



Public Records Act Audit Report for Reserve Bank of New Zealand - Te Pūtea Matua

Prepared for Te Rua Mahara o te Kāwanatanga Archives
New Zealand

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We are independent of Te Rua Mahara o te Kāwanatanga Archives New Zealand (Te Rua Mahara) in accordance with the independence requirements of the Public Records Act (PRA) 2005.

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1. Executive summary

Reserve Bank of New Zealand Te Pūtea Matua (Te Pūtea Matua) was established in 1934 and is the central bank of New Zealand. Te Pūtea Matua has statutory functions under the Reserve Bank of New Zealand Act 2021, the Banking (Prudential Supervision) Act 1989, the Insurance (Prudential Supervision) Act 2010, the Non bank Deposit Takers Act 2013, the Financial Market Infrastructures Act 2021, and the Anti money Laundering and Countering Financing of Terrorism Act 2009.

Te Pūtea Matua creates public records in relation to its statutory functions. These functions include central bank functions, acting as a prudential regulator and supervisor, monitoring the financial system, and monitoring the needs of the public for bank notes and coins.

Te Pūtea Matua has 500 staff. The Executive Sponsor is the Assistant Governor/General Manager Information, Data, and Analytics. The Executive Sponsor is supported by the Knowledge and Information Management (KIM) Directorate. There are currently four IM staff, including the Manager Knowledge Centre and Records Management, who are responsible for maintaining the IM and records practices at Te Pūtea Matua.

The official recordkeeping repository at Te Pūtea Matua is an electronic documents and records management system (EDRMS). Data is also maintained, but not limited to, on a treasury management system, customer relationship management system, and a survey and timeseries management system. Some physical information is held on site, no physical information is held in third party storage facilities.

The maturity of Te Pūtea Matua 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 Te Rua Mahara Archives New Zealand (Te Rua Mahara) to undertake an independent audit of Te Pūtea Matua under section 33 of the PRA. The audit took place on-site in September 2023.

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

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

3. This audit

This audit covers all public records held by Te Pūtea Matua including both physical and digital information.

The audit involved the review of selected documentation, interviews with selected staff, including the Executive Sponsor, Knowledge and Information Management Directorate, the information technology team, and a sample of operational staff at Te Pūtea Matua. The Executive Sponsor is the Senior Responsible Officer for the audit.

The audit reviewed Te Pūtea Matua information management practices against the PRA and the requirements in the Standard and provides an assessment of current state maturity. As part of this audit, we completed systems assessments over key systems that act as a repository for public records for Te Pūtea Matua. The systems assessed were an EDRMS, a customer relationship management (CRM) system, a treasury management system, and a survey and timeseries management system. Where recommendations have been made, they 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. Te Pūtea Matua has reviewed the draft report, and a summary of their comments can be found in Section 6.

4. Maturity Assessment

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

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

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

5. Audit findings by category and topic



Governance

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

TOPIC 1 – IM strategy

Optimising

Summary of findings

Te Pūtea Matua has a current Data and Information Management Strategy (the Strategy) which drives IM practices throughout the organisation and is currently working on continuing to uplift their IM practices. The Strategy was approved by the Executive Leadership team in September 2022 and received Board endorsement in November 2022, Te Pūtea Matua regularly review the roadmap to deliver the uplift in capability and capacity outlined in the Strategy.

The Strategy details the requirements to enable Te Pūtea Matua to deliver current and future data and information services. The Strategy is reviewed on an annual basis and is regularly assessed to ensure the objectives remain relevant, initiatives are resourced, and the outcomes are measurable. Regular business planning sessions are held with the Executive Leadership Team and the Board to ensure the Strategy is updated to reflect changing business needs and direction.

Senior management across all departments at Te Pūtea Matua are involved in identifying and leading the IM strategic direction through active involvement in business planning and strategy sessions. IM is integrated into other organisation-wide initiatives and plans, such as enterprise risk management and the solution Architecture Review Board.

The Strategy references the Information Management Uplift Project, which is an ongoing project that includes plans to replace the current EDRMS and to embed changes to the IM culture at Te Pūtea Matua. A Data and Information Governance (DIG) Office has been established within the KIM directorate to support the overall organisational data and IM needs.

Recommendation

Due to the assessment of 'Optimising' for this topic, we have not made a recommendation.

