



Public Records Act 2005 Audit Report for the Office of the Privacy Commissioner

**Prepared for Archives
New Zealand**

October 2021

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Independence

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

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1. Executive summary

The Office of the Privacy Commissioner (OPC) is an Independent Crown Entity, whose role is to develop and promote a culture in which personal information is protected and respected in New Zealand.

The OPC creates high value public records primarily in relation to the Privacy Act, including case reports relating to complaints about breaches of privacy. There are 34 staff at the OPC including on Manager of Support Services who leads information management.

Most records are maintained electronically in a single Enterprise Content Management system (ECM). The ECM has been used by OPC since 2007 and has been updated periodically since. Hard copy files are stored offsite in a commercial storage facility.

The OPC employs a skilled and experienced Manager of Support Services who leads their information management function, supported by the wider Senior Leadership Team.

The OPC 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.

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2. Introduction

KPMG was commissioned by Archives New Zealand to undertake an independent audit of the Office of the Privacy Commissioner (OPC) under section 33 of the Public Records Act 2005 (PRA). The audit took place in October 2021.

The OPC'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 the Office of the Privacy Commissioner including both physical and digital information.

The audit involved reviews of selected documentation, interviews with selected staff, including the Executive Sponsor, the Manager of Support Services, Information Technology support, and a sample of other staff members from various areas of OPC. Note that the Executive Sponsor is the senior responsible officer for the audit.

The audit reviewed OPC'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. OPC 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				●	
	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

The OPC does not have an information management strategy to provide strategic direction and support over information management activities.

While there is no documented strategy, senior management supports the strategic direction of information management. This is demonstrated by senior management investing in ECM improvements and upgrades as required and ensuring that new systems incorporate relevant information management settings to support internal processes. An example of this is the upcoming upgrade for the OPC's ECM, and the transition to the browser-based site to support the user experience of the system.

Recommendations

Develop an information management strategy for the OPC in line with Archives New Zealand guidance. This does not have to be a standalone strategy for a small entity and can be incorporated within OPC's wider strategic plan, but it should clearly articulate information management objectives.

TOPIC 2 – IM policy and processes

Maturing

Summary of findings

The OPC has a current information management policy, "Information and Records Management Policy", that has been approved by senior management. This was last updated in September 2021 and outlines the organisation's requirements under relevant legislation, and the Archives New Zealand standard and requirements. The policy outlines roles and responsibilities for key personnel, as well as responsibilities for all staff in general. The ECM contains system controls to ensure that information management requirements are met, such as required metadata.

The policy is communicated to all staff and contractors through induction training. All staff excluding contractors undertake two days of training relating to information management, which outlines details of the policy. Given the small size of the organisation, ongoing support is provided where required, and reminders and tips are shared to support effective use of the systems.

All processes and policies at the OPC consider information management. All staff make use of the ECM, and the responsibilities of information management are articulated in both job descriptions and discussed in performance appraisals.

Given the small size of the organisation, where information management breaches occur, they are noticed promptly through workflow reporting. They are addressed by phone initially by the Manager of Support Services and, where action is not taken, an email is sent to the individual and their manager.

Recommendations

Due to the assessment of maturing for this topic, we have not made any recommendations.

TOPIC 3 – Governance arrangements and Executive Sponsor

Managing

Summary of findings

The OPC does not have a separate information management governance group due to its small size. Instead, the senior leadership team discuss information management as required. Information management is not a standing item at the senior leadership team meetings, but where there are updates to activities, changes in processes, or system updates required, these will be discussed and considered.

The Executive Sponsor is highly involved in information management matters. They understand the requirements of their role as Executive Sponsor and works closely with the Manager of Support Services in relation to all information management matters. The Manager of Support Services is the primary information management lead and keeps the Executive Sponsor very well informed through periodic reporting and regular discussions. Where information management advice or reporting is required, the Manager of Support Services is involved in discussions with the senior leadership team.

