



Human Rights Commission  
Te Kāhui Tika Tangata  
Public Records Act 2005 Audit Report

Prepared for Archives New Zealand  
August 2022



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# 1. Disclaimers

## Use of Report

This report was prepared for the use of Archives New Zealand (Archives NZ) and the Human Rights Commission. It was prepared at the direction of Archives NZ and may not include all procedures deemed necessary for the purposes of the reader. The report should be read in conjunction with the disclaimers as set out in the Statement of Responsibility section. We accept or assume no duty, responsibility, or liability to any other party in connection with the report or this engagement, including, without limitation, liability for negligence in relation to the factual findings expressed or implied in this report.

## Independence

Deloitte is independent of Archives NZ in accordance with the independence requirements of the Public Records Act 2005. We also adhere to the independence requirements of Professional and Ethical Standard 1 (Revised): Code of Ethics for Assurance Practitioners issued by the New Zealand Auditing and Assurance Standards Board. Other than this audit programme, we have no relationship with or interests in Archives NZ.

## Statement of Responsibility

The procedures that we performed did not constitute an assurance engagement in accordance with New Zealand Standards for Assurance engagements, nor did it represent any form of audit under New Zealand Standards on Auditing, and consequently, no assurance conclusion or audit opinion is provided. The work was performed subject to the following limitations:

- This assessment is based on observations and supporting evidence obtained during the review. This report has taken into account the views of Human Rights Commission and Archives NZ who reviewed this report.
- Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. The procedures were not designed to detect all weaknesses in control procedures as the assessment was performed by interviewing relevant officials and obtaining supporting evidence in line with the guidelines of the Archives NZ's Information Management (IM) Maturity Assessment.
- The matters raised in this report are only those which came to our attention during the course of performing our procedures and are not necessarily a comprehensive statement of all the weaknesses that exist or improvements that might be made. We cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of operations and their responsibility to prevent and detect irregularities, including fraud. Accordingly, management should not rely on our deliverable to identify all weaknesses that may exist in the systems and procedures under examination, or potential instances of non-compliance that may exist.

We have prepared this report solely for the use of Human Rights Commission and Archives NZ. The report contains constructive suggestions to improve some practices which we identified in the course of the review using the instructions and procedures defined by Archives NZ. These procedures are designed to identify control weaknesses but cannot be relied upon to identify all weaknesses.

## 2. Executive Summary

### Human Rights Commission

Human Rights Commission | Te Kāhui Tika Tangata (HRC) is an Independent Crown Entity formed in 1977 and functions under the mandate of the Human Rights Act 1993. In addition, HRC is New Zealand's National Human Rights Institution (NHRI) representative and is accredited by the Global Alliance of NHRIs (GAHNNRI).<sup>1</sup>

The primary functions of HRC are to:

- advocate and promote respect for, and an understanding and appreciation of, human rights in New Zealand society, and;
- encourage the maintenance and development of harmonious relations between individuals and among the diverse groups in New Zealand society.

The day-to-day functions for HRC include providing information and resolving disputes about unlawful discrimination and racial or sexual harassment. There are about 90 HRC staff employed across New Zealand, with offices in Wellington and Auckland.

HRC holds high-risk/high-value records relating to enquires and complaints received via the Human Rights Information and Support and Dispute Resolution teams. This is recorded within Te Matatuhi, HRC's version of Microsoft CRM.

The Office of Human Rights Proceedings (OHRP) is an independent part of the HRC; and both share the core systems. OHRP provides legal representation for people who claim to have been unlawfully discriminated against and helps to prepare and take cases to the Human Rights Review Tribunal. OHRP is based at HRC's Auckland Office with staff in the Wellington Office also and holds some non-client specific documentations that are created and maintained consistent with HRC's IM protocols.

### Summary of Findings

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

Maturity Level	Beginning	Progressing	Managing	Maturing	Optimising
No. of Findings	5	14	1		

<sup>1</sup> A body sponsored by the Office of the United Nations High Commissioner for Human Rights (OHCHR).

