



Public Records Audit Report Herenga ā Nuku Aotearoa, the Outdoor Access Commission

Prepared for Te Rua Mahara o te Kāwanatanga, Archives
New Zealand

October 2023



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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.



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1. Executive summary

Herenga ā Nuku Aotearoa, the Outdoor Access Commission (Herenga ā Nuku) is a Crown agency that leads and supports the negotiation, establishment, maintenance, and improvement of access to the outdoors. Herenga ā Nuku works with private landowners, local government, and the Department of Conservation to carry out this work. Herenga ā Nuku has approximately 30 staff working across the head office and as regional field advisors. The Corporate Services Team, made up of three staff, are responsible for overseeing information management (IM) practices.

Herenga ā Nuku creates and maintains high value public records. These include contributions to policies and standards, enquiries and disputes, and geospatial data sets.

Herenga ā Nuku uses SharePoint as the main document management system. Herenga ā Nuku also maintains a geographic information system (GIS) and a case management system (CMS).

Most records are maintained electronically. Some physical records are held on-site at the Herenga ā Nuku head office, but the majority are stored with a third-party storage provider.

The IM maturity of Herenga ā Nuku is summarised below. Further detail on each of the maturity assessments can be found in Sections 4 and 5 of this report.

Beginning	4
Progressing	14
Managing	2
Maturing	0
Optimising	0



2. Introduction

KPMG was commissioned by Te Rua Mahara o te Kāwanatanga Archives New Zealand (Te Rua Mahara) to undertake an independent audit of Herenga ā Nuku under section 33 of the PRA. The audit took place on-site in September 2023.

The IM (IM) practices of Herenga ā Nuku were audited against the PRA and the requirements in the [Information and records management standard](#) (the Standard) as set out in Te Rua Mahara's IM Assessment.

Te Rua Mahara provides the framework, 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 on-site 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 Herenga ā Nuku including both physical and digital information.

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

The audit reviewed the IM practices of Herenga ā Nuku against the PRA and the requirements in the Standard and provides an assessment of current state maturity. As part of this audit, we completed assessments over key systems that act as a repository for public records used by Herenga ā Nuku. The systems assessed were a geographic information system (GIS), a case management system (CMS), and SharePoint. 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 in Section 5. Herenga ā Nuku 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, 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 IM 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

Herenga ā Nuku does not have an IM strategy that provides strategic direction and support for IM activities. Staff interviewed noted they have begun thinking about incorporating IM into existing strategies.

Herenga ā Nuku has an organisational strategic narrative covering 2021 – 2025. The strategic narrative however does not detail the long-term and organisation-wide approach to managing information and across all operational environments. There is a lack of alignment between IM and the strategic direction of Herenga ā Nuku.

While there is a lack of alignment of IM to strategic direction, IM is considered as part of business needs. To better support IM requirements, Herenga ā Nuku upgraded SharePoint and has implemented a CMS.

Recommendation

Develop a strategy for IM. This can be a standalone document or integrated with wider or related strategies, for example the Strategic Narrative 2021 – 2025.

Summary of findings

Herenga ā Nuku has an outdated Information Management Policy that was endorsed by senior management in 2014. The Policy is consistent with the PRA. The Policy however references the outdated Archives Act 1957 for the retention and disposal of records, which has been superseded by the Public Records Act 2005. The Policy details the responsibilities for IM at a high-level. The Policy does not contain references to other relevant policies at Herenga ā Nuku.

The Policy is currently under review and is scheduled to be approved in late 2023. Most staff members interviewed knew how to access the Policy.

All staff members were aware of their roles and responsibilities for IM at a high-level. Some business units have process documents detailing IM processes for corporate records.

Recommendations

Finish revising the Policy and ensure it is approved by senior management.

Document IM processes and procedures to support the Policy for all business units. Routinely communicate the Policy and process documentation to all staff

Summary of findings

Due to the size of the organisation, Herenga ā Nuku does not have an independent governance group that oversees IM. IM is not formally covered at senior management meetings, or at other forums such as the Audit and Risk Committee.

Corporate services, which includes the Executive Sponsor, is responsible for overseeing IM. The Executive Sponsor understands their oversight and monitoring role and works closely with Corporate Services staff to pick up and remediate issues related to IM.

Issues related to IM are raised to the Executive Sponsor on an as-needed basis.

The Executive Sponsor acts on issues in relation to IM. Five years ago, IM systems at Herenga ā Nuku were not fit-for-purpose. The Executive Sponsor drove the initiative to implement the current CMS to improve the management of information.

Recommendation

Ensure IM is included in the Terms of Reference for an appropriate governance committee and a standing item on the agenda.