The Executive Sponsor actively promotes the value and importance of information management, displayed through their support of the Manager of Support Services running extensive training with new team members, and placing importance on correct use of the information management system.

Recommendations

Develop an information management strategy that is visibly supported by the senior leadership team (refer Topic 1 – *IM Strategy*).

TOPIC 4 – IM integration into business processes

Optimising

Summary of findings

Given the small size of the organisation and the use of the ECM by all staff, information management is well integrated into business processes at the OPC. Use of the ECM is consistent across all business units, meaning any business change would result in an impact on ECM use.

As the OPC is a small organisation, any business change or development initiative would include the involvement of information management personnel, who can give advice on information management requirements. Based on interviews and focus groups, the Manager of Support Services is a trusted member of the organisation, and staff rely on their expertise throughout any process changes.

While the Manager of Support Services is a well trusted and utilised resource, all staff understand their responsibilities in relation to information management. Expectations are outlined in job descriptions for all staff, and are considered during performance appraisals. Where staff require clarification, they are comfortable approaching the Manager of Support Services and Executive Sponsor as needed.

Recommendations

Due to the assessment of optimising for this topic, we have not made any recommendations.

Summary of findings

External organisations support the OPC for some functions as required, such as outsourcing their IT function. Requirements for managing information, specifically relating to ownership and the return of records, are outlined in contracts. However, this clause does not reference ongoing information management requirements or the Public Records Act.

There is no evidence of monitoring contracted parties to ensure that information management requirements are met.

Recommendations

Review relevant contracts for outsourced functions and collaborative arrangements to ensure requirements for managing information are included.

Summary of findings

The OPC currently has no specific information management processes to locate and identify information of importance to Māori. The information management policy does not outline the principles of Te Tiriti o Waitangi, and this has been acknowledged as something that OPC plan on developing.

The OPC recently appointed a Principal Advisor – Māori. One of the responsibilities for this resource will be to develop an understanding of resources and information that is of importance to Māori, demonstrating that the OPC are in the initial stages of their journey of improving their efforts in this space.

Recommendations

Design a processes to locate and identify information of importance to Māori, incorporating this into the information management policy currently in place.

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.

Summary of findings

Information management compliance is monitored through usage reports and the monitoring of staff members’ desktop sizes to ensure information is being saved appropriately in the ECM. These reports are provided to the Executive Sponsor. Issues are addressed as they arise, and the Executive Sponsor may pass the information on to the Senior Leadership Team if they need to be escalated.

In relation to the monitoring of compliance with Public Records Act requirements and other relevant legislation, the OPC is in the process of establishing a new governance group who will monitor and review this compliance. This is a work in progress.

Recommendations

Establish a regular and proactive approach to monitoring compliance and identifying any issues with the current information management policy in place.

Capability



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

TOPIC 8 – Capacity and Capability

Progressing

Summary of findings

The Manager of Support Services has the appropriate information management capability to support the minimum business process requirements, and is well respected within the organisation. They provide one-on-one induction training to all new starters at OPC, and staff interviewed noted they are the first port of call for any question they have about information management.

Professional development opportunities are accessible to the Manager of Support Services who has attended courses and conferences. This is supported by the Executive Sponsor and through OPC's professional development funds that staff may access.

It was noted that there is a lack of capacity to improve some information management practices, for example, the lack of capacity to develop an information management strategy, or to formalise a disposal authority. Based on the overall maturity of the organisation's information management practices, there should be consideration of whether further resources are required, or whether some administrative tasks could be passed to other employees outside of existing information management roles.

Recommendations

In consultation with the Executive Sponsor and Manager of Support Services, review the information management staff capacity to ensure that it is aligned to business needs.

TOPIC 9 – IM roles and responsibilities

Maturing

Summary of findings

Staff interviewed noted that job descriptions outline details of information management responsibilities for all staff and contractors. Performance plans consider their job descriptions, and therefore information management is discussed in appraisals with all staff. In addition, ongoing reporting is completed to ensure staff are adhering to information management requirements.

