KPMG

Public Records Act 2005 Audit Report for Heritage New Zealand Pouhere Taonga

Prepared for Archives New Zealand

May 2022

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Independence

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

Contents

1. Executive summary

Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown entity and New Zealand's leading national historic heritage agency. HNZPT aims to identify, protect, and promote heritage. While carrying out its mandate, HNZPT creates high value digital and physical public records relating to and including:

- heritage property records
- archaeological regulation
- research and preservation
- historical reports.

HNZPT uses shared drives as their primary method for managing information. HNZPT also uses Microsoft 365 and several databases to carry out its business activities. HNZPT stores and maintains both physical and digital records. A third party storage provider holds the majority of HNZPT's physical records. Due to New Zealand being under alert level Red at the time of this audit, the audit was conducted remotely, and we were not able to inspect the onsite physical storage arrangements.

HNZPT employs approximately 140 staff. There is one dedicated information management staff member, the Manager Knowledge Services, who is supported by the Business Support Administrator. HNZPT does not have a dedicated governance group to oversee information management. In place of this, the Audit and Risk Committee (ARC) carry out this oversight function.

HNZPT 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.

Beginning	**4**
Progressing	**14**
Managing	**1**
Maturing	**1**
Optimising	

2. Introduction

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

HNZPT's information management 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 HNZPT including both physical and digital information.

The audit involved reviews of selected documentation, interviews with selected staff, including the Executive Sponsor, information management staff, and a sample of other staff members from various areas of HNZPT. Note that the Executive Sponsor is the senior responsible officer for the audit.

The audit reviewed HNZPT's information management practices against the PRA and the requirements in the Information and records management standard and provides an assessment of current state maturity. 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. HNZPT 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. 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 & 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 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

HNZPT do not have an up-to-date information management strategy that provides strategic direction and support for information management within the organisation. HNZPT's last information management strategy was created in 2005. The actions contained in this strategy had a time-frame of three years and do not account for information management initiatives currently being implemented.

Information management staff expressed the intention of updating the strategy to meet the organisation's current and future needs. However, the update had not yet started at the time of the audit.

Recommendations

Develop an updated information management strategy following Archives New Zealand's guidance. This should reflect information management initiatives that are planned or underway and should be approved by the Audit and Risk Committee.

TOPIC 2 – IM policy and processes   Managing

Summary of findings

There is a current information management policy which was approved in April 2022. The policy links to relevant legislation, the Archives New Zealand Standard, and other internal policies, such as the Information Technology Policy. The policy outlines the responsibilities for all staff and contractors, with specific responsibilities for the Executive Team, Executive Sponsor, Directors and Managers, and other senior management. Staff interviewed said they are aware of where to find policies and procedures, which are available on the HNZPT intranet. Staff said that they are typically made aware of policy updates through email.

Comprehensive information management process guidance is available and was last updated in April 2022. This is available on the intranet and is provided to staff during their induction. The guidance material covers processes such as 'files and filing', 'email management', and 'electronic filing structure'.

Information management roles and responsibilities are inconsistently documented in job descriptions for staff. Some specialist roles have specific role descriptions which cover information management, but most staff do not have specific roles or responsibilities for information management within their job description.

Recommendations

Include information management responsibilities in all staff job descriptions going forward.

TOPIC 3 – Governance arrangements and Executive Sponsor   **Progressing**

Summary of findings

HNZPT do not have a dedicated information management governance group. The Audit and Risk Committee (ARC) undertake this function. The Executive Sponsor for this audit is a member of the Executive Team and is responsible for providing information management updates to the ARC. However, the ARC and Executive Team do not receive regular reporting on wider information management matters.

The Executive Sponsor is aware of their oversight and monitoring role in relation to information management. The Executive Sponsor supports the Manager Knowledge Services when required and champions information management by attending information technology (IT) and other relevant project working groups.

Appropriate support is received from other members of the Executive Team to address information management needs. The Executive Sponsor champions information management by engaging with and providing support to information management staff.

Recommendations

Design and implement regular reporting that provides useful and actionable information to the Executive Sponsor and can be provided to the ARC and Executive Team.