Summary of findings

Responsibility for the management of information within business units is not formally assigned to business owners. Responsibilities of business owners are not documented. However, business owners understand and act on their responsibilities and provide support for staff when required. Business owners are expected to support staff to ensure information is complete and is stored in the correct file locations.

Issues with the management of information are identified and are directed to managers, corporate services, and information technology (IT) staff as appropriate.

Recommendation

Document IM responsibilities for business owners in the Information Management Policy or in job descriptions.

Summary of findings

Requirements, roles, and responsibilities for managing information are not identified in contracts or memoranda of understanding for outsourced functions and collaborative arrangements. There is no recognition of the public records status of information held by contracted parties.

Recommendation

Include IM roles, responsibilities, and requirements in all future contracts for outsourced functions and collaborative arrangements.

Summary of findings

Information of importance to tangata whenua is identified in the CMS. The CMS records interests and participation in projects. Information of importance to specific mana whenua is saved in the GIS, which records mana whenua interests and participation in projects.

Herenga ā Nuku has a National Operations Manager and a Strategic Relationships Manager, both support the maintenance of access, discoverability, and care for information of importance to tangata whenua and mana whenua.

Planning is underway to improve how IM systems enable access and discoverability for information of importance to tangata whenua.

Recommendation

Involve IM expertise and those with strong te ao Māori understanding when changing systems to improve access to information of importance to tangata whenua and mana whenua.

Self-monitoring



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

Summary of findings

There is some monitoring of compliance with the internal IM Policy and processes.

IM requirements from the PRA and other relevant legislation are identified and documented in the IM Policy. However, monitoring compliance with the PRA and other relevant legislation is performed on an inconsistent basis.

Corrective actions to address compliance are performed on an as-needed basis. There is no formal approach to implement corrective actions to address compliance.

Recommendation

Develop a plan to monitor IM activity for the purposes of regularly reporting to the Executive Sponsor.

Capability



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

TOPIC 8 – Capacity and capability

Beginning

Summary of findings

IM capability and capacity requirements have not been formally identified or addressed. The Executive Sponsor noted that for the current size of the organisation, there is an appropriate level of capacity and capability. If changes were made to business activities, then IM capability and capacity needs would be formally identified and addressed.

Staff overseeing IM are regarded as trusted professionals and have access to some IM related professional development opportunities, on an as-requested basis.

Recommendation

Formally assess IM capability and capacity requirements against current business needs and decide if the needs can be addressed internally or with some external expertise.

TOPIC 9 – IM roles and responsibilities

Progressing

Summary of findings

Roles and responsibilities for IM are documented as a high-level statement in job descriptions and in the employee handbook of Herenga ā Nuku.

IM responsibilities are communicated to most staff and contractors during the on-boarding process, but communication of responsibilities varies depending on business unit.

Training needs for IM have not been identified at an organisational level. Staff interviewed noted they have received varying levels of training and would like to receive further training on IM. Herenga ā Nuku does not currently have the capacity (related to budget and time) to take this further.

Recommendations

Routinely communicate IM responsibilities for all staff and contractors at an organisation-wide level.

IM training, particularly on the use of metadata and search techniques, for business systems used should be prioritised.

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

Staff and contractors have some awareness of their legal obligations to create full and accurate records as part of their business practice. Information is routinely created and captured as part of all business functions and activities. Information is managed in controlled environments to ensure its usability and reliability. The use of uncontrolled environments is actively discouraged.

Corporate Services staff are aware of some information usability, reliability, and trust issues. Some staff noted difficulty in finding and retrieving information in the current SharePoint version. Staff interviewed expressed that there was a loss of some metadata during the migration of information from the former to current version of SharePoint. Therefore, staff occasionally resort to the older version to retrieve historical information. This has not yet been addressed due to limited capacity and operational priorities.

Recommendation

Identify the issues with SharePoint and remediate these where possible.

Summary of findings

Herenga ā Nuku has an inventory of the physical information that is stored with a third-party storage provider, but this does not cover physical information that is stored onsite or specify what information is high-value / high-risk.

High-value and high-risk information has been identified in the organisation-specific disposal authority. There has been no analysis of risks to high-value or high-risk information assets.

Recommendation

Determine the high-value / high-risk physical and digital information assets and record these in an information asset register.

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.

***Summary of findings***

Staff with IM expertise are involved in the design and configuration decisions relating to most new and upgraded business systems. However, standardised IM requirements for new and upgraded business systems have not been identified and documented. The business systems of Herenga ā Nuku include some of the minimum metadata required by Te Rua Mahara.

Some system design and configuration documentation are maintained by Herenga ā Nuku and some is held by third-party providers.

Recommendation

When designing and configuring new systems for managing information, ensure specialist IM advice is sought.