Upon starting work at OPC, staff are provided extensive training through a formal induction process, where information management responsibilities are communicated, and relevant training materials are provided for ongoing reference. However, this training is not specifically related to the wider integrity of government.

Information management responsibilities are communicated on an ongoing basis through reminder emails, including "tips and tricks". The Manager of Support Services offers clinics in both Wellington and Auckland to assist staff with any information management issues.

Recommendations

When discussing the roles and responsibilities of staff in relation to information management, articulate the importance of adhering to these requirements as they relate to the wider integrity of government.

Creation



It is important to take a systematic approach to the management of government information, and this starts with an understanding of what information must be created and captured. It is expected that public offices create and capture complete and accurate documentation of the policies, actions and transactions of government. Knowing what information assets are held by public offices is essential to IM practice.

TOPIC 10 – Creation and capture of information

Maturing

Summary of findings

Staff and contractors actively ensure that the right information is created and captured in all business functions and activities, following the OPC information management policy. Information is routinely created and captured as part of all business functions and activities and stored in the ECM.

Due to the ECM at times being slow, staff occasionally create documents in personal environments. However staff interviewed noted that final versions of documents are always saved into the ECM. Desktop size is monitored and reported on, and where unapproved environments are used, they are reported to the Manager of Support Services.

Metadata is routinely created through the ECM to support the usability, reliability and trustworthiness of information. Metadata is auto-populated within the ECM with additional user-defined metadata required by the OPC to assist with their internal workflows.

Recommendations

Ensure the Senior Leadership Team are routinely notified of organisation-wide usability, reliability, and trust issues relating to the ECM used. Where there are no concerns found, the Senior Leadership Team should be notified of this to maintain completeness in reporting.

TOPIC 11 – High-value / high-risk information

Beginning

Summary of findings

The OPC has not undertaken the process of formally identifying information assets as high-value or high-risk. Instead, the OPC classifies all information in the ECM as high-value and high-risk information.

OPC does not have a documented inventory of the information they hold in both digital and physical storage, making it difficult to establish a long-term management plan for this type of information.

Recommendations

Create an information asset register that identifies the information that is high-value or high-risk to the OPC, and develop a plan for the long-term management of this information. This could be performed at the same time as developing an organisation-specific disposal authority (refer Topic 20 – *Current organisation-specific disposal authorities*).

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

Due to the size of the organisation, the OPC Manager of Support Services and Executive Sponsor are fully involved in the design, configuration and implementation of projects involving upgraded business systems. For example, the upgrades of the ECM typically come from the advice of these individuals, and they are involved in the rollout of these upgrades.

New business systems are only commissioned if they meet information management requirements. However, standardised information management requirements for new and upgraded business systems are not documented.

Information management is supported by the Senior Leadership Team, given that all business processes rely on the OPC's ECM. Information management requirements are consistently considered in technology systems, with the strong involvement of the Manager of Support Services and Executive Sponsor in senior leadership team decision making.

Recommendations

Document standardised information management requirements for new and upgraded business systems.

TOPIC 13 – Integrity of information

Managing

Summary of findings

The OPC has organisation-wide information management practices routinely followed by staff and contractors, with information primarily held in the ECM. Staff interviewed noted that the information is typically easy to find, reliable and trustworthy. This is proven by:

- Information management controls being in place, ensuring only relevant staff members can access certain files. For example, Senior Leadership Team records can only be accessed by those staff members and their administrative staff. However, the controls in place are not regularly tested to ensure they remain fit for purpose.
- The ECM's audit trail capability provides visibility showing which staff members have opened and updated documents in the ECM, maintaining the integrity of the information held.
- Accessibility of information is assisted through the search function of the ECM. Staff interviewed noted that information can always be found and are confident that it is reliable and trustworthy. The search capability is supported by a filter function, that enables staff to complete a more advanced search, supporting the accessibility of the documents.

Recommendations

Routinely review management controls to maintain the controls that ensure the documents on record are reliable and trustworthy.