Summary of findings

Te Pūtea Matua has an Information and Data Management Policy (IDMP) that was authorised by the Executive Leadership Team in February 2022. Te Pūtea Matua also has a Records Management Policy (RMP) that was authorised by the Executive Sponsor in October 2022. In addition, Te Pūtea Matua has policies on Declassifying Official Information, E-discovery, and Information Sharing. The Policies are communicated to all staff and contractors during their induction and are available on the intranet.

Both the Reserve Bank of New Zealand Information and Data Management Policy and the Records Management Policy are aligned to the Strategy. The PRA and the Standard form the basis of both Policies. Requirements from the Policies are built into the EDRMS and business processes. These include business classification schemes, metadata schema, capture of records in approved environments, and retention and disposal schedules applied to the EDRMS. Process documentation for some departments is out of date and the KIM directorate continues to engage in those areas to ensure good IM practices.

Breaches of the Policies and processes are actively addressed through an incident management process. Reporting compliance with the Policies is required from each department on a quarterly basis.

All staff and contractors are regularly informed of their IM responsibilities during their induction, ongoing training, town hall presentations, and support sessions. Induction processes for staff and contractors include signing the Code of Conduct that includes the requirement to meet IM responsibilities. The onboarding process also includes meetings with KIM staff and mandatory IM training.

The Policies are linked to other corporate policies in the Corporate Policy Library and the Strategy. The RBNZ Information and Data Management Policy includes a statement that other corporate policies must be read in conjunction with it. The Strategy refers to all relevant policies and standards that will be delivered.

IM responsibilities are documented in detail for KIM staff. The need to comply with Te Pūtea Matua approved policies is included in the Code of Conduct, that is required to be signed by all staff and contractors.

Recommendation

Ensure ongoing engagement of IM staff across all business units as part of the process and procedure reviews.

Summary of findings

The Executive Sponsor consistently fulfils their oversight and monitoring role. The Executive Sponsor is supported by the Director of Knowledge and Information Management and other KIM staff.

The Executive Sponsor is the Chair of the Information and Data Portfolio (IDP) Steering Group, which provides direction and support for IM. The Executive Sponsor and the IDP Steering Group champion the need for IM to be integrated into all parts of Te Pūtea Matua. The Executive Sponsor is a member of the Enterprise Portfolio Delivery Committee. A member of the KIM Directorate is a voting member of the Architecture Review Board. The Director of Knowledge and Information Management is a member of the Enterprise Risk Management Committee. These memberships ensure that IM is addressed as part of solution design, project delivery, as well as risk management at an organisation-wide level.

The DIG Office has been established to support the delivery objectives of the Data and Information Management Strategy and provide organisation-wide support around data and information governance activities.

The Executive Sponsor is responsible for IM in Executive Leadership strategy and business planning sessions and is involved in relevant governance committees and forums. Since starting in the position two years ago, the Executive Sponsor has sought further funding to promote the continuous improvement of IM practices. This has enabled delivery of the IM capability uplift and KIM staff to be recognised for their experience and enabled additional full-time staff to join the KIM team.

The Executive Sponsor actively promotes the value and importance of IM from the Leadership level through to the operational level. This includes sharing reminders of good IM practice and providing guidance to staff in weekly newsletters.

The Executive Sponsor uses IM reporting to inform strategic business decisions. Monthly reporting from the Information Management Uplift Project informs the Executive Sponsor's strategic business decisions.

The Executive Sponsor and the Director of Knowledge and Information engage with those responsible for IM at other central banks. The Executive Sponsor and Director of Knowledge and Information Management are recognised specialists in information and data management who speak at conferences within Aotearoa and overseas.

Recommendation

Due to the assessment of 'Optimising' for this topic, we have not made a recommendation.

Summary of findings

Responsibility for the management of information within business units is consistently assigned to business owners. Responsibilities are documented in the Records Management Policy. Knowledge and Information Management staff operate an outreach program to all business owners to support their understanding of their responsibilities.

Business units that have recently undergone a system or process change tend to have a stronger understanding of their IM responsibilities, as KIM staff have been involved in the change process. Staff interviewed as part of the focus groups noted that some business owners demonstrated awareness of their IM responsibilities by performing spot checks on the EDRMS for correct filing practices.

