Deloitte.

Ministry of Social Development | Te Manatū Whakahiato Ora

Public Records Act 2005 Audit Report

Prepared for Archives New Zealand

August 2022

MAKING AN IMPACT THAT MATTERS since 1845

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1. Disclaimers

Use of Report

This report is for the use of Archives New Zealand (Archives NZ) and Ministry of Social Development |Te Manatū Whakahiato Ora (MSD) only. 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 (the PRA). 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 the PRA 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 MSD 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 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 MSD 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

Ministry of Social Development (MSD)

The Ministry of Social Development | Te Manatū Whakahiato Ora (MSD) was established in 2001 when the Ministry of Social Policy and the Department of Work and Income merged. MSD is responsible for providing the New Zealand Government with strategic social and sectoral policy advice in relation to income support, community services, youth and family.

MSD's service delivery areas are responsible for the delivery of income support, employment services, student loans, superannuation, war pensions and other specialist activities. The nature of MSD's services means it works closely with other government agencies, non-government organisations, communities and iwi.

MSD employs about 9,000 staff across New Zealand and its head office is in Wellington.

The high-risk / high-value information MSD holds under the PRA includes information on:

- Welfare Benefits and Entitlements
- Youth Services – client case management and key programme records
- Family and Community – key programme records and case studies
- Disability issues – board and advisory groups meeting and minutes
- Social Services Accreditation Standards – records regarding policy and procedures
- Research and evaluation reports and publications
- Fraud investigations documents and records
- Records regarding legislative reform.

Approximately 30% of MSD's teams use Objective as its electronic document and records management system (EDRMS) for corporate instances. Objective holds the most diverse repository of information relevant to the PRA. Due to the size and complexity of MSD, this PRA audit focused on the following three areas to assess the IM practices at MSD:

1. Disability Issues
2. Family and Community Services
3. Welfare Benefits and Entitlements.

Staff interviews focussed on the three focus areas above, hence, the findings of this report are not indicative of all teams across MSD. Our interviews with the Information Management (IM) and IT teams did provide context to the wider information management practices at MSD.

Summary of Findings

We assessed MSD'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	2	12	6	-	-

3. Introduction

Background

Archives NZ provides Information Management (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 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 commissioned Deloitte to undertake these audits for certain public offices.

Objective

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 MSD's IM practices, against Archives NZ's IM Maturity Assessment Model (PRA requirements). 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). MSD's maturity level for each topic area assessed is highlighted under each of the respective areas. Ratings were based on MSD's 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. Deloitte completed the onsite audit and audit report, which Archives NZ reviewed before release to MSD. Archives NZ is responsible for following up on the report's recommendations with MSD.

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.

MSD'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 NZ	●				

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, 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.

Managing

Observations

MSD has a current Information Strategy (IS), which the Senior Leadership Team (SLT) approved in May 2022. The IS requires some updates following SLT's review before it is published organisation wide and made available on MSD's intranet. The IM team advised it is currently updating the IS, which includes consulting with senior level IM and information technology (IT) staff.

The IS is fundamental to enable MSD to deliver their organisational strategy of Te Pae Tawhiti – Our Future. The IS sets out a plan with key strategic initiatives, which is underpinned by IM principles. The IS includes a current and future state gap analysis with key recommendations. A roadmap sets out how MSD will implement these strategic recommendations, which informs the IM work programme.

The IS has provided focus to MSD on how they will manage their digital infrastructure to support their core functions. MSD noted they have plans to incorporate the IS into its formal induction training programme.

Recommendation

1. Once approved communicate the IS to all staff and contractors.

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

MSD has an IM Policy (the Policy) last updated in February 2011, which the IM team is currently updating. Roles and responsibilities are documented in the Policy. However, the Policy has not been updated in line with MSD's guidance for policy reviews, which states policies should be updated biennially to ensure they are fit-for-purpose.

MSD has current standards that cover minimum metadata requirements for classifying information, digital information, retaining, disposing, and transferring information, which the Privacy and Security Oversight Board approved.

The IM team is focused on ensuring that the updated Policy appropriately incorporates Māori considerations for data sovereignty. The Policy being developed is consistent with relevant legislation and Archives NZ's standards and requirements. It is also linked to other MSD policies and strategies such as the Privacy, Security and Access Policy.

