

Public Records Act 2005 Audit Report for Te Puni Kōkiri

Ministry of Māori Development

Prepared for Archives New Zealand

October 2021

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



Contents

1.	Executive summary	1
2.	Introduction	2
3.	This audit	2
4.	Maturity Assessment	3
5.	Audit findings by category and topic	4
	Governance	4
	Self monitoring	6
	Capability	7
	Creation	8
	Management	9
	Storage	10
	Access	11
	Disposal	12
6.	Summary of feedback	15



1. Executive summary

Te Puni Kōkiri (TPK) was established under the Ministry of Māori Development Act 1991 with responsibilities to promote achievement of Māori in education, training, employment, health, economic resource development and to liaise with other departments or agencies for Māori to ensure adequacy of those services.

TPK is the government s principal policy advisor on Māori wellbeing and development. TPK leads public policy for Māori, advises on Government Māori relationships, and administers and monitors legislation.

TPK creates high value public records in relation to:

- Treaty of Waitangi claims and settlements
- Whānau Ora Programme
- Functions and governance of Māori housing networks and initiatives
- Consultation with Māori
- Functions and governance of Māori Wardens

TPK uses an Electronic Document and Records Management System (EDRMS) to store information. Most records are maintained electronically, with minimal records remaining in hardcopy.

TPK has approximately 350 full time equivalent employees at the time of this audit. There are four staff members in the Records Management team which is led by the Chief Information Officer. TPK is currently reviewing the structure of the Records Management team.

TPK information management maturity is summarised below. Further detail on each of the maturity assessments can be found in sections 4 and 5 of this report.

Beginning	8
Progressing	9
Managing	3
Maturing	
Optimising	





2. Introduction

KPMG was commissioned by Archives New Zealand to undertake an independent audit of Te Puni Kōkiri (TPK) under section 33 of the Public Records Act 2005 (PRA). The audit took place in October 2021.

TPK information management practices were audited against the PRA and the requirements in the <u>Information and</u> <u>records management standard</u> as set out in Archives New Zealand's Information Management Maturity Assessment.

Archives New Zealand provides the framework and specifies the audit plan and areas of focus for auditors. Archives New Zealand also provides administrative support for the auditors as they undertake the independent component of the audit process. The auditors are primarily responsible for the onsite audit, assessing against the standard, and writing the audit report. Archives New Zealand is responsible for following up on the report's recommendations with your organisation.

3. This audit

This audit covers all public records held by TPK including both physical and digital information.

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

The audit reviewed TPK information management practices against the PRA and the requirements in the Information and records management standard and provides an assessment of current state maturity. Where recommendations have been made, these are intended to strengthen the current state of maturity or to assist with moving to the next level of maturity.

The summary of maturity ratings can be found at section 4, with detailed findings and recommendations following in section 5. TPK has reviewed the draft report, and a summary of their comments can be found in section 6.



4. Maturity Assessment

This section lists all assessed maturity levels by topic area. For further context about how each maturity level assessment has been made, refer to the relevant topic area in the report in section 5.

0-1		-	Maturity				
Category	No.	Торіс	Beginning	Progressing	Managing	Maturing	Optimising
Governand	e						
	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		•			
	7	Self-monitoring	•				
		_					
	8	Capacity and Capability		•			
	9	IM Roles and Responsibilities		•			
		·					
	10	Creation and capture of information		•			
	11	High-value / high-risk information	•				
	12	IM requirements built into technology systems			•		
	13	Integrity of information		•			
	14	Information maintenance and accessibility	•				
	15	Business continuity and recovery			•		
	16	Appropriate storage arrangements			•		
	18	Information access, use and sharing		•			
	20	Current organisation-specific disposal authorities		•			
	21	Implementation of disposal decisions	•				
	22	Transfer to Archives New Zealand	•				

Note: Topics 17 and 19 in the Information Management Maturity Assessment are applicable to Local Authorities only and have therefore not been assessed.



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

Summary of findings

TPK does not have an information management strategy to provide strategic direction and support over information management activities. The Executive Sponsor is new to the organisation, and a restructure is taking place within the TPK Records Management team to ensure that information management has a more concentrated focus than it has historically. There are plans for an information management strategy to be developed once the new team structure has been implemented.

