

Public Records Audit Report for AgResearch Limited

Prepared for Archives New Zealand

March 2023



Disclaimers

Inherent Limitations

This report has been prepared in accordance with our Consultancy Services Order with Archives New Zealand dated 26 November 2020. Unless stated otherwise in the CSO, this report is not to be shared with third parties. However, we are aware that you may wish to disclose to central agencies and/or relevant Ministers' offices elements of any report we provide to you under the terms of this engagement. In this event, we will not require central agencies or relevant Ministers' offices to sign any separate waivers.

The services provided under our CSO ('Services') have not been undertaken in accordance with any auditing, review or assurance standards. The term "Audit/Review" used in this report does not relate to an Audit/Review as defined under professional assurance standards.

The information presented in this report is based on that made available to us in the course of our work, publicly available information, and information provided by Archives New Zealand and the AgResearch Limited. We have indicated within this report the sources of the information provided. Unless otherwise stated in this report, we have relied upon the truth, accuracy and completeness of any information provided or made available to us in connection with the Services without independently verifying it.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by, the AgResearch Limited management and personnel consulted as part of the process.

Third Party Reliance

This report is solely for the purpose set out in Section 2 and 3 of this report and for Archives New Zealand and the AgResearch Limited's information and is not to be used for any other purpose or copied, distributed or quoted whether in whole or in part to any other party without KPMG's prior written consent. Other than our responsibility to Archives New Zealand, neither KPMG nor any member or employee of KPMG assumes any responsibility, or liability of any kind, to any third party in connection with the provision of this report. Accordingly, any third party choosing to rely on this report does so at their own risk. Additionally, we reserve the right but not the obligation to update our report or to revise the information contained therein because of events and transactions occurring subsequent to the date of this report.

Independence

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



Contents

1. Executive summary	1
2. Introduction	2
3. This audit	2
4. Maturity Assessment	3
5. Audit findings by category and topic	4
Governance	4
Self monitoring	7
Capability	7
Creation	9
Management	10
Storage	12
Access	13
Disposal	14
6. Summary of feedback	17
7. Appendix 1	19



1. Executive summary

AgResearch Limited (AgResearch) is a Crown Research Institute that supports the agriculture sector research activities. AgResearch creates high value public records including research publications and funding documents. AgResearch has research databases that store public records such as science research data and reports.

AgResearch uses various systems to store digital information. Working documents are primarily stored in Microsoft Teams with some in shared drives, and organisation wide information such as policies are held in SharePoint. Research publications are required to be submitted to a centralised output repository and the majority of raw science research data is kept in the high performance computing (HPC) system (uses supercomputers and computer clusters to solve advanced computation problems).

The majority of physical information is stored offsite with a third party storage supplier. There is limited information stored on site.

AgResearch has approximately 657 full time equivalent staff members, including three IM staff. There is a newly established IM governance group, the Information and Security Governance Group (I&SGG), of which the Executive Sponsor is the chair.

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

Beginning	6
Progressing	12
Managing	2
Maturing	0
Optimising	0





2. Introduction

KPMG was commissioned by Archives New Zealand to undertake an independent audit of AgResearch Limited (AgResearch) under section 33 of the Public Records Act 2005 (PRA). The audit took place in November 2022.

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

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

3. This audit

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

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

The audit reviewed AgResearch's IM practices against the PRA and the requirements in the IM and records standard and provides an assessment of current state maturity. As part of this audit, we completed systems assessments over AgResearch's key systems that act as a repository for public records. Where recommendations have been made, these are intended to strengthen the current state of maturity or to assist with moving to the next level of maturity.

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



4. Maturity Assessment

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

Category	No.	Topic	Maturity				
			Beginning	Progressing	Managing	Maturing	Optimising
Governand	ce						
	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-monit	oring						
	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		•			
Managem	ent						
	12	IM requirements built into technology systems		•			
	13	Integrity of information		•			
	14	Information maintenance and accessibility		•			
	15	Business continuity and recovery	•				
Storage							
16		Appropriate storage arrangements		•			
Access							
	18	Information access, use and sharing		•			
Disposal							
	20	Current organisation-specific disposal authorities		•			
	21	Implementation of disposal decisions	•				
	22	Transfer to Archives New Zealand	•				

Please note: Topics 17 and 19 in the IM 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

AgResearch has an IM strategy called "Information Management Plan 2021 – 2025" dated June 2021 which has been approved by senior management. The Information Management Plan sets out an action plan, including implementing an organisational strategic framework, and provides strategic direction and supports business needs for IM.