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

Summary of findings

Staff interviewed were aware of their responsibilities for managing information within their business area. The requirements for managing information are integrated into their core business processes with specific standard operating procedures (SOPs), such as the Archaeological Provisions SOP. These are further supported by the organisation-wide process guidance materials created by the information management staff.

There are information management champions within each regional office who provide support with the management of shared drives, records, and the creation of information. The information management champions meet monthly to discuss updates, changes, or issues. Staff view the information management personnel and champions as respected professionals and can receive tailored support and guidance as necessary. Staff interviewed spoke positively about their relationship with the Knowledge Services Manager.

Information management expertise is not regularly included in process changes and strategic business activities due to the day-to-day requirements of the Knowledge Services Manager role. While staff recognise the importance of including an information management perspective, capacity limitations restrict the amount of input that information management staff can provide.

Recommendations

Ensure information management expertise is regularly involved in all upcoming business change and development.

Summary of findings

We reviewed the Master Services Agreement for the outsourced IT function and found that information management requirements were not included. HNZPT are in regular contact with their IT provider to track progress against their IT project. However, there is no evidence of information management specific monitoring taking place for this IT contract.

A collaborative arrangement is in place between HNZPT and two other parties for the administration of a national database of recorded archaeological sites. PRA requirements are not explicitly referenced within the contract; however, information management and the associated responsibilities of each party are outlined.

Information management staff are not generally involved in writing or approving information management sections of outsourced or collaborative arrangements. We note that outsourcing a business function does not reduce an organisation's responsibility to ensure that all information management requirements are met.

Recommendations

Ensure all contracts for outsourced functions or collaborative arrangements going forward include roles and responsibilities for information management, including monitoring contracted parties to ensure the requirements are met.

TOPIC 6 – Te Tiriti o Waitangi **Maturing**

Summary of findings

The Māori Heritage Council works with HNZPT to ensure that the protection of heritage sites meets the needs of Māori, to ensure a bicultural view is reflected in the exercise of power, and to assist iwi and hapū with the management of their heritage resources.

HNZPT produces a Heritage Index explicitly identifying information of importance to Māori. Each record that has significance to Māori has a description, and relevant content tags (e.g., 'carvings', 'religious buildings' etc.). A Māori Built Heritage Database has also been created, which identifies many marae located throughout New Zealand and documents the hapū and original iwi holding ownership of each marae. Information management expertise is involved in helping maintain wāhi tapu files, which contain information on places that are sacred to Māori.

Staff interviewed were confident that HNZPT considers data sovereignty and data protection concerns when carrying out their work. For example, they do not release all information in public listings to protect the information for the communities. To increase the accessibility of information relating to Māori at HNZPT, it ensures metadata tags and key words have appropriate macrons. Consideration is also given to the location of data stored offsite, particularly when it is related to hapū and iwi. HNZPT do not collaborate with other Crown entities across the sector currently to discuss information of importance to Māori.

Recommendations

Ensure information management expertise works collaboratively with other Crown entities to improve the accessibility, discoverability, and care of information of importance to 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

HNZPT monitors compliance with the Public Records Act and other relevant legislation through its Annual Legislative Compliance Report. Compliance with internal policies is monitored on an ad-hoc basis through activities such as inspections of the shared drives to ensure folder structure and naming conventions are being followed. The monitoring includes looking in the shared drives to identify documents that have been filed incorrectly. Staff members who create and capture information incorrectly are notified. The staff who have failed to comply with policy and procedures are then sent a reminder of where to save documents. Improvement plans are currently being implemented to support staff and increase their competency in creating and storing information. Results from information management monitoring are not regularly reported to Executive Team. This reporting is initiated in response to an incident or exception and not on a regular basis.

Recommendations

Develop a regular information management monitoring programme to inform the Executive Sponsor, Executive Team and ARC on compliance with the Public Records Act and the Information Management Policy.

