



Public Records Audit Report for Manatū Taonga - Ministry for Culture and Heritage

Prepared for Te Rua Mahara o te Kāwanatanga Archives
New Zealand

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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

Manatū Taonga – Ministry for Culture and Heritage (Manatū Taonga) was established in 1999 and lead Government work in the arts, heritage, broadcasting and sports sector.

Manatū Taonga is responsible for providing advice on policy and legislation, monitoring of government funded cultural organisations, allocating and monitoring radio broadcasting licenses, collecting, preserving, and sharing the history of Treaty settlements and bringing New Zealand's culture and heritage online. Manatū Taonga had 182 full-time staff at the time of the assessment. Within the Information and Technology Services Team, the Senior Information Management Adviser and the Information Management Adviser are responsible for overseeing information management (IM) practices at Manatū Taonga.

Manatū Taonga creates high value public records that include governance and strategic management, Crown funding, monitoring and support publications and data.

Manatū Taonga manages information on an electronic document and record management system (EDRMS), SharePoint Online, and a Protected Objects Database. Both the EDRMS and SharePoint hold equivalent status as the official recordkeeping repository at Manatū Taonga.

Most records are maintained electronically. A small number of physical records are held on site, but the majority of physical information is held at a commercial third-party storage provider.

The IM maturity of Manatū Taonga is summarised below. Further detail on each of the maturity assessments can be found in Section 4 and 5 of this report.

Beginning	0
Progressing	12
Managing	8
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 Manatū Taonga under section 33 of the PRA. The audit took place in March 2024.

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

Te Rua Mahara provides the framework and specifies the audit plan and areas of focus for auditors. Te Rua Mahara also provides administrative support for the auditors as they undertake the independent component of the audit process. The auditors are primarily responsible for the onsite audit and writing the audit report. Te Rua Mahara is responsible for following up on the report's recommendations with your organisation.

3. This audit

This audit covers all public records held by Manatū Taonga including both physical and digital information.

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

The audit reviewed IM practices at Manatū Taonga against the PRA and the requirements in the Standard and provides an assessment of current state maturity. As part of this audit, we completed systems assessments over key systems that act as a repository for public records at Manatū Taonga. The systems assessed were SharePoint Online, an EDRMS, and a Protected Objects Database. 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. Manatū Taonga has reviewed the draft report, and a summary of their comments can be found in Section 6.

4. Maturity Assessment

This section lists all assessed maturity levels by topic area in a table format, refer to Appendix 1 for an accessible description of the table. For further context about how each maturity level assessment has been made, refer to the relevant topic area in the report in Section 5.

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

Please note: Topics 17 and 19 in the Information Management Maturity Assessment are applicable to local authorities only and have therefore not been assessed.

5. Audit findings by category and topic



Governance

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

TOPIC 1 – IM strategy

Managing

Summary of findings

Manatū Taonga has an Information Management Strategy (the Strategy) that was approved in August 2023 by the Te Kahui Mataaho (TKM), the senior leadership team at Manatū Taonga. The Strategy was presented to third tier managers by the Executive Sponsor and the Senior IM Adviser. The Strategy was communicated to all staff and contractors via the newsletter and is accessible on the intranet.

The Strategy supports wider business needs and legislated responsibilities. The Strategy details three strategic goals to ensure:

- Information is discoverable and accessible by Manatū Taonga staff and stakeholders.
- Information has integrity and is valued to enable Manatū Taonga to fulfil its core functions.
- Information is captured, shared, and used to support Manatū Taonga achieve its strategic vision.

The Strategy detailed 27 initiatives to be undertaken to improve IM practices and to support the achievement of the strategic goals. Examples of these initiatives include *designing a regular IM reporting process that provides useful and actionable information for the Executive Sponsor and the Information Governance Group* and *Develop a digitisation policy to support planned and sustainable digitisation of physical information and records*. An IM work programme has been developed to undertake the initiatives detailed in the Strategy. The work programme is detailed in the *IM Strategy Initiatives Implementation Plan*

Information management staff have reported to the Executive Sponsor on the progress of the IM work programme. Reporting to the Executive Sponsor has occurred twice since the Strategy was implemented. There is a draft monitoring and reporting framework that outlines the process of quarterly IM reporting to the Executive Sponsor, monthly reporting to the Chief Information Officer (CIO), and IM governance group. Progressing the development and implementation of the IM monitoring and reporting framework is underway as one of the strategic initiatives.