Summary of findings

Herenga ā Nuku has localised IM practices that ensure information is reliable and trustworthy. Staff and contractors described variable experiences when finding and retrieving information. As reported, some staff had difficulty accessing information that was migrated from the previous SharePoint version to the current SharePoint. They need to access the 'clone' of the previous SharePoint to find this information. This issue does not significantly impact business activities.

Staff and contractors have confidence that the information they create is comprehensive and complete.

Recommendation

Identify and rectify issues with finding and retrieving information and remediate where possible.

Summary of findings

Herenga ā Nuku has strategies in place to manage and maintain physical and digital information during some business and system change projects. This includes list and location registers for information stored at the third-party storage provider, and access controls and migration plans. Some technology obsolescence risks have been identified for the current Windows version and the mobile mapping application for searching publicly accessible locations.

Preservation needs for physical and digital information have not yet been identified and addressed.

Recommendation

Ensure digital continuity needs are identified and plans are in place to address these.

Summary of findings

Herenga ā Nuku has a Business Continuity Plan (BCP) that was last updated in 2018. The BCP details the roles and responsibilities for managing digital information for key business systems in a disaster event. The BCP was last formally tested in 2019 and used during the COVID-19 Level Four lockdown.

Herenga ā Nuku maintains a Records Disaster Recovery Plan that details the roles, responsibilities and process regarding the salvaging and restoration of physical information in a disaster event. The plan also includes details regarding specialists at Te Rua Mahara. However, the plan was last reviewed in 2015 and does not identify critical records to be salvaged or restored. The Executive Sponsor raised that most physical information held on-site has been digitised.

Recommendations

Update the BCP to ensure it identifies identify critical information.

Implement a regular testing cycle for the BCP and Records Disaster Recovery 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

Managing

Summary of findings

Herenga ā Nuku has appropriate protection and security in place to protect physical information against unauthorised access, loss, and destruction. Most physical information is stored with a third-party storage provider, while the remaining physical records are stored in secure file storage at the Herenga ā Nuku head office. Most physical records held on-site have been digitised, as referenced in Topic 15 – *Business Continuity and Recovery*.

There is appropriate protection and security in place against unauthorised access, loss, deletion, and destruction for digital information. Access controls are localised to business units, multi-factor authentication is in place for remote working, and all information is maintained in the cloud.

The storage environment for physical and digital information has appropriate physical protection against hazards. Protection and security processes are tested regularly.

Recommendation

Ensure information protection and security risks are identified and regularly reported to the Executive Sponsor.



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

File plans and metadata schema are available but inconsistently applied in SharePoint. Most staff and contractors know how to use the systems and tools that are used for IM, however, as mentioned in Topic 10 - *Creation and capture of information* some staff noted difficulty in finding and retrieving information in the current SharePoint version. This sometimes results in staff resorting to using the older version to retrieve historical information.

Access controls are documented, actively monitored and maintained. Any issues are addressed promptly. Any variations to core access controls must be approved by Corporate Services and the employee's manager prior to being implemented. Access to physical information is strictly controlled and monitored by Corporate Services staff.

Metadata is automatically applied where possible and meets most of the metadata requirements issued by Te Rua Mahara. Unique identifiers are inconsistently applied to information held in SharePoint.

Information management processes are applied to incoming and outgoing data shared with external parties, such as password protecting information shared externally with other agencies.

Recommendation

Ensure that metadata and search training for all business systems is included in any identification of training needs.

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

Managing

Summary of findings

Herenga ā Nuku has a current and approved organisation-specific disposal authority that is valid to 2025. This disposal authority covers information relating to all business functions and formats. There is an inconsistent review cycle to ensure that the organisation-specific disposal authority reflects business and legislative changes.

Recommendation

Establish a regular review cycle for the organisation-specific disposal authority to ensure it is in line with current business activities and any changes to legislation.

TOPIC 21 – Implementation of disposal decisions

Progressing

Summary of findings

Processes at Herenga ā Nuku ensure information is retained for as long as required for business use and as identified in the general and organisation-specific disposal authorities. Herenga ā Nuku has a draft Records Retention and Disposal Plan that details the disposal process and requirements under relevant disposal authorities. This Plan is yet to be approved by senior management.

There has been disposal of physical information between 2020 and 2023 and this is documented in a disposal register. The disposal register details when records were disposed of, the description of records, and the disposal authority.

The Executive Sponsor raised that approval must be obtained from them prior to the disposal of records. Approval is documented on sign-off sheets that is separate to the disposal register,

There has been no disposal of digital information.

Recommendation

Finalise and obtain approval from senior management for the Records Retention and Disposal plan. Ensure this includes disposal of digital information in line with the requirements of general and organisation-specific disposal authority.