There is regular reporting on identified initiatives and implementation activities. IM staff provide monthly reports to the Executive Sponsor and the IM governance group on the progress of the IM action plans. The reports are then shared with the senior management through the Executive Sponsor's monthly directorate reports.

However, the strategy document has not been effectively communicated to all staff and contractors. Most staff interviewed indicated they had not seen it. Focus group staff and Executive Sponsor noted that although the IM Strategy is approved by senior management, senior management lacks the knowledge and guidance on how to improve IM practices, and what their responsibilities are. This is mainly due to training on IM awareness and responsibilities not yet being developed.

Recommendations

Communicate the strategy to senior management to ensure buy-in for the ongoing improvement of IM at AgResearch. Ensure the strategy is internally available for all staff and contractors to access.

TOPIC 2 – IM policy and processes

Progressing

Summary of findings



AgResearch has a current and up-to-date IM policy. It was reviewed and approved by senior management in January 2022. The policy is consistent with the Archives New Zealand Information and Records Management Standard (the Standard) and references to other relevant legislation such as the PRA, Official Information Act 1982 and the Privacy Act 2020. It links to other internal policies and contains roles and responsibilities for key personnel (such as the Executive Sponsor) and all staff in general.

The policy was communicated to staff when it was updated in January 2022 through the intranet and a webinar delivered by IM staff. Staff interviewed were aware of the policy and where to find it.

The IM process documents do not cover all aspects of IM. Process documents are limited to the disposal of information, requesting or lodging laboratory books, and posting publications into a centralised output repository.

Recommendation

Develop and approve process documentation for all IM processes in conjunction with the IM policy.

TOPIC 3 – Governance arrangements and Executive Sponsor

Managing

Summary of findings

AgResearch has a newly established IM governance group; the Information and Security Governance Group (I&SGG), of which the Executive Sponsor is the chair. A Terms of Reference was approved in September 2022 which outlines the primary functions of the I&SGG as strategic alignment, risk management, security oversight, and information and data management.

The Executive Sponsor performs their oversight and monitoring role through reviewing the monthly progress reports on initiatives and implementation activities. However, there is no oversight from the Executive Sponsor on day-to-day activities such as compliance with the IM policy and requirements from the PRA, standards and other legislation.

The Executive Sponsor meets monthly with other Executive Sponsors in the Crown Research Institutes to share experience, progress and knowledge in IM. For example, AgResearch partnered with other CRIs to source the third-party storage provider.

Recommendation

In connection with *Topic 7 – self-monitoring*, develop a monitoring programme over day-to-day IM activities. Report monitoring results to the Executive Sponsor.

TOPIC 4 – IM integration into business processes

Progressing

Summary of findings

The IM responsibilities are not consistently communicated and assigned to staff.

Responsibilities are documented in the IM policy and will be included in all job descriptions



from October 2022. However, no induction or regular training on these responsibilities is currently provided to staff. Staff interviewed noted team managers are expected to communicate all internal policies including IM during onboarding. This has not been done across the organisation and as a result, not all staff are aware of their IM responsibilities.

The requirements for managing information are integrated into some business processes and activities. For example, publications are required to be submitted to an output repository that centrally holds all final research publications and is available to authorised staff. IM is considered in some business process changes, but there is no formalised process to ensure IM staff are involved in all relevant business process changes and development.

Recommendations

Ensure business owners understand their IM responsibilities as documented and monitor their application of these.

TOPIC 5 – Outsourced functions and collaborative arrangements Beginning

Summary of findings

Requirements for managing information are not outlined in current contracts for outsourced functions and collaborative agreements. However, a new contract template including IM clauses has been approved and is effective immediately. The clauses outline contracted party's IM obligations such as returning information on termination. The contract template also recognises the status of documents handled as public records. As no contract has been signed using the new template, there has been no monitoring of contracted parties' compliance with IM requirements.