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

HNZPT have a dedicated Manager Knowledge Services who is supported by a Business Support Administrator. Staff interviewed noted that the information management personnel are competent and well respected within the organisation. These staff members provide the organisation with access to information management expertise to support its business needs. However, as there is only one dedicated information management staff member, they have limited capacity to support information management requirements such as IT projects and other business process changes. The information management staff are located in Wellington and are supported by information management champions across the regions.

Staff have access to training related to information management when business IT systems are implemented, such as the rollout of the Microsoft 365 software suite. In addition, staff members interviewed noted that the Manager

Knowledge Services is the first point of contact for all information management needs and provides one-on-one training to staff as needed.

The organisation acknowledges that it has limited capacity to meet its information management needs effectively. There are ongoing conversations to identify how to best address this, but to date there is no formal plan or evidence of regular assessments being carried out to evaluate information management capacity against business needs. Understanding capacity requirements is necessary given HNZPT's intention to introduce an enterprise document and records management system (EDRMS), utilise more cloud-based services, and the need to make disposal decisions on a more regular basis.

Recommendations

Review the capacity of information management staff against the organisations business needs to enable information management expertise to be included in business change (in connection with Topic 4 – *IM integration into business processes*).

TOPIC 9 – IM roles and responsibilities   Progressing

Summary of findings

HNZPT staff interviewed were aware of the information management responsibilities of Crown entities and understood the specific requirements in relation to their role. While these responsibilities are documented in job descriptions for certain specific roles (e.g., Reception Administrator and Business Support Administrator), they are not documented for all staff. Staff and contractors undergo a formal induction process, which covers information management. As part of the induction process, new staff receive an induction pack containing information management guidance alongside other internal policies and procedural documents.

There is no regular annual information management training provided to staff or contractors. However, staff interviewed were comfortable reaching out to information management staff or champions for assistance. They were able to give examples where one-on-one training was provided to support their needs. Communication about information management is done on an as-needed basis, particularly in response to process changes or policy updates.

Recommendations

Assess the need for annual information management refresher training. HNZPT should deliver training tailored towards the needs of staff across different business units in the organisation.

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

HNZPT staff indicated that they understand and comply with their obligations to create full and accurate records.

Information is routinely created and captured in physical and digital formats as part of all business functions and activities. Staff are encouraged to ensure all information is created and stored in controlled environments. Process guidance specifically outlines where different types of information should be stored and why this is important.

The use of shared drives limits the type of metadata that is being captured when creating and managing information. Because of this, HNZPT does not currently meet Archives New Zealand's minimum metadata requirements. Unique identifiers are not available for information stored in shared drives, and there is no audit trail to capture interactions with the records and modifications of information.

There is no structured approach to monitoring and addressing information usability and reliability issues. However, ad-hoc monitoring that takes place does identify some of these issues, which are then addressed as necessary.

Recommendations

Develop a structured approach to monitoring and addressing information usability and reliability for all systems holding information within HNZPT.

TOPIC 11 – High-value / high-risk information   **Progressing**

Summary of findings

HNZPT has an inventory of a range of its physical and digital information through systems such as the library database. The library database identifies a broad collection of physical and digital information held by HNZPT and identifies where the items are located. While HNZPT staff are generally aware of the high-value/high-risk information that the organisation holds, there is no comprehensive register formally capturing this information. However, high-value/high-risk information is explicitly defined in the Business Continuity Emergency Response Plan (e.g. contracts, and legal titles).

Recommendations

Develop and maintain a full information asset register that covers both digital and physical information and identifies all information that is of a high-value or high-risk nature. This could be performed in line with the finalised organisation specific disposal authority (refer to Topic 20 – *Current organisation-specific disposal authority*).

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   **Progressing**

Summary of findings

Information management staff have been involved in implementing Microsoft Teams for internal communications. Due to limited capacity, information management expertise is not consistently involved when configuring or upgrading business systems.

Information management expertise is utilised when undergoing system changes. For example, when assessing the type of information held on HNZPT servers and decommissioning servers. Staff noted that servers are being decommissioned to consolidate information and streamline the transition to an EDRMS in the future. However, HNZPT does not have standardised information management requirements which are used to guide business system changes or upgrades.

Recommendations

Create standardised information management requirements for new and upgraded business systems and ensure information management staff are included as part of this process.