Information management is integrated into most business processes and activities. Most policy requirements are integrated into the EDRMS, and all staff interviewed were aware of their obligations. Information management has recently become integrated into digital workflows. This includes the mandatory addition of classification levels to protect the integrity, availability, and confidentiality of information. Knowledge and Information Management staff interviewed identified that there are some business units that are yet to update their process documentation. Knowledge and Information Management staff actively work with business units around the IM components of their process improvement cycles. The KIM team schedule quarterly sessions with colleagues in the Auckland-based office to provide in-person support and guidance, in addition to the regular support conversations.

Information management expertise is regularly included in business process change and development. Members of the KIM Team are involved in all decision-making bodies for changes to business process, including their current implementation of the new customer relationship management system.

All issues related to IM are directed to KIM staff. Staff who participated in focus groups confirmed that they typically approach the KIM team directly for support. Additionally, staff spoke positively about their relationship with, and their ability to trust, KIM staff.

Recommendation

Ensure KIM staff are involved in changes in all business processes and development initiatives to advise on IM requirements.

Summary of findings

Te Pūtea Matua does not have any significant outsourced functions that would create or manage significant public records. Most procurement completed by Te Pūtea Matua uses an All of Government (AoG) contract template with unmodified terms and conditions. Te Pūtea Matua is currently building their capability to include further IM requirements into contractual arrangements.

We sighted one Memorandum of Understanding (MoU) between Te Pūtea Matua and a Government agency. The MoU details requirements for information sharing, and the requirement that all parties will store and retain any information as required by the PRA. The public record status of information shared between Te Pūtea Matua and the other agency is recognised in the MoU. There is no evidence of monitoring the MoU to ensure IM requirements are met.

Recommendations

Assess the need to define specific requirements, roles and responsibilities for the management of information in future contracts for outsourced functions or collaborative arrangements.

Monitor contracts for outsourced functions or collaborative arrangements to ensure IM requirements are met.

Summary of findings

Te Pūtea Matua has not formally assessed whether the public records held are of importance to Māori. There are no processes in place to identify and locate information of importance to Māori.

Te Pūtea Matua has made significant progress in the incorporation of Te Tiriti o Waitangi principles into their operations. Planning is underway to implement changes to IM practices. This will focus on improving access, discoverability, and care for information of importance to Māori.

Planning is underway to include plans to incorporate metadata into systems that hold information that may be of importance to Māori. Te Pūtea Matua published a Te Tiriti o Waitangi Statement in June 2023 that included a statement on emerging considerations relating to data sovereignty. Te Pūtea Matua acknowledged that they need to be proactive in developing an understanding of the impact of Māori data sovereignty and when it may apply.

Te Pūtea Matua has developed a Māori Access to Capital programme, working alongside retail banks. The programme is a collaboration across the banking system to help reduce barriers for Māori accessing capital. A Senior Data and Information Governance Adviser is part of the data working group of this programme, as a representative from the Information, Data, and Analytics Group.

Recommendation

Develop processes to locate and identify 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

Managing

Summary of findings

There is some monitoring of compliance with the RBNZ Information and Data Management Policy, the Records Management Policy, PRA, and the Standard.

Knowledge and Information Management staff raised that their monitoring capability is limited due to the age of current technology. Currently, KIM staff monitor areas of low usage in the EDRMS and the volume of documents that are checked in and out to ensure documents are consistently updated with the latest metadata values. The Director of Knowledge and Information Management monitors the completion rate of the mandatory IM training, and the Executive Sponsor is informed of the completion rate. Additionally monitoring of compliance with PRA requirements, the Standard, and other relevant legislation is undertaken through the completion of the Comply With survey on an annual basis.

The Internal Audit team performed a Records Management Review in November 2022. The review included an assessment of whether business units are meeting the requirements of policies and procedures. Quarterly updates on the progress of actions that came out of the audit are reported to the Enterprise Risk Management Audit Committee and the Board Audit Committee.

There is a structured approach to implement corrective actions to address non-compliance with policies and processes. KIM staff reach out to educate business units where a risk of non-compliance is identified. These interactions are maintained on a dashboard to ensure departments are receiving enough IM support. KIM staff interviewed raised that there may be outstanding areas where there is non-compliance but are faced with system limitations to monitor and address these instances.