Recommendations

Develop an information management strategy following Archives New Zealand's guidance. The information management strategy should be approved by senior management and reviewed on a periodic basis to ensure it continues to align with TPK objectives.

TOPIC 2 – IM policy and processes

Summary of findings

TPK has a Records Management Policy, which outlines the organisations' requirements under the Public Records Act (PRA) and other relevant legislation. It contains the responsibilities of staff and managers. The policy was reviewed and approved in November 2017 by the previous Executive Sponsor. It was due for revision in 2019 but this did not occur as there were staff movements during this period. TPK is aware of this and intends to refresh it once a strategy has been approved.

Documentation of information management processes is inconsistent across TPK business units. The inconsistent processes are due to information management process responsibilities falling with individual units. During the focus group, staff noted that the Legal Services team has robust information management processes, but this did not extend out to the rest of TPK.

Staff interviewed knew how to access the policy on the intranet if they needed to. They also had awareness of their roles and responsibilities for information management, as these were communicated to them during the new starter on-boarding process.

Recommendations

Review the Records Management Policy to ensure it is up to date and reflects current legislation and the Archives New Zealand standard. The policy should then be regularly reviewed.



Beginning

Progressing

5. Audit findings by category and topic

TOPIC 3 – Governance arrangements and Executive Sponsor

Summary of findings

There is a Culture, Capability and Systems Governance Board, established at the beginning of 2021, where information management issues can be raised. The Executive Sponsor sits on this Board. However, there is no evidence of information management issues being escalated to date. There is currently no regular reporting of information management to the Governance Board.

The Executive Sponsor is new to their role at TPK. They do have awareness of their oversight and monitoring role. However, due to the breadth of their day to day role, they do not have capacity to actively champion information management within the organisation.

Recommendations

Design regular reporting that provides useful and actionable information that the Executive Sponsor can provide to the Culture, Capability and Systems Governance Board.

TOPIC 4 – IM integration into business processes

Summary of findings

Business owners are aware of both their own and their team's information management responsibilities which are outlined in the TPK Records Management Policy and in formal induction training which is provided when staff start. Staff can request refresher training on these responsibilities.

Based on feedback from staff interviews, it was noted that occasionally these responsibilities are not translated into practice, and business owners do not consistently act on their responsibilities. Staff also felt they should not 'bother' their managers on simple information management issues such as the using the correct metadata so would instead file it in a general folder or on their desktop.

Recommendations

Design and provide regular refresher training to remind staff and business owners of their information management responsibilities.

TOPIC 5 – Outsourced functions and collaborative arrangements

Summary of findings

The TPK Executive Sponsor and Records Management team is not aware of any significant outsourced functions or collaborative arrangements that are in place. We were unable to review an agreement pertaining to outsourced functions and could not verify if appropriate information management details are in place.

The Records Management team have no control or visibility over outsourced functions and collaborative agreements.

Recommendations

Undertake an exercise to determine what outsourced functions and collaborative agreements are in place, including those involving research. Then review these agreements to ensure that information management requirements have been included in these contracts.

Beginning

Progressing

Beginning

TOPIC 6 – Te Tiriti o Waitangi

Summary of findings

TPK acts as the principal advisor on Māori wellbeing and development to the Government of New Zealand and as such, all information held by TPK is of importance to Māori. However, TPK has not identified which information they hold would be considered high-risk or high-value. Refer to Topic 11 – High-value / high-risk information for further explanation.

Recommendations

Refer to recommendation for Topic 11 - High-value / high-risk information.

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

Summary of findings

TPK commissioned a third-party to perform an information management maturity assessment in 2020. There is no other information management monitoring performed by TPK. The information manager has not created a corrective action plan to address the findings within the report.

Recommendations

Establish a regular and proactive approach to monitoring of information policies of the Records Management Policy when reviewed, the Public Records Act, and the Archives New Zealand standard.

Develop and implement an action plan to address the findings in the information management maturity assessment ensuring actions remain relevant for TPK. This should be led and managed by Records Management team.

