



# Public Records Audit Report for the Accreditation Council

Prepared for Archives  
New Zealand

December 2022



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The information presented in this report is based on that made available to us in the course of our work, publicly available information, and information provided by Archives New Zealand and International Accreditation New Zealand. 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.

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### **Independence**

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

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# 1. Executive summary

The Accreditation Council of New Zealand (Accreditation Council) is a group of 55 full time equivalent staff who work closely with many government departments to support regulation and the adoption or development of international standards. It partners with laboratories, inspection bodies, building consent authorities and medical imaging providers around New Zealand to ensure they are meeting these standards through 'accreditation'.

The Accreditation Council creates public records across its operations, including fieldwork documentation from assessments, accreditation details and corporate records.

The Accreditation Council has an Enterprise Content Management system (ECM) which holds most of the digital information, shared drives which hold historic information, and a Client Relationship Management System (CRM) which holds all client information. The ECM was implemented in 2015, alongside a shift away from physical records. Historic physical records are held at a third party storage provider.

There is one Business Support Manager and an Information Technology (IT) Manager who lead information management at the Accreditation Council.

The Accreditation Council's information management maturity is summarised below. Further detail on each of the maturity assessments can be found in sections 4 and 5 of this report.

<b>Beginning</b>	<b>9</b>
<b>Progressing</b>	<b>4</b>
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## 2. Introduction

KPMG was commissioned by Archives New Zealand to undertake an independent audit of the Accreditation Council under section 33 of the Public Records Act 2005 (PRA). The audit took place in October 2022.

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

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

## 3. This audit

This audit covers all public records held by the Accreditation Council including both physical and digital information. Telarc Limited is a Crown Entity Subsidiary and is 100% owned by the Accreditation Council. However, this was out of scope for this audit as it is assessed as a public office in its own right and will be audited independently.

The audit involved reviews of selected documentation and interviews with selected staff; including the Executive Sponsor, the Information Technology team, and a sample of other staff members from various areas of the Accreditation Council. The Executive Sponsor is the Senior Responsible Officer for the audit.

The audit reviewed the Accreditation Council's information management practices against the PRA and the requirements in the Information and Records Management Standard (the Standard) and provides an assessment of current state maturity. As part of this audit, we completed systems assessments over the Accreditation Council's key systems that act as a repository for public records. The key systems reviewed included the Accreditation Council's ECM, shared drives, Outlook, and their client management system. Where recommendations have been made, these are intended to strengthen the current state of maturity or to assist with moving to the next level of maturity.

The summary of maturity ratings can be found at Section 4, with detailed findings and recommendations following in Section 5. The Accreditation Council 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
<b>Governance</b>							
	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	●				
<b>Self-monitoring</b>							
	7	Self-monitoring			●		
<b>Capability</b>							
	8	Capacity and Capability		●			
	9	IM Roles and Responsibilities	●				
<b>Creation</b>							
	10	Creation and capture of information				●	
	11	High-value / high-risk information	●				
<b>Management</b>							
	12	IM requirements built into technology systems				●	
	13	Integrity of information			●		
	14	Information maintenance and accessibility			●		
	15	Business continuity and recovery	●				
<b>Storage</b>							
	16	Appropriate storage arrangements		●			
<b>Access</b>							
	18	Information access, use and sharing		●			
<b>Disposal</b>							
	20	Current organisation-specific disposal authorities	●				
	21	Implementation of disposal decisions	●				
	22	Transfer to Archives New Zealand	●				

**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***

The Accreditation Council does not have an information management strategy in place to provide strategic direction and support over information management activities.

Although there is no documented strategy specific to information management, senior management do support the strategic direction of the Accreditation Council's recordkeeping practices through their IT strategy. Senior management are investing in an IT transformation which encompasses a strategy to ensure appropriate management of information in the future. This IT strategy is documented in the Accreditation Council's *Current State Assessment* review which outlines the current use of technology and identifies system improvements.

An example of senior management supporting an information management strategy is a new initiative of *Information as a Service*. While this initiative is in its infancy at the Accreditation Council, the intent is to utilise the information held by it to draw insights about changes and improvements across the industry. The Accreditation Council would be able to actively market these insights gained through its primary business function to diversify the Accreditation Council's service offerings. This initiative highlights that senior management understands the value of the information held by the Accreditation Council.