Recommendation

Explore opportunities to enable KIM staff to have oversight of organisation-wide compliance with policies, the PRA, and the Standard within new and upgraded IM systems.



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

Maturing

Summary of findings

IM capability development is aligned with current and future business needs and is considered as part of the workforce planning at Te Pūtea Matua. The Director of Knowledge and Information Management regularly assesses IM capability and capacity against business needs.

Currently Te Pūtea Matua advised that there is insufficient capacity to complete tasks such as disposal of digital information and on-site physical information. Additional funding has been secured to build capacity and capability within the KIM team. Te Pūtea Matua is in the process of hiring an additional staff member for the KIM Team to enable them to achieve long-term goals. The DIG Office provides additional capacity and capability.

Job descriptions for KIM staff are regularly reviewed and updated to meet business needs. Job descriptions are detailed and include requirements to meet the responsibilities of the PRA.

Te Pūtea Matua has an allocated budget for KIM staff to have regular access to IM-related professional development. Knowledge and Information Management staff have attended several IM-related conferences and are members of the Archives and Records Association of New Zealand and the Records and Information Management Practitioners Alliance. Knowledge and Information Management staff also have access to broader professional development opportunities such as risk management, Te Ao Māori, communication, and cultural competency. Knowledge and Information Management staff are involved across the organisation to support business needs and initiatives. This includes risk management and Official Information Act processes.

Recommendation

Assess the resource requirements to support continuous IM practice such as disposal of physical and digital records.

Summary of findings

The Code of Conduct and job descriptions for IM staff are regularly reviewed and updated to reflect IM requirements and business needs. IM responsibilities of non-KIM staff are not specifically detailed in job descriptions, aside from the requirement to comply with Te Pūtea Matua policies.

IM responsibilities are regularly promoted as part of normal business practice through town hall sessions that are held by the Director of Knowledge and Information Management. KIM staff work closely with operational staff to ensure IM responsibilities are understood. Staff noted they understand their roles and responsibilities in relation to IM.

Senior management understand their IM responsibilities, however, staff raised that there is an opportunity for them to actively promote and demonstrate good IM behaviours.

There is a mandatory induction to IM roles, responsibilities, and practices for all staff and contractors. This includes eLearning training through the Learning Management System.

All new starters are required to read and sign the Code of Conduct, which includes responsibilities to comply with Te Pūtea Matua policies. KIM staff conduct face-to-face sessions for new starters to ensure an understanding of IM responsibilities. There is a formal and ongoing programme of IM training delivered to all staff and contractors, including security classification refresher training and records management campaigns. There is targeted IM training in response to business needs and issues when they are identified.

Recommendation

Provide further training and support to the Leadership Teams to enable them to role model good IM practices.



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

Managing

Summary of findings

Staff and contractors ensure that the right information is created and captured as part of business functions and activities. Staff confirmed that this is fundamental to their role.

Final versions of information are generally managed in controlled environments to ensure usability and reliability. Staff may use uncontrolled environments, such as Microsoft Teams, for first working drafts and collaborative pieces of work, however, final versions are usually saved in the EDRMS. Staff noted that the use of uncontrolled and individual environments to manage information is actively discouraged, as supported by policy.

Appropriate metadata is generally created for information stored in the EDRMS to support the usability, reliability, and trustworthiness of information. However, there are inconsistencies in the metadata and use of classification principles for non-official record keeping repositories, such as SharePoint.

KIM staff raised that technological limitations impact their ability to monitor and address information usability and reliability issues. Currently, monitoring involves testing hyperlinks, version control, and access control to ensure that up-to-date information is being accessed by authorised staff. These limitations are identified and addressed in the Business Case for the Information Management Uplift Project.

Recommendation

Assess reasons for staff using uncontrolled environments and address issues impacting the use of controlled environments.

Summary of findings

Te Pūtea Matua maintains an Information and Data Asset register of all data sets and assigns them to relevant department owners. The data sets recorded on the repository include data stored locally that is used to inform decision making, and/or data collected or published externally. The Information and Data Asset Register is centrally maintained with a form available for staff to inform the DIG Office of new datasets. Staff interviewed raised that they are unsure of the last time new datasets had been added to the Information and Data Asset Register, however work is underway to determine the updates required.