Recommendation

1. Ensure that the draft Policy is updated soon and subsequently biennially.

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.

Managing

Observations

MSD's Privacy and Security Oversight Board (PSOB) provides IM governance over information privacy, security, and management. PSOB meets monthly and is formalised with a Terms of Reference, recorded meeting minutes and regular reporting. The board comprises of the Deputy Chief Executive (DCE) Business Integration, DCE Organisation Assurance and Communications, DCE People and Capability, Group General Manager (GGM) Improvement, Systems and Technology, GGM Insights and GM Information (Chair). The IM team complete monthly dashboard reporting for PSOB.

The Executive Sponsor (ES) understands and performs their oversight and monitoring role of IM. They support IM at MSD through promoting the value of IM at a senior management level. Staff reported that the ES champions IM within the organisation by actively promoting IM values and importance.

The ES does not currently work with other ES's outside of MSD, which may provide useful guidance and support to continue IM improvements within the Office of the DCE.

Recommendation

1. ES to act upon issues identified in the regular IM reporting.

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 individuals and team's responsibilities for managing information. There is no enterprise-wide IM approach, as business units have separate processes and activities. MSD uses a wide variety of bespoke and off-the-shelf systems, including many legacy systems. The IT landscape contributes to inconsistency across business units. Job descriptions detail at a high level that staff must contribute to keeping records that are complete, trustworthy, and secured appropriately for client privacy.

The IM team provides IM advice as a service to different business units. This advice is provided when requested and this is currently happening particularly in two complex projects where IM staff review and provide advice on business processes as it relates to IM. Interviews with staff noted that IM compliance varies greatly between business units, with some teams using Objective more frequently than others.

Recommendation

1. Formally document IM responsibilities within business unit processes to ensure all staff 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

MSD works with thousands of external providers and has information sharing agreements in place with them. It uses the All of Government consulting contracts, Memorandum of Understandings (MoU) and Master Service Agreements (MSA) to ensure that requirements for managing information are covered. MSD has also developed a Third Party Provider Information Assurance Standard (TPS) which the PSOB approved in February 2022 to ensure consistency throughout the organisation. The TPS provides guidance on the criteria to be met, outlines roles and responsibilities for security, privacy, IM and how to comply with the TPS.

A MSD service contract with an outsourced function was sighted as part of this audit and it referenced confidentiality, data ownership and record maintenance. A MoU between MSD and the Ministry of Health (MoH) was also sighted outlining roles and responsibilities, confidentiality, retention, information security and the requirements of the PRA.

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

Recommendation

1. Develop and implement monitoring of the IM requirements for public records created by outsourced functions.

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

The IM implications within Te Tiriti o Waitangi settlement agreements and other agreements with Māori are not formally known to the IM team. Some information of importance to Māori has been formally identified and work to identify the rest of the information is ongoing. MSD has started to develop processes to locate and identify this information. For example, MSD produces iwi profiles that comprises of iwi ethnicity and geolocation information. This enables MSD to report on iwi affiliation to relevant iwi and other government agencies.

MSD is aware that information held could have importance to Māori. However, until the official guidelines on Māori data sovereignty including retention is issued, MSD has opted to treat all related data as important.

The importance of Māori data governance has been acknowledged within MSD's IS, which includes ensuring that information of importance is accessible, reliable, and complete. In addition, the IS outlines the key requirement that MSD intends to treat Māori information as taonga, as well as identifying and developing Māori data governance requirements.

Recommendation

1. Formally identify all information of importance to Māori, which may be included as a category within the Information Asset Register (IAR).

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.

Progressing

Observations

MSD monitors compliance with the PRA requirements, standards, and other relevant legislation through an annual ComplyWith survey. The results of the ComplyWith survey are reported to MSD's Organisational Health Committee by the Legal Services team. Issues are raised and mitigated as part of the work programme.