#### ***Recommendation***

Develop an information management strategy following Archives New Zealand's guidance. The information strategy should be approved by senior management and communicated to all staff and contractors, including technical experts.

**Summary of findings**

There is no stand-alone information management policy. However, the Accreditation Council's *Accreditation Services Management System Manual* references information management. This manual details the Accreditation Council's expectations on confidentiality provisions, record control and publicly available information under its accreditation services function. In addition, there is documentation outlining processes relating to the storage of client records in the Accreditation Council's Client Management System. However, there is limited policy and process documentation across the corporate functions at the Accreditation Council.

Given the accreditation service process documents encompass information management, the Accreditation Council is well placed to formalise a policy document specific to information management across both corporate and accreditation services.

Staff have a general awareness of their roles and responsibilities for information management, and some staff understood their requirements under the Standard and requirements, but this is not formally documented.

**Recommendation**

Develop an information management policy and associated process documents that provide information management guidance to staff. It should include roles and responsibilities, align with the Standard and requirements, and relevant legislation.

**Summary of findings**

Due to the size of the organisation, the Senior Leadership Team also functions as the information management team. This includes the Chief Executive and Business Support Manager. Information management is incorporated into the management team's priorities and planning document. This document provides some direction and support for information management for the Accreditation Council.

The Executive Sponsor actively promotes the value and importance of information management by encouraging a collaborative environment with the team and providing support to staff where needed. The drive for continuous improvement in information management practices and the proposed *Information as a Service* initiative are key examples of this advocacy.

The Executive Sponsor's role also encompasses quality management, holding the responsibility of auditing the Accreditation Council's accreditation services function. These audits review the Accreditation Council's assessment practices, including how their assessors create, capture and store information, showing that information management responsibilities are integrated into the Accreditation Council's usual business processes.

The Executive Sponsor does not currently work with Executive Sponsors from other organisations.



## ***Recommendations***

The Executive Sponsor should consider working with other Executive Sponsors in public offices of a similar size or within the sector, to form a community of practice.

The Accreditation Council should act on identified issues from regular information management reporting

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

## **Maturing**

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

The Executive Sponsor has overall responsibility for the management of information in their role as Business Support Manager. Due to the size of the organisation, the Executive Sponsor is involved in any change or development of business processes. Information management is highly integrated into business processes as this is a key component of all business functions, particularly the Accreditation Council's accreditation service.

Staff are aware of their responsibilities for information management as their roles require and they actively fulfil these within their business area. For example, staff are required to identify the class of document they are uploading into the ECM, which then prompts mandatory metadata to be saved. The metadata required will differ depending on the class of information being saved. By using mandatory metadata fields, it ensures consistency in finding information.

Staff interviewed felt confident that they could raise issues around information management with the Executive Sponsor. However, performance plans do not include responsibilities for management and quality of information.

### ***Recommendation***

Include responsibilities for the management and quality of information in performance plans for business owners who have IM responsibilities.

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## **TOPIC 5 – Outsourced functions and collaborative arrangements**

## **Beginning**

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

The Accreditation Council does not have any significant outsourced functions or collaborative arrangements in place.

The Accreditation Council rarely engages formal contractors, but it does engage technical experts on an ad-hoc basis to support the accreditation service. There are no formal agreements with technical experts, so information management roles and responsibilities and requirements for information management are not identified in contracts. However, external parties are required to sign a *Confidentiality and Impartiality Declaration*. While this declaration includes specific clauses on confidentiality and privacy, it makes no reference to the Public Records Act or the public records status of any deliverables.

### **Recommendation**

Identify the work with external parties that create public records and ensure that this is covered by documentation covering IM responsibilities and requirements.

## **TOPIC 6 – Te Tiriti of Waitangi**

## **Beginning**

### **Summary of findings**

The Accreditation Council has not identified any information that is of importance to Māori. In addition, there is currently limited capability within the Accreditation Council to incorporate and maintain metadata in Te Reo Māori. As a result, the Accreditation Council has not been able to actively improve the accessibility and discoverability of information of importance to Māori.

### **Recommendation**

Identify whether the Accreditation Council holds information that is of importance to Māori. The outcome of this exercise will inform the Accreditation Council what further actions are required to address this topic.

