



Transport Accident Investigation
Commission

Public Records Act 2005 Audit Report

Prepared for Te Rua Mahara o te Kāwanatanga
Archives New Zealand

March 2023

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1. Disclaimers

USE OF REPORT

This report has been prepared in accordance with the Consultancy Order Services dated 1 December 2020 and variation dated 23 September 2021. We have prepared this report solely for Te Rua Mahara o te Kāwanatanga Archives New Zealand (Archives) and Transport Accident Investigation Commission (TAIC). It was prepared at the direction of Archives and may not include all procedures deemed necessary for the purposes of the reader. The report should be read in conjunction with the disclaimers as set out in the Statement of Responsibility section. We accept or assume no duty, responsibility, or liability to any other party in connection with the report or this engagement, including, without limitation, liability for negligence in relation to the factual findings expressed or implied in this report.

INDEPENDENCE

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

STATEMENT OF RESPONSIBILITY

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

This assessment is based on observations and supporting evidence obtained during the review. This report has taken into account the views of TAIC and Archives, and both have reviewed this report.

Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. The procedures were not designed to detect all weaknesses in control procedures as the assessment was performed by interviewing relevant officials and obtaining supporting evidence in line with the guidelines of the Archives Information Management (IM) Maturity Assessment.

The matters raised in this report are only those which came to our attention during the course of performing our procedures and are not necessarily a comprehensive statement of all the weaknesses that exist or improvements that might be made. We cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of operations and their responsibility to prevent and detect irregularities, including fraud. Accordingly, management should not rely on our deliverable to identify all weaknesses that may exist in the systems and procedures under examination, or potential instances of non-compliance that may exist.

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

2. Executive Summary

TRANSPORT ACCIDENT INVESTIGATION COMMISSION

The Transport Accident Investigation Commission (TAIC) is a Crown Entity, established and governed by the TAIC Act 1990. TAIC’s overall purpose is to investigate certain rail, maritime, and aviation accidents and incidents to improve future transport safety rather than ascribe blame to any person. TAIC is required to conduct its investigations independently.

TAIC is also subject to international conventions and has a jurisdiction which extends to the 12 nautical mile limit of New Zealand’s territorial waters and the air above. It also has jurisdiction over all New Zealand registered aircraft and ships. TAIC has primacy of investigation at an accident scene and to the evidence at that scene but may consent to others to also investigate and access physical evidence for their own purposes.

TAIC employs approximately 30 full-time employees at various locations around New Zealand, with the majority based in Wellington. There is one full time dedicated IM Advisor responsible for guiding TAIC in applying appropriate IM practices. TAIC holds high-risk/ high-value records including:

- Research and analysis data, working papers, reference material and final reports
- Records of TAIC’s involvement with international agencies
- Investigations and inquiries with the publication of findings and recommendations
- Examination of performance of transport regulators.

SUMMARY OF FINDINGS

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

Maturity Level and Number of Findings

Beginning	3
Progressing	5
Managing	10
Maturing	2
Optimising	-

3. Introduction

BACKGROUND

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

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

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

The Chief Archivist has commissioned Deloitte to undertake these audits of certain public offices and this audit was completed in November 2022.

OBJECTIVE

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

SCOPE

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

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

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

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

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

Information Management Maturity Summary

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

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

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

Audit Findings by Category and Topic

GOVERNANCE

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

Topic 1: IM Strategy

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

Managing

OBSERVATIONS

TAIC does not have one overall IM strategy. Instead, TAIC’s IM approach is incorporated into the following three documents: the Data Strategy, the Research Strategy, and the Communication Strategy. The three documents were last reviewed in 2019 with the next one due in 2024, as TAIC’s standard policy and strategy reviews are on a five-year cycle. The IM Advisor is currently reviewing this process to align it with the industry average of a three-year review cycle for all IM policies, strategies, guidelines and templates.

There is a roadmap for three documents that sets out the desired technology environment including IM, that TAIC wants to achieve by 2025. These three strategies sufficiently cover IM requirements and discusses the need for developing strong IM practices to support the future business needs. However, the IM roadmap that TAIC wants to achieve by 2025 is not reported on.