## 3. Introduction

### Background

Archives NZ provides IM leadership across the public sector. This is achieved through monitoring government organisations' IM practices to assure the New Zealand public that:

- full and accurate records are created and maintained, improving business efficiency, accountability and government decision-making, and in turn, enhancing public trust and confidence in government;
- government is open, transparent and accountable by making public sector IM practices known to the public.

Section 33 of the Public Records Act 2005 (PRA) requires that every public office has an independent audit of its record keeping practices every 5 – 10 years. The audit programme is part of Archives NZ's monitoring of and reporting on the state of public sector IM. It is one of the key components of their Monitoring Framework, which also includes an annual survey of public sector IM and the IM Maturity Assessment.

The Chief Archivist has commissioned Deloitte to undertake these audits for certain public offices.

### Objective

The objective of these audits is to identify areas of IM strengths and weaknesses within the public office, prioritising areas that need attention and what needs to be done to strengthen them. They are seen as an important mechanism for organisations to improve their IM maturity and to work more efficiently and effectively.

### Scope

Deloitte has undertaken an independent point-in-time assessment of HRC's IM practices against Archives NZ's IM Maturity Assessment Model. The IM Maturity Assessment aligns with the PRA and Archives NZ's mandatory Information and Records Management standard. Topics 17 and 19 of the Archives NZ IM Maturity Assessment are only applicable to local authorities and have therefore been excluded for the purposes of this audit.

The IM Maturity Assessment model classifies the maturity of IM practices from "Beginning" (least mature) to "Optimising" (highest maturity level). HRC's maturity level for each topic area is highlighted under each of the respective areas. Ratings were based on HRC officials' responses to questions during the interviews and the supporting documents provided in line with the IM Maturity Assessment guidelines.

Archives NZ provided Deloitte with the framework including the specified audit plan, areas of focus for the PRA audits, and administrative support to Deloitte. Deloitte completed the onsite audit and audit report, which Archives NZ reviewed before release to HRC. Archives NZ is responsible for following up on the report's recommendations with HRC.

Our audit was based on a sample of IM systems, the review of selected documentation on a sample basis, and interviews conducted with a selection of staff and focus groups. As such, this audit does not relate to an Audit as defined under professional assurance standards.

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

## 4. Information Management Maturity Summary

This section lists the Information Management maturity level for each of the assessed topic areas. For further context refer to the relevant topic area in Section 5.

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

**Note:** Topics 17 and 19 of the Archives NZ IM Maturity Assessment are only applicable to local authorities and have therefore been excluded.

# 5. Audit Findings by Category and Topic

## Governance

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

### Topic 1: IM Strategy

*High-level statement outlining an organisation's systematic approach to managing information across all operational environments of an organisation.*

Progressing

#### Observations

HRC does not have an IM Strategy (the Strategy), although one is currently being developed. Senior leadership within HRC is increasing the priority of IM management.

HRC undertook an IM health check in February 2022, which is being used for developing the Strategy and IM implementation roadmap. In addition, HRC advised the recommendations from this PRA audit will be used to help inform the Strategy and roadmap.

#### Recommendation

1. Finalise and implement the Strategy ensuring it meets Archives NZ's requirements and aligns to business needs.

### Topic 2: IM Policy and Processes

*An information management policy supports the organisation's information management strategy and provides a foundation for information management processes.*

Progressing

#### Observations

HRC has an IM Policy (the Policy), which the Acting Chief Executive approved in June 2022. The Policy aligns with the PRA and IM requirements and references the Privacy Act and relevant internal policies such as internet, privacy and security. The Policy documents high level roles and responsibilities and describes the expectations for how information will be managed within HRC and stored on the intranet.

A sample of job descriptions reviewed outline at a high-level IM roles and responsibilities. However, staff interviewed noted that they are not too sure of their IM responsibilities.

All new staff and contractors undertake induction training, which includes an introduction to the Policy and how to use their electronic document management system (EDMS), SharePoint. However, there are no formal IM processes to follow for all staff.