Recommendation

Complete the development and implementation of the IM monitoring and reporting framework.

Summary of findings

The Information Management Policy (the Policy) was approved by TKM in November 2023.

The Policy is consistent with the Strategy, the PRA, the Standard and requirements issued by Te Rua Mahara. The Policy is linked to other Manatū Taonga policies, such as the Information Security Policy Framework. The Policy documents the roles and responsibilities for all Manatū Taonga staff.

Manatū Taonga has developed and published up-to-date and approved IM guidelines, which include the *Best Practice When Managing Information* document and the *Information Management Guide*.

The Policy and process documentation are provided to all staff during their on-boarding process and are regularly communicated via the all-staff weekly newsletter. Both the Policy and process documentation are accessible via the intranet.

There are no processes in place to manage breaches of the Policy.

Recommendation

Develop an approach to manage breaches of the Policy.

Summary of findings

Manatū Taonga is in the process of determining whether IM will be governed by a stand-alone group or is included in a broader governance group. A Terms of Reference for an IM governance group at Manatū Taonga has been developed. However, due to the high turnover in the Executive Sponsor role, this governance group has not been very active.

The Executive Sponsor is the Deputy Secretary Corporate Services. At the time of this audit, the Executive Sponsor had been in their role for less than two months. The Executive Sponsor has actively sought to understand their role and responsibilities for providing oversight for IM through engagement with IM staff and an external IM consultant. While the current Executive Sponsor has been in their role for a short period, IM staff expressed that they feel supported and empowered by the Executive Sponsor to achieve the IM-related strategic objectives. The Executive Sponsor is responsible for developing and presenting the business case to migrate all information to and formalise SharePoint Online as the official recordkeeping repository at Manatū Taonga. The Executive Sponsor has advocated to extend the role of a contracted Senior Technical Business Analyst to ensure that there is appropriate capability to support the migration project.

Manatū Taonga has provided examples of IM reporting performed in 2023 to the former IM governance group. Manatū Taonga has provided a quarterly report that was provided to TKM which detailed the completion of the Policy, and how IM had been formally integrated into the certification and accreditation process for new systems at Manatū Taonga. As mentioned in *Topic 1 – IM Strategy*, there is a draft IM monitoring and reporting framework in place and the Executive Sponsor has been reported to twice since the Strategy was approved. The Executive Sponsor has set an expectation for IM staff to provide reporting to them on a quarterly basis.

Recommendation

Determine whether IM will be formally governed by a stand-alone group or as part of a broader governance group.

Summary of findings

Roles and responsibilities for IM are communicated to staff and contractors during the onboarding process and are documented in the Policy. The Policy requires that *managers and business unit owners are responsible for the management of the information their teams create or collect, or information systems they oversee*. Managers and business owners *should model and encourage good IM practice, and work with the IM team to identify risks that should be mitigated by training or process improvement*. Business owners inconsistently demonstrate and act upon their IM responsibilities. Staff said that there is an opportunity for business owners to consistently role model good IM behaviour. Staff said that there is an opportunity for improvement within business units that have more contractors as they do not understand IM requirements.

All new and upgraded business systems, projects, and programmes of work are now required to populate an IM plan. A requirement of the IM plan is to have owners that are responsible for the information that is created, managed, and stored.

Issues with the management of information that impact business processes are identified on an inconsistent basis. Manatū Taonga is planning to strengthen their IM monitoring functionality through the development of a monitoring and reporting framework. Staff generally consult with IM staff in the event that they need support.

Recommendation

Develop specialised training for business owners so that they are aware of their roles and responsibilities.

Summary of findings

Manatū Taonga confirmed they do not have any significant outsourced functions. Manatū Taonga provided a template of a memorandum of agreement between Manatū Taonga and an iwi entity. The template details some IM roles and responsibilities and requirements, for example, the iwi entity must *be able to supply information that may be requested by Manatū Taonga from time to time to enable the parties to comply with their respective reporting obligations*. Manatū Taonga is planning to embed standard IM requirements in all significant agreements.

The template acknowledges that the information created as part of this arrangement will be publicly available.

Manatū Taonga has plans in place to carry out an exercise to review all existing major collaborative arrangement agreements that may produce or contain high-risk or high-value information. While some monitoring of contracted parties to ensure IM requirements are met is performed by Legal, IM staff have a strategic initiative in place to formally set up a process to monitor compliance with contractual clauses relating to the management of Manatū Taonga records.