Recommendation

Monitor contracted parties' compliance with IM requirements under the new contract template.

TOPIC 6 – Te Tiriti of Waitangi

Progressing

Summary of findings

AgResearch is in the early stages of locating and identifying information of importance to Māori. Work is underway on a cross-Crown Research Institute Māori data sovereignty project. This includes developing guidelines on information of importance to Māori such as what information is already collected and/or needs to be collected and appropriate protocols to manage this. Some information of importance to Māori has been identified and documented, however the identification process is ad-hoc rather than planned and formalised. In addition, the IM implications of agreements with Māori are not yet generally understood.

Recommendations

Identify and document all information of important to Māori.



Clarify the potential IM implications from agreements with Māori and document the practical application of these.

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

Beginning

Summary of findings

The IM requirements from the PRA, the Standard, and other relevant legislation are identified within the IM policy. However, there is no monitoring of compliance with these requirements.

There is no formal monitoring of compliance with the IM policy. Instead, IM staff perform adhoc monitoring activities and corrective actions. For example, when IM staff noticed papers were inappropriately disposed of in the paper bins, they discussed the issue with relevant staff members and followed up with an educational session.

Recommendation

Design and implement regular information monitoring procedures and report findings to the Executive Sponsor.

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

Progressing



Summary of findings

AgResearch has a Knowledge and eResearch Leader who is supported by two IM specialists. IM staff interviewed noted the IM capability requirements are starting to be addressed but not fully fulfilled. Their roles and responsibilities were adjusted to have a greater focus on IM in August 2022 which is also reflected in their job descriptions. Whilst IM staff can prioritise work and meet minimum day-to-day demands, they consider that additional support is required to fully meet the business needs. It is in the IM Plan to formally assess and increase the capacity at AgResearch.

IM staff have regular access to IM professional development opportunities. The two IM specialists are members of IM professional groups such as Records and IM Professional Australasia (RIMPA). They have attended conferences and workshops organised by these professional groups.

Recommendation

Regularly assess IM capacity and capability requirements against BAU needs and the implementation of the strategy to ensure the IM team is appropriately resourced.

TOPIC 9 – IM roles and responsibilities

Beginning

Summary of findings

Since October 2022, IM roles and responsibilities are documented in all job descriptions, performance plans and codes of conduct. Before this, roles and responsibilities were only documented in the IM policy. IM responsibilities for contractors have been included in the new approved contract template.

IM responsibilities are not proactively communicated to staff and contractors. Managers are expected to introduce relevant policies to new staff and contractors during onboarding, including the IM policy. However, there is limited oversight or enforcement of this. As a result, the understanding of IM responsibilities comes from the need to manage information appropriately for day-to-day activities. Staff indicated an induction checklist which requires the managers to communicate IM policy to new staff is currently in draft.

There is no regular IM training provided to staff across AgResearch. One-off training has been provided to staff on an as-needed basis. For example, a workshop on the disposal of physical information was delivered when staff moved buildings. IM training and education plans are the next actions to be addressed in the IM Plan.

Recommendation

Develop a mandatory IM induction plan for staff and contractors to address the business needs which is ideally delivered by IM staff.

Assess the need for ongoing refresher training for staff and develop a plan to address the identified need.





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

AgResearch staff and contractors interviewed indicated they understand and comply with their legal obligations to create and capture full and accurate records. However, as identified in Topic 7 *Self-monitoring* the practise of information creation and capture is not consistent across the organisation due to a lack of monitoring. For example, authors are required to submit all final research publications to a centralised output repository. However, IM staff indicated this requirement is not always followed across the organisation and sometimes IM staff follow up and remind the authors.

Information is captured in various locations such as Microsoft Teams (Teams), SharePoint and shared drives, some of which automatically create the metadata that supports the usability, reliability and trustworthiness of the information. While most science research data is stored on the high-performance computing (HPC) system (uses supercomputers and computer clusters to solve advanced computation problems), some data is stored in uncontrolled environments on individual hard drives.