## **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**

## **Managing**

### **Summary of findings**

While the Executive Sponsor actively raises awareness of information management compliance to the Senior Leadership Team, this is not a recurring agenda item in their meetings. Where information management is discussed, an action list is documented and circulated after each meeting.

Staff noted that there is regular monitoring of internal information management processes to ensure compliance with internal processes. For example, in addition to a comprehensive training process for assessors, their assessments continue to be peer reviewed to ensure individuals consistently follow information management procedures. Each assessment is signed off by the assessment lead, ensuring that all necessary information has been created and captured in the ECM.

There is also a formal auditing process to support accurate monitoring of information management practices across the assessments undertaken by the Accreditation Council. There is limited monitoring of corporate services staff adherence to information management practices. The Executive Sponsor conducting an audit of each work programme. The Executive Sponsor selects a sample of assessments, and reviews whether staff have followed the applicable assessment processes, including their required information management practices. The business maintains an audit schedule and there is full visibility of audit outcomes and actions across the Senior Leadership Team.

Furthermore, every four years the Accreditation Council is audited by the Asia Pacific Accreditation Cooperation to ensure a high performance standard. This review and report include a summary of information requirements, document and records control, and review of the Accreditation Council's ECM and internal auditing processes.

The Accreditation Council identifies the above monitoring activity as critical to business functioning. As a result, information management is a key focus of its internal risk management process. However, while it is detailed, the self-monitoring does not specifically reference the Public Records Act requirements or the Standard in either the Accreditation or Corporate sides.

### ***Recommendation***

Review existing self-monitoring practices to ensure that they consider compliance with Public Records Act requirements, and the Archives New Zealand Standard.

## **Capability**



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

## **TOPIC 8 – Capacity and Capability**

### **Progressing**

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

The Executive Sponsor is responsible for providing oversight and monitoring of information management practices and is supported by the Senior Leadership Team to do so. The Executive Sponsor and IT Manager form the information management capability at the Accreditation Council. Across these staff members, the Accreditation Council has access to appropriate Information Management staff capability and capacity to support staff and information management in its current state. However, staff acknowledge there is room to improve their knowledge around the Public Records Act particularly for the corporate side of the business. Information Management staff have confidence that if requested, they could utilise professional development budgets to improve their capability in this area.

Information management capacity is not currently included in the Accreditation Council's workforce planning. To maintain information management maturity, the current capability and capacity levels are suitable. However, to improve information management maturity, which the Accreditation Council endeavours to do, capability and capacity will need to be considered in workforce planning.

### ***Recommendation***

Review the workforce planning to include information management capability and capacity.

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

## **Beginning**

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

Accreditation Council staff have a high-level awareness of their information management responsibilities. Staff complete induction training modules as part of staff onboarding.

Roles and responsibilities for information management are not documented in job descriptions, performance plans and codes of conduct for staff. These roles and responsibilities are also not assessed as part of employee performance. However, employment agreements require staff to comply with all Accreditation Council policies and procedures. As information management is captured in the *Accreditation Services Management System Manual*, this would be considered a procedure that must be complied with under employment agreements.

Training on information management is strong for assessors. There is a structured training schedule that all assessors must complete which can take up to six months. This training teaches assessors the fundamentals of their role, including the creation and capture of information. Training includes observing ten assessments which ensures a strong understanding of information management responsibilities in relation to assessments before undertaking their first five assessments under supervision. Once completed and logged alongside other relevant training in their *Training Record*, they are signed off to be an assessor. Induction and ongoing trainings are less formal and structured for corporate services staff, with most information management practices being taught while on-the-job.

### ***Recommendations***

Information management roles and responsibilities for staff and contractors should be included in job descriptions, performance plans and the Accreditation Council's code of conduct.

All staff and contractors should have a formal induction specific to their IM roles and responsibilities.

## 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

## Maturing

### *Summary of findings*

Accreditation Council staff and contractors actively ensure that the right information is created and captured as part of all business functions and activities. While uploading information into the ECM, staff are prompted to identify the file type and create mandatory metadata. Staff are also encouraged to manually capture additional metadata. However, there is an opportunity to enhance efficiency using automated metadata capture.