RECOMMENDATION

Ensure that there is regular reporting on IM initiatives.

Topic 2: IM Policy and Processes

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

Managing

OBSERVATIONS

TAIC has a current Information and Records Management policy (the Policy) which is due for review in 2025. The Policy directly references and aligns with the PRA. The Policy includes high-level overview of TAIC IM roles and responsibilities, and key principles for keeping effective records including creating and maintaining adequate information. The Policy references the IM Guidelines, Code of Conduct and Privacy policy.

The Policy is available on TAIC’s intranet (QMS) and communicated to all staff and contractors during their induction training. All employees are notified and sent the newest version when the IM Policy is updated.

The IM Advisor indicated that only serious breaches are reported to management and Senior Leadership Team (SLT) to be dealt with according to the type of breach.

RECOMMENDATION

Ensure all breaches of the IM policy and processes are actively monitored and addressed.

Topic 3: Governance arrangements and Executive Sponsor

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

Maturing

OBSERVATIONS

TAIC does not have a dedicated IM Governance group however, areas such as Privacy, Security, IM, and the status of current or future projects are discussed at SLT monthly meetings. The IM Advisor is regularly involved in the SLT meetings to highlight areas of IM importance and discuss how IM initiatives are tracking.

Feedback consistently indicated that the Executive Sponsor (ES), who is the General Manager of Business Services advocates for IM at TAIC. The ES performs their IM role through attending the monthly SLT meeting and supports new IM initiatives. The IM Advisor stated that the ES actively champions IM programmes and provides resources and support for IM. Furthermore, the acting ES noted that the ES proactively networks with others in their industry on IM matters.

There is regular reporting to SLT about IM, which is a standard item on the agenda.

RECOMMENDATION

The ES should use the regular IM reporting to inform strategic business decisions.

Topic 4: IM Integration into Business Processes

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

Managing

OBSERVATIONS

Business owners are aware of their responsibilities to create, capture and maintain information generated by their teams. The IM Advisor oversees the maintenance and administration of TAIC’s SharePoint, which is the primary document management system. Further, the IM Advisor is involved at the start of projects to ensure they have access to the correct templates and that folders have the correct privileges.

Staff interviewed highlighted that there are some minor inconsistencies in naming conventions between teams at TAIC. The IM Advisor has created a naming convention guidance document to standardise the approach. The document includes a table for abbreviations of functions and common documents that staff create to help navigate the SharePoint folders and identify relevant information.

Staff interviewed noted that the IM Advisor is available and willing to provide ongoing support for IM during projects.

RECOMMENDATION

Include responsibility for management and quality of information in role responsibilities.

Topic 5: Outsourced Functions and Collaborative Arrangements

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

Beginning

OBSERVATIONS

The Memorandum of Understanding (MOU) between TAIC and Fire Emergency New Zealand (FENZ) was sighted. It covers confidentiality, handling of evidence for preservation and co-ordination of investigations. The MOU references the Privacy Act, Official Information Act and TAIC Act, but not the PRA.

The ES has initiated a work programme to include IM roles and responsibilities in contracts. However, TAIC does not have regular contract monitoring to determine the level of compliance with the PRA.

RECOMMENDATION

Clearly identify roles and responsibilities for IM within outsourced functions and collaborative arrangements and monitor.

Topic 6: Te Tiriti o Waitangi

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

Beginning

OBSERVATIONS

TAIC has not formally identified information of importance to Māori. Whilst TAIC’s information is often classified as confidential there is no classification programme to identify information that could be of importance to Māori under Te Tiriti o Waitangi.

TAIC’s Cultural Advisor ensures that Māori values are incorporated into their work but not IM requirements.

RECOMMENDATION

In consultation with TAIC’s Cultural Advisor, formally identify all information of importance to Māori and ensure it is documented within the Information Asset Register (IAR) or similar.

SELF-MONITORING

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

Topic 7: Self-Monitoring

Organisations should monitor all aspects of their information management.

Beginning

OBSERVATIONS

TAIC monitors its compliance with the TAIC Act requirements for management of information. However, no monitoring is performed to assess if TAIC complies with the PRA and the internal Policy. The IT team completes the GCDO cloud risk assessment each time a new cloud system is implemented.

