



New Zealand Post Limited  
Public Records Act 2005 Audit Report

Prepared for Archives New Zealand  
August 2022



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# 1. Disclaimers

## Use of Report

This report was prepared for the use of Archives New Zealand (Archives NZ) and New Zealand Post Limited. It was prepared at the direction of Archives NZ and may not include all procedures deemed necessary for the purposes of the reader. The report should be read in conjunction with the disclaimers as set out in the Statement of Responsibility section. We accept or assume no duty, responsibility, or liability to any other party in connection with the report or this engagement, including, without limitation, liability for negligence in relation to the factual findings expressed or implied in this report.

## Independence

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

## Statement of Responsibility

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

- This assessment is based on observations and supporting evidence obtained during the review. This report has taken into account the views of New Zealand New Zealand Post Limited and Archives NZ who reviewed this report.
- Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. The procedures were not designed to detect all weaknesses in control procedures as the assessment was performed by interviewing relevant officials and obtaining supporting evidence in line with the guidelines of the Archives NZ's Information Management (IM) Maturity Assessment.
- The matters raised in this report are only those which came to our attention during the course of performing our procedures and are not necessarily a comprehensive statement of all the weaknesses that exist or improvements that might be made. We cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of operations and their responsibility to prevent and detect irregularities, including fraud. Accordingly, management should not rely on our deliverable to identify all weaknesses that may exist in the systems and procedures under examination, or potential instances of non-compliance that may exist.

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

## 2. Executive Summary

### New Zealand Post Limited

New Zealand Post Limited (NZ Post) is a State-Owned Enterprise formed in 1987 to replace the New Zealand Post Office. NZ Post operates under the Postal Services Act 1998 and provides core services such as, delivering message communications in letter format, distributing parcels, providing financial transactions and electronic bill payment services through its retail network. NZ Post provides mail and courier services including selling stamps, paying bills, taking passport photos, and providing government services e.g., paying car registration fees. NZ Post provides the range of services through their core functions and two subsidiaries, Kiwibank and Air Post.

NZ Post is required under the Deed of Understanding to meet several social obligations, which include:

- Charging a uniform price for letters
- Maintaining a relationship between the price of letters and the Consumer Price Index
- Continuous delivery to several delivery points throughout New Zealand
- Having a minimum number of retail outlets.

NZ Post has 4600 full time employees that help maintain its network of 142 branches throughout New Zealand.

The high-value / high-risk information NZ Post holds under the PRA includes Board papers, records on mail and courier services, creation of stamps, and delivery operations.

### Summary of Findings

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

Maturity Level	Beginning	Progressing	Managing	Maturing	Optimising
No. of Findings	11	8	1	–	–

## 3. Introduction

### Background

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

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

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

The Chief Archivist has commissioned Deloitte to undertake these audits for certain public offices.

### Objective

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

### Scope

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

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

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

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

NZ Post's feedback to this report is set out in Section 6.

## 4. Information Management Maturity Summary

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

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

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



# 5. Audit Findings by Category and Topic

## Governance

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

### Topic 1: IM Strategy

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

Beginning

#### Observations

NZ Post does not currently have an IM Strategy that provides a strategic direction and support over IM activities. The Executive Sponsor (ES) is aware that NZ Post needs to mature their IM activities but has no active plans to develop an IM Strategy.

#### Recommendation

1. Develop an IM Strategy to provide a strategic direction for IM.

### Topic 2: IM Policy and Processes

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

Progressing

#### Observations

NZ Post has an IM Standard (the Standard) that was last updated and approved by senior management in 2020. The next review scheduled for 2021 has not happened. The ES is aware of this but is waiting for the output of this PRA audit to ensure the Standard is fit-for-purpose.

The Standard:

- Provides guidance on staff roles and responsibilities for creating, capturing, and storing information
- Outlines that all files must be stored on SharePoint, which is NZ Post’s main repository
- Explicitly prohibits the use of storing on local workstations or personal hardware, for example flash drives.

The Standard is linked to NZ Post’s associated Privacy and Access Control standards which are available on the Intranet. Staff reported they were unaware of the Standard, but confident they could find it, and have mixed understanding of their IM roles and responsibilities.