#### Recommendation

1. Develop IM processes for staff to follow.

### Topic 3: Governance arrangements and Executive Sponsor

*The Executive Sponsor has strategic and executive responsibility for overseeing the management of information in a public sector organisation.*

Beginning

#### Observations

HRC does not have an IM governance group due to the size of the entity. As the Executive Sponsor (ES) has several other responsibilities, they have a limited capacity to actively provide an oversight role to drive IM. There is also currently no reporting on IM activities.

#### Recommendation

1. Form an IM governance group or incorporate IM into the Terms of Reference of a relevant existing governance group.

### Topic 4: IM Integration into Business Processes

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

Beginning

#### Observations

Business owners have a limited understanding of their individual and team responsibilities for managing information. IM requirements are not formally integrated or documented into business processes and activities. There is no enterprise-wide IM approach as business units have separate processes and activities. Support for business owners is limited as HRC does not have an IM team. The ES, who is the Manager of Finance and Business Services, and their team currently handled IM work but with limited capacity.

Staff reported support for IM related processes is often found through 'knowing who to ask', rather than formal documentation.

#### Recommendation

1. Ensure that IM responsibilities for business owners are documented.

### Topic 5: Outsourced Functions and Collaborative Arrangements

*Outsourcing a business function or activity or establishing collaborative initiatives does not lessen an organisation's responsibility to ensure that all requirements for the management of information are met.*

Progressing

#### Observations

HRC uses the All of Government consulting contracts and Master Service Agreements (MSA) to ensure that requirements for managing information are covered. An MSA reviewed contains clauses around information ownership, legal obligation and specific details on IM, retention, portability and security. HRC has MSAs with service providers, such as Datacom and Lanworx.

We sighted a Memorandum of Understanding (MoU) with another government agency, Te Puni Kōkiri. The MoU specifies what information may be released to the public and information ownership through acknowledging each party's contribution to the work done. There is no regular monitoring over the contracts in place to ensure compliance with the PRA.

#### Recommendation

1. Develop a regular monitoring process to ensure suppliers are compliant with IM requirements under the PRA.



## Topic 6: Te Tiriti o Waitangi

*The Public Records Act 2005 and the information and records management standard supports the rights of Māori under Te Tiriti o Waitangi/Treaty of Waitangi to access, use and reuse information that is important to Māori.*

Progressing

### Observations

Work has begun to identify information of importance to Māori within HRC, however, not all information has been identified yet. There is a detailed work programme in place to understand information of importance to Māori. The newly established Ahi Kaa team are the owners with responsibility for delivering the work programme and assisting the wider-HRC in becoming a Tiriti-focused organisation. This initiative will involve building relationships with key Māori stakeholders.

The IM implications for information of importance of Māori have been acknowledged by HRC. HRC acknowledges they hold information of importance to Māori, however, this information has not been formally identified in central systems.

### Recommendation

1. Complete the identification of information of importance to Māori and document it within the Information Asset Register (IAR) or similar.

## Self-Monitoring

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

### Topic 7: Self-Monitoring

*Organisations should monitor all aspects of their information management.*

Beginning

#### Observations

HRC recently completed an IM health check, which assessed HRC's IM maturity, information architecture, IM systems and user experience. The results from this self-assessment have informed development of the draft Strategy and the IM implementation plan.

There is regular monitoring of compliance with the PRA and other relevant legislation via an annual ComplyWith survey.

There is no formalised monitoring of compliance with internal IM policy and processes. Non-compliance is reported on an ad hoc basis to the ES, with avenues for further escalation if the non-compliance is significant.

#### Recommendation

1. Once the IM policy is updated, agree which aspects of IM should be monitored and reported.

## Capability

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

### Topic 8: Capacity and Capability

*Organisations should have IM staff or access to appropriate expertise to support their IM programme.*

Progressing

#### Observations

As part of developing its Strategy and IM roadmap development, HRC is considering its IM resourcing requirements from both capacity and capability perspectives. HRC is currently recruiting for an IM advisor as one of the ways to address IM capability requirements.

