



Public Records Audit Report for the Abuse in Care Royal Commission of Inquiry

Prepared for Te Rua Mahara o te Kāwanatanga Archives
New Zealand

August 2023



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Independence

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

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1. Executive summary

The Abuse in Care Royal Commission of Inquiry (the Commission) was established in 2018. The purpose of the Commission is to investigate and examine historical abuse in State and faith-based care institutions between the years of 1950 to 1999. The Commission is an independent unit, with the Department of Internal Affairs (DIA) being the parent Department. The Commission holds high-value/high-risk information such as confidential evidence to support its investigations, records pertaining to hearings including survivor stories, and published reports.

The Commission has an Evidence Management System (EMS), which is used as an electronic discovery tool and a Customer Relationship Management System (CRMS). The Commission migrated all information from DIA's Enterprise Content Management System (ECMS) to its own SharePoint in late 2021.

At the time of this audit, approximately 300 staff are employees for the Commission. The Commission is undergoing the process of downsizing staff in preparation for its decommissioning on 30 June 2023. The Executive Sponsor (Associate Executive Director, Support Services) and the Chief Information Officer (CIO) are responsible for information management at the Commission. The Commission has two dedicated information management staff and a dedicated governance group, the Information Management and Security Governance Group, who oversee information management.

The Commission will deliver its final report by 30 June 2023. Decommissioning planning on the transfer of information to DIA has begun.

The purpose of this report is to evaluate and report the Commission's current state information management maturity and provide



general recommendations in each topic of key learnings for future inquiries.

As the Commission is a limited life entity, the recommendations are constructed to support the Commission itself where practicable, and to further provide recommendations to DIA and Archives New Zealand for application with future inquiries. We have provided an overall recommendation for the Commission to consider during its transition and closure to ensure appropriate care of records.

The Commission's information management maturity is summarised below. Further detail on each of the maturity assessments can be found in Sections 4 and 5 of this report.

Beginning	2
Progressing	5
Managing	10
Maturing	1
Optimising	0
Not Applicable	2



2. Introduction

KPMG was commissioned by Te Rua Mahara o te Kāwanatanga Archives New Zealand to undertake an independent audit of The Abuse in Care Royal Commission of Inquiry (the Commission) under section 33 of the Public Records Act 2005 (PRA). The majority of the audit took place remotely in November 2022. The focus group was hosted onsite at KPMG Wellington.

The Commission's information management (IM) practices were audited against the PRA and the requirements in the [Information and records management standard \(standard\)](#) as set out in Archives New Zealand's Information Management Maturity Assessment.

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

3. This audit

This audit covers all digital public records held by the Commission. Most of the Commission's information is digital. The small amount of physical information is digitised.

The audit involved reviews of selected documentation, interviews with selected staff, including the Executive Sponsor, Information Management staff, the Information Technology team, and a sample of other staff members from various areas within the Commission. Note that the Executive Sponsor is the Senior Responsible Officer for this audit.

The audit reviewed the Commission's information management practices against the PRA and the requirements in the Information management and records standard and provides an assessment of current state maturity. As part of this audit, we completed multiple systems assessments over the Commission's key systems that act as a repository for public records.

The summary of maturity ratings can be found at Section 4, with detailed findings and recommendations following in Section 5. The Commission has reviewed the draft report, and a summary of its 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 & 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	Ratings for Topics 21 and 22 are not applicable.				
	22	Transfer to Archives					

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

Managing

Summary of findings

The Commission has an information management strategy that was approved in 2020 by the Chair and Executive Director. It provides strategic direction and supports business needs for information management by assessing the current state and setting out next steps for the organisation. For example, the detailed steps of migration from the Commission's former ECRMS (which was a DIA system) to SharePoint online. The strategy document has been effectively communicated to all staff and contractors. Staff interviewed noted that the strategy is accessible on SharePoint and is linked in their new-starter induction pack.