#### Recommendation

1. Update the Standard and communicate to all business units and staff.

### Topic 3: Governance arrangements and Executive Sponsor

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

Beginning

#### Observations

NZ Post has a Data Governance, Information Protection and Privacy Committee (the Committee). Its members include the Executive Sponsor (ES), Chairperson of Data and Analytics, Secretary of Data Governance, and staff from the Security, Legal and IT Risk teams. The Committee meets quarterly and is governed by a draft Terms of Reference (ToR). The ToR outlines responsibilities, purpose and scope at a high level and that IM activities will be discussed during the meetings. There are minutes for each meeting.

At the time of the audit, the ES had been in the role for two weeks but is aware of their IM responsibilities. The ES reported that the SLT acknowledges the need to mature the IM practices at NZ Post and intends to implement the key recommendations from this PRA audit.

There is no regular reporting of IM activities to the ES.

#### Recommendation

1. Formalise regular reporting to ES about IM activities, issues, and risks.

### Topic 4: IM Integration into Business Processes

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

Progressing

#### Observations

Business owners have a limited understanding of their individual and team's responsibilities for managing information outlined in the Standard. There is no enterprise-wide IM approach as business units have separate processes and activities across all systems at NZ Post. SharePoint captures the minimum metadata requirements of Archives NZ. The remaining systems do not capture the minimum metadata requirements, as recommended by Archives NZ. For example, Diligent captures the date, time, and documents name but not unique identifier and creator.

Business owners reported they know about IM due to past roles at other organisations instead of being formally made aware from NZ Post. Staff reported support for IM related processes is often found through 'knowing who to ask', rather than formal documentation. There is no organisation wide training for IM including induction. However, during staff focus groups, the projects team mentioned they have developed an IM training presentation that could be used across NZ Post.

#### Recommendation

1. Document business owners' IM responsibilities and support them to educate their staff to understand their responsibilities.



## Topic 5: Outsourced Functions and Collaborative Arrangements

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

Progressing

### Observations

NZ Post has a significant number of agreements with government agencies and commercial organisations. A Memorandum of Understanding (MoU) between New Zealand Customs Service and NZ Post was sighted. It does not reference the PRA. However, the MoU outlined both parties' requirements to be compliant with the NZ privacy laws. The MoU further addresses security, access controls, intellectual property, confidentiality and prohibiting the offshore storage of NZ Post's information without approval.

There is no monitoring over the contracts in place to ensure compliance with the PRA.

### Recommendation

1. Update contracts with external parties to include requirements for the management of information under the PRA.

## Topic 6: Te Tiriti o Waitangi

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

Beginning

### Observations

NZ Post has not identified information of importance to Māori nor is this recognised or addressed in the Standard.

NZ Post is unsure if information they hold is of importance to Māori.

### Recommendation

1. Develop a plan to 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 internal policies and processes.

### Topic 7: Self-Monitoring

*Organisations should monitor all aspects of their information management.*

Beginning

#### Observations

There is no formalised monitoring of compliance with the PRA or against the Standard. Privacy and security compliance is regularly reported to the Committee, but this does not explicitly include IM requirements. Regular reporting to the Committee does not specifically focus on legislative or policy compliance of the PRA. The ES advised that NZ Post has plans to include IM as part of the quarterly meetings under the Data and Governance discussions when core roles are filled.

#### Recommendation

1. Develop a monitoring process which monitors compliance against the PRA and the mandatory Information and records management standard, NZ Post's Standard and other relevant legislation.

## Capability

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

### Topic 8: Capacity and Capability

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

Beginning

#### Observations

NZ Post has three vacancies in their Data and Technology team that have IM responsibilities as part of the job description. At the time of this review, there are no current Data and Technology team members that have organisation-wide IM as part of their role. The ES acknowledged the lack of capacity and are actively recruiting, but this is taking longer than anticipated due to the tight labour market. The ES, who previously was a senior technology leader with over two years' experience in that role, is confident that once these roles are filled NZ Post will have sufficient capacity to address its IM needs.