The IM team has the ability to assess the use of Objective using some in-built tools. The IM team monitoring the use of Objective or compliance with the policy and processes is on an ad hoc basis. Issues with information usability is addressed in an ad hoc manner through fixing reported issues rather than a structured approach. The IM team generates a monthly dashboard that tracks key initiatives such as, an organisation wide IM maturity assessment, enterprise level risk profiles, physical and digital information creation across regions. The dashboard also includes tracking of approvals and reviews in Objective and the training the IM team provides to the business units. The dashboard is provided to the PSOB monthly. The IM dashboard tracks eight key domains including self-monitoring. MSD has highlighted a low level of maturity regarding self-monitoring, this was backed up during staff interviews. In the February 2022 dashboard, the IM team noted they are developing a plan to mature all eight domains.

Recommendation

1. Develop a regular monitoring process that covers compliance with the Policy and report results to the ES and PSOB.

Capability

Information underpins everything 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.

Progressing

Observations

MSD's current IM team consists of the IM General Manager, IM Manager, a lead IM advisor, six Senior IM advisors (two are on secondment) and four IM advisors. The IM team have sufficient skills and capability to provide IM support to the organisation and achieve the current work programme. The IM team reported they are confident their team has the appropriate capacity to meet MSD's minimum IM needs. All staff reported they are well respected within MSD and are the first point of contact for any queries, issues or questions relating to IM.

The IM team have regular access to IM related professional development opportunities through a dedicated budget. For example, some IM team members attended a PRA fundamentals course.

There is no regular assessment of IM capability and capacity against business needs.

Recommendation

1. Regularly assess IM capability and capacity and monitor these against business needs.

Topic 9: IM Roles and Responsibilities

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

Progressing

Observations

MSD staff and contractors have an appropriate level of awareness of their IM responsibilities. These responsibilities are communicated through the Policy, Code of Conduct, some job descriptions and the mandatory induction and training.

MSD has a mandatory IM training module as part of its induction and onboarding of new staff. However, based on staff interviews, there is a lack of regular ongoing IM training offered. Staff interviewed would like general refresher training on IM roles and responsibilities and learn how to efficiently search for information.

Recommendation

1. Assess the need for ongoing IM training and deliver a programme to meet the identified needs.

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.

Progressing

Observations

Staff and contractors have appropriate awareness of their legal obligations to create and capture records that are full and accurate, due to the mandatory IM induction training and access to IM expertise. Information critical to business functions is identified in the following documentation: Crisis Management Plan, Disaster Recovery for Vital and Physical Records and the IAR.

MSD's primary repository for corporate information is Objective, which staff reported having a variable experience with including usability, particularly its search function. Based on interviews, staff were not aware of the IM guidelines and processes available such as, the naming information guide or the administrative information guidance which details how long information should be retained. These IM processes vary between business units.

The use of personal emails and Dropbox are blocked to ensure that information is created in a controlled environment. MSD has not blocked the use of personal drives and OneDrive to ensure that MSD is able to access environments that may be utilised by their clients and service providers.

Due to the number of different systems used at MSD, there is some inconsistency with creating and maintaining information.

Recommendation

1. Develop a structured approach to monitoring and addressing issues related to information usability and reliability.

Topic 11: High-Value/High-Risk Information

The organisation has identified its high-value/high-risk information assets, including identifying and addressing any risk to those assets.

Progressing

Observations

The IM team has created an IAR to record information, including information classified as high-value / high-risk. The IAR includes a description of the information, owner, location and classification. MSD acknowledges that they are at the beginning of the process of identifying this information and have not performed a risk assessment.

The IAR is a living document that the IM team updates on an as-needed basis.

Recommendation

1. Perform a risk assessment for high-value / high-risk information assets.

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.

Managing

Observations

IM expertise is involved in designing and configuring decisions for most new and upgraded business systems. The IM team uses a design specification checklist and process to ensure that IM requirements are being met across metadata, retention and disposal.

The IM team was recently involved in the transfer of data from MSD to Oranga Tamariki. Throughout this project, they were involved in identifying the types of testing required to preserve data integrity and developed criteria for what success looked like. They were also involved in verifying the integrity of information throughout the transfer.

MSD has a range of standards that covers business units' requirements to ensure new systems meet MSD's IM requirements. For example, the Minimum Metadata Capture, and Information Retention and Disposal standards. The Information Group comprises the IM, Security and Privacy teams. The IM team confirmed that business units seek advice and approval during requirements for new systems and the decommissioning of old systems.