The strategy briefly mentions the decommissioning of the Commission, however there is a formal plan outside of the strategy for the closure requirements and considerations for the closure of the Commission. This considers things such as offboarding, disposal and digital transfer to Archives via the Department of Internal Affairs (DIA).

Recommendation for future inquiries

Consideration should be given to developing a customisable templated Information Management Strategy that would address the special needs of limited life entities such as Inquiries.

Inquiries should maintain a current strategy that is approved by and actively supported by senior management.

Summary of findings

The Commission has two relevant policies with regards to information management, the Information Management and Privacy Policy and the Information Protection and Security Policy.

The Information Management and Privacy Policy was last updated and reviewed in July 2022. The policy links to relevant legislation such as the Public Records Act and the Inquiries Act, and other internal policies, such as the Information Protection and Security Policy. The Information Protection and Security Policy outlines the roles and responsibilities for all staff and contractors, with specific responsibilities for, the Information Management and Information Communication Team (ICT), all People Leaders/Managers and the Executive Sponsor. Staff interviewed said they were aware of where to find policies and process documentation on SharePoint. Staff said that they are provided with the Information Protection and Security Policy through their new starter induction pack and are notified of any updates via email.

Process guidance documents are available to staff and differ depending on their business unit. Process documents include guidance on collecting information during fieldwork and the sharing of information.

Recommendation for future inquiries

Given the short life of most Inquiries an Information Management Policy and associated processes should be activated as soon as practicable. Consideration should be given to developing a customisable templated Information Management Policy and associated procedures that could be used immediately.

Summary of findings

The Commission has an Information Management and Security Governance Group (IMSGG), the agreed scope is documented in the IMSGG Establishment Memo. Members include the Chief Information Officer (who manages the Information Management team), Information Technology and Information Management team, and members from other business units. When the IMSGG was established, meetings were held monthly but are now held bi-monthly.

The Executive Sponsor is not part of the IMSGG but is kept informed of relevant updates and actions from the meetings. The Executive Sponsor understands the importance of their oversight and monitoring role and provides support to the Information Management team when required.

Recommendation for future inquiries

Establish an oversight information management group as part of the establishment process for an Inquiry. The information management governance group should oversee all aspects of information management such as strategy, risk, and compliance. The Executive Sponsor should have a role within this group.

Summary of findings

Information management roles and responsibilities are well defined in the Information Management and Privacy Policy. Staff interviewed were aware of their responsibilities for managing information within their business area. New starters complete a mandatory induction which includes information management practices and are provided ongoing support from information management staff when required. Given the nature of the Commission, staff noted that their information management responsibilities are well understood and taken seriously.

Issues with management of information are identified by staff or managers in relevant teams when they review work. Issues are addressed directly with staff involved. If required, the issue will be escalated to senior management.

Information management is integrated into core business processes and activities at the Commission. Information management staff are involved in information management projects and initiatives to ensure requirements are met. An example of this is business unit staff involving the information management team when updating their processes.

Recommendation for future inquiries

Consider information management during the design phase of developing business processes and tools that support the processes.

Schedule regular training and use different communication mediums with staff so that they understand their responsibilities for managing information.

Summary of findings

The Commission uses the All of Government (AoG) contract templates for its agreements with external parties. The template includes a section on information management, which outlines the responsibilities for the supplier for managing and maintaining records in accordance with applicable laws. The clause does not specifically detail the creation, management, and retention requirements for information. We sighted two contracts which related to transcription services for the Commission, noting they do not have many outsourced or collaborative functions.

The Commission does not monitor compliance with information management clauses detailed in these contracts. The Information Management team are not involved with the contracts for external parties.

Recommendation for future inquiries

Include specific details covering the creation, management, retention, portability, and security of information in third party contracts. Compliance with these obligations should be monitored to ensure that information management requirements are met.

AOG contract templates should be assessed to improve clauses on requirements for information management.

Summary of findings

The Commission is committed to honouring Te Tiriti o Waitangi obligations in their investigations, as outlined in the Terms of Reference. The Commission provides appropriate recognition of Māori interests. It does not have any information management processes to locate and identify information of importance of Māori although initial discussions were held to identify this information. It is clear from our interviews that Te Tiriti principles are embedded into other aspects of the Inquiry.