TOPIC 22 – Transfer to Te Rua Mahara

Beginning

Summary of findings

Herenga ā Nuku was established in 2008 as a result of the enactment of the Walking Access Act 2008. Herenga ā Nuku has not existed for 25 years; therefore, it does not currently maintain physical and digital information of archival value that is over 25 years old. There has been some identification of physical information that is of archival value. This has not occurred for digital information.

Recommendation

Formally identify what physical or digital information is of archival value by applying the DA.



6. Summary of feedback

We accept all the audit findings and recommendations in the draft report on our PRA audit. While Herenga ā Nuku is a very small crown agency, with a limited budget, our staff are aware of their responsibilities to maintain high quality public records. We realise that we are mainly at the progressing stage of our maturity in terms of the specific requirements of the Public Records Act and we are going to use the audit findings and recommendations in the audit report as a roadmap for our future work in this important area.

We certainly appreciated the professional manner of the audit team as they completed the audit and their well thought out report and recommendations.

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 – Progressing

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 - Beginning

Topic 9, IM roles and responsibilities - Progressing

Topic 10, Creation and capture of information - Progressing

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

Topic 12, IM requirements built into technology systems - Progressing

Topic 13, Integrity of information - Progressing

Topic 14, Information maintenance and accessibility - Progressing

Topic 15, Business continuity and recovery – Progressing

Topic 16, Appropriate storage arrangements – Managing

Topic 18, Information access, use and sharing – Progressing

Topic 20, Current organisation-specific disposal authorities – Managing

Topic 21, Implementation of disposal decisions – Progressing

Topic 22, Transfer to Te Rua Mahara – Beginning

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8 January 2024

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E te rangatira e Ric, tēnā koe

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the Herenga ā Nuku Aotearoa Outdoor Access Commission (Herenga ā Nuku) 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 practice at Herenga ā Nuku is assessed as operating mostly at 'Progressing' level. The organisation is well-positioned with its current organisation-specific disposal authority to increase IM maturity by finalising the Records Retention and Disposal plan and implementing further disposal as approved.

It would be a useful for the organisation to understand why the SharePoint migration has resulted in issues with finding information and to resolve the issues where possible.

Prioritised recommendations

The audit report lists 23 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.

Nāku noa, nā



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

Cc Phil Culling, Deputy Chief Executive (Executive Sponsor),
phil.culling@walkingaccess.govt.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Governance	1: IM strategy	<i>Develop a strategy for IM. This can be a standalone document or integrated with wider or related strategies, for example the Strategic Narrative 2021 – 2025.</i>	This is useful to direct IM improvement even for a small organisation. It will help the organisation understand any associated resourcing requirements. Information and records management strategy
Governance	2: IM policy and processes	<i>Finish revising the Policy and ensure it is approved by senior management.</i>	An up-to-date Policy is necessary to establish foundational understanding of what is expected from the staff and should be routinely reviewed to ensure it is still relevant. Information and records management policy development
Governance	5: Outsourced functions and collaborative arrangements	<i>Include IM roles, responsibilities, and requirements in all future contracts for outsourced functions and collaborative arrangements.</i>	Assessment of what is required related to the kinds of functions and contracts would be useful to scope and prioritise this work.
Capability	8: Capacity and capability	<i>Formally assess IM capability and capacity requirements against current business needs and decide if the needs can be addressed internally or with some external expertise.</i>	While current capacity and capability for IM are considered appropriate for a small organisation, there is an impact on IM due to low resourcing. An example is noted in the audit report Topic 9: <i>IM roles and responsibilities</i> where staff IM training is requested. When the strategy is developed IM resourcing should be reassessed to ensure that not only BAU but improvement activities can be addressed.

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Capability	9: IM roles and responsibilities	<i>IM training, particularly on the use of metadata and search techniques, for business systems should be prioritised.</i>	It is commendable that IM responsibilities are included in the on-boarding process but the organisation should assess how further IM training could be made available.
Creation	10: Creation and capture of information	<i>Identify the issues with SharePoint and remediate these where possible.</i>	This activity is also the recommendation for Topic 13: <i>Integrity of information.</i>
Creation	11: High-value / high-risk information	<i>Determine the high-value / high-risk physical and digital information assets and record these in an information asset register.</i>	The current organisation-specific disposal authority is a good basis to work from in developing an IAR.
Disposal	21: Implementation of disposal decisions	<i>Finalise and obtain approval from senior management for the Records Retention and Disposal plan. Ensure this includes disposal of digital information in line with the requirements of general and organisation-specific disposal authorities.</i>	Approval of the plan and further implementation of disposal would see Herenga ā Nuku realising the benefits of having an organisation-specific disposal authority.