The EDRMS and the Master Folder Editor, an application used to inventory all digital and physical information, registers all current and legacy information maintained by Te Pūtea Matua. The Master Folder Editor does not extend towards systems that are not considered document management systems.

In 2012, Te Pūtea Matua undertook a one-off appraisal of the historical physical records stored in the on-site basement in order to transfer records that are of high-value/high-risk to Te Rua Mahara. This was performed to mitigate potential risks of damage to the physical records.

During the 2012 appraisal process, the disposal schedule was updated to ensure all records are covered by agreed and authorised disposal actions. This resulted in a DA592 disposal authority that is valid until December 2025. The appraisal report identified high-value information maintained by Te Pūtea Matua and the associated disposal criteria. The disposal criteria are applied to appropriate information in the EDRMS.

While information that is considered high-value is identified in the appraisal report, Te Pūtea Matua does not maintain a register that is specific to high-value assets. Instead, Te Pūtea Matua maintain the Master Folder Editor inventories without high-risk/high-value information being specifically identified. There is work planned to perform risk assessments on the high-value information identified in the organisation-specific disposal authority.

Recommendation

Enhance existing inventories with the ability to identify information that is of high-risk/high-value.



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

Maturing

Summary of findings

IM staff are routinely involved in the design, configuration, and implementation of new and upgraded business systems. Te Pūtea Matua has a co-design approach between IM and Information Technology (IT) for any decisions related to IM and data platforms.

The design and configuration phases for new systems include addressing requirements regarding the PRA and the Privacy Act 2020.

Te Pūtea Matua is in the process of migrating to a new CRM system. This process includes KIM staff to ensure IM requirements are met.

KIM staff are involved in the decommissioning of business systems. Te Pūtea Matua is decommissioning the former CRM. KIM staff are actively involved in this project and are responsible for the migration of information.

Standardised IM requirements are considered in the development of digital architecture for information systems. A member of the KIM Directorate is a member of the Architecture Review Board, which assessed both new system implementations, as well as major changes to existing systems. This provides assurance to the Executive Sponsor that IM requirements are included in current and future state technologies. Additionally, a member of the Information, Data, and Analytics Group participates in project steering groups of all projects under the EPDC remit.

Metadata and disposal requirements are applied to information maintained in the EDRMS to support the retention of information of long-term value. Disposal requirements however are yet to be updated, and this is addressed in the Information Management Uplift Project.

Te Pūtea Matua has also begun assessing risks related to some business systems and their ability to meet IM requirements as part of the Information Management Uplift Project. The current EDRMS used by Te Pūtea Matua meets all minimum metadata requirements issued by Te Rua Mahara and internal compliance requirements. However, the user interface has not been updated for several years and disposal actions on information held in the system need to be updated.

Recommendation

Identify and mitigate or eliminate risks relating to business systems that do not meet IM requirements.

TOPIC 13 – Integrity of information

Maturing

Summary of findings

Organisation-wide IM practices are in place and routinely followed to ensure that information is reliable and trustworthy. This includes the consistent use of management controls such as version control and audit trails, which are key features of the EDRMS that supports the integrity of information. Naming conventions are routinely used by staff and contractors and guidance is in place to support the effective naming of files.

Management controls are routinely tested by the KIM team including monthly patching and tests scripts to ensure that these features are operating. File plans are also monitored on a daily basis through a folder consistency report, which highlights inconsistencies between the master file plan, the EDRMS, and the network file system. The volume of information that has been checked in and out on the EDRMS is also tested on a routine basis.

Staff interviewed noted that they generally have a consistent experience when finding and retrieving information. There are some instances where information is harder to find, for example, historical information or information from a business unit that has been restructured. Staff noted that the search function on the EDRMS is not easy to use but where needed, they receive support from KIM staff.

User experience issues, such as difficulty using the EDRMS search function and the lack of enterprise search functions, were identified in the Business Case for the Information Management Uplift Project and are scheduled to be addressed as the project progresses.

Recommendation

Address user experience issues identified in the Business Case for the Information Management Uplift project.

Summary of findings

Strategies for the management and maintenance of information are routinely part of the planning for business and system changes. Strategies to manage and maintain digital information include the review of digital backup and recovery processes, regular restoration testing, migrations plans, and checksum validations to ensure the correct number of documents have been transferred and no corruption has occurred. Strategies to maintain physical information include list and location registers and access controls.