The IM Advisor performs ad-hoc informal checks on staff SharePoint usage. If issues with naming conventions or metadata capture are identified, the IM Advisor will hold team training to reinforce the TAIC IM Guidelines.

RECOMMENDATION

Develop a review process to monitor compliance with the Policy, PRA and mandatory 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

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

Managing

OBSERVATIONS

TAIC has one FTE that solely focuses on IM. In interviews with staff and the IM Advisor, it was stated that there is sufficient capacity to ensure effective IM at TAIC. Furthermore, all staff interviewed agreed that the IM Advisor was highly regarded as a trusted IM professional that provided IM support proactively through training and ongoing engagement support.

The ES and IM Advisor noted that there is sufficient budget for IM specific training and the IM Advisor is actively encouraged to attend training and other IM development opportunities. The IM Advisor has recently attended a training course by the Association of Local Government Information Management, which will enable them to enhance the IAR.

There is a workforce review performed every three years to identify the current gaps and future needs for staff at TAIC. The review is conducted by an external HR advisor.

RECOMMENDATION

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

Topic 9: IM Roles and Responsibilities

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

Progressing

OBSERVATIONS

Three job descriptions (JDs) were reviewed and two had a high-level overview of IM such as, responsibility for storing and maintaining files appropriately. Staff interviewed noted their awareness of responsibilities for IM and adhered to the policy. However, there was no reference to the PRA, and roles and responsibilities had limited detail.

TAIC has started a remuneration system review project that includes updating JDs and responsibilities. The IM Advisor has provided feedback on the inclusion of the relevant IM roles and responsibilities in all JDs.

There is mandatory induction training that all staff and contractors must complete that includes a one-on-one meeting with the IM Advisor. During this meeting, the IM Advisor informs staff where to find key policies and guidelines for managing information they create.

During interviews with the IM Advisor, they advised that they offer SharePoint refresher training to staff on request. However, as they are often present in team and project meetings, any IM questions are usually answered during these meetings.

RECOMMENDATION

Assess the need for ongoing training and deliver to 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

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

Managing

OBSERVATIONS

The IM Advisor provides induction training to ensure the staff are aware of the information they are responsible to create and capture during their investigations.

Staff interviewed had a robust understanding of their responsibilities to create full and accurate information to support their business functions. All information is created digitally using the standardised templates and stored in the relevant systems by staff. However, staff interviewed noted there were minor inconsistencies between teams that could impact the finding of the most current documents.

SharePoint meets the minimum metadata requirements for Archives. The IM Advisor uses the Archives metadata requirements guidance document to ensure TAIC is capturing relevant information. Furthermore, the IM Advisor has created a standardised naming convention guidance document to ensure that all documents are easily identifiable.

Hubstream is a bespoke system that the Investigators use to store and manage sensitive information captured at accident sites. The contract between TAIC and Hubstream was reviewed and covers confidentiality, retention, information security, information retrieval and destruction after contract termination. The contract mentions the TAIC Act but not the PRA.

RECOMMENDATION

Develop a structured approach to monitoring and addressing information usability, reliability and trust issues.

Topic 11: High-Value/High-Risk Information

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

Progressing

OBSERVATIONS

TAIC has an IAR, created in 2021. The IAR identifies key information such as document description, physical location, disposal date, retention period, access restrictions and relevant digital system. However, the IAR high-value/significance and impact columns are left blank.

RECOMMENDATION

Assign a high-value/high-risk status to the 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. The information must be reliable, trustworthy, and complete and managed to ensure it is easy to find, retrieve and use, as well as protected and secure.

Topic 12: IM Requirements built into Technology Solutions

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

Managing

OBSERVATIONS

IM experts are involved in the planning and developing of new technology systems at TAIC. An example of this is the involvement of the IM Advisor during the recent Hubstream implementation program to ensure IM requirements are designed in from the beginning of the project.

Since their appointment in 2021, the IM Advisor has been leading a project to improve and standardise the SharePoint system at TAIC.

RECOMMENDATION

Ensure IM requirements are actively addressed during the design and configuration for new and upgraded business systems including disposal requirements.