The ES reported there is an organisational wide training budget that is promoted, however, to their knowledge no one has undertaken IM specific training. Staff interviewed reported they are aware of the training budget.

#### Recommendation

1. Assess the capacity and capability requirements against business needs. When the IM Strategy is completed include resourcing requirements.

### Topic 9: IM Roles and Responsibilities

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

Beginning

#### Observations

Staff and contractor IM roles and responsibilities are not documented in the Standard or the Code of Conduct. Only some job descriptions include IM, specifically roles that have IM as part their responsibilities. However, roles that are not responsible for IM directly have no reference to IM responsibilities. The Data and Technology job descriptions for the open vacancies include high level IM activities and responsibilities and a requirement to champion strong IM enterprise wide.

IM is not part of the induction training, however training on how to use and store information on SharePoint can be requested by staff, which the SharePoint administrator conducts. NZ Post does have training modules that cover cybersecurity, storing and sharing information which contains some relevant guidance for IM related practices.

#### Recommendation

1. Develop a formal induction to IM roles, responsibilities and practices that is given to all staff and contractors as part of on-boarding.

## Creation

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

### Topic 10: Creation and Capture of Information

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

Beginning

#### Observations

Staff have limited understanding of their responsibility to create full and accurate information to support business functions and to formally document NZ Post IM activities. Staff reported they are aware of this need based on previous roles but there is no guidance documentation at NZ Post.

SharePoint is set up to capture key metadata and the SharePoint administrator is aware metadata requirements can be customised. Due to the size and lack of IM training at NZ Post, there is inconsistency in creating and maintaining information. Business units have developed their own methods and file structures for storing information.

#### Recommendation

1. Assess the need for ongoing training and guidance documentation to support staff and contractors understand the requirement to create and maintain full and accurate information.

### Topic 11: High-Value/High-Risk Information

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

Beginning

#### Observations

The ES reported that their predecessor had developed an Information Asset Register (IAR) that contains the high-value and high-risk information. However, NZ Post was not able to produce the IAR when requested.

NZ Post has acceptable storage arrangements for important information i.e., stamps of historical value are stored in waterproof containers.

#### Recommendation

1. Create an IAR which identifies the information that is high-value or high-risk in association with developing the 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. The information must be reliable, trustworthy, and complete and managed to ensure it is easy to find, retrieve and use, as well as protected and secure.

### Topic 12: IM Requirements built into Technology Solutions

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

Progressing

#### Observations

There is no formal policy that outlines IM requirements must be included in technological solutions. However, the Data and Technology team, which is responsible for IM is included during transformation and implementation of any new systems at NZ Post.

The Data and Technology team advised they include IM requirements when designing new system changes or upgrades. New system transitions are usually undertaken as part of a project and IM requirements are identified as part of the requirements gathering process. However, there is no specific documented process to follow. During the recent migration from Google Drives to SharePoint the Data and Technology team performed the taxonomy structure reviews to ensure the new system would be appropriate and capture sufficient metadata.

The Data and Technology team reported confidence they had documentation for all systems in use at NZ Post.

#### Recommendation

1. Standardise the inclusion of IM expertise and requirements in designing, upgrading, and decommissioning of business systems.

### Topic 13: Integrity of Information

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

Progressing

#### Observations

The reliability and trustworthiness of information varies greatly across business units. Certain areas, such as the Operations and Service Delivery team have thorough IM processes, which supports the reliability of information. Each team reported they have their own processes for storing information to ensure its reliability and findability. Staff reported they often have issues with finding other teams' information relying on support from the subject owner. Staff findability issues were mostly around historical information.

All staff interviewed reported variable experiences finding the final version of documents and often go by the latest date the document was edited.

#### Recommendation

1. Consult with business units to develop organisation wide practices to ensure information is reliable and trustworthy.

## Topic 14: Information Maintenance and Accessibility

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

Progressing

### Observations

NZ Post does not have a formalised strategy for long-term maintenance and accessibility of information. General accessibility to physical information is ensured through long-term third-party storage of most information. The off-site records are indexed, which NZ Post uses to accurately retrieve the correct record.