Based on staff interviews, system design and configuration are not fully documented and maintained for all their business systems but are for current systems. Several legacy and bespoke systems do not have system documentation available, as some individual application owners have since left the organisation.

Recommendation

1. Ensure that system design and configuration are fully documented and maintained for all new 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 Legal team have thorough IM processes, which support the reliability of information. Other units do not have consistent naming conventions resulting in issues finding information. Staff interviewed noted that they have a variable experience when trying to find specific information and note issues around naming conventions and with Objective's search function. There are also issues finding historical information due to changes in how teams named information.

The IM staff indicated optional training is available for Objective. During interviews not all staff members had participated in the available training; however, the teams that had, noted an improved experience with Objective.

Recommendation

1. Update IM processes in consultation with business units and communicate to all staff.

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

MSD has processes in place to manage and maintain digital information during business and system change projects. This is predominantly managed in house with third-party specialists being consulted on an as-needed basis. Recent upgrades made to Objective have always considered the IM requirements.

General accessibility to physical information is maintained through storage with an off-site commercial storage provider. MSD maintains a summary of contents and index of all physical information transferred off-site ensuring it remains accessible. The off-site storage provider maintains an index of MSD information they store enabling ease of access when MSD requests it.

Digital information is also accessible and maintained, through access control, format, and metadata continuity. Security processes and continuous system updates ensure digital information remains accessible over time. However, technology obsolescence risks are not formally identified and there are no plans in place to address these risks.

Recommendation

1. Technology obsolescence risks are identified, and plans are in place to address these risks.

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

MSD has a Business Continuity Plan (BCP) that whilst outdated is still appropriate for the size and complexity of the organisation. MSD's BCP is reinforced by other supporting documentations such as the Disaster Recovery for Vital and Physical Records documentation. This outlines key business functions and actions required for information recovery for business continuity. The BCP and supporting documents were last updated in 2018.

MSD recently performed a simulation disruption event to test their BCP and reported no major issues as a result. Each of the teams assessed the information and systems that are critical for their continuity during a disruption event. The IM Group along with other business stakeholders are currently developing a step-by-step guide for SLT to provide clarity on what actions they must perform during a disruption event.

Backups are taken daily, weekly, monthly, and annually and there is annual testing of digital system backups to ensure information can be restored following a business disruption event. For Objective, backups are taken prior to upgrades that allows for the system to be rolled back in case of issues.

Recommendation

1. Ensure that all business continuity and recovery plans are up to date.

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.

Managing

Observations

A large portion of digital information storage is managed on MSD's own environment with vendors providing technical support when needed. For example, Objective's information is held on-premise at MSD, however, the search server used is cloud-based and managed by Objective. Requirements for information security and protection are built-in to the corresponding service contracts. All information has access restricted to the appropriate roles and any security incidents are reported to the ES and PSOB.

A large portion of MSD's physical information is kept with a third-party storage provider. Some physical information is kept onsite in lockable storage rooms and documents are labelled to ensure it remains accessible. These documents are stored in an office environment, which include fire safety, flood mitigation and access control. For these file rooms, managers of the respective teams are provided their own unique key to access the storage rooms. Access to various storage rooms is appropriately managed depending on the type of records stored there.

Recommendation

1. Information protection and security risks are regularly identified and mitigated.

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

MSD applies access controls for both physical and digital information. Access controls are in place across all digital systems, including restricting access to folders based on the teams and what they require to perform their duties. Business unit managers and/or team leaders have the permissions to manage access controls and permissions. Access control and permissions are documented and captured in the respective system.

Some staff reported functional issues with the findability of information, naming conventions and file taxonomy. Some business units have developed their own IM processes. Metadata requirements are met through Objective, however, not all of MSD's information is within this system, which leads to inconsistent metadata across MSD. For example, in TRIM, MSD's physical record management system, the metadata captured is date, record type, title and record number. TRIM also has the capability to include a destruction date on records.

During interviews, some staff reported that they often add additional metadata details to their documents to increase its findability. The employees who noted this were the same team members that have participated in the IM Objective training.