Risks to the ongoing accessibility of physical information are identified and addressed. This includes the digitisation and disposal of critical physical records and limiting access to the on-site storage. Preservation needs for physical information is addressed through environmental controls within the on-site storage, such as temperature and pest control.

Risks to the ongoing accessibility of digital information have been identified and are being addressed. This includes plans to ensure information systems are continuously refreshed and updated and testing to ensure old links continue to work.

Technology obsolescence risks have been identified. The current EDRMS is becoming obsolete, and plans are underway to address this in the Information Management Uplift Project.

Te Pūtea Matua has built an enterprise landscape view that identifies when a digital asset is approaching end-of-life. Preservation needs for digital information have not been identified.

Recommendation

Identify preservation and digital continuity needs for digital information and plan to address these.

Summary of findings

Te Pūtea Matua has a Business Continuity Policy that was approved in March 2018 which establishes the general, organisation-wide approach to business continuity. The Policy has not been recently reviewed and updated. Te Pūtea Matua also maintains a Backup and Recovery Standard that was approved in March 2023. This document establishes the organisation-wide approach to backing up information, data, and configurations.

Each business unit is required to perform a business impact analysis that prioritises requirements of data and system recovery, and KIM staff were involved in the process. Review of business-unit specific BCPs occurs every two years. While critical information is not identified in BCPs, each business unit maintains documented procedures that includes the recovery point objective, recovery point actual, and the recovery time objective for critical business systems.

Most critical physical information has been transferred to Te Rua Mahara. The remaining critical physical information has been digitised to enable business continuity and recovery. Since 2010, all information created by Te Pūtea Matua has been stored digitally.

While there is a limited amount of physical information determined as high-value maintained on-site, the Knowledge and Information Management Business Continuity Plan details a salvage plan for this physical information. Plans include a dedicated salvage team and appendices with salvage techniques.

Te Pūtea Matua has confidence it will be able to operate following a business disruption through regular testing and review. The frequency of testing of systems depends on their criticality to business operations. Testing may occur multiple times a year for critical systems, to a minimum of once every two years for lower priority systems. Crisis simulations are performed on systems by the Digital Solutions and Security team, and remediation processes are in place for when gaps are identified during the simulations.

Recommendations

Identify critical information in each business unit-specific business continuity plan.

Implement a regular review cycle for the Business Continuity Policy and business unit-specific business continuity plans.



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

Te Pūtea Matua maintains some physical information on-site. No physical information is held at third-party storage facilities. There is appropriate protection and security in place to protect physical information against unauthorised access, loss, and deletion. This includes maintaining heavily restricted access. Employees who do not have access must be accompanied by security personnel.

The storage environment for physical information has appropriate protection against hazards, including fires, humidity, and pests.

Te Pūtea Matua maintains most of their digital information on the cloud and has implemented measures to regularly mitigate information protection security risks for all their systems. Te Pūtea Matua has a dedicated Systems Operations Centre (SOC) that regularly tracks and manages security risks, including unauthorised access to digital information.

Access to information in digital systems is defined by the employee's business unit. If an employee needs to access information from a different department, they must contact the department to get permission to view the file structure.

Information protection and security risks are regularly reported to the Enterprise Risk Management Committee, and the Director of Knowledge and Information Management is informed of these risks as a member of the Committee. There are regular risk management workshops with Governors and Directors to ensure controls are considered into business process mapping exercises. The Executive Sponsor is informed if there are any instances of loss, destruction, or deletion of information.

All staff and contractors are introduced to protection and security requirements through the mandatory training.

Recommendation

Due to the assessment of 'optimising' for this topic, we have not provided a recommendation.



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

Maturing

Summary of findings

Te Pūtea Matua actively maintains file plans and metadata schema to ensure reliable management and discovery of information.

Staff interviewed understood how to use the systems and tools that contain and facilitate access to information. Staff noted that the search function in the EDRMS is difficult to use, however KIM staff have provided advanced training in the use of metadata and search techniques. There are plans to implement a new EDRMS as part of the Information Management Uplift Project, and improvement in the search function is considered as part of the business case.