Recommendation

Embed IM requirements in all agreements with significant collaborative arrangements.

Summary of findings

Manatū Taonga understand that they hold information of significant importance to Māori. Manatū Taonga maintains a Protected Objects Database, which is a system that records information regarding found taonga tūturu (protected objects). Information about taonga tūturu is registered by public museums, archaeologists, and iwi representatives.

As Manatū Taonga engages with over 60 iwi, hapū, and whānau groups, an engagement workspace has been developed in SharePoint Online in order to manage all interactions in a single area. The EDRMS and the Manatū Taonga website enables macrons to be used in the search function to support the discoverability of information of importance to Māori. Manatū Taonga has made a significant amount of information of relevance and importance to Māori publicly available on their website.

Planning is underway to implement changes to IM practices to improve access, discoverability, and care for information of importance to Māori. Manatū Taonga is developing metadata to enable SharePoint Online to support the further identification of information of importance to Māori. The metadata created will be used to label information of importance to or of relevance to Māori in an information asset register (IAR). Manatū taonga is in the process of developing the structure of the IAR.

Projects are underway to improve IM practices that include appropriate levels of care of information of importance to Māori. Manatū Taonga is building their capability and awareness of Māori Data Sovereignty and has ensured that the Protected Objects Database is hosted locally.

Staff with IM expertise have not historically been involved in any new agreements with Māori or of importance to Māori. However, the Senior IM Adviser is building relationships with the recently established Te Hononga Māori Crown Partnerships team. This team is responsible for providing strategic advice regarding working respectfully and purposefully with Māori. Plans to identify IM implications from Te Tiriti agreements and the practical application of them are included in the strategic initiatives. Some IM implications of Te Tiriti o Waitangi agreements have been identified. For example, these agreements are based on openness between parties, therefore Tiriti partners are given an orientation tour of what is held at Manatū Taonga that is of relevance to them. Tiriti partners have the authority to have full and ongoing access to this information.

Recommendations

Complete the metadata schema that supports further identification and findability of information of importance to Māori.

Work with the Te Hononga Māori Crown Partnerships Team to determine and document all IM implications from Te Tiriti agreements and other agreements with Māori.

Self-monitoring



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

TOPIC 7 – Self-monitoring

Progressing

Summary of findings

Manatū Taonga performs some monitoring of compliance with the Policy and IM processes. Monitoring activities are performed by the IM Adviser and include review of the volume of information stored in uncontrolled environments and the volume of documents that have been checked in and checked out. Some monitoring is performed over the types of documents that are being created and by whom.

Information management staff said that as the Policy is aligned to the PRA and the Standard, monitoring activities also encompass compliance with legislative requirements. Information management staff said that compliance with the Privacy Act 2020 and the Official Information Act 1982 is performed by a different business unit.

Results of monitoring activities are inconsistently reported to the Executive Sponsor and TKM. Information management staff said that once the reporting and monitoring framework is completed, and SharePoint Online is established as the official recordkeeping repository, there will be more insightful IM reporting.

Corrective actions to address compliance are inconsistent. Manatū Taonga does not have a formal process on how corrective actions are implemented. The IM adviser informally follows up with staff members when they are at risk of non-compliance.

Recommendation

Complete the IM reporting and monitoring framework.



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

Managing

Summary of findings

Manatū Taonga confirmed that IM capability requirements are appropriately addressed for the current state. The Senior IM Adviser joined Manatū Taonga approximately two years ago and had past experience in a similar role across multiple Public Sector organisations.

Staff at Manatū Taonga responsible for IM are the Senior IM Adviser and IM Adviser who both report to the Chief Information Officer. IM staff have been upskilled when they worked with an external IM consultant in 2023 to develop the Strategy.

The Executive Sponsor and IM staff said that capacity requirements are appropriately resourced for the number of staff working at Manatū Taonga. Information management staff are supported by a Senior Adviser, Operations and Projects and a fixed-term Senior Technical Business Analyst when required.

Manatū Taonga confirmed that IM capacity is included in workforce planning and is assessed each financial year against the operating budget. Manatū Taonga said that they have considered future IM workforce demand.

Information management staff have access to some IM-related professional development. Information management staff attend some cross agency education sessions and are provided with some upskilling opportunities where it is relevant to their roles. Upskilling opportunities are readily accessible via the ongoing relationship with an external IM consultant and the vendor working with Manatū Taonga on the SharePoint Online migration project. Information management staff noted that they may be constrained by budget to attend formal professional development opportunities to further develop their technical expertise.