The Accreditation Council provide staff with laptops and mobile phones to carry out business functions, both of which can access the ECM. Therefore, the use of uncontrolled environments and personal devices to manage information is limited, and the business actively discourages this during assessor induction training. Information transfers between the Accreditation Council and its clients typically occurs via email, and a new file sharing system will be implemented in early 2023. The business occasionally issues USB drives to staff for temporary information transfers for site visits where there is no internet connection, or where a client has requested information be shared through USB. However, these types of requests are becoming less common. Use of external sites is monitored, and any issues would be reported to the Senior Leadership Team.

With metadata measures in place, staff are confident in the reliability and trustworthiness of the information they find in the ECM. This is further supported by version controls in place. To support the monitoring of these information management practices, programmes of work in the accreditation services space are audited annually to ensure documents are appropriately recorded in the ECM.

### *Recommendation*

Consider the use of automation to capture metadata and other document information as part of its business functions and activities.

***Summary of findings***

The Accreditation Council has not undertaken a process of formally identifying information assets as high-value or high-risk for the purpose of determining what information needs to be created and managed in accordance with the PRA. Therefore, the Accreditation Council does not have a documented inventory of information it holds. Without a register of this information, it is not possible to develop a long-term management plan that focuses on the maintenance of high-value or high-risk records.

There is a view that much of the information the Accreditation Council holds is likely to be high-value or high-risk, however it requires analysis to understand which specific information should be identified as such.

***Recommendation***

Formally identify high-value/high-risk information assets in the Accreditation Council.

**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***

The Executive Sponsor is involved in the design, configuration, and implementation of new and updated business systems. The Executive Sponsor as a member of the Senior Leadership Team is key to decision making around the design and deployment phases of technology systems. The Accreditation Council’s transition from a paper-based to more of a paperless organisation and the implementation of the ECM are examples of where the Executive Sponsor used information management expertise in overseeing system change. Furthermore, the IT Manager is actively involved in any iterative changes to the ECM and other business systems.

The Executive Sponsor and IT Manager both ensure that any updates to business systems align with business units’ needs while still ensuring strong information management practices. For example, the move to their current ECM was driven by an understanding that the use of shared drives was not adequate for storing information collected during assessments. The Executive Sponsor and IT manager are also involved in the decommissioning of business systems to ensure information management requirements are met. An example of both is the recent migration to a new payroll system, where they were engaged by their finance function to ensure information management was considered and there would be no information loss.

While there is a general awareness about the risks to information associated with the use of information management systems, these are not actively mitigated as there is no risk register for technology systems.

### ***Recommendation***

Where the Accreditation Council identifies risks relating to business systems, record these in a risk register.

## **TOPIC 13 – Integrity of information**

## **Managing**

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

Staff have a good understanding of information management requirements and that the information that they create should be comprehensive and complete. Staff interviewed were confident in their ability to create reliable and trustworthy information and did not report any problems with managing, storing, and accessing information.

The phased adoption of the new ECM has significantly improved information access. The ECM allows staff to capture minimum metadata requirements and the system has strong search capabilities to ensure documents in the system can be found easily. The ECM can also search for files within shared drives, allowing both information repositories to be searched at once.

Information management practices are particularly strong across accreditation services. This is due to the clear and documented processes around the creation, capture and storage of assessment information in the ECM. Due to the procedures in place, staff have a consistently good experience when sourcing assessment documentation. However, staff acknowledged that the corporate services area of the Accreditation Council requires additional direction around recordkeeping to ensure consistency in practices.

### ***Recommendation***

Formally implement information management processes across the Accreditation Council, with a particular focus on corporate services, to ensure the consistency of information management practices across the organisation.

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

## **Managing**

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

The Accreditation Council has strategies in place for managing and maintaining information during business and system changes. For example, upon launching its new ECM, the Accreditation Council decided to become more paperless and moved from having on-site storage of physical records to using a commercial storage provider. Physical information is held in paper format and metadata has been recorded to ensure accessibility of this into the future.

Risks to the ongoing accessibility of digital information have been identified and some have been mitigated. For example, the Accreditation Council recognises the risks of technology obsolescence as some of its historic records are in digital formats that are no longer accessible

digitally. Physical copies of these are held as the primary information source to ensure accessibility into the future. However, this issue has led the Accreditation Council to consider the file types used when storing digital information to ensure accessibility into the future.

### **Recommendation**

Create a risk register for preservation needs of both physical and digital information.