TOPIC 13 – Integrity of information   Progressing

Summary of findings

Localised information management practices across HNZPT are documented in SOPs designed for specific business units. Staff interviewed said that the quality of information management within a business area can be dependent on the predecessor in that role, and how proficient their information management practices were. Although there are SOPs in place, staff indicated that there can be variable experiences in finding and retrieving information between teams.

The shared drives have access controls in place, with most staff only having access to their regional office shared drive. As a result, most staff who work across business units or regional offices cannot easily access and retrieve information created and stored by other regions. Accessing this information typically requires going through a staff member in the relevant office, who would then send the requested information.

The intranet requires permissions to upload and edit information. In contrast, shared drives do not require permissions to alter some records, which means staff could edit, move, or delete information without authorisation, if the folder does not have restricted access. However, within shared drives, some files are restricted, and therefore staff cannot access these without the correct permissions.

Staff are not confident that the information held by HNZPT is comprehensive and complete. For example, when responding to Official Information Act (OIA) requests, there can be uncertainty as to whether all the relevant information has been identified.

Recommendations

Implement an EDRMS* to improve consistency and minimise risk to the integrity of information. In the interim, consider whether edit permissions could be implemented within shared drives.

*We note a new EDRMS being implemented is currently planned by HNZPT.

TOPIC 14 – Information maintenance and accessibility   Progressing

Summary of findings

HNZPT has tools to help manage and maintain both digital and physical information during business changes, such as the library database. Access controls are in place for shared drives, such that information management staff must grant access to users for them to access information within the respective drives.

Information management staff are aware of several technology obsolescence risks. For example, staff spoke of the risk to information stored on DVDs and floppy disks due to the possibility of these items being damaged or being inaccessible in the future. However, they have not assessed the risk of obsolescence and preservation of information. The information management staff informed us that digitisation of information had been costed, but this process has not yet been approved.

Recommendations

Complete a risk assessment to identify information that is at risk of obsolescence and develop a plan to manage this risk (in connection with Topic 11 – *High-value / high-risk information*).

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

Summary of findings

HNZPT has a Business Continuity Emergency Response Plan, which was revised in October 2021. This plan identifies vital records, how they should be stored, and how they are to be retrieved and managed after an emergency. However, while there is a description of how physical information should be handled, there is no specific plan for managing and restoring digital information.

While the Business Continuity Emergency Response Plan specifies that testing is to be carried out annually, staff could not provide information on when the most recent test was carried out (this test should have taken place in April 2021). The plan does not document any procedures or criteria of the test, or whether it covers both physical and digital information.

Recommendations

Update the Business Continuity Emergency Response Plan to incorporate the restoration of digital information. Ensure the plan is tested regularly and that backups of digital information can be used to restore information successfully.

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

There are measures in place at the Wellington office to secure and protect physical information against loss or destruction. For example, there are storage shelves, lockable desk draws, fire controls, pest control and a hazards register*. In addition, HNZPT uses a third-party storage provider for physical information, which provides protection against unauthorised access, deletion, or destruction.

There are measures to protect digital information, such as access control for the shared drives and the intranet, multifactor authentication for Microsoft accounts, and pin codes required for mobile phones. However, there are insufficient protections against changes to or deletion of information. Individual files can be changed, moved, or deleted within shared drives without requiring any further authorisation.

HNZPT outsources their IT function. There is a contract in place for backup as a service, but information management staff were not aware of the details of the backup process and retention timeframes.

Recommendations

Investigate appropriate permissions to minimise the risk of changes or loss of information from occurring (i.e., lock finalised documents such as organisation-wide policies).

Note that KPMG was unable to examine the physical storage sites due to Covid-19 restrictions, as New Zealand was in alert level Red at the time of the audit. Therefore, the physical assessment has been performed based on information obtained during the interviews.

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

Metadata is created by HNZPT systems as staff carry out their business activities. However, the systems in place do not enable HNZPT to meet the Archives New Zealand minimum metadata requirements. This limits the accessibility and discoverability of information.