Summary of findings

The OPC is now primarily a digital workplace, where the information created and stored is held in the ECM. This displays a strong commitment to maintain ongoing accessibility to the information as long as it is required. However, information maintenance and accessibility is not documented in the OPC's strategic plans.

Thorough testing is completed prior to any business and system changes to ensure risks to the information are minimised.

The OPC has plans for an unexpected business interruption, with a business continuity plan and remote working access provided to all staff, using multi-factor authentication to protect OPC's information and data. The OPC is aware of technology obsolescence risks and therefore uses Office 365 as it is an 'evergreen' product to mitigate these risks.

Physical documents are stored at a third-party commercial storage facility. This reduces the risk of physical damage, and documents are available upon request.

Recommendations

Ensure the management and maintenance of information is included in all strategic plans for the organisation. While information management is discussed alongside business change, it should be articulated in documented strategic plans relating to transformation initiatives or ICT plans, for example.

Summary of findings

The OPC has a business continuity plan, which was last updated on 18 July 2019. The document provides details on the restoration of digital business information by providing staff remote access instructions. The OPC's IT provider regularly tests the back-up of these documents and servers.

The plan does not outline the salvage and restoration of physical business information, but OPC now stores physical information at a third-party provider, and recent documents are stored digitally and are accessible remotely.

The plan does not specifically identify critical information or systems that are required to be able to continue to operate during a business disruption.

Recommendations

Update the business continuity and recovery plan to incorporate information management considerations, particularly surrounding the identification of what critical information is required to ensure business continuity.

Storage



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

TOPIC 16 – Appropriate storage arrangements

Optimising

Summary of findings

The OPC uses third party storage providers for both physical and digital information, which provides protection against unauthorised access, loss, deletion, or destruction. For access to digital information, multi-factor authentication is used to minimise risk. Restrictions are set by the system administrators to ensure information management folders are only accessible to staff that require it.

Penetration testing of IT security is performed regularly to ensure risks are regularly mitigated, and there is a monthly check to confirm that back-up systems and servers are working effectively. Where issues arise, they are reported to the senior leadership team, and processes are refined.

Recommendations

Due to the assessment of optimising for this topic, we have not made any recommendations.

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

The OPC consistently uses metadata to facilitate the management and discovery of information. Depending on the file type, the information management system automatically captures certain metadata fields at the creation of the document and includes additional required fields that must be user-defined, meaning the metadata is embedded in standard business practice.

The Manager of Support Services works with managers to identify metadata requirements to support the reporting required by each team. Once requirements are established, required metadata fields are updated accordingly. The Manager of Support Services has established a taxonomy file plan, limiting file access where appropriate, and creating a structure in the filing of documents. This taxonomy is maintained by limited staff who can create folders in the ECM. The maintenance of metadata and file plans are typically updated on a reactive basis rather than through regular reviews.

Staff and contractors know how to use the ECM and understand how to use the tools to control and facilitate access to information due to their induction training.

Recommendations

Perform active maintenance of metadata and file plans to ensure reliable management and discovery of information, rather than maintaining these systems reactively.

Disposal



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

TOPIC 20 – Current organisation-specific disposal authorities

Beginning

Summary of findings

There is no current and approved organisation-specific disposal authority. OPC has never had a disposal authority since its establishment in 1993, and all records have been retained throughout this time.

OPC plans to develop a retention and disposal schedule in the future.

Recommendations

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

Implement a regular review process to ensure the disposal authority does not expire.

TOPIC 21 – Implementation of disposal decisions

Beginning

Summary of findings

Currently, the OPC retains all information indefinitely, and no disposals take place. All staff understand that information is not to be disposed of as this is discussed in induction training. Physical documents held in third party storage are not regularly reviewed for disposal.

Once a disposal authority has been approved, the OPC will likely require additional resourcing to manage the review of older content. This resource would be required to both identify what information may be disposed of, and to document its disposal.