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

**Beginning**

### **Summary of findings**

The Accreditation Council has a *Disaster Recovery Plan* which was last updated in November 2017. The document provides details on the back-up and recovery of business systems but does not detail the critical information within these systems that will be required throughout a business disruption.

Physical records are not referenced within the *Disaster Recovery Plan*. However, these documents are stored at a commercial storage provider and are not required for regular business activities.

The Accreditation Council acknowledge that this document should be updated to focus on business continuity, including detail around critical information required throughout a business disruption.

### **Recommendation**

Review the existing *Disaster Recovery Plan* to reflect wider business continuity considerations. Incorporate information management by specifying what critical information is required to ensure business continuity.

## **Storage**



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

## **TOPIC 16 – Appropriate storage arrangements**

**Progressing**

### **Summary of findings**

All physical records are stored at a third-party storage provider who facilitate the protection of physical records. Servers remain located on-site, with intent to move to an external provider.



Digital records are tagged by staff with their document class. Once tagged, the ECM automatically updates document permissions based on the type of information. The user who created the document can also select who has access to the document. Digital information in the ECM cannot be deleted or destroyed permanently as IT can restore records.

Cyber security is monitored, with the IT Manager reporting on findings and risks in Senior Leadership Team meetings. Digital records are backed up and stored on tapes to prevent against loss. However, these backup systems have not been regularly tested since the Accreditation Council moved to a new datacentre 18 months ago.

### ***Recommendation***

Periodically review and test digital storage environments to ensure protection, security and back-ups are effective and appropriate. Report the findings to the Senior Leadership Team.

## **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***

The Accreditation Council uses an internal document class guide when saving information in its ECM, assisting staff to store documents appropriately and support the discovery of information. This guide is also helpful when staff retrieve information from the ECM because it directs them to the metadata tagged to the document they are retrieving.

Staff interviewed were knowledgeable on how to use the systems required to fulfil their roles, including the ECM and the Client Management System. Assessors have developed this knowledge through induction and ongoing training.

Staff had a good understanding of how the business controls access to certain files, and that IT had administrative rights to update permissions if required. The ECM also offers strong visibility over who has access, read, and edit rights for individual documents. However, these access controls are not formally documented.

The Accreditation Council's ECM meets Archives New Zealand's minimum metadata requirements, and staff utilise the metadata capabilities of the system well. Staff can establish personalised views within the ECM based on metadata tags to support rapid access to information. Some historic digital information remains on shared drives, which does not meet minimum metadata requirements.

Where the Accreditation Council uses technical experts to support its assessments service, verbal summaries are recorded digitally and stored within the ECM, and physical records are scanned and saved in the ECM. Where the Accreditation Council must share information externally, this is typically done via email. However, the Accreditation Council has plans to move towards a file sharing system linked to their ECM that will enable secure sharing of information with external parties as part of their IT transformation.

### ***Recommendation***

The Accreditation Council should formally document access controls and periodically review these to ensure controls remain appropriate.



## **Disposal**

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

## **TOPIC 20 – Current organisation-specific disposal authorities**

**Beginning**

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

There is no current and approved organisation-specific disposal authority. The Accreditation Council has never had a disposal authority in place since its establishment in 1973.

the Accreditation Council intends to develop an organisation-specific disposal authority and will seek guidance from Archives New Zealand to support development of this.

### ***Recommendation***

Develop an organisation-specific disposal authority and obtain approval from Archives New Zealand.

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

**Beginning**

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

The Accreditation Council does not have an organisation-specific disposal authority under which it is permitted to dispose of records. Therefore, it is only permitted to dispose of records under the General Disposal Authorities (GDAs).

No formal disposal actions have been taken against physical or digital records. Once an organisation-specific disposal authority has been developed and approved, the Accreditation Council will need to reassess resourcing required to implement disposal activity.

### ***Recommendation***

While the organisation specific DA is being created, develop an implementation plan for disposal under the GDAs.