HRC has a budget for professional development but no specific budget for IM training.

#### Recommendation

1. Regularly assess and monitor IM capacity and capability against business needs. Resources and advice may be sourced externally if required due to the size of the organisation.

### Topic 9: IM Roles and Responsibilities

*Staff and contractors should be aware of their responsibility to manage information.*

Beginning

#### Observations

Staff and contractor IM responsibility is outlined in the Policy. However, several staff interviewed were unsure of their individual obligations. They were not confident of whether key IM documents such as, the IM Policy existed.

There is mandatory induction training for new staff and contractors to make them aware of IM roles and responsibilities. However, there is no enterprise-wide IM-specific training. Staff interviewed reported that they have developed their own informal onboarding training for their respective teams. However, this was usually limited to how to use EDRMS rather than explicitly detailing requirements for managing information. In addition, where staff were aware of their obligations towards IM, this tended to be the result of understanding of other legislation, such as the Official Information Act.

#### Recommendation

1. Identify IM training needs for the organisation and develop a plan to provide the training.

## Creation

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

### Topic 10: Creation and Capture of Information

*Every public office and local authority must create and maintain full and accurate information documenting its activities.*

Progressing

#### Observations

Most staff at HRC understand their roles and responsibilities for creating and capturing information from the IM training received as part of onboarding. Staff and contractors are encouraged to use SharePoint and Te Matatuhi, HRC's version of Microsoft CRM, for records they must create and keep.

Staff have reported that they do not often consider IM requirements in their day-to-day operations. Information is routinely created and captured within SharePoint and Te Matatuhi. Appropriate metadata is routinely created by SharePoint automatically. Emails in Microsoft 365 are saved to SharePoint for some teams.

HRC does not have standard naming conventions and file management processes vary between business units. This can make it difficult for staff to find information from other business units, particularly during cross-system Te Matatuhi and SharePoint use, which decreases the usability of the information created.

#### Recommendation

1. Identify issues impacting findability of information and address these across the organisation.

### Topic 11: High-Value/High-Risk Information

*Staff and contractors should be aware of their responsibility to manage information. Every public office and local authority must create and maintain full and accurate information documenting its activities.*

Progressing

#### Observations

HRC has developed an IAR to capture information. The high-value / high-risk information is largely related to enquires and complaints to the Human Rights Information and Support and the Dispute Resolution teams. The IAR is stored on Te Matatuhi and there is process documentation for adding information to it.

#### Recommendation

1. Ensure that all information assets are identified and included in the IAR and that an agreed process for updating the register is implemented.

## Management

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

### Topic 12: IM Requirements built into Technology Solutions

*IM requirements must be identified, designed, and integrated into all of your organisation's business systems.*

Progressing

#### Observations

IM expertise, such as third-party contractors, are sometimes involved in design and configuration decisions relating to new and upgraded business systems. IM was a major part of the data transfer from the old Radar system to Te Matatuhi, a cloud-based system. HRC performed validation and testing on the transferred data to ensure of no unauthorised changes or loss of metadata.

IM requirements are addressed during the design and configuration decisions relating to some new and upgraded business systems, such as SharePoint. SharePoint also meets minimum IM requirements through auto-metadata fields such as, name of author and date of creation. Meeting metadata requirements is a consideration for HRC when choosing a new system.

#### Recommendation

1. Formalise the requirement to involve IM expertise in all new business systems, implementations, and system upgrades.

### Topic 13: Integrity of Information

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

Progressing

#### Observations

HRC has localised IM practices that ensure that information is reliable and trustworthy. However, there is no formal organisation-wide taxonomy or naming conventions. Each team has its own processes.

Staff and contractors have variable experiences when finding and retrieving information created by other teams, and often rely on shared links to find documents.