Recommendation for future inquiries

Consideration of information of importance to Māori should be part of the design phase of an inquiry. Organisations can promote the access and maintenance of information of importance to Māori by enhancing metadata to ensure information is easily accessible and useable. Information management teams' expertise should be actively involved to improve the accessibility and discoverability of information of importance to Māori.

Self-monitoring



Public offices are responsible for measuring and monitoring their information management performance for planning and improvement purposes. This helps to ensure that IM systems and processes are working effectively and efficiently. It also ensures that public offices are meeting the mandatory Information and records management standard as well as their own internal policies and processes.

TOPIC 7 – Self-monitoring

Progressing

Summary of findings

There is some monitoring of compliance with the Commission’s information practices against the Archives’ standard.

The Commission does not formally monitor compliance with the Information Management and Privacy Policy. If the Information Management team is made aware of an instance of non-compliance, then corrective actions are discussed with the team or the individual. An example of this is following up with staff if they send attachments in emails instead of links.

Information management staff feel empowered to speak up in any instances of non-compliance with the Commission’s policies.

Recommendation for future inquiries

Design monitoring to ensure that information is created and captured correctly to support reporting and for an efficient close-down process. With limited life entities, self-monitoring is even more important to ensure information is well managed throughout the entities’ existence.

Identify and document information requirements from the Public Records Act, standards, and other relevant legislation within the information management policy and processes during the establishment of the Inquiry. Periodic reviews should be performed to monitor whether the information management policies and processes, Public Records Act requirements, standards, and other relevant legislation are adhered to.

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

Managing

Summary of findings

The Commission has appropriate information management staff capacity and capability to support information management. The Information Management staff are the first point of contact for any queries or issues relating to information management, and staff expressed that they are seen as trusted professionals by others in the Commission.

Information Management staff are involved in system projects. Staff have a good relationship with the Information Management team at DIA and regularly connect for advice on information management matters. InterGen, an external technology provider, also provides Information Management staff with technical assistance in both system migration and handling the CRMS.

Due to the Commission being a limited life organisation, staff numbers are reducing over the next few months as it gets closer to 30 June 2023. Staff expressed they still need the original number of information management staff to aid in the process of transferring of information to DIA. Business planning for capability and capacity is monitored by management against the reduction in information management staff.

Recommendations for future inquiries

Monitor and assess the capacity and capability of information management staff against business needs. Ensure staff have access to professional development for information management to upskill as needed. For limited life entities, it is recommended that information management staff are retained until the inquiry is shut down and they have ensured that the information is in a good state to transfer.

Summary of findings

The Commission's staff have appropriate awareness of their information management responsibilities. There is a formal induction process for all new starters at the Commission, and during this staff are directed to relevant policies and strategy documents. Annual refresher training is mandatory at the Commission through online modules provided by DIA.

Information management duties were not specifically included in the two job descriptions sampled. There was reference to compliance with internal policies and procedures and the Public Service Code of Conduct.

Additional training is provided to reinforce information management roles and responsibilities when new systems are introduced, such as SharePoint in late 2021. Extra resources are provided to all staff if needed through Knowledge Cafes, where the Information Management Team cover best practice and give helpful tips to staff to manage their information. Information management staff also communicate best practice to the wider teams/business units if instances of non-compliance are identified. Staff interviewed expressed that they trust and feel comfortable reaching out to Information Management staff for assistance.

Recommendation for future inquiries

Roles and responsibilities should be well documented and inducted including access to refresher training.

Job descriptions and other documentation should be assessed to identify where information management roles and responsibilities are best included.

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

Information is managed in reliable and controlled environments. The Commission discourages the storage of information in uncontrolled environments such as local drives, which have limited capacity. Document drafts are occasionally created in local drives, however, staff interviewed advised that final versions are always uploaded to the appropriate system. Multi-factor authentication is also in place to access the Commission's systems.