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Progressing



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

Summary of findings

TPK has recently assessed its capacity requirements and is in the process of establishing a new structure for the Records Management team, which will see additional staff and an information manager hired. Currently, the records team is within the information services area of TPK. The new structure is designed to separate information management from information services with a manager with records management experience.

Professional development opportunities are available to staff at TPK where needed and requested. This is a selfdriven process by staff members.

Recommendations

After TPK has established the new structure for the Records Management team, regular assessment against business needs should be performed.

TOPIC 9 – IM roles and responsibilities

Summary of findings

TPK staff interviewed had a high-level awareness of their information responsibilities, but more formal training is required to increase maturity.

The team lead for records management provides a formal induction to all new staff and contractors on how to correctly use the EDRMS, and staff are informed of the importance of good record keeping at TPK. There is no other formal training after the induction, only brief refresher training when requested.

Information management responsibilities are included in the staff Code of Conduct and relevant job descriptions sampled. There is no specific tailoring to the relevant job descriptions, and TPK is in the process of reviewing this. Information management responsibilities are not included in staff performance plans. Compliance with processes are not regularly reviewed or updated to ensure they continue to meet information management requirements.

Recommendations

Assess the need for formal refresher training or a targeted approach to increase information management maturity of staff.



Progressing

Progressing

Creation

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

TOPIC 10 – Creation and capture of information

Progressing

Summary of findings

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

The EDRMS automatically captures Archives New Zealand minimum metadata requirements. There are also compulsory metadata fields within the EDRMS system that staff are required to manually fill in when saving their documents. Guidebooks are available on where to save information as well. Staff expressed that they have a tendency to save information in general share drives and locally on desktops to avoid manually entering metadata initially, although staff noted that they will ensure that all relevant information is uploaded into the EDRMS after information has been created. The use of uncontrolled environments is not routinely monitored by the Records Management team. There is no structured approach to monitoring and addressing information usability or reliability.

Recommendations

Investigate how to increase staff use of EDRMS and limit use of alternatives including monitoring of where records are saved.

TOPIC 11 – High-value / high-risk information

Summary of findings

TPK has not conducted formal identification or developed a management plan for the high-value or high-risk information assets it holds. While the Records Management team understands what information assets are highvalue or high-risk, there is no formal inventory of this information.

Without any inventory of this information, it is not possible to have a long-term management plan for this type of information. In addition, there is a risk that this knowledge could be lost by the organisation when staff depart from TPK.

Recommendations

Identify high-value/high-risk information and document in an Information Asset Register.



Beginning

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 Managing

Summary of findings

The Chief Information Officer and the wider information services team are involved in upgrades to systems including the EDRMS.

The Records Management team is part of the information services team, who contribute expertise and involvement in the design and configuration of business systems.

The EDRMS automatically captures the minimum metadata requirements set out by Archives New Zealand.

TPK has standard information management requirements documented for large business systems. However, not all upgraded systems use this documentation. For these systems, risks are considered, but not documented and it was clear from our interviews that the team have the expertise to manage these risks.

Recommendations

Ensure there are metadata and disposal requirements and processes to facilitate the retention of information of long-term value.

Ensure the documentation for new upgraded business systems will meet information management requirements.

TOPIC 13 – Integrity of information

Summary of findings

There are localised information management practices across TPK, with staff noting that some teams are better at structuring their information storage to ensure it is reliable and trustworthy.

Information is held in various forms and formats at TPK. Physical information is a mix of secure onsite storage at TPK and a third-party storage provider, while digital information is held on the EDRMS and occasionally on desktops and shared drives. Staff interviewed noted that the main barrier to the EDRMS was the search function and the volume of metadata required to manually input when saving documents. This means staff have variable experiences when trying to find and retrieve information. The Chief Information Officer is aware of the manual metadata requirements and is planning on pre-populating some of the basic fields, such as date and name, to ensure better findability and usability.

Recommendations

Investigate how to improve the search experience in the EDMRS and implement pre-populated metadata fields.



Progressing



TOPIC 14 – Information maintenance and accessibility

Summary of findings

TPK controls the risks to ongoing accessibility and preservation of physical information.