There is no formal IM process in place that is applied to incoming and outgoing data shared with external parties. The MSD Privacy and IM teams manages information usage and sharing agreements through MoU's. The MoU between MSD and MoH details that each party must comply with the PRA and data requirements and data shared remains the property of MSD.

Recommendation

1. Develop IM processes which are applied to incoming and outcoming data shared with external parties.

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.

Managing

Observations

MSD has a current approved Disposal Authority (DA) which covers information relating to all business functions. The next DA review is not due until April 2031; however, the Information Retention and Disposal Standard is due for review in May 2023. The Information Retention and Disposal Standard governs the day-to-day practices for IM activities at MSD.

Staff and contractors are generally aware of their organisations-specific DA.

Recommendation

1. Provide training focused on disposal to ensure that all staff and contractors understand the disposal requirements relevant to the information they create and use.

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 (GDA).

Progressing

Observations

MSD has a current organisation-specific DA, which has been in place since April 2021. To date no information has been disposed under it.

However, there has been information disposed under the General Disposal Authorities (GDAs). MSD runs a disposal programme which notifies business owners when information is scheduled for disposal under the GDAs. Business owners are required to review this and approve the disposal.

MSD has a culture of retaining information. Staff interviewed report that the disposal process is rigorous and time consuming, which has led to information being retained. Through interviews, staff and contractors advised have some understanding of the disposal requirements relevant to the information they create. MSD acknowledges that staff and contractors require on-going training particularly around information retention and disposal.

The IM team has documented guidance on how staff can dispose of information from Objective. The guidance documents ensure that key metadata information is retained after the contents of the documents have been destroyed or transferred to a third-party for physical storage.

The IM team has developed a destruction register to ensure that they have oversight on information being disposed. This register captures information such as date, information classification, information owner and quantity.

MSD is aware of the moratorium on disposal of any information relevant to the Royal Commission inquiry into abuse in care. Therefore, the IM team has a temporary hold on the destruction of any records that could be of interest or relevant to the Royal Commission inquiry. The IM team has a document available on the intranet for all staff on what records fall under the Royal Commission's inquiry.

Recommendation

1. Ensure business owners regularly implement disposal of information under both the GDAs and DA.

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

There have been no recent transfers of physical and digital information to Archives NZ and no deferral of transfer agreement exists. The last transfer to Archives NZ was in 2011.

MSD is aware it holds physical information that is over 25 years old, however the full extent of the information held is not known.

Recommendations

1. Formally identify physical and digital information of archival value that is over 25 years old.

6. Summary of Feedback

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

MSD welcomes this audit of our information management practices and sees this as an opportunity to continue to mature our practice. We broadly agree with the actions proposed and note that many of these actions are already reflected in our current work programme or future roadmap.

Allowing for the above, there are some areas where we consider this audit does not fully capture our overall maturity:

- *Te Tiriti o Waitangi* – While MSD has not completed the process of formally identifying all information of potential value to Māori (as we are waiting from guidance from external work programmes such as Mana Ōrite (led by Stats NZ)), we have taken significant steps towards ensuring we are well positioned to manage this information in line with our obligations under Te Tiriti. This has included incorporating these obligations into our information strategy, seeking advice from our external Māori Reference Group about the implications of all our major information initiatives, and creating a dedicated role to provide advice on Māori Data Governance.

- *Capacity and capability* – MSD has recently approved a significant expansion to our information management teams as part of a wider operating model intended to better support our information needs. This, when implemented, will more than double the number of roles with an information management focus, and will support building additional information management capability into roles that are dedicated to privacy and information security.

- *Implementation of disposal decisions* – MSD carried out regular disposal under our previous disposal authority until the first COVID-19 lockdown in 2020. Our new disposal authority was approved in 2021, at the height of the COVID-19 response when MSD drastically pivoted its work programme to support New Zealanders. As a result of this disruption we have not been dedicating resources to routine disposal but have been keeping track of what information would otherwise have been disposed and which can be prioritised for disposal as resourcing frees up. It is also worth noting that where possible disposal requirements for information are implemented systematically rather than at an individual level, allowing our user education to be role based and targeted.

- *Transfer to Archives NZ* – MSD has had limited ability to transfer eligible information to Archives NZ due to public sector constraints on storage and transfer capability, particularly for digital information.