Topic 13: Integrity of Information

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

Managing

OBSERVATIONS

QMS contains all templates, files, guides and policies and only three employees have access to edit the files stored on QMS, but all employees can view and download these files. The use of QMS ensures that staff can easily find the most up-to date version of corporate documents.

Staff noted that the standardisation of naming conventions has increased the trustworthiness of documents stored on SharePoint. Employees are easily able to identify the most up-to date version of reports due to naming conventions and through the latest files available on the intranet.

All staff interviewed were confident that they were capturing and creating adequate information with some staff adding additional metadata to increase the documents findability.

RECOMMENDATION

Implement agreed monitoring to ensure all information is reliable, usable, compressive and complete.

Topic 14: Information Maintenance and Accessibility

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

Maturing

OBSERVATIONS

TAIC is currently implementing a digitisation plan to move the high-risk/high-value information to their SharePoint. TAIC is digitising their physical records and scanning and uploading them to their cloud-based systems. The initiative aims to remove TAIC’s reliance on physical documents. Access to any physical information is appropriately controlled using swipe cards.

Systems are regularly updated, and all new information is created in digital format in SharePoint or OneDrive. Investigation staff require OneDrive to upload documents, photos and notes when operating in the field. OneDrive enables the Investigation staff to easily synch and maintain records. Once the investigation is completed, all evidence and the completed report can be added to the relevant SharePoint folder.

The IM Advisor has enabled and receives deletion notifications on files in some sites on SharePoint or OneDrive that are deleted. The IM Advisor can then investigate the deletion event by inquiring with the team leader and person who deleted the information to ensure it was intentional, authorised and meets the requirements of the disposal authority. This does not happen often and is a mitigating control to stop accidental deletion of documents. Furthermore, SharePoint and OneDrive systems have a 90-day retention period for any document deleted.

RECOMMENDATION

Identify digital continuity needs for digital information and document these.

Topic 15: Business Continuity and Recovery

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

Managing

OBSERVATIONS

TAIC has a business continuity plan (BCP), Resilience Policy and have recently performed a cybersecurity risk assessment. The BCP has a plan that prioritises which teams and services are required to be focused on first during a disruption event. The BCP has individual plans for the different types of disruption events such as natural disasters, reputational risk, or pandemics. The BCP outlines how TAIC plans to mitigate the effect of these events on TAIC’s operational effectiveness.

All-important digital information is held in cloud systems such as SharePoint and OneDrive. The IT and support staff noted that their digital systems are backed up and tested on a weekly basis by LANTech. Investigators have been trained for a business disruption event and how to safely extract high-risk/high-value information from their current storage locations.

RECOMMENDATION

Identify critical information and record this 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

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

TAIC has adequate access controls in place to prohibit unauthorised access to physical information. Physical information is located in two separate locations, both protected by swipe card access. One of the locations has both flood and fire protection, but the other location only has flood but no fire protection. TAIC has a hazard register at each of the storage locations.

All physical information is stored in Archives approved boxes and are appropriately labelled.

All digital information is managed according to archival requirements.

As well as digitising physical records, TAIC is currently transferring all physical records to TIMG’s storage.

RECOMMENDATION

Ensure that physical and digital information is included in the IAR.

ACCESS

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

Topic 18: Information Access, Use and Sharing

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

Managing

OBSERVATIONS

TAIC uses SharePoint to manage most of their digital information. OneDrive is used by the Investigation staff to capture field notes and evidence during the initial stage of their inquiry.

TAIC had external consultants who specialise in document management for the Microsoft suite perform a review of TAIC's information access and sharing practices. The review provided recommendations to improve how TAIC uses SharePoint to support their information access, use and sharing activities.

The acting ES and IM Advisor noted that there is organisational wide commitment to using TAIC's metadata schema and taxonomy.

There is metadata training available on request as emails are manually entered in SharePoint for retention, however, due to the size of the organisation, questions are often asked at meetings that the IM Advisor attends.

Staff interviewed noted that access controls are documented, monitored and maintained.

RECOMMENDATION

Actively maintain taxonomy and metadata schema to ensure reliable management and discovery of information.