Staff noted that information management requirements are considered for managing and maintaining physical and digital information during business and system change processes. The information services team has a clear 321 strategy (three backups in at least two different places in at least one offsite location) to ensure there is accessibility of information during a business and system change or possible hack. TPK does not currently formally consider technology obsolescence in relation to information maintenance and accessibility.

Recommendations

Identify and document risks relating to technology obsolescence and a plan to address these.

TOPIC 15 – Business continuity and recovery

Summary of findings

TPK has a business continuity plan that was last updated on 24 September 2021. The plan outlines the information vital to TPK via the "Critical Business Functions" section, to continue to operate during or immediately following a business disruption event. Currently, the TPK business continuity plan does not engage with expertise for salvage and restoration of physical business information in the event of a business disruption event.

TPK regularly undertakes various system backups. Back-ups occur daily, weekly, monthly, and yearly. The daily backups are held for 14 days, weekly for two months, monthly for one year and yearly for seven years. Ideally, backups should only be kept for two years. Long-term retention of back-ups creates additional risk for TPK, including the risk of misuse of outdated information.

Recommendations

Ensure there is access to expertise for the salvage and restoration of physical business information.

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

Summary of findings

TPK has protection and security controls for physical and digital information. Physical files are kept in a locked Lundia filing system in a secure storage room on its premises, which protects the documents against potential damage. The storage room has appropriate water protection, air conditioning and access rights. Digital information is stored with cloud providers and onsite. Data is accessible based on restrictions set by the IT team. For example, certain files in EDRMS have set permissions to these folders, which are only accessible to those who require it.





10

Managing

Managing

Regular reporting of information protection and security risks is not being made to the Culture, Capability and Systems Governance Board. Without regular reporting, the Executive Team is not able to effectively support the Executive Sponsor in remediating any information protection and security risks to TPK.

Recommendations

Ensure that information protection and security risks are regularly reported to the Culture, Capability and Systems Governance Board, and remediation actions identified.

Access

Ongoing access to and use of information enables staff to do their work and the public to hold government accountable. To facilitate this, public offices need mechanisms for finding and using this information efficiently. Information and/or data sharing between public offices and with external organisations should be documented in specific information sharing agreements.

TOPIC 18 – Information access, use and sharing

Progressing

Summary of findings

TPK actively maintains a naming conventions document and guidebook for documents within EDRMS, which facilitate the reliable management of information. The EDRMS automatically captures all the Archives New Zealand requirements. However, during focus groups, staff expressed their frustrations due to the large number of naming conventions available to use when storing files. This could occasionally result in files being named inconsistently and therefore difficult to find.

Staff interviewed noted that there were some inconsistencies with using the system and the tools that contain and facilitate access to the information. It was noted that most of the training they receive for the systems they use daily is through an induction when they first start. Organisation-wide refresher training is not provided unless specifically requested. This means staff are sometimes tasked with looking through volumes of information to find the correct documents.

Access to information is controlled by restricted access to systems and folders. When staff join TPK, the information services team ensures they have the correct access to what they need, and do not have access to what they are not permitted to. This ensures access is appropriate, based on the individual's position and the type of information they need. However, these access controls are not documented.

Recommendations

Implement regular organisation-wide refresher training to ensure consistent management and discovery of information.



Disposal

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

TOPIC 20 – Current organisation-specific disposal authorities

Summary of findings

TPK has a current and approved organisation-specific disposal authority covering all information formats and business functions. The authority was approved in June 2016. There is a documented disposal framework outlining the methods for disposal and destruction of information. There is no regular review cycle for the disposal authority to ensure that it is up to date and remains relevant.

Recommendations

Implement a regular review process of the organisation-specific disposal authority.

TOPIC 21 – Implementation of disposal decisions

Summary of findings

Disposal actions have been carried out historically but are not currently routinely carried out. The latest disposal actions register sighted was from October 2011, which was well documented. The destruction of physical information is complete and irreversible by using the secure document destruction bins. All destruction of digital information is complete and irreversible.

Important emails which need to be retained are copied and saved into the EDRMS and the email system automatically deletes emails after 7 years.

TPK plans to ensure adequate resources are allocated to ensure that disposal actions are routinely carried out once the new team structure is in place.