AgResearch has identified information usability, reliability and trust issues and started to address them. A project to improve information searchability across AgResearch is waiting for senior management approval to implement.

Recommendation

Plan to identify, address and mitigate the risks involved with the incorrect use of IM storage environments.

TOPIC 11 – High-value / high-risk information

Progressing

Summary of findings

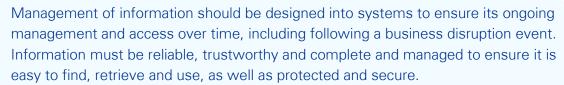
AgResearch has an information asset register that details the inventory of some physical and digital information. IM staff indicated they are working with business units to start identifying high-value and high-risk information. A three-level criterion that defines high-value and high-risk information is outlined in the Information Asset Register – Context and Maintenance document. However, this register does not include all information assets.

Recommendation



Update the information asset register to include all information held in digital and physical systems and identify the high-value/high-risk information assets.

Management





TOPIC 12 – IM requirements built into technology systems

Progressing

Summary of findings

IM requirements are sometimes addressed in new business systems when IM staff are involved in the design and configuration decisions. For example, IM requirements are addressed in the new output repository system, for which the Knowledge and eResearch Leader is the business owner. However, there are no standardised IM requirements for new and upgraded systems that have been identified and documented.

SharePoint and Teams automatically capture the minimum metadata requirements set out by Archives New Zealand. AgResearch's other systems such as shared drives do not meet minimum metadata requirements.

Recommendation

Identify and document standardised IM requirements for new and upgraded systems.

Involve IM expertise when designing and configuring new and upgraded systems and when decommissioning.

TOPIC 13 – Integrity of information

Progressing

Summary of findings

There are localised IM practices across AgResearch. Staff noted some business units and teams established their own business rules to manage information such as file structure and naming conventions. Staff interviewed also showed an awareness of their obligations under the PRA to create information that is comprehensive and complete, however this is not always done across the organisation.

While staff indicated that widely used information such as policies and publications is easy to locate and access, other information can be difficult to find, particularly if a specific team holds the information. This is partly due to non-standardised IM practices but also the functionality of the document management system. Business units, teams and working groups across AgResearch use Teams as their primary document management system for day-to-day



activities. Only group members have visibility and access to the information of a specific business unit, even though it is not confidential or restricted. Staff indicated the best way to find information would be to ask the relevant person, but this is time consuming and requires locating the right person. A project to improve information searchability is underway.

Recommendation

In consultation with staff, identify and document issues with finding and retrieving information due to inconsistent practice across the organisation.

Assess the functionality of the document management system to ensure it supports standardised IM practice.

TOPIC 14 – Information maintenance and accessibility

Progressing

Summary of findings

There are plans in place to manage and maintain physical information during some business changes. For example, as noted earlier, a workshop was delivered to staff on assessing and managing physical information before moving to a new building. Some physical information preservation risks have been identified. For example, research recording tapes are kept in a climate-controlled environment to prevent deteriorating.

There are plans in place to manage and maintain digital information during some business and system changes, but this is determined by whether IM staff are involved. It was noted in interviews that a migration plan and a standard change control process have been used during the decommissioning of an old on-premise SharePoint site to a new cloud-based SharePoint site.

Technology obsolescence risks have been identified as part of the organisational risk management processes, and preservation and digital continuity needs are identified with plans in place to address these. For example, the current high-performance computing (HPC) system that stores science research data requires updating and a project is underway to upgrade the hardware.

Recommendation

Create and document a plan for managing and maintaining digital and physical information during all business and system changes.

Involve IM expertise in the development of strategies for ongoing management and access to digital information.

TOPIC 15 – Business continuity and recovery

Beginning

Summary of findings

AgResearch has an IT Disaster Response Plan that was approved in March 2022. The IT Disaster Response Plan outlines critical information technology (IT) systems and services,



including prevention, response and recovery strategies to support business continuity. The disaster plan is regularly tested by the IT staff. However, the IT Disaster Response Plan and the Business Continuity Management policy do not explicitly outline critical information and include the salvage and restoration of physical business information.