Staff and contractors are aware of the information they create and manage should be comprehensive and complete, as per the Policy and induction. Staff are aware of the overarching legal obligations of their roles based on previous ones and the type of information that they should be creating and capturing. This means that compliance is due to individual experience, not the training and systems in place.

#### Recommendation

1. Develop consistent naming conventions, filing structures and version control rules across teams.

### Topic 14: Information Maintenance and Accessibility

*Information maintenance and accessibility cover strategies and processes that support the ongoing management and access to information over time.*

Progressing

#### Observations

There is a clear process to manage and maintain physical and digital information during business and system changes.

General accessibility to physical information is ensured through long-term ongoing storage of most information, which is retained off-site with a commercial storage provider. There is some physical information stored onsite, but this is largely restricted to the Auckland Office and is stored in a way which prevents unauthorised access and use.

General accessibility to digital information is also ensured through long-term ongoing storage of digital information by providers such as, Lanworx. HRC migrated all their stored digital information from shared drives to SharePoint and Te Matatuhi when implementing their new system. To ensure that digital information is still accessible over time, HRC employs continuous updates of systems and strong security processes. Digital continuity planning is not formalised.

**Recommendation**

1. Formally identify digital continuity needs for digital information to inform IM work programme planning.

**Topic 15: Business Continuity and Recovery**

*This covers the capability of the organisation to continue delivery of products or services, or recover the information needed to deliver products or services, at acceptable pre-defined levels following a business disruption event.*

Progressing

**Observations**

HRC has an outdated Business Continuity Plan (BCP), which identifies critical information and was last updated in 2018. The BCP includes the critical internal and external digital systems required for HRC to function, such as requiring access to Te Matatuhi. The BCP also outlines roles and responsibilities for senior leadership staff individually and teams as a whole. It further outlines the need for data backups of emails and files as they are identified as vital records for BCP purposes. In addition, critical information is stored in digital format as hard-copy information is scanned over to SharePoint as part of daily operations.

Internal systems such as SharePoint and Te Matatuhi are regularly backed up and comprehensive access controls are in place. Backups are taken daily, and the ICT team has access to an online portal through which they can test these backups. This presents a visual representation as a 'green' or 'red' backup which can be accessed by the IT team. This online portal was viewed last month. The last testing of the restoration of the backups occurred last year.

In the event of a business disruption, there is a salvage operation plan in place for physical information stored onsite at HRC. This includes disposing physical information damaged by the business disruption which is deemed unsalvageable.

**Recommendation**

1. Ensure the BCP is up to date and develop a regular review and testing cycle.

## Storage

Good storage is a very important factor for information protection and security. Appropriate storage arrangements for both physical and digital information ensures information remains accessible and usable for as long as it is required for business and legal purposes and for accountable government.

### Topic 16: Appropriate Storage Arrangements

*Appropriate storage arrangements for both physical and digital information ensures information remains accessible and usable throughout its life.*

Managing

#### Observations

A large portion of HRC physical information is kept with a third-party storage provider.

A small amount of physical information for HRC and OHRP is kept onsite in an environment, which includes fire safety, flood mitigation and access control, such as requiring swipe cards to enter the floor. There are two different sets of lockable cabinets, which contain business records and physical information to be transferred off-site to its third-party storage provider. HRC records file locations on spreadsheets, as well as assigning certain records to the control of particular teams.

A large portion of digital information storage is managed through third-party providers such as, Datacom and Lanworx. Requirements for information security and protection are built-in to the respective service contracts. Risks to information are not identified and reported on the risk register.

#### Recommendation

1. Ensure risks to information are identified and reported on the risk register.

## Access

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

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

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

Progressing

#### Observations

HRC applies access controls for both physical and digital information. Access controls are in place across all digital systems, including restricting access to folders within SharePoint or to whole systems. Approval on a case-by-case basis is required to access documents or files outside of a staff member's normal role. Staff interviewed agreed that they have the right access permissions for the information they needed to do their work.