Recommendations

Develop a disposal implementation plan to ensure disposal actions are routinely carried out.

TOPIC 22 – Transfer to Archives New Zealand

Summary of findings

TPK is aware of physical information it holds which is over 25 years old, however, there is no formal identification purpose of identifying this information. It has not identified any digital information over 25 years old. There is no formal plan to transfer information to Archives New Zealand and there is no deferral of transfer agreement held by TPK.







Beginning

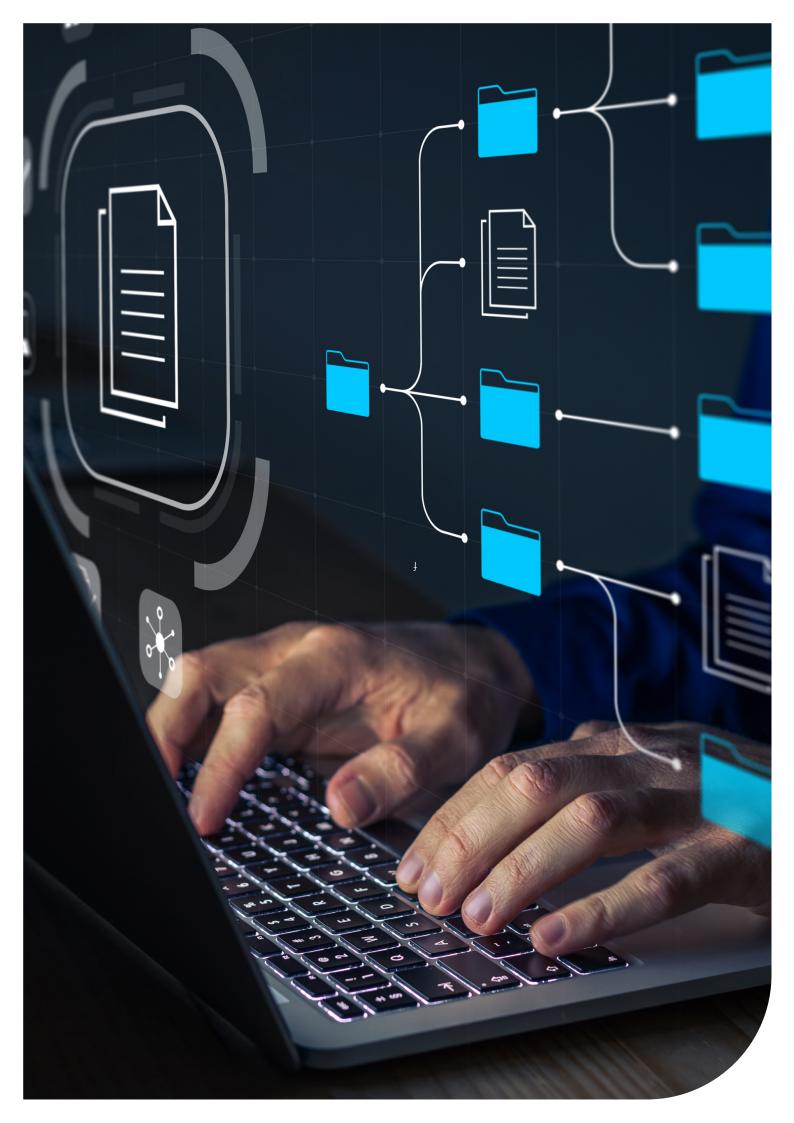
Progressing

Beginning

Recommendations

Create a formal plan to identify the physical and digital information over 25 years that is of archival value which can be transferred to Archives New Zealand.





6. Summary of feedback

Te Puni Kōkiri is thankful for the opportunity to discuss our current state of information and records management and our medium to longer term planning in this area. This report accurately reflects the current state of Te Puni Kōkiri.

There is currently work being undertaken to review policies and strategy, and to raise awareness with executive governance regarding the their role and the importance of information and records management for Te Puni Kōkiri. Further recommendations will form part of the future plans for the Records Management function.

We would like to keep connected to the wider information and records management sector, and look forward to discussing our progress as we implement these recommendations and increase the maturity of information and records management within Te Puni Kōkiri.