Staff interviewed were confident that information captured is reliable and trustworthy because it is created and managed in controlled systems with appropriate metadata.

Metadata is routinely created through the business systems to support the usability, reliability, and trustworthiness of information. However, this is not routinely monitored.

Recommendation for future inquiries

Determine the appropriate metadata and management of information in controlled environments at the onset of the inquiry. This is when appropriate consideration for automated systems to manage information, capture and/or categorise information should be considered.

Develop and implement a monitoring plan to address any information issues.

Where automated systems are not appropriate, staff should be actively encouraged to save information in the correct business system rather than in uncontrolled environments. Reliability, usability, or trust issues should be monitored and addressed.

Summary of findings

The Commission has awareness of what information it holds that is considered high-value/high-risk. The high-value/high-risk information includes survivor records, evidential records, reports, and relevant Commission minutes and administration documents. At this stage high-value/high-risk status is not formally recorded for all information.

The Commission is currently undertaking the process to identify high-value/high-risk information. The Commission is compiling this information into an excel spreadsheet called the Vital Records Register. The register is a working spreadsheet and will be used to support the transfer of information to DIA as the Commission decommissions.

An inventory of information was established when the Commission migrated from DIA's system to SharePoint.

Recommendation for future inquiries

A template for an information asset register (IAR) should be available when an inquiry entity is established. An IAR would be beneficial to support the transfer of information during the decommissioning process and would help inform the rules for accessibility and confidentiality of information.

High-value/high-risk information assets should be formally identified in the design phase of the inquiry including an analysis of risks. An inventory documenting all information held in digital and physical systems should be maintained.

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

The Information Management team is routinely involved in the design and configuration of new and upgraded business systems. An example of this was its involvement of the migration from the DIA system and implementation of SharePoint in late 2021.

All metadata and version histories from the former ECMS were mapped into SharePoint, and routine spot checks were performed as part of the migration.

SharePoint has been configured and designed to meet the business needs of the Commission and the minimum metadata requirements are met. The system is set up consistently across the Commission to require a minimum of manual application of metadata

The Information Management team has a close working relationship with the ICT team. The two teams worked together when the Microsoft 365 tenancy was established.

Recommendation for future inquiries

Involve information management staff during the design and configuration of information management systems set up for a limited life organisation.

Summary of findings

Organisation-wide information management practices are in place and routinely followed to ensure that information is reliable and trustworthy. User-experience issues with finding and retrieving information are rare. All systems contain advanced search tools with optimised filtering functions and staff have had adequate training in procedures for creating and capturing information using metadata. The advanced search function supports the accessibility of information across business systems.

Staff at the Commission have a good understanding of information management requirements, and the value of the organisation's information is constantly reiterated through email communication. All staff have a responsibility to ensure they save and access information only through approved corporate systems.

In the migration from DIA's ECMS to SharePoint, the Information Management Team ensured that the design of the system supported the integrity of information and user experience. During the migration phase, business units were consulted to ensure efficient information retrieval. Staff interviewed noted that information can always be found and that they are confident that it is reliable and trustworthy.

There is no active monitoring or testing in place to ensure the integrity of information. While management controls such as audit trails and version control are in place, there is no regular assessment of whether these controls are functioning properly.

Recommendation for future inquiries

Test controls regularly to ensure information remains reliable, trustworthy, and complete. This could include regular testing of audit trails, descriptive metadata, and versioning.

Evaluate user experience regularly to ensure finding and retrieving of information is consistent among staff.

Summary of findings

When migrating from DIA’s ECMS to SharePoint, Information management staff were involved in business and system change planning. Information management staff were involved in ensuring the new cloud-based platform mirrored the former ECMS and continued to align with the PRA requirements.

Strategies are in place to maintain digital information during business and system changes. This included a reconciliation of information in the DIA ECMS to the migrated data in SharePoint. The Commission has access controls for users which are regularly monitored to ensure appropriate access to systems. Most digital information is stored in a cloud-based application or regularly backed up and copied onto multiple secured hard drives. Preservation needs for digital information are managed by activity working to transfer the information when the Commission shuts down.

