mahara o te Kāwanatanga Archives New Zealand
10 Mulgrave Street
Wellington
Phone +64 499 5595
Websites www.archives.govt.nz
www.dia.govt.nz

Nepia Winiata
Chief Executive
Te Wānanga o Aotearoa
Nepia.Winiata@twoa.ac.nz

E te rangatira e Nepia, tēnā koe

Nei rā te mihi ki a koutou o te wānanga nā. He nui ngā kaupapa kei raro i te maru o te mātauranga, ka eke ki te taumata ki Tikitiki-o-Rangi. Nō reira, tēnā koutou katoa.

Public Records Act 2005 Audit Recommendations

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

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

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

Audit findings

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

Kia pono ai te rua Mahara – Enabling trusted government information

Organisations that are assessed as having a maturity level of 'Managing' across all IM topics are broadly meeting the minimum requirements expected by the PRA and the mandatory Information and records management standard. The IM maturity level for TWoA is assessed at the 'Beginning' and 'Progressing' levels with no topics reaching 'Managing' or above.

For a successful improvement journey, it is essential to have direction and support at the governance level to set IM expectations and culture. Governance also needs to be underpinned by enough IM expertise to provide central control, protection of information and appropriate disposal.

To protect information the systems must be fit for purpose with automated metadata capture with all staff well trained so that IM expectations are understood. Monitoring and reporting will help to ensure that TWoA understands IM practice and trends and can mitigate issues as required.

Prioritised recommendations

The audit report lists 24 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 our website shortly. We would be grateful if you would advise of any redactions that your organisation considers are necessary within 10 working days.

As required by the PRA, I will also provide the Minister of Internal Affairs with a report on the results of the audit programme for each financial year, which is tabled in the House of Representatives.

We will follow up this letter with a request to your Executive Sponsor that your organisation provides us with an action plan to address the prioritised recommendations. Our follow up process will track your progress against the action plan.

Thank you again for your support with the audit. We would greatly appreciate further feedback on the audit process and the value it provides to organisations. We have sent a feedback survey link for the attention of your Executive Sponsor in the accompanying email.

Ka eke, ka eke, eke panuku, eke Tangaroa, tuturu ki a Tāne te waiora, Tāne te pūkenga, Tānenui- ā-Rangi, Tāne te wānanga, hui ē, tāiki ē.

Nāku iti noa, nā

Anahera Morehu
Poumanaaki Chief Archivist
Te Rua Mahara o te Kāwanatanga Archives New Zealand

Cc Peter Fletcher-Dobson, Pouwhakahaere Taupārongo Chief Information Officer, (Executive Sponsor), peter.fletcher-dobson@twoa.ac.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Governance	1: IM strategy	*Develop a plan and timeline for completion and approval of an IM strategy.*	This is the basis for directing IM improvement across the organisation. [Information and records management strategy](#)
Governance	3: Governance arrangements and Executive Sponsor	*Establish, or include within an existing group, a governance group, which includes the Executive Sponsor, that can champion IM within the organisation.*	This is essential to support the Executive Sponsor in their role and to raise the awareness of IM trends and issues at Senior Leadership level.
Self-monitoring	7: Self-monitoring	*Ensure the IM team receive internal audit reports that include IM and develop corrective actions to address any identified issues.*	This would complete the audit loop and help ensure that there is benefit derived from audit activity.
Capability	8: Capacity and capability	*Ensure that IM capability and capacity is regularly assessed and monitored against business needs.*	IM improvement across the organisation is underpinned by having enough IM resource to oversee and support BAU as well as the IM Strategy when developed.
Capability	9: IM roles and responsibilities	*Include mandatory IM training as part of the induction process.*	This would help raise IM awareness of IM requirements across the organisation. It would also assist with the recommendation for Topic 10: *Creation and capture of information* ensuring staff understand which repositories they are required to use.
Creation	11: High-value/High-risk information	*Complete the stocktake of high-value/high-risk information assets created and maintained across the organisation and document this within the inventory.*	This could be in done in consultation with other Wānanga as similar assets will be generated.

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Management	12: IM requirements built into technology systems	*Assess where possible existing systems can be improved to include minimum metadata requirements and make required changes.*	Ideally this is sorted out before the system is implemented with IM expertise included at the design stage. Metadata, taxonomy and disposal capability are all important to be considered in system set up along with appropriate protection of information.
Disposal	21: Implementation of disposal decisions	*Develop a disposal implementation plan for digital information and physical information.*	This would benefit TWoA to manage risks associated with the over retention of information and storage costs.