Our thanks to the auditors; we were appreciative of the approach and manner in which this work was undertaken.



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Dave Samuels Chief Executive Te Puni Kōkiri Ministry of Māori Development samud@tpk.govt.nz

Tēnā koe Dave

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of Te Puni Kōkiri Ministry of Māori Development (TPK) by KPMG under section 33 of the Public Records Act 2005 (PRA). Thank you for making your staff and resources available to support the audit process.

Introduction

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

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

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

Audit findings

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

Kia pono ai te rua Mahara – Enabling trusted government information

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

TPK is generally operating at lower than expected IM maturity. Having a current organisation-specific disposal authority is commendable and enables the organisation to meet many IM requirements, for example authorised disposal and transfer to Archives New Zealand. However, to achieve maturity improvement across the organisation there needs to be sufficient IM capacity and capability and support from the governance body.

In the audit report Topic 6: *Te Tiriti o Waitangi* is reported as at 'Progressing' level. This low rating may seem unusual for your organisation, as the auditors noted. TPK undoubtedly has a deep understanding of its portfolio and of the value of its information holdings, both to Māori and to Aotearoa New Zealand. However, as noted under Topic 11: *High-value/high-risk* these value assessments have not been formalised so that they can influence the management of information. We anticipate that TPK would embed Te Ao Māori perspectives into these value assessments. Such an approach could provide guidance for other public offices.

Prioritised recommendations

The audit report lists 22 recommendations to improve your organisation's IM maturity.

We endorse all audit 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.

We have included the recommendation for Topic 9: *Roles and responsibilities* as this may help mitigate an unintended repeat of the case study in the 2019/20 Annual Report on the <u>State of Government Recordkeeping</u>. In that case a lack of knowledge and incorrect management of a public record resulted in unauthorised disposal. We will use the audit follow up process to seek assurance about the steps by TPK taken since that incident.

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

and on Min

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

Cc Grace Smit, Deputy Secretary (Executive Sponsor) grace.smit@tpk.govt.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Governance	1: IM Strategy	Develop an information management strategy following Archives New Zealand's guidance. The information management strategy should be approved by senior management and reviewed on a periodic basis to ensure it continues to align with TPK objectives.	Developing an IM strategy with support from the governance body is essential to drive IM improvement across the organisation.
Governance	4: IM integration into business processes	Design and provide regular refresher training to remind staff and business owners of their information management responsibilities.	This aligns with recommendations for <i>Topic 9 IM</i> roles and responsibilities and <i>Topic 18 Information</i> access, use and sharing. Staff need to understand what is required of them in their role and receive the IM training required.
Capability	8: Capacity and capability	After TPK has established the new structure for the Records Management team, regular assessment against business needs should be performed.	Identifying the required skilled staffing and ensuring access to training is essential to support effective and efficient IM and maturity improvement across the organisation.
Capability	9: IM Roles and responsibilities	Assess the need for formal refresher training or a targeted approach to increase information management maturity of staff.	This topic is selected to specifically address the incident outlined in the Case Study – Te Puni Kōkiri from Chief Archivist's Annual Report on the State of Government Recordkeeping 2019/20.
Creation	11: High- value/high-risk information	Identify high-value/high-risk information and document in an Information Asset Register.	This is fundamental to understanding where to focus IM attention and an opportunity to embed Te Ao Māori perspectives into IM.

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Management	12: IM requirements built into technology systems	Ensure there are metadata and disposal requirements and processes to facilitate the retention of information of long-term value	Implementing disposal in the EDRMS would be a useful step for the organisation along with improvement of automated metadata capture (<i>Topic 13</i> below).
Management	13: Integrity of information	Investigate how to improve the search experience in the EDRMS and implement pre-populated metadata fields	This would support the staff in their use of the system and assist with problems identified in <i>Topic 18 Information access, use and sharing</i> .
Disposal	21: Implementation of disposal decisions	Develop a disposal implementation plan to ensure disposal actions are routinely carried out.	Implementing authorised disposal realises the value of the organisation-specific disposal authority and will increase efficiency across the organisation by making the finding of information easier and having less information to manage.