As referenced in Topic 16 – *Appropriate Storage Arrangements*, access controls are determined by staff and contractor business units. If staff and contractors need to gain access to information held in other business units, tickets must be logged with the service desk, and their manager and the relevant business unit must approve access. KIM staff work closely with the service desk to ensure sufficient oversight of access controls.

Metadata used to find and manage information in the EDRMS complies with the minimum metadata requirements issued by Te Rua Mahara. Metadata is automatically applied and updated where possible for information maintained in the EDRMS, except for security classifications, which are manually selected. This does not extend to information stored in other systems. Te Pūtea Matua has identified this, and it will be addressed as part of the Information Management Uplift Project.

IM processes are applied to incoming and outgoing information and data shared with external parties. Te Pūtea Matua has issued guidelines on sharing information with public entities, and as referenced in Topic 5 – *Outsourced functions and collaborative arrangements*. All staff were aware that for files to be shared externally, approval must be obtained from the manager and shared through the approved filesharing system.

Recommendation

Due to the initiatives underway and rating for ‘maturing’ for this topic, we have not made a recommendation.



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 (or have a deferral of transfer) and be determined as either “open access” or “restricted access”.

TOPIC 20 – Current organisation-specific disposal authorities

Managing

Summary of findings

Te Pūtea Matua has a current, and approved, organisation-specific disposal authority that covers physical and digital information for core business functions. This is valid until December 2025.

Review of the disposal authority occurs when there are significant changes in legislation relevant to activities of Te Pūtea Matua. The last formal review of the disposal authority was performed in 2017. Staff interviewed noted that the changes in the Reserve Bank Act 2021 and the commencement of the Deposit Takers Act 2023 will influence a change in the existing disposal authority. Review of the disposal authority does not occur on an annual or otherwise regular basis.

Staff and contractors are aware of the disposal requirements relevant to the information they create and use. This is supported by the Data and Retention Policy. Staff noted that if they were unsure of the retention requirements, they would seek support from KIM staff.

Recommendation

Implement a regular review cycle to ensure the organisation-specific disposal authority reflects business as well as legislative changes.

Summary of findings

Processes ensure that information is retained for as long as required for business use and relevant disposal authorities. Retention periods relevant to organisation-specific and general disposal authorities are applied to information stored in the EDRMS. Processes and guidelines are documented for the disposal of information and are available to all staff. There has been no disposal of digital information, however disposal is currently being considered during business system changes.

Te Pūtea Matua is not carrying out disposal actions for physical information due to limited capacity within the KIM team. The last disposal of physical records occurred in 2017, which included disposal of all physical records held at a third-party storage facility. Disposal actions are documented in a register that details when the disposal was carried out, what was disposed of, and under what authority. A separate confirmation memorandum details who performed and approved the disposal action.

Recommendation

In line with Topic 8 – *Capacity and Capability*, assess the need for additional resources to perform routine disposal actions for information across all repositories and formats.

Summary of findings

Most physical information of archival value that is over 25 years old and no longer required for business use has been transferred to Te Rua Mahara. All information that has been transferred has been determined as open or restricted access. There is a deferral of transfer for some records over 25 years old. The analysis behind the decision to defer the transfer of information to Te Rua Mahara is documented in the appraisal report.

No digital information has been transferred to Te Rua Mahara.

Recommendation

Identify digital information over 25 years old that can be transferred to Te Rua Mahara and discuss the transfer process.



6. Summary of feedback

Reserve Bank of New Zealand – Te Pūtea Matua welcomes the findings of the Archives New Zealand Public Records Act 2005 audit of our information management maturity.

We are pleased to see that our focus on uplifting our information management maturity, through the refresh of our Data and Information Management Strategy and delivery activities led by our Knowledge and Information Management directorate, have been recognised in the report.

We accept the recommendations from the report and are actively focused on continuing to strengthen our information management practices through our information and data management delivery work programme.