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

## **Beginning**

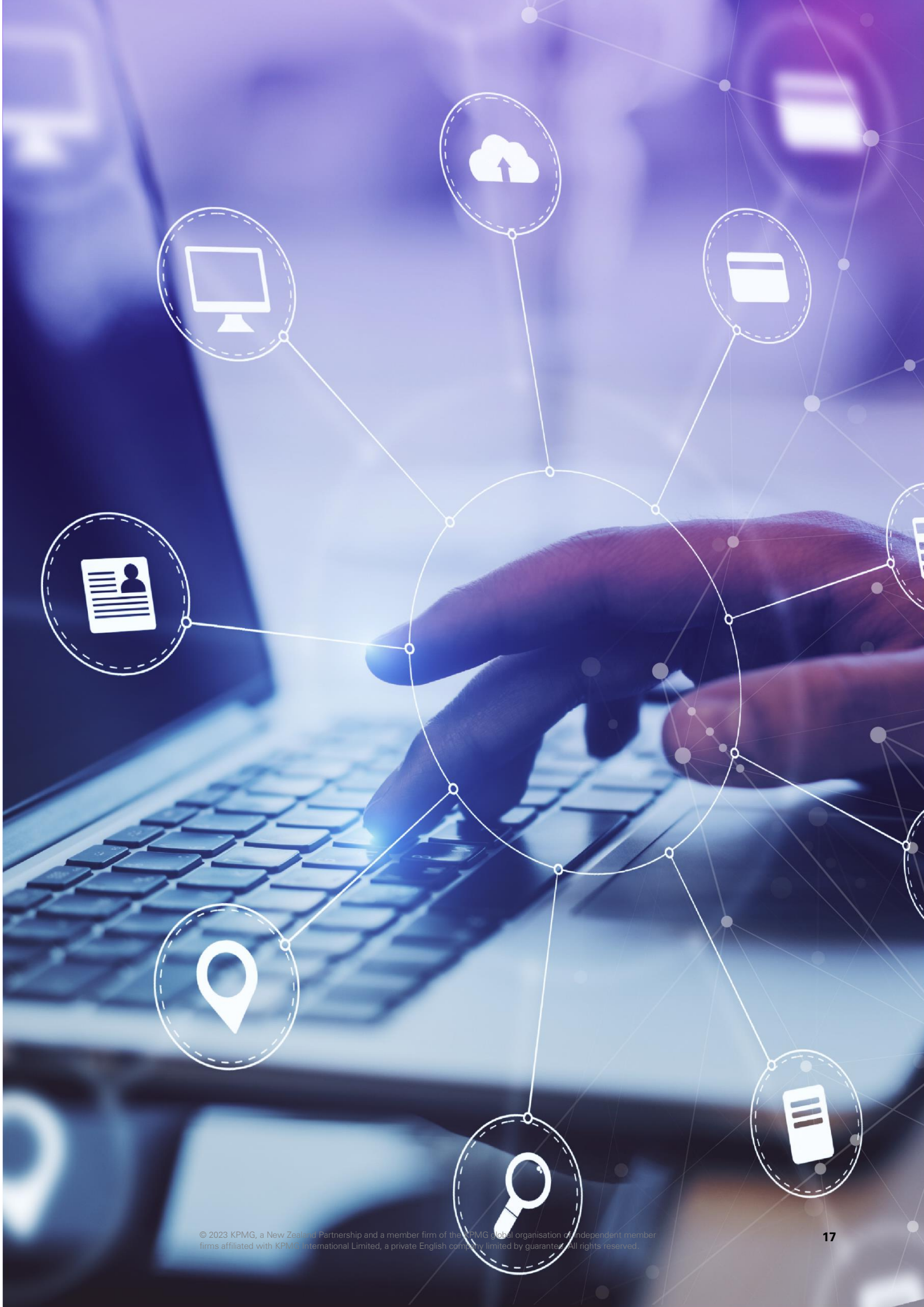
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### ***Summary of findings***

There have been no information transfers to Archives New Zealand in either physical or digital formats. The Accreditation Council is aware that it holds some physical and digital records over 25 years old, but there is no plan to transfer these to Archives New Zealand and there is no deferral of transfer agreement in place. Physical documents over 25 years old are stored with a third-party storage provider.

### ***Recommendation***

Following approval of the organisation-specific disposal authority, identify information of archival value that is older than 25 years in preparation for transfer.