Recommendations

Review budgets allocated to IM staff and determine whether there is sufficient budget available to have IM staff attend formal professional development opportunities.

Summary of findings

Manatū Taonga has decided to exclude IM roles and responsibilities from job descriptions, as IM responsibilities and compliance requirements are included in the Policy. Catch-all statements in the code of conduct require all staff and contractors to comply with all Manatū Taonga policies.

A formal induction to IM roles, responsibilities, and practices is given to all staff and most contractors as part of the on-boarding process.

Information management responsibilities are communicated to all staff and contractors through the formal onboarding process. The onboarding process is a two-day online 'essentials' training that involves understanding what records are, what the staff member's responsibilities are, and an overview of Policy requirements. Within a fortnight of staff being onboarded, the IM Adviser provides an in-person training of the systems used at Manatū Taonga.

Manatū Taonga plans to develop a formal and ongoing programme of IM training for all staff and contractors, which is identified as an initiative in the Strategy.

Recommendation

Develop a formal and ongoing programme of IM training to meet business needs and deliver the training programme to all staff and contractors.

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 are made aware of their obligations to create and capture full and accurate records during the on-boarding process. Information is routinely created and captured as part of all business functions and activities.

Information is generally managed in controlled environments to ensure its usability and reliability. At the time of the audit, the EDRMS and SharePoint Online held equivalent status as recordkeeping repositories, which resulted in some concerns around the findability of information. Information is currently created and stored across the EDRMS, SharePoint Online and OneDrive. Staff said that emails are filed into the EDRMS in an inconsistent basis, as it is easier to find these emails on Outlook as opposed the EDRMS. There is some monitoring in place on the use of uncontrolled environments to store information.

Most metadata is automatically applied to information stored in the EDRMS and SharePoint Online to support usability, reliability, and trustworthiness of the information. As the use of standardised naming conventions and version control is inconsistent at Manatū Taonga, there is a risk that information may be unreliable.

Outlook storage is occasionally monitored by IM staff and staff are informed of their obligations to manage information appropriately when their Outlook storage is nearing capacity. Monitoring of whether information is saved in the correct location is performed by IM staff on a monthly basis. Quality review of information that is created at Manatū Taonga is largely ad hoc and dependent on capacity.

A structured approach to monitoring and addressing information usability, reliability, and trust issues is being developed. Information management staff are currently formalising the reporting and monitoring framework.

Recommendation

Formalise SharePoint Online as the official recordkeeping repository and reduce the number of shared drives.

Summary of findings

There is no inventory of information held on digital systems. There is an inventory on the EDRMS of physical information stored on-site and at the third-party storage provider. Information management staff confirmed that the development of an IAR is underway to formally document all information assets maintained at Manatū Taonga.

High-value/high-risk information has been identified in the appraisal report that was developed to obtain the organisation-specific disposal authority.

While analysis of risks to specific information assets has not been identified, Manatū Taonga engaged a third-party in December 2023 to perform an Information Security Risk Review. The Review considered IM risks, such as *knowledge is not documented or is lost*, and *personal information is unlawfully accessed and/or lost*. All new and upgraded business systems are now required to have a documented Information Management Plan, that details whether the information contained within the system is considered high risk. Risks to information and mitigations are detailed in the accompanying Privacy Impact Statement and Business Risk Assessment.

Recommendations

Identify high-value/high-risk information assets in the IAR.

Management



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

TOPIC 12 – IM requirements built into technology systems

Managing

Summary of findings

Information management expertise is involved in design and configuration decisions relating to most new and upgraded business systems. The Senior IM Adviser was consulted during the implementation of the new HR system. The Senior IM Adviser and the IM Adviser are involved in the EDRMS to SharePoint Online migration project.

Information management expertise is involved during the decommissioning of some business systems to ensure IM requirements are met. Manatū Taonga has recently decommissioned an email archive, where IM staff were consulted on the retention of information that was stored on the system. The Senior IM Adviser has developed the *Information Management Requirements for Migration and Decommissioning of Systems* to ensure IM requirements are considered during the decommissioning of systems.

As mentioned in *Topic 11 – High-value/high-risk information*, an Information Management Plan is required to be completed for all new and upgraded business systems. The Information Management Plan includes standardised IM requirements that are required to be applied to all business systems. Information management requirements are also considered in mandatory business impact assessments and cloud risk assessments. The EDRMS and SharePoint Online meet the minimum metadata requirements issued by Te Rua Mahara.