7. Appendix 1

The table in Section 4, on page 3 lists all assessed maturity levels by topic area in a table format. This table has been listed below for accessibility purposes:

Topic 1, IM strategy – Optimising

Topic 2, IM policy and processes – Maturing

Topic 3, Governance arrangements & Executive Sponsor – Optimising

Topic 4, IM integration into business processes – Maturing

Topic 5, Outsourced functions and collaborative arrangements – Progressing

Topic 6, Te Tiriti o Waitangi – Progressing

Topic 7, Self-monitoring – Managing

Topic 8, Capability and capacity - Maturing

Topic 9, IM roles and responsibilities - Maturing

Topic 10, Creation and capture of information - Managing

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

Topic 12, IM requirements built into technology systems - Maturing

Topic 13, Integrity of information - Maturing

Topic 14, Information maintenance and accessibility - Maturing

Topic 15, Business continuity and recovery – Managing

Topic 16, Appropriate storage arrangements – Optimising

Topic 18, Information access, use and sharing – Maturing

Topic 20, Current organisation-specific disposal authorities – Managing

Topic 21, Implementation of disposal decisions – Progressing

Topic 22, Transfer to Archives – Progressing

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30 January 2024

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E te rangatira e Adrian, tēnā koe

Public Records Act 2005 Audit Recommendations

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

Introduction

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

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

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

Audit findings

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

Kia pono ai te rua Mahara – Enabling trusted government information

Organisations that are assessed as having a maturity level of 'Managing' across all IM topics are broadly meeting the minimum requirements expected by the PRA and the mandatory Information and records management standard. The audit report shows that IM practice at Te Pūtea Matua is predominately operating at the higher maturity levels of Managing or above. This exemplary result is due to strong governance and planning with enough staff to operationalise (although disposal is an area where staffing is identified as an issue).

The very positive audit outcome has meant there are relatively few recommendations for improvement. Through its ongoing Information Management Uplift Project, Te Pūtea Matua has already identified activities to improve IM practice and maturity such as replacing the current EDRMS.

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 eight recommendations as identified in the Appendix.

What will happen next

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

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

We will follow up this letter with a request to your Executive Sponsor that your organisation provides us with an action plan to address the prioritised recommendations. Our follow up process will track your progress against the action plan.

Thank you again for your support with the audit. We would greatly appreciate further feedback on the audit process and the value it provides to organisations. We have sent a feedback survey link for the attention of your Executive Sponsor in the accompanying email.

Nāku iti noa, nā



Anahera Morehu

Poumanaaki Chief Archivist

Te Rua Mahara o te Kāwanatanga Archives New Zealand

Cc Kate Kolich, Assistant Governor and General Manager Information, Data and Analytics (Executive Sponsor), kate.kolich@rbnz.govt.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Governance	5: Outsourced functions and collaborative arrangements	<i>Assess the need to define specific requirements, roles and responsibilities of the management of information in future contracts for outsourced functions or collaborative arrangements.</i>	When using AoG templates additional IM requirements can be added if assessed as needed.
Governance	6: Te Tiriti o Waitangi	<i>Develop processes to locate and identify information of importance to Māori.</i>	Planning is reported as being underway to support improvement in maturity for this topic.
Self-monitoring	7: Self-monitoring	<i>Explore opportunities to enable KIM staff to have oversight of organisation-wide compliance with policies, the PRA and the Standards within new and upgraded systems.</i>	The system limitations that restrict monitoring could be addressed when planning for the EDRMS replacement (as indicated in Topic 1: IM strategy).
Creation	10: Creation and capture of information	<i>Assess reasons for staff using uncontrolled environments and address issues impacting the use of controlled environments.</i>	This needs to be understood so it can be addressed when planning for a new system (as above).
Creation	11: High-value/High-risk information	<i>Enhance existing inventories with the ability to identify information that is of high-risk/high-value.</i>	Identifying the information asset is important to understand, share, protect and use it. Information assets overview
Management	15: Business continuity and recovery	<i>Identify critical information in each business unit – specific continuity plan.</i>	This is information critical to the operation of Te Pūtea Matua during or immediately after a business disruption event.
Disposal	21: Implementation of disposal decisions	<i>In line with Topic 8: Capacity and Capability, assess the need for additional resources to perform disposal actions for digital information across all repositories and formats.</i>	Once processes are set up and any backlogs are addressed this should be a regular activity for disposal of the residue of physical information. Disposal of digital information should be aligned across the systems where possible.

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Disposal	22: Transfer to Archives	<i>Identify digital information over 25 years old that can be transferred to Te Rua Mahara and discuss the transfer process.</i>	This is the next step after the excellent work with disposal of physical information, see Digital transfer - Overview