Recommendations

Once the retention and disposals schedule has been approved (as discussed in Topic 20 – *Current organisation specific disposal authorities*), the OPC should ensure disposal activities are routinely planned, actioned, and documented in a disposal register.

Summary of findings

Based on Archives New Zealand’s requirements, records older than 25 years old should be transferred to Archives New Zealand. The OPC was established in 1993 and is therefore has information that is 25 years and older. This information should be identified and transferred once the OPC has a disposal authority.

There is no deferral of transfer agreement held by OPC.

Recommendations

Once the disposal authority has been approved, OPC should identify records of archival value that are over or nearing 25 years old and obtain a deferral of transfer agreement for those records, or arrange the transfer as required.



6. Summary of feedback

Thank you for the opportunity to comment on the Audit Report.

We accept in full your analysis and associated recommendations. We propose that these will form the basis of our formal information strategy and establish improved Public Records Management going forward. The report presents the roadmap ahead with clarity and the challenges this will represent.

We found the process constructive and informative and thank you for the manner in which the Audit was undertaken, especially as the pandemic impacts meant a higher than expected flexibility.

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25 March 2022

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Tēnā koe Liz

Public Records Act 2005 Audit Recommendations

This letter contains our recommendations related to the recent independent audit of the Office of the Privacy Commissioner (OPC) 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

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Dunedin Regional Office, 556 George Street, Dunedin

Organisations that are assessed as having a maturity level of 'Managing' across all IM topics are broadly meeting the minimum requirements expected by the PRA and Archives' mandatory Information and records management standard. The OPC is well placed, with several categories at or above the 'Managing' maturity level. Having a working IM policy and strong levels of staff understanding of the importance of IM ensures that IM roles and responsibilities are understood, and that practice is consistent in support of the work of the organisation. The OPC does well at induction and training for staff and contractors and integrating IM into business processes. The intention to establish and implement an OPC disposal authority, and develop the associated components, is the right focus for improving IM maturity. The Executive Sponsor and Manager of Support Services are clearly effective in their role, but an assessment of additional IM capability needed to resource IM maturity improvements would be prudent.

Prioritised recommendations

The audit report lists 17 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 for the release within 10 working days.

As required by the PRA, we 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, and we will contact your Executive Sponsor shortly in relation to this.

Nāku noa, nā



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

Cc Gary Bulog, General Manager, Privacy Commissioner (Executive Sponsor)
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APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Governance	1: Strategy	<i>Develop an information management strategy for the OPC in line with Archives New Zealand guidance. This does not have to be a standalone strategy for a small entity and can be incorporated within OPC's wider strategic plan, but it should clearly articulate information management objectives.</i>	Strategic planning would assist OPC's understanding of the capacity and capability needed for IM maturity improvement, for example in the disposal area.
Governance	6: Te Tiriti o Waitangi	<i>Design a process to locate and identify information of importance to Māori, incorporating this into the information management policy already in place.</i>	The newly appointed Principal Advisor – Māori will be useful in assisting with the recommendation.
Capability	8: Capacity and Capability	<i>In consultation with the executive Sponsor and Manager of Support Services, review the information management staff capacity to ensure that it is aligned to business needs.</i>	As in Topic 1 above.
Creation	10: High-value/high-risk information	<i>Create an information asset register that identifies the information that is high-value or high-risk to the OPC and develop a plan for the long-term management of this information. This could be performed at the same time as developing an organisation-specific disposal authority (refer Topic 20 – Current organisation-specific disposal authorities)</i>	This work will help to prioritise activity for efficient targeting of resources. A comprehensive and well-maintained information asset register will assist the development and implementation of a disposal authority.
Management	12: IM requirements built into technology systems	<i>Document standardised information management requirements for new and upgraded business systems.</i>	This would be useful to support understanding of IM requirements across the organisation.

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Disposal	20: Current organisation-specific disposal authorities	<i>Develop an organisation-specific disposal authority and obtain approval from Archives New Zealand.</i>	This work is essential in enabling the effective ongoing management of information.