Recommendation for future inquiries

Ensure preservation and accessibility of information on closedown is considered when implementing IM systems.

Summary of findings

The Commission has a business continuity plan (BCP) that was last updated in December 2020. The BCP covers two business disruption events, Pandemic Planning and Loss of System/IT. Some functions such as finance and payroll are performed through the DIA network.

The BCP identifies systems, resources, and information that would need to be accessed to support business continuity.

The Commission does not regularly test its BCP. The last event that the BCP was brought into effect was during COVID-19 lock down in 2021. The Commission advised that no issues were identified, and all staff were able to access the network from home.

Recommendation for future inquiries

A customisable template for an inquiries BCP should be available so that this can be quickly set up and tested. Information management expertise should be involved in the prioritisation of information and a clear plan in place following an event of disruption.

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

Managing

Summary of findings

The Commission has protection and security controls, such as multi-factor authentication, for all digital information. The Commission uses multiple external hard drives to back up digital information. The external hard drives are stored in secure places. Information on SharePoint is stored with offshore cloud providers.

Access to information is determined by what information is required by different business units. For example, only the evidence team can access their business system as they are approved staff. Only Information Management staff and relevant business unit managers are authorised to have access to all information.

The Commission has not experienced any loss of information. Information Management staff are responsible for monitoring and managing information security issues. Information protection and security risks are raised by Information Management staff at the quarterly IMSGG meetings. Protection and security responsibilities are communicated through policies and induction training.

Recommendation for future inquiries

Information protection and security needs for the information created and managed by the inquiry should be understood at establishment.

Access



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

TOPIC 18 – Information access, use and sharing

Managing

Summary of findings

Archives' minimum metadata requirements are built into all information management systems at the Commission to facilitate consistent management and information discovery. Systems automatically capture metadata supporting information useability and findability. Extra non-mandatory fields are added to some areas for further description such as demographics and institution types for ease of usability and findability. Minimum metadata fields are mandatory, the extra fields refine information identification.

Information management practices are similar across business units, with formalised file structures and naming conventions to facilitate the management and discovery of information. As a result, staff interviewed expressed a consistent experience finding information across systems.

As described earlier, access controls for systems are restricted to business units, and access must be granted from Information Management staff. Access permissions are regularly maintained in all systems by the Information Management staff to reflect changing teams and access requirements.

Recommendation for future inquiries

At implementation ensure that the process for applying access controls for information are documented and the metadata structure is considered to facilitate discovery, use and sharing 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

Progressing

Summary of findings and recommendation

The Commission is covered by a current disposal authority administered by DIA. An amendment relating to a recent development in the inquiry is needed and is being worked on collaboratively.

An amendment to the inquiries Disposal Authority (DA) will need to be completed before the closure of the Commission to ensure that the DA covers all information of the Commission. It is recommended that the Commission works with DIA to expedite this process for 30 June 2023.

TOPIC 21 – Implementation of disposal decisions

Not Applicable

In addition to the Public Records Act 2005, the Commission also has powers under the Inquiries Act 2013. The Commission is subject to a moratorium which means no records by the Commission may be destroyed, discharged, or transferred until the moratorium is removed. The current disposal moratorium does not have a fixed end date and will be in place until the Chief Archivist decides the moratorium is no longer required.

The Commission has performed a high-level mapping exercise of its records to the Inquiries Disposal Authority which is centrally administered by DIA. Along with the Commission, DIA will do an amendment to cover any gaps where records are not covered by the Inquiries Disposal Authority.

TOPIC 22 – Transfer to Archives New Zealand

Not Applicable

The standard 25-year rule for transfer information of archival value does not apply to the Commission. The Commission are currently working through with DIA and Archives to support the transfer of digital records upon closure of the Commission. DIA as the relevant department, is supporting the feasibility, testing and transferring.