Digital information is maintained through regular updates of all systems by the Data and Technology team. Cloud backups are stored for 13 months. We inspected the Master Agreement between Datacom and NZ Post and identified they are responsible for backing up and testing of NZ Post's systems.

### Recommendation

1. Identify technology obsolescence risks and develop plans to address them.

## Topic 15: Business Continuity and Recovery

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

Managing

### Observations

NZ Post has developed multiple business continuity and recovery plans (BCPs) for all individual business units across the group. These BCPs are based on NZ Post's internally developed BCP guide and template.

We sighted the Data and Technology team's BCP and confirmed it outlines all the necessary information to be included in the BCP such as:

- Overview
- Critical functions of the team
- Who is responsible for performing the critical functions and ensure they continue during a disruption event
- The team's communication structure
- Vendors and systems for critical functions and contingencies
- Scenario planning for potential changes to technology.

The BCP includes recovery plans, which outlines the actions for restoring critical information. The Data and Technology team at NZ Post relies on their IT vendors to restore their digital systems following a business disruption event.

### Recommendation

1. Ensure all BCPs are compliant with the guide and template.



## Storage

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

### Topic 16: Appropriate Storage Arrangements

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

Progressing

#### Observations

A large portion of NZ Post's physical information is stored with a third-party storage provider.

Onsite physical information is labelled ensuring it remains accessible and is stored in an office-environment, which includes fire safety, flood mitigation and access control. Information identified as having historical value is kept in water secured plastic containers. To gain access to the onsite storage facilities requires a building key card and physical key. During the physical check, some boxes were located on the floor, however, these were mainly old receipts pertaining to Purchase Card transactions that date back from 2005 to 2019. Since 2019, NZ Post has switched to a digital receipt capturing system. NZ Post reported the ad-hoc nature of their filing system is due to the organisation transferring information to the NZ Post House. Staff reported there is a current re-organisation programme underway.

A large portion of digital information storage is managed through third-party providers, for example, Datacom and Microsoft. Requirements for information security and protection are built-in to the respective service contracts.

#### Recommendation

1. The Data and Technology team to regularly report to the ES information protection and security risks and any remediations.

## Access

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

### Topic 18: Information Access, Use and Sharing

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

Progressing

#### Observations

NZ Post applies access controls for digital information based on roles. Staff interviewed reported that new starters have issues with not being provided appropriate access. Requesting access requires approval from the employee's manager before the system administrator grants folder access. Staff noted that there are some issues with revoking access if an employee moves teams.

Staff reported minor functional issues with the findability of information, naming conventions, version control and taxonomy. Between business units there are ad hoc, undocumented, and inconsistent IM processes. Appropriate metadata is only created within systems, which have built-in metadata requirements, for example SharePoint.

#### Recommendation

1. Ensure access controls are consistently implemented and removed for the protection of information.

## Disposal

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

### Topic 20: Current Organisation-Specific Disposal Authorities

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

Beginning

#### Observations

NZ Post does not have a current approved Disposal Authority (DA) but disposes of information under the General Disposal Authorities (GDAs).

#### Recommendation

1. Develop an organisation-specific DA and submit to Archives NZ for approval.

### Topic 21: Implementation of Disposal Decisions

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

Beginning

#### Observations

As NZ Post does not have an approved DA, no information is currently disposed outside of the GDAs. All staff reported a cultural inclination to retain information and not actively dispose of in accordance with the GDAs. Information marked for destruction under the GDAs is signed off and the disposal action is carried out by their third-party physical storage provider. Staff interviewed reported that disposal activities are not actioned at NZ Post facilities, instead Iron Mountain handles all destruction.

As an organisation, it was expressed that NZ Post has a culture of being overly cautious when it comes to retaining information. Staff interviewed reported deleted documents are mainly older drafts or unused templates. The final version of the document is never deleted.

#### Recommendation

1. Once the DA is approved, NZ Post to develop an implementation plan for regular disposal of physical and digital information.