AgResearch has various backup systems in place to ensure digital information is able to be restored. Back-ups occur daily, weekly, monthly and yearly with a retention period of up to 10 years. However, backups should ideally only be kept for two years as long-term retention of back-ups creates additional risks for AgResearch.

Recommendations

Update business continuity plan and framework to include critical information required to ensure business continuity and detail the processes to recover or restore both physical and digital information.

Storage

Good storage is a very important factor for information protection and security.

Appropriate storage arrangements for both physical and digital information ensures information remains accessible and usable for as long as it is required for business and legal purposes and for accountable government.

TOPIC 16 – Appropriate storage arrangements

Progressing

Summary of findings

There is appropriate protection and security in place for the majority of physical information. As previously stated, most physical information is stored with a third-party storage provider. The physical information to be reviewed for archive or disposal is stored in an onsite storage room which is appropriately labelled and protected against hazards such as fires. An access card is required to enter the onsite storage room, with access limited to approved personnel. However, IM staff noted there is limited visibility over physical information held by individual staff.

Digital information is protected against unauthorised access, loss, deletion, or destruction. For example, access is controlled within Teams and SharePoint with staff only having access to areas relevant to them and audit trails are in place. The project management system, which holds information such as budget, project status, etc, does not allow deletion by staff members without appropriate authorisation.

Testing protocols for digital information are administered and reported regularly by the third-party provider. IT staff receive a monthly suspicious audit report from the provider and will escalate any material concerns to the Executive Sponsor.

Recommendation



Ensure IM staff are involved in identifying protection and control issues associated with digital information.

Monitor staff activity to ensure storage requirements for physical information are followed.

Access

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

TOPIC 18 – Information access, use and sharing

Progressing

Summary of findings

As previously stated, SharePoint and Teams automatically capture the minimum metadata requirements set out by Archives New Zealand. However, AgResearch's other systems such as shared drives do not meet minimum metadata requirements.

Staff and contractors know how to use some systems and tools to facilitate their access to information. However, staff noted not all staff fully understand how to use AgReseach's intranet search function as no training is provided on metadata and search techniques. Moreover, inconsistent use of metadata such as different naming conventions also leads to difficulty in locating information. IM staff indicated this will be enhanced through improving the classification of information in a new business classification scheme. This project is currently waiting for senior management approval.

Access to physical and digital information is controlled by restricted access to systems and folders. The access controls are documented for some systems. For example, publishing into the output repository system requires a form to be filled out, which includes detailing appropriate access permissions. Any access to the offsite physical information requires the IM staff's approval and is recorded by the third-party storage provider. Staff indicated information and data sharing requirements are followed according to the external parties' contract requirements.

Recommendation

Ensure the classification scheme/file plan supports consistent management and discovery of information.

IM training should include naming conventions and search techniques.



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

There is no current, approved organisation-specific disposal authority. The previous organisation-specific disposal authority which covered all business functions and formats expired in May 2021. IM staff noted they applied for an extension of the disposal authority July 2022. This is currently awaiting approval from the Chief Archivist.

Recommendation

Implement a regular review process of the organisation-specific disposal authority to ensure it is updated prior to expiry.

TOPIC 21 – Implementation of disposal decisions

Beginning

Summary of findings

Disposal actions have been carried out for physical information under the General Disposal Authority and the organisation-specific disposal authority before it expired. Secure destruction bins for physical disposal are used. There is no list documented information disposed of in last 10 years. AgResearch have a disposal guidance document which outlines what information can be disposed of and the procedures. But this is not communicated to all staff and contractors. Focus group staff indicated they are not aware of this document but would contact IM staff for guidance regarding disposal when needed.

Digital information is retained indefinitely. IM staff indicated they intend to incorporate disposal functions in Microsoft 365 for the information stored in Teams and SharePoint to meet PRA requirements.

Recommendation

Develop a disposal register to record approved disposal activity.

Develop a disposal implementation plan for action when the extension of the organisationspecific disposal authority is approved.