Staff reported issues with the findability of information, especially due to there being no organisation-wide taxonomy and with different teams within HRC using different naming conventions. Appropriate metadata is only created within systems which have built-in metadata requirements, for example SharePoint. Staff interviewed had mixed responses when asked if they added metadata to information, they created to improve findability. This is governed by the team staff work in.

HRC has information sharing agreements with external parties, such as Te Puni Kōkiri. These are largely governed by MoUs, which outline how and where information can and should be shared.

OHRP information is on a separate channel on SharePoint. Employees within OHRP have no access to any other teams in HRC's workspace or to Te Matatuhi.

#### Recommendation

1. Develop and communicate a consistent taxonomy for use across the organisation.



## Disposal

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

### Topic 20: Current Organisation-Specific Disposal Authorities

*This is about an organisation having its own specific disposal authority, not the implementation of the disposal actions authorised by the authority. It is not about the General Disposal Authorities.*

Progressing

#### Observations

HRC current approved Disposal Authority (DA) was recently extended until September 2023. This DA was recently reviewed as a result of HRC wishing to dispose of records, but there is no regular review process. As this is an older DA which has been extended, it is not specific enough to cover all information formats that have arisen over the past decade.

#### Recommendation

1. Develop a new DA to replace the current one due to expire September 2023.

### Topic 21: Implementation of Disposal Decisions

*This is about the implementation of disposal decisions, whether from organisation-specific disposal authorities or the General Disposal Authorities.*

Progressing

#### Observations

HRC has an approved DA; information is retained for as long as required for business use and are largely identified in the DA though some newer formats are not specifically covered.

Disposal of physical information is fully documented, including date of disposal, who carried it out, what was disposed of and under what authority. This disposal is carried out by Iron Mountain, when requested.

HRC is currently under a moratorium because of a Royal Commission of Inquiry and is currently not permitted to dispose of digital information. The moratorium refers to the Abuse in Care Royal Commission of Inquiry; this has resulted in the Chief Archivist issuing a notice in 2019 under section 20 of the PRA to prevent the disposal of any records relevant to the Royal Commission Terms of Reference. If there is any doubt about whether a record is covered by the moratorium, then records will be retained.

The HRC is currently planning on adding the ability to flag records for disposal when they reach the correct age in both SharePoint and Te Matatuhi.

All staff reported a culture of retaining information. Staff do not actively dispose of information using General Disposal Authorities (GDAs) or the current DA. There is additional uncertainty about the rules around disposal due to the moratorium on HRC. Very limited disposal occurs under GDA's.

#### Recommendation

1. Once the updated DA is approved, establish a plan for regular disposal for both digital and physical information.

## Topic 22: Transfer to Archives New Zealand

*Information of archival value, both physical or digital, should be regularly transferred to Archives NZ or a deferral of transfer should be put in place.*

Beginning

### Observations

HRC has not identified any information over 25 years old that could be deemed to be of archival value. Information from the old hard drives was carried over through HRC's previous system, Radar, to Te Matatuhi and SharePoint.

HRC has had some early discussion and planning sessions with Archives NZ, in terms of transferring digital records though it was agreed not to transfer anything at this time.

### Recommendations

1. Identify digital information of archival value within the IAR.
2. Develop a transfer plan for implementation when Archives NZ is accepting physical transfers.

## 6. Summary of Feedback

This section sets out HRC's feedback pursuant to this PRA audit.

Te Kāhui Tika Tangata / The Human Rights Commission notes the findings and recommendations of this review and generally accepts the overall outcome. This report will be used to inform work on our IM Strategic Plan and associated Roadmap which is nearing completion.

We note this report is currently consistent with our self-review assessment in 7 areas, down one category in 9 areas and down by two in 4 areas. Overall, this is considered reasonable given the nature of self-assessments and the findings documented in this report.

An exception to this would be topics 12 and 14 that were rated by the Commission as Maturing and by the audit as Progressing. It would seem the comments and findings in this report are not inconsistent with a rating of Managing and we believe this would be a more accurate assessment. We therefore ask that this is amended in the final report.