### Topic 22: Transfer to Archives New Zealand

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

Beginning

#### Observations

NZ Post has information over 25 years old. However, a large portion of NZ Post's information is not deemed of archival value as it falls under one of the GDAs.

Physical information of archival value was regularly transferred to Archives NZ until this process was paused. NZ Post is now unsure of what information is of archival value, which has created a retention culture at NZ Post with most staff reporting they retain more records than probably necessary. NZ Post will only destroy information if it falls under GDA6 or GDA7.

**Recommendation**

1. Once the organisation-specific DA has been approved, develop a plan to identify, classify and transfer archival information.

## 6. Summary of Feedback

This section sets out NZ Post's feedback pursuant to this PRA audit.

Thank you for carrying out the assessment on NZ Post's current state and level of maturity of our information management capability and practises. We will take on board the audit recommendations, as we develop our information management strategy and a roadmap to uplift the information management maturity levels across all topics. A remedial action plan will be shared with Archives NZ at the next check-in session.

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20 September 2022

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Tēnā koe David

### **Public Records Act 2005 Audit Recommendations**

This letter contains my recommendations related to the recent independent audit of the New Zealand Post Limited by Deloitte under section 33 of the Public Records Act 2005 (PRA). Thank you for making your staff and resources available to support the audit process.

#### ***Introduction***

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 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. NZ Post is currently operating mostly in the lower maturity levels. With the planned appointment of IM staff, the organisation will be able to work on maturity uplift. Developing an approved organisation-specific disposal authority will provide assurance to the organisation by identifying information able to be destroyed or transferred to Archives New Zealand. Implementation of a disposal programme for digital and physical information will benefit NZ Post with less information to manage, search through and store.

### *Prioritised recommendations*

The audit report lists 20 recommendations to improve your organisation's IM maturity.

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

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



Stephen Clarke  
Chief Archivist Kaipupuri Matua  
**Archives New Zealand Te Rua Mahara o te Kāwanatanga**

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## APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
<b>Governance</b>	1: IM Strategy	<i>Develop an IM Strategy to provide a strategic direction for IM.</i>	This is a key activity for improving IM maturity by planning activities and associated resourcing.
<b>Governance</b>	2: IM Policy and Processes	<i>Update the Standard and communicate to all business units and staff.</i>	This fundamental policy document should be current and well understood by staff by including in induction training.
<b>Governance</b>	3: Governance arrangements and Executive Sponsor	<i>Formalise regular reporting to ES about IM activities, issues, and risks.</i>	NZ Post has a governance group covering IM which includes the ES so is well set up to improve maturity. Identifying relevant reporting on IM to the ES and the governance group is the next step in conjunction with decisions on Topic 7: Self-Monitoring.
<b>Capability</b>	8: Capacity and capability	<i>Assess the capacity and capability requirements against business needs. When the IM Strategy is completed include resourcing requirements.</i>	NZ Post are taking steps to appoint to the required roles. Ongoing monitoring of IM capacity and capability requirements is required for sustained maturity improvement.
<b>Capability</b>	9: IM Roles and Responsibilities	<i>Develop a formal induction to IM roles, responsibilities and practices that is given to all staff and contractors as part of on-boarding.</i>	This recommendation will support NZ Post's Standard when updated. Mandatory IM training should be routinely delivered, and the organisation's need for IM training regularly assessed. Training will assist staff to understand the requirements for creation and capture of information as identified in Topic 10: <i>Creation and Capture of Information</i> .

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
<b>Creation</b>	11: High-Value/High-Risk Information	Create an IAR which identifies the information that is high-value or high-risk in association with developing the organisation-specific disposal authority.	This should be done in conjunction with the work on the organisation-specific disposal authority (Topic 20) and will help NZ Post by determining which information is most important to the organisation.
<b>Disposal</b>	20: Current Organisation-Specific Disposal Authorities	<i>Develop an organisation-specific DA and submit to Archives NZ for approval.</i>	This is a fundamental activity to understand the information created by NZ Post and how it should be managed and disposed of. As it identifies information authorised for destruction it provides the necessary assurance to implement a disposal programme.