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Tēnā koe Debbie

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the Ministry of Social Development Te Manatū Whakahiato Ora (MSD) 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.

Organisations that are assessed as having a maturity level of 'Managing' across all IM topics are broadly meeting the minimum requirements expected by the PRA and Archives' mandatory Information and records management standard. The audit report has assessed your IM practice as mostly at the 'Progressing' maturity level, a smaller number of topics at 'Managing' and a few at 'Beginning'. Considering the importance of the information that MSD holds for New Zealanders we would expect to see the organisation's IM practice at least at the 'Managing' level, to provide assurance that information is being managed appropriately.

Your feedback in section 6 of the audit report outlines approval for a significant expansion in the IM team to support your information needs. It looks useful to build IM capability into wider roles dedicated to privacy and information security thereby broadening IM knowledge across MSD as well as adding more core IM roles.

It is understood that most of MSD's public records are subject to the current disposal moratorium applied to public records that may be of interest to the Royal Commission of Inquiry into Abuse in Care. Because of the moratorium, disposal activity has been minimal with most on hold. Considering the areas that the audit focused on it is likely that some information would not be subject to the moratorium, and disposal under the GDAs, as described under Topic 22: *Implementation of Disposal Decisions*, would therefore be authorised.

We acknowledge that currently it is not possible to transfer physical information to Archives New Zealand's Wellington repository. However, we are accepting digital transfers depending on the readiness of the organisation and we welcome discussion on this. Preparation for digital and physical transfer is included as a priority recommendation. This is also an opportunity for MSD to determine the access status of information that is at least 25 years old. This work is a requirement under section 43 of the PRA. It also assists public access even if the information is still held by the organisation and not yet transferred, as required under section 47. Transfer preparation will mean that MSD is well placed for physical transfer when the new Archives repository is completed.

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 eight 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

Cc Melissa Gill, Deputy Chief Executive Organisational Assurance and Communication (Executive Sponsor), melissa.gill009@msd.govt.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Governance	2: IM Policy and Processes	*Ensure that the draft Policy is updated soon and subsequently biennially.*	It is essential that the Policy is kept up-to-date and socialised as a current reference for MSD staff on their IM roles and responsibilities.
Governance	5: Outsourced Functions and Collaborative Arrangements	*Develop and implement monitoring of the IM requirements for public records created by outsourced functions.*	Considering the number of external providers MSD should monitor a sample of important contracts for their compliance with contractual requirements for IM.
Governance	6: Te Tiriti o Waitangi	*Formally identify all information of importance to Māori, which may be included as a category within the Information Asset Register (IAR).*	Work has started in this area with support from MSD's external Māori Reference Group and Stats NZ. It is expected that they will provide guidance to assist understanding of significant information of importance to Māori enabling MSD to complete their identification work.
Self-Monitoring	7: Self-Monitoring	*Develop a regular monitoring process that covers compliance with the Policy and report results to the ES and PSOB.*	For a large organisation proactive monitoring of areas of IM of most risk is essential activity. This also includes monitoring and addressing information usability and reliability issues identified in Topic 10: *Creation and Capture of Information.*
Creation	10: Creation and Capture of Information	*Develop a structured approach to monitoring and addressing issues related to information usability and reliability.*	Staff need to understand their role in this which could be strengthened by the training recommendation for Topic 9: *IM Roles and Responsibilities.*

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Creation	11: High-Value/High-Risk Information	*Perform a risk assessment for high-value /high-risk information assets.*	Risks to high-value /high-risk information should be identified. Monitoring and reporting on these risks should be part of the self-monitoring process see Topic 7: *Self-Monitoring.*
Management	13: Integrity of Information	*Update IM processes in consultation with business units and communicate to all staff.*	It's important that staff have confidence that they have found all the information that they need and can do this efficiently.
Disposal	22: Transfer to Archives New Zealand	*Formally identify physical and digital information of archival value that is over 25 years old.*	Preparation for transfer or agreement on deferral of transfer is useful to be ready for the lifting of the moratorium and for when physical transfer is possible. This preparation is an opportunity to set and document the access status of records over 25 years old.