In terms of the report format, one improvement recommendation we would make would be to group all recommendations together in a table to list, number and identify these in one area, perhaps as an appendix.

Lastly, we would like to thank Archives NZ and Deloitte. The audit was a positive experience with a methodology that has been easy to follow and understand.

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12 Hakihea (December) 2022

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Tēnā koe Moira

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

This letter contains my recommendations related to the recent independent audit of the Human Rights Commission Te Kāhui Tika Tangata by Deloitte under section 33 of the Public Records Act 2005 (PRA). Thank you for making your staff and resources available to support the audit process.

#### ***Introduction***

Te Rua Mahara o te Kāwanatanga Archives New Zealand (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. The HRC is operating mostly at the 'Progressing' level but is proactively taking steps to improve maturity. Earlier in 2022 an IM health check was done. The audit report notes that results from the health check which has already been completed and from this audit will be addressed in an IM Strategy and implementation roadmap. The planned appointment of an IM advisor will assist the organisation with maturity improvement in many topic areas.

In section 6 of the audit report there is mention of two topics where the maturity ratings are not well aligned with your self-assessment. We suggest that there are some minor points to be addressed which would move the organisation to the 'Managing' level.

We appreciate your recommendation for improvement to the audit report and will discuss this with the auditors.

### *Prioritised recommendations*

The audit report lists 21 recommendations to improve your organisation's IM maturity.

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



Anahera Morehu  
Chief Archivist

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

Cc Grant McKenna, Manager Finance and Business Services (Executive Sponsor),  
[grantM@hrc.co.nz](mailto:grantM@hrc.co.nz)

## APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
<b>Governance</b>	1: IM Strategy	<i>Finalise and implement the Strategy ensuring it meets Archives NZ's requirements and aligns to business needs.</i>	It is noted that work has already started on the Strategy based on earlier work assessing the health of IM practice at HRC.
<b>Governance</b>	3: Governance arrangements and Executive Sponsor	<i>Form an IM governance group or incorporate IM into the Terms of Reference of a relevant existing governance group.</i>	A new governance group or incorporating the oversight of IM into another group would support the ES in their role. Operational monitoring and reporting of IM practice would also assist the ES to raise IM issues at the governance level ( <i>Topic 7: Self-Monitoring</i> ).
<b>Governance</b>	4: IM Integration into Business Processes	<i>Ensure that IM responsibilities for business owners are documented.</i>	This would help to raise IM awareness across the organisation.
<b>Capability</b>	8: Capacity and Capability	<i>Regularly assess and monitor IM capacity and capability against business needs. Resources and advice may be sourced externally if required due to the size of the organisation.</i>	The HRC is recruiting for an IM advisor to support improvement of IM maturity. Having a dedicated IM staff member would enable many of the recommendations to be done such as those for <i>Topic 2: IM Policy and Processes</i> ; <i>Topic 4: IM Integration into Business Processes</i> and <i>Topic 7: Self-Monitoring</i> .
<b>Capability</b>	9: IM Roles and Responsibilities	<i>Identify IM training needs for the organisation and develop a plan to provide the training.</i>	Improving IM training, along with updating the IM Policy, will go a long way to increasing staff awareness of their roles and responsibilities in a standardised manner across the organisation.

<b>Category</b>	<b>Topic Number</b>	<b>Auditor's Recommendation</b>	<b>Archives New Zealand's Comments</b>
<b>Creation</b>	11: High-Value/High-Risk Information	<i>Ensure that all information assets are identified and included in the IAR and that an agreed process for updating the register is implemented.</i>	A good start has been made on this by the Information and Support and the Dispute Resolution teams. Creating an IAR that includes all high-value information supports the organisation to prioritise its IM activity.
<b>Management</b>	13: Integrity of Information	<i>Develop consistent naming conventions, filing structures and version control rules across teams.</i>	Although there are localised IM practices it would be useful to have a standardised filing structure as much as possible to help finding and retrieving information.