In order to facilitate the retention of information of long-term value, Manatū Taonga is in the process of applying retention labels to information stored on the EDRMS and SharePoint.

System design and configuration are fully documented for all business systems. Depending on the system, design and configuration documents are maintained either by Manatū Taonga or the external system provider.

Recommendation

Apply retention labels in line with general and organisation-specific disposal authorities to information stored on the EDRMS and SharePoint Online.

Summary of findings

IM practices that ensure information is reliable and trustworthy varies between business units. Staff have identified that business units that have more contractors tend to demonstrate less compliance with the Policy and processes as they do not understand IM requirements.

Staff have variable experiences when trying to find and retrieve information. While the expectation that final versions of information are stored on the EDRMS, information is currently managed across the EDRMS and SharePoint Online. While there are guidelines on naming conventions available for staff to refer to, there is an inconsistent application of naming conventions across Manatū Taonga. As a result of these factors, information can be difficult to find and retrieve. Staff also noted that the file plan is uncontrolled in the EDRMS, therefore they find it challenging to understand where they are expected to save their information.

Policy requirements expect all staff and contractors to understand that the information they create and manage should be comprehensive and complete. Staff demonstrated an understanding of this requirement, however there is a lack of confidence in contractors in that they understand their obligations.

Recommendation

Ensure the file plan is controlled on SharePoint Online.

Deliver further training and guidance to contractors on the requirements for managing information.

Summary of findings

Strategies are in place to manage and maintain information during business and system changes. Manatū Taonga maintains a list and location register of physical information maintained at the third-party storage provider. A list and location register is maintained on the EDRMS for physical information held on-site. Access to this information is restricted to IM staff. Risks to the ongoing accessibility of physical information held on-site are identified, and plans are in place to transfer physical information held on-site to the third-party storage provider.

Preservation needs for information held at the third-party storage provider and on-site have not been identified.

Strategies are in place to manage and maintain digital information during business and system changes. Manatū Taonga has published guidance documentation for new and upgraded information systems, which includes IM considerations 'by design'.

Manatū Taonga has identified servers that are at risk of technology obsolescence and is planning to replace these servers with cloud solutions. Manatū Taonga has also identified technology obsolescence risk to CDs, USBs and discs. Manatū Taonga has performed a back-up of information and are planning to transfer it to a third-party storage provider.

Preservation and digital continuity needs for digital information have been identified. Work has also been performed to update old files stored in the EDRMS to file types that are compatible with SharePoint Online where possible. Manatū Taonga said that the migration strategy specific to the migration from the EDRMS and SharePoint will require the considerations of option and solutions for any inaccessible file formats.

Recommendation

Address preservation and digital continuity needs as identified or mitigate the risks as relevant.

Summary of findings

Manatū Taonga has identified their critical services and systems in the Information Technology and Records Business Continuity Plan (BCP), however, critical information is not identified at an asset level. All critical information is stored in a digital format to enable business continuity and recovery.

The BCP does not include the salvage and restoration of physical business information held on-site. Information management staff said that there are plans to transfer this information to a third-party storage provider.

The BCP includes actions for the restoration of digital business information, such as contacting critical vendors that can provide technical support to restore business systems.

The BCP was updated in March 2024 but is not regularly tested. Manatū Taonga maintains a disaster recovery clone of their information systems at a data centre. The disaster recovery clone has not been tested to verify that systems can be made operational in a disaster recovery scenario.

Recommendation

Identify critical information in the BCP.

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

Manatū Taonga has confidence that physical information maintained by the third-party storage provider has appropriate protection and security in place against unauthorised access, loss, or deletion. Sensitive physical information held on-site is stored in an access-controlled room, where only IM staff have access. Each file box is secured with cable ties to prevent unauthorised loss or destruction.

Manatū Taonga uses Datacom's Cloud Services for Government, which IM staff said adheres to strict security specifications. Information stored on SharePoint Online is backed-up and protected by an independent software vendor. Access controls are granted at the minimum-level required, and information cannot be permanently deleted from information systems by employees.

The storage environment for physical and digital information provides appropriate protection against floods and pests. Individual rooms that hold on-site physical information do not have fire protection in place. Most physical information is stored in cardboard boxes provided by the third-party storage provider, there are plans in place to transfer this information to the storage provider.