A file plan describes where different types of information should be stored. Guidance documents further specify naming conventions and other relevant properties for the management of information and are provided to staff as part of their induction material. Staff are comfortable using the systems and tools available to them. However, they have not been provided with detailed guidance or training on search techniques for all databases.

There is some documentation of permissions, such as the ability to add content to the intranet. However, there are inconsistencies in access to shared drives. For example, certain staff members (depending on their job role) have access to a national shared drive and regional drives, whereas other staff only have access to their regional drive. There does not appear to be regular reassessments of whether permission and access controls are still appropriate for current staff members.

Recommendations

Ensure that all future systems (as appropriate) enable HNZPT to meet the minimum metadata requirements as specified by Archives New Zealand.

Regularly monitor access controls and ensure they are appropriately applied.

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

HNZPT does not have a current and approved organisation-specific disposal authority. HNZPT established a draft disposal authority in 2013, but this is not approved by Archives New Zealand and requires further alterations to make it fit for purpose.

Recommendations

Develop an organisation-specific disposal authority which covers all information formats and business functions that is approved by Archives New Zealand.

TOPIC 21 – Implementation of disposal decisions   Beginning

Summary of findings

Historically, disposal actions have been carried out for physical information under the General Disposal Authorities. These historic disposals were documented in a disposal register. However, the last documented disposal decision was made in 2012, demonstrating that disposal decisions are not made regularly.

HNZPT does not have a plan to regularly monitor and manage information to enable regular disposal decisions to be made. Rather, information is retained indefinitely. This poses the risk that HNZPT will be holding on to records for longer than they need to.

Recommendations

Once an organisation-specific disposal authority is approved (refer Topic 20 – *Current organisation specific disposal authorities*), HNZPT should develop a plan to ensure disposal actions are routinely carried out for physical and digital information.

TOPIC 22 – Transfer to Archives New Zealand   Beginning

Summary of findings

HNZPT was established in 1954 and is required to identify all information of archival value which is over 25 years old. HNZPT has not carried out a formal assessment to identify physical and digital information over 25 years old.
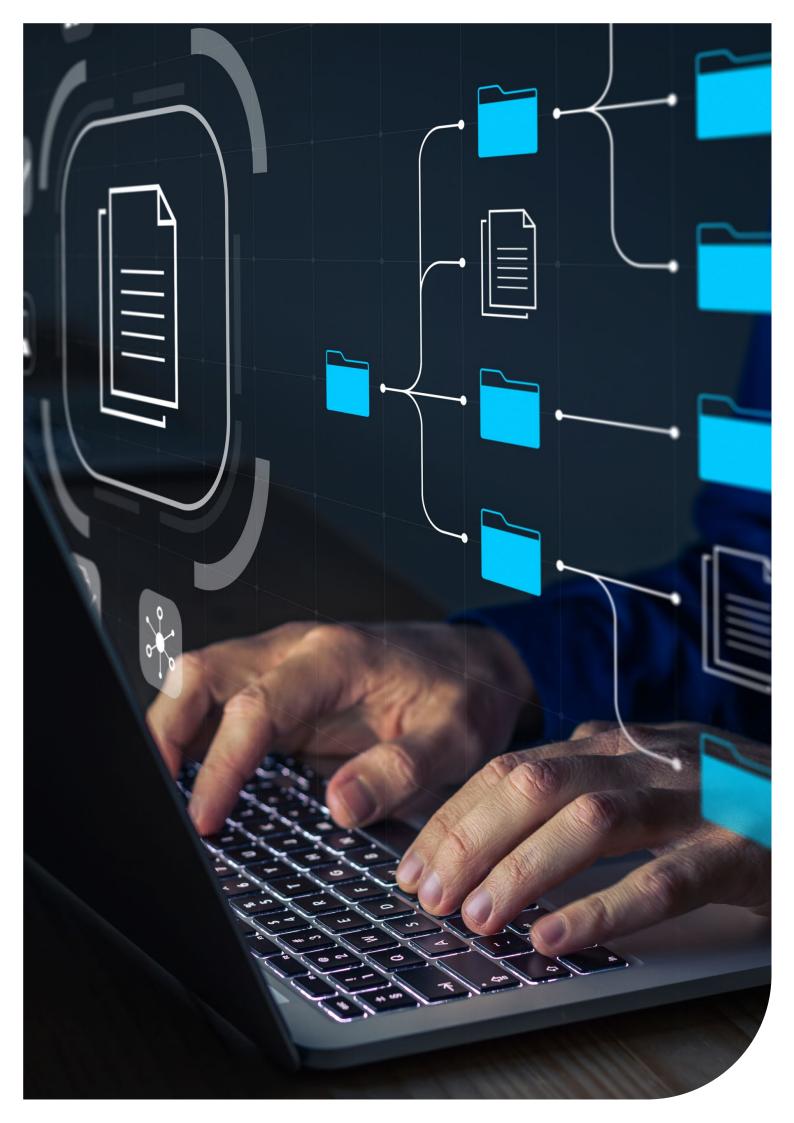
Recommendations