## 6. Summary of feedback

*The Accreditation Council would like to thank the KPMG reviewers and Archives New Zealand for their audit and for the constructive manner in which it was undertaken. We concur that the reported maturity assessments against each of the Archives NZ categories fairly reflect the current status against the Public Records Act and Archives New Zealand Standard. We thank the team for their recommendations, which will provide a useful framework to ensure the Council's current and future initiatives in information management are aligned with the Public Records Act and Archives New Zealand expectations.*

## 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 – Progressing

Topic 3, Governance arrangements & Executive Sponsor – Maturing

Topic 4, IM integration into business processes – Maturing

Topic 5, Outsourced functions and collaborative arrangements – Beginning

Topic 6, Te Tiriti o Waitangi – Beginning

Topic 7, Self-monitoring – Managing

Topic 8, Capability and capacity - Progressing

Topic 9, IM roles and responsibilities - Beginning

Topic 10, Creation and capture of information - Maturing

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

Topic 12, IM requirements built into technology systems - Maturing

Topic 13, Integrity of information - Managing

Topic 14, Information maintenance and accessibility - Managing

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 – Beginning

Topic 21, Implementation of disposal decisions – Beginning

Topic 22, Transfer to Archives New Zealand – Beginning

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Tēnā koe Brian

## Public Records Act 2005 Audit Recommendations

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

### Introduction

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

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

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

### Audit findings

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

*Kia pono ai te rua Mahara – Enabling trusted government information*



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 Council has robust oversight of its accreditation role and associated information management however the corporate information management side of the organisation is not so well covered. The experience that the Council has with management of accreditation information will be able to be similarly applied to corporate information with the right level of specialist support.

### **Prioritised recommendations**

The audit report lists 22 recommendations to improve your organisation's IM maturity.

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

### **What will happen next**

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

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

Cc Barry Ashcroft, Business Support Manager (Executive Sponsor), [BAshcroft@ianz.govt.nz](mailto:BAshcroft@ianz.govt.nz)

## APPENDIX

Category	Topic Number	Auditor's Recommendation	Archive's Comments
<b>Governance</b>	1: IM Strategy	<i>Develop an information management strategy following Archives New Zealand's guidance. The information strategy should be approved by senior management and communicated to all staff and contractors, including technical experts.</i>	Despite being a small organisation, it is useful to have an agreed IM strategy and roadmap alongside or incorporated into the IT strategy. As IM relates to understanding the information required to operate the business and IT the structure that supports it both need to be covered.
<b>Governance</b>	2: IM policy and processes	<i>Develop an information management policy and associated process documents that provide information management guidance to staff. It should include roles and responsibilities, align with the standard and requirements, and relevant legislation.</i>	The goal here is to have both the accreditation and corporate services well covered by policy and process documentation so that requirements are well understood and can be actioned.
<b>Governance</b>	5: Outsourced functions and collaborative arrangements	<i>Identify the work with external parties that create public records and ensure that this is covered by documentation covering IM responsibilities and requirements.</i>	Roles and responsibilities for the maintenance of records created by external technical experts engaged in the accreditation work should be clearly documented and understood.
<b>Capability</b>	8: Capacity and Capability	<i>Review the workforce planning to include information management capability and capacity.</i>	As reported, to support improvement extra IM expertise is needed. Development of the IM strategic plan will help the organisation to understand the direction and what resources are needed.
<b>Capability</b>	9: IM roles and responsibilities	<i>All staff and contractors should have a formal induction specific to their IM roles and responsibilities.</i>	Formal induction is essential to understanding the organisation's requirements and these should be documented in the policy as well as other documents in the organisations' pantheon.

<b>Category</b>	<b>Topic Number</b>	<b>Auditor's Recommendation</b>	<b>Archive's Comments</b>
<b>Creation</b>	11: High-value/high-risk information	<i>Formally identify high-value/high-risk information assets in the Accreditation Council.</i>	This should be done based on an information asset register which would also support developing an organisation-specific disposal authority and will help the Council understand and manage its information.
<b>Management</b>	15: Business continuity and recovery	<i>Review the existing Disaster Recovery Plan to reflect wider business continuity considerations. Incorporate information management by specifying what critical information is required to ensure business continuity.</i>	Ensuring the Council understands its critical information and where it is held is a good start. This can be done in conjunction with development of an IAR.
<b>Disposal</b>	20: Current organisation-specific disposal authorities	<i>Develop an organisation-specific disposal authority and obtain approval from Archives New Zealand.</i>	This can be done in conjunction with developing and IAR.