Protection and security processes are tested inconsistently; however plans are in place to introduce regular testing for digital systems in the future.

Recommendations

Transfer physical information held on-site to the third-party storage provider.

Introduce regular testing of protection and security processes for digital systems.



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

Managing

Summary of findings

A taxonomy is available in the EDRMS, however staff said that sometimes information is not stored correctly as part of the taxonomy as it is uncontrolled. The Senior IM Adviser said that a new taxonomy schema has been developed for SharePoint Online that aligns appropriately with the business functions and activities at Manatū Taonga.

Staff and contractors generally know how to use the EDRMS and SharePoint Online. However, as information is stored and created across both environments, staff said that it can be difficult to find information. There is inconsistent application of naming conventions, which contribute to difficulty of finding information.

Access controls for physical and digital information are documented and are in line with business needs. Staff are granted the minimum level of access to perform their work. Staff can request access to restricted information; however, access must be authorised by the Chief Information Officer. Manatū Taonga has drafted an Information Access Control Policy that is yet to be reviewed by TKM.

Access permissions for physical and digital information are implemented and are maintained when a new employee is on-boarded or when an employee is terminated. Review of access permissions on the EDRMS is performed on an inconsistent basis. Access for external users that collaborate through SharePoint Online have their access privileges removed after 90 days of inactivity.

Metadata used to find and manage information on the EDRMS and SharePoint Online complies with the minimum metadata requirements issued by Te Rua Mahara. Minimum metadata requirements for new and upgraded business systems are detailed in the *IM requirements for New IT Systems* document.

Information management processes are applied to incoming and outgoing data shared with external parties. All incoming and outgoing datasets are shared via a secure file sharing platform. Manatū Taonga are yet to implement Government Security Classifications to outgoing information, however, Manatū Taonga is a SeeMail partner.

Recommendation

Regularly review access permissions in the EDRMS and SharePoint Online.

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

Manatū Taonga has a current organisation-specific disposal authority (DA629) that covers information relating to all business functions, and both physical and digital information. DA629 was approved in 2021.

Manatū Taonga has not been required to perform a review. Information management staff said that any organisational changes would trigger a review to determine whether it remains fit-for-purpose.

Staff understand that information created and maintained at Manatū Taonga is subject to a retention period. This understanding does not extend to the specific disposal requirements relevant to the information they create and use, as retention periods are not applied to information maintained on the EDRMS or SharePoint Online.

Recommendation

Create documentation to support staff and contractors to understand the disposal requirements relevant to the information they create and use.

Summary of findings

Manatū Taonga has processes in place to ensure some physical and digital information is retained for as long as required for business use and as identified in organisation-specific and general disposal authorities. The EDRMS and SharePoint are configured such that staff can only soft delete information. Prior to soft deletion, users are required to select reasons based on general disposal authority seven on why they are deleting the record. Additionally, staff are informed of the circumstances in which they are allowed to soft delete records via the Policy and induction training.

Initiatives in relation to the disposal of information are identified in the Strategy. For example, there are plans in place to apply retention labels in the EDRMS, SharePoint Online, shared network drives, and non-current physical records.

Disposal actions were performed on some physical information and are fully documented across several disposal registers. Destruction of physical information was performed through secure destruction bins.

Some information has recently been securely destroyed in line with general disposal authority seven. These disposal actions were fully documented in a register. Manatū Taonga plans to perform further disposal actions within the SharePoint Online environment once the migration project has been completed.

Recommendation

Develop a plan and implement routine disposal actions across all formats and repositories.

Summary of findings

Some information over 25 years old has been transferred to Te Rua Mahara in Wellington and the Alexander Turnbull Library. Manatū Taonga recently became responsible for legacy Broadcasting Board records, which have been transferred to the Te Rua Mahara physical records repository in Christchurch. Information transferred to Te Rua Mahara has been determined as open or restricted access.

Manatū Taonga has not assessed the remaining physical information held on-site and held at the third-party storage provider to determine if it is over 25 years old and of archival value.

Manatū Taonga has not identified digital information over 25 years old or of archival value, therefore plans are not currently in place to transfer this information to Te Rua Mahara.

A deferral of transfer agreements are in place for physical information relating to the Television New Zealand archive.

Recommendations

Identify all remaining physical information and digital information that is over 25 years old or of archival value.

Develop plans to transfer digital information that is over 25 years old or of archival value to Te Rua Mahara.