The Commission have done a high-level assessment of the classification status of the records and will refine this. The aim is by the closure of the Commission that testing will have determined if direct transfer to Archives is feasible.

Overall recommendation for the Abuse in Care - Royal Commission of Inquiry

Given the Commission will be delivering its final report and closing on 30 June 2023, the individual topic recommendations above include generalised recommendations for future inquiries. Consideration should be given to supporting the specific information management needs of a limited life entity, such as templated documentation and guidance (a set-up kit) where possible. This will enable the Inquiry to implement tested information management processes and activities from the beginning and support the transfer of well managed information at closure.

The Commission must continue its work with DIA and Archives New Zealand relating to the digital transfer of all records.

The Commission must continue its best practise information management throughout the reduction in Commission staff over the remaining months. Maintaining the staff resource throughout the closedown period is crucial in completing the remaining information management tasks.



6. Summary of feedback

Abuse in Care Royal Commission of Inquiry welcomes the audit of our information management policies and procedures.

The report is comprehensive of our current maturity, and we agree with the recommendations and findings in the audit for future Royal Commissions.

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 – Managing

Topic 2, IM Policy – Managing

Topic 3, Governance arrangements & Executive Sponsor – Managing

Topic 4, IM integration into business processes – Managing

Topic 5, Outsourced functions and collaborative arrangements – Beginning

Topic 6, Te Tiriti o Waitangi – Beginning

Topic 7, Self-monitoring – Progressing

Topic 8, Capability and capacity – Managing

Topic 9, IM roles and responsibilities – Progressing

Topic 10, Creation and capture of information – Progressing

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

Topic 12, IM requirements built into technology systems - Maturing

Topic 13, Integrity of information - Managing

Topic 14, Information maintenance and accessibility - Managing

Topic 15, Business continuity and recovery – Managing

Topic 16, Appropriate storage arrangements – Managing

Topic 18, Information access, use and sharing – Managing

Topic 20, Current organisation-specific disposal authorities – Progressing

Topic 21, Implementation of disposal decisions – Not Applicable

Topic 22, Transfer to Archives New Zealand – Not Applicable

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27 October 2023

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Tēnā koe Helen

Public Records Act 2005 Audit

This letter contains my comments related to the recent independent audit of the Royal Commission of Inquiry into Abuse in Care (the Commission) 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 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 Te Rua Mahara mandatory Information and records management standard. The Commission's IM practice is assessed as mostly at the Managing maturity level with some topics at higher and lower levels. The Commission demonstrably takes its role seriously in managing and protecting the large volume of information created and used during this lengthy inquiry.

Although two topics in the Disposal section of the audit report are assessed as Not Applicable there is still work to be done in these areas when the Commission is disestablished. It is essential that information is well managed throughout any inquiry so that it is in good order for transfer to Te Rua Mahara at closure. The transfer of the Commission's records to Te Rua Mahara is being worked on, and the effectiveness of information management at the Commission will support a well-managed transfer. We note that since the audit was completed, the Commission's final reporting date has been extended to 28 March 2024, but this has not affected the audit recommendations.

I acknowledge that the Commission will not be able to make the recommended improvements for future inquiries. This audit was done with the intention of making the recommendations useful for future inquiries. The recommendations on page 24 of the audit report under *Overall recommendations for the Abuse in Care – Royal Commission of Inquiry* are to maintain best practice information management prior to closure and reporting, including work on the transfer of Commission records.

What will happen next

The audit report and this letter will be proactively released on Te Rua Mahara 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.

The Commission, Te Rua Mahara and the Department of Internal Affairs will continue to work on the records transfer. Te Rua Mahara will provide other support and advice required by the Commission prior to the completion of its work. We will also provide the audit report and this letter to the Department's Toi Hiranga Regulation and Policy Branch, as recommendations about future inquiries relate to that branch's responsibilities.

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 noa, nā



Anahera Morehu

Poumanaaki Chief Archivist

Te Rua Mahara o te Kāwanatanga Archives New Zealand

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