DISPOSAL

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

Topic 20: Current Organisation-Specific Disposal Authorities

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

Managing

OBSERVATIONS

TAIC has a current Disposal Authority (DA) which expires in February 2024. The DA covers all information formats and business functions. The IM Advisor plans to review the DA to ensure it is fit-for-purpose and ready for renewal.

RECOMMENDATION

Develop a plan to review the DA so that the TAIC is ready to create a new DA before expiry.

Topic 21: Implementation of Disposal Decisions

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

Progressing

OBSERVATIONS

The disposal of physical records is in accordance with the DA and GDAs. The disposal is documented and approved by the ES.

For digital information the IM Advisor is planning to apply retention and destruction labels in SharePoint. As appropriate, digital information stored on disks and hard drives are destroyed to ensure that no information is recoverable.

RECOMMENDATION

Plan and implement disposal actions across all repositories and formats.

Topic 22: Transfer to Archives New Zealand

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

Progressing

OBSERVATIONS

TAIC has identified information of importance to Archives over 25 years old. This information has been classified according to the TAIC Act as either restricted or open access records.

TAIC has digital records over 10 years old that they are currently planning on transferring to Archives.

RECOMMENDATION

Develop and agree a plan with Archives to transfer appropriate digital information.

4. Summary of Feedback

The Transport Accident Investigation Commission (TAIC) is committed to the continuous development and improvement of the way we store information. We recognise the value of the information we hold and acknowledge its importance under the Public Records Act 2005. We welcome the summaries of findings and the recommended actions, and these will be a key input to prioritising and planning our information management maturity actions into the future.

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2 August 2023

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Tēnā koe Martin

Public Records Act 2005 Audit Recommendations

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

Introduction

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

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

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

Audit findings

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

Kia pono ai te rua Mahara – Enabling trusted government information

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. Information maturity for TAIC is assessed as mostly at Managing or above clearly showing the organisation's commitment to meet the requirements of the TAIC Act 1990 and the PRA. The decision to resource an IM Advisor role to provide IM advice and system support has supported TAIC to largely meet IM responsibilities. The topics still at Beginning level and some at Progressing are recommended below for improvement.

Prioritised recommendations

The audit report lists 20 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 six 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
Poumanaaki Chief Archivist
Te Rua Mahara o te Kāwanatanga Archives New Zealand

Cc Cathryn Bridge, General Manager Business Services (Executive Sponsor)
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APPENDIX

Category	Topic Number	Auditor's Recommendation	Archive's Comments
Governance	5: Outsourced Functions and Collaborative Arrangements	<i>Clearly identify roles and responsibilities for IM within outsourced functions and collaborative arrangements and monitor.</i>	Contracts should identify IM requirements and a monitoring plan developed, agreed, and implemented.
Governance	6: Te Tiriti o Waitangi	<i>In consultation with TAIC's Cultural Advisor, formally identify all information of importance to Māori and ensure it is documented withing the Information Asset Register (IAR) or similar.</i>	If necessary, external advice from other organisations further along the path could be sought to assist with this work.
Self-Monitoring	7: Self-Monitoring	<i>Develop a review process for monitoring compliance with the Policy, PRA, and mandatory standard.</i>	As TAIC already has an IM Policy, a monitoring plan should be developed against it, agreed, and implemented. Similarly, a monitoring plan should be developed for the PRA and the mandatory standard.
Capability	9: IM Roles and Responsibilities	<i>Assess the need for ongoing training and deliver to staff and contractors.</i>	Due to the size of the organisation, IM training is reportedly often delivered at point of need. To address any identified knowledge gaps training documentation should be available on the QMS as well.
High-Value/High-Risk Information	11: High-Value/High-Risk Information	<i>Assign a high-value/high-risk status to the information assets in the IAR.</i>	TAIC has established an IAR but assessing and including the value/risk status of the asset will assist in the organisation's understanding of its information.
Disposal	21: Implementation of Disposal Decisions	<i>Plan and implement disposal actions across all repositories and formats.</i>	Applying the DA and GDAs in SharePoint is planned and implementation would ensure the TAIC benefits from having disposal coverage.