6. Summary of feedback

Manatū Taonga Ministry for Culture and Heritage accepts the recommendations of the audit report. We acknowledge the value of the information we create and receive and are committed to being good stewards of this information.

Manatū Taonga holds a significant amount of information of importance to Māori, and the better identification and management of this information will be a key outcome of several upcoming initiatives, including the development of an Information Asset Register.

Our Information Management Strategy, launched in August 2023, gives us a clear path forward to lifting our information management maturity across the Ministry, and we will continue to focus on the initiatives identified in the Strategy, which align with the recommendations in this report.

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 – Managing

Topic 2, IM policy and processes – Managing

Topic 3, Governance arrangements & Executive Sponsor – Progressing

Topic 4, IM integration into business processes – Progressing

Topic 5, Outsourced functions and collaborative arrangements – Progressing

Topic 6, Te Tiriti o Waitangi – Managing

Topic 7, Self-monitoring – Progressing

Topic 8, Capability and capacity - Managing

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 - Managing

Topic 13, Integrity of information - Progressing

Topic 14, Information maintenance and accessibility - Managing

Topic 15, Business continuity and recovery – Progressing

Topic 16, Appropriate storage arrangements – Progressing

Topic 18, Information access, use and sharing – Managing

Topic 20, Current organisation-specific disposal authorities – Managing

Topic 21, Implementation of disposal decisions – Progressing

Topic 22, Transfer to Te Rua Mahara – Progressing

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E te rangatira e Leuanae Laulu Mac Leuanae, tēnā koe

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the Ministry for Culture and Heritage (Manatū Taonga) 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. Information management maturity at Manatū Taonga is assessed as mostly at 'Progressing level'. Te Rua Mahara considers that organisations assessed at the 'Progressing level' require greater focus and priority on the management of information.

Manatū Taonga IM staff are taking advantage of the planned migration of information to SharePoint Online to improve the taxonomy which will enable greater consistency and ease of finding information across the system. With SharePoint Online planned to be the main system, staff will have more certainty about where to create and maintain information. Other benefits will be the lessening of the administrative load for the IM staff as there will be fewer repositories to oversee and the opportunity for disposal of digital information to be managed in the system.

Prioritised recommendations

The audit report lists 24 recommendations to improve your organisation's IM maturity.

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

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 iti noa, nā



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

Cc Daiman Smith, Deputy Secretary Corporate Services Pou Mataaaho o Te Iho (Executive Sponsor) daiman.smith@mch.govt.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Governance	3: Governance arrangements and Executive Sponsor	<i>Determine whether IM will be formally governed by a stand-alone group or as part of a broader governance group.</i>	This should not only be determined but enacted and the governance group set up to support the Executive Sponsor in their role.
Governance	5: Outsourced functions and collaborative arrangements	<i>Embed IM requirements in all agreements with significant collaborative arrangements.</i>	This initiative will ensure that all parties understand their requirements to manage the information involved.
Self-monitoring	7: Self-monitoring	<i>Complete the IM reporting and monitoring framework.</i>	This will help inform the Executive Sponsor and governance group of IM trends and issues and support action where needed.
Capability	9: IM roles and responsibilities	<i>Develop a formal and ongoing programme of IM training to meet business needs and deliver the training programme to all staff and contractors.</i>	This is necessary to support a maturity uplift and a consistent approach across the organisation with an IM staff resource of two. This should include an approach to train business owners who have responsibility for contractors who may have escaped on-boarding training to ensure IM requirements are well understood, followed and overseen by everyone.
Creation	10: Creation and capture of information	<i>Formalise SharePoint Online as the official recordkeeping repository and reduce the number of shared drives.</i>	Rationalising the storage environments will ensure better findability and easier management of the information.

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Creation	11: High-value/high-risk	<i>Identify high-value/high-risk information assets in the IAR.</i>	It will benefit the organisation to identify the high-value/high risk information assets as their management can be prioritised.
Management	13: Integrity of information	<i>Ensure the file plan is controlled in SharePoint Online.</i>	This will build on the learning from the issues with the uncontrolled file plan in the EDRMS. Consistency in file plan structure across the system helps staff find information more easily if well supported by training.
Disposal	21: Implementation of disposal decisions	<i>Develop a plan and implement routine disposal actions across all formats and repositories.</i>	Depending on the migration plan implementing disposal in SharePoint Online may be the key activity needed.