Once an organisation-specific disposal authority has been created and approved (see Topic 20 – *Current organisation-specific disposal authorities*), HNZPT should identify both physical and digital information of archival value that is over 25 years old. Information older than 25 years should either be transferred to Archives New Zealand, or a deferral of transfer agreed.

6. Summary of feedback

Heritage New Zealand Pouhere Taonga has appreciated the work of both the auditors and Archives New Zealand in relation to the analysis of our information management performance. We consider that the report is a fair assessment of our information management maturity level given the framework provided for the audit.

We have some reservations about the framework which we shared with Archives New Zealand and the auditors in our conversations with them as part of the process. In making these observations, we noted that we appreciated the value of having a process to bench-mark our performance by at all, and that the observations were offered in the spirit of collaboration. The first is the 'one size fits all' nature of the audit, which we consider does not appear to take account of the differing size, scale, and breadth of responsibility of New Zealand's public service organisations. The second is the framework's requirement, of an effective pass rate of 100% to progress between levels - in several instances we self-assessed our pass rates at 80% towards the next level, and many at 60%, only to discover that the auditors would consider a single answer at the lower level as anchoring the organisation to that level. This felt like a loss of a significant part of the value provided by the nuanced questions in the framework. Finally, it would be helpful to know whether the auditors or Archives New Zealand found, or saw, any opportunities for funding the achievement of the recommendations that they have made.

We are reasonably comfortable that the recommendations align with the actions we have underway to improve our information management maturity. We particularly look forward to our progress against our organisational ICT plan which will allow our information management to advance considerably over the next two or three years. We have already begun mapping the proposed recommendations against our available resources to plan a timeframe for meeting them. For an organisation of our size, this involves breaking down the recommendations into a substantial number of actions and sequencing them effectively so that they are undertaken as optimally as our capacity allows.

We have appreciated the mahi that has gone into a process which fits nicely with our philosophy of continuous improvement. We look forward to working closely with Archives New Zealand to optimise our further work in this area.

Claire Craig

Deputy Chief Executive

Executive Sponsor.

Andrew Coleman
Chief Executive
Heritage New Zealand Pouhere Taonga
Acoleman@heritage.org.nz

Tēnā koe Andrew

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of Heritage New Zealand Pouhere Taonga (HNZPT) 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

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

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

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

Audit findings

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

Kia pono ai te rua Mahara – Enabling trusted government information

Auckland Regional Office, 95 Richard Pearse Drive, Mangere, Auckland
Christchurch Regional Office, 15 Harvard Avenue, Wigram, Christchurch
Dunedin Regional Office, 556 George Street, Dunedin

Organisations 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. IM maturity at HNZPT is assessed as mostly at the 'Progressing' level.

We acknowledge your comments in Section 6: *Summary of feedback* about the operation of the Information Management Maturity Assessment. The government sector is diverse and complex, and the assessment tool was designed to be applicable across the sector. A more nuanced approach would potentially provide additional value but may be more complicated to administer. As we work through the audit programme, we anticipate that the tool will evolve to meet the future needs of the sector.

Other comments in Section 6 relate to the funding of IM improvement. Alongside your ICT plan, described as an enabler for improvement, we recommend development of an IM strategy to prioritise activities giving the most benefit as a basis for a case for funding initiatives. For example, IM improvements can increase efficiency by improving access to information across the organisation and reduce risk through improved control of the information.

An outstanding area for HNZPT is Topic 6: *Te Tiriti o Waitangi*, assessed at the 'Maturing' level. This topic is generally at low maturity across the sector. It would be beneficial to the wider government sector if this exemplary IM practice could be shared. We would like to discuss how that could be facilitated.

Prioritised recommendations

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

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

What will happen next

The audit report and this letter will be proactively released on the Archives website shortly. We would be grateful if you would advise of any redactions that your organisation considers are necessary for the release within 10 working days.

As required by the PRA, I will also provide the Minister of Internal Affairs with a report on the results of the audit programme for each financial year, which is tabled in the House of Representatives.

We will follow up this letter with a request to your Executive Sponsor that your organisation provides us with an action plan to address the prioritised recommendations. Our follow up process will track your progress against the action plan. We will also be in touch about sharing your approach to information of importance to Māori.

Thank you again for your support with the audit. We would greatly appreciate further feedback on the audit process and the value it provides to organisations, and we will contact your Executive Sponsor shortly in relation to this.

Nāku noa, nā

Honiana Love
Acting Chief Archivist Kaipupuri Matua
Archives New Zealand Te Rua Mahara o te Kāwanatanga

Cc Claire Craig, Deputy Chief Executive, Policy, Strategy and Corporate Services Manahautū Tuarua Hautaki, ccraig@heritage.g.nz (Executive Sponsor)

APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Governance	1: IM strategy	*Develop an updated information management strategy following Archives New Zealand's guidance. This should reflect information management initiatives that are planned or underway and should be approved by the Audit and Risk Committee.*	This would be useful prioritisation opportunity to provide direction for IM improvement in conjunction with HNZPT's ICT plan.
Governance	5: Outsourced functions and collaborative arrangements	*Ensure all contracts for outsourced functions or collaborative arrangements going forward include roles and responsibilities for information management, including monitoring contracted parties to ensure the requirements are met.*	Any contracts where public records are being created and maintained should clearly describe the IM roles and requirements and be monitored.
Capability	8: Capacity and capability	*Review the capacity of information management staff against the organisations business needs to enable information management expertise to be included in business change (in connection with Topic 4 – IM integration into business process)s.*	IM champions are useful in an organisation that operates over different sites but must be led by staff with IM expertise. For an organisation the size of HNZPT contracting in additional IM expertise when needed could be considered.
Creation	11: High-value/high-risk information	*Develop and maintain a full information asset register that covers both digital and physical information and identifies all information that is of a high-value or high-risk nature. This could be performed in line with the finalised organisation-specific disposal authority (refer to Topic 20 – Current organisation-specific disposal authority).*	This is a useful tool for prioritising effort as it shows which IM assets are the most valuable for the organisation (and New Zealand) and where to concentrate attention.

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Management	13: Integrity of information	*Implement an EDRMS* to improve consistency and minimise risk to the integrity of information. In the interim, consider whether edit permissions could be implemented within shared drives. *We note a new EDTMS being implemented is currently planned by HNZPT.*	This investment would manage the risks associated with shared drives and improve access to information across the organisation if configured with the involvement of IM expertise.
Management	14: Information maintenance and accessibility	*Complete a risk assessment to identify information that is at risk of obsolescence and develop a plan to manage this risk (in connection with Topic 11 – High-value/high-risk information)*	It is a concern that HNZPT established in 1954 and with its national heritage role may have unique information on formats such as floppy disks.
Disposal	20: Current organisation-specific disposal authorities	*Develop an organisation-specific disposal authority which covers all information formats and business functions that is approved by Archives New Zealand.*	Creation and approval of a disposal authority also provides a basis for maturity uplift in other areas of IM practice at HNZPT. It is essential for the organisation to understand all its information and how to manage it. It will also enable access for New Zealanders when information of archival value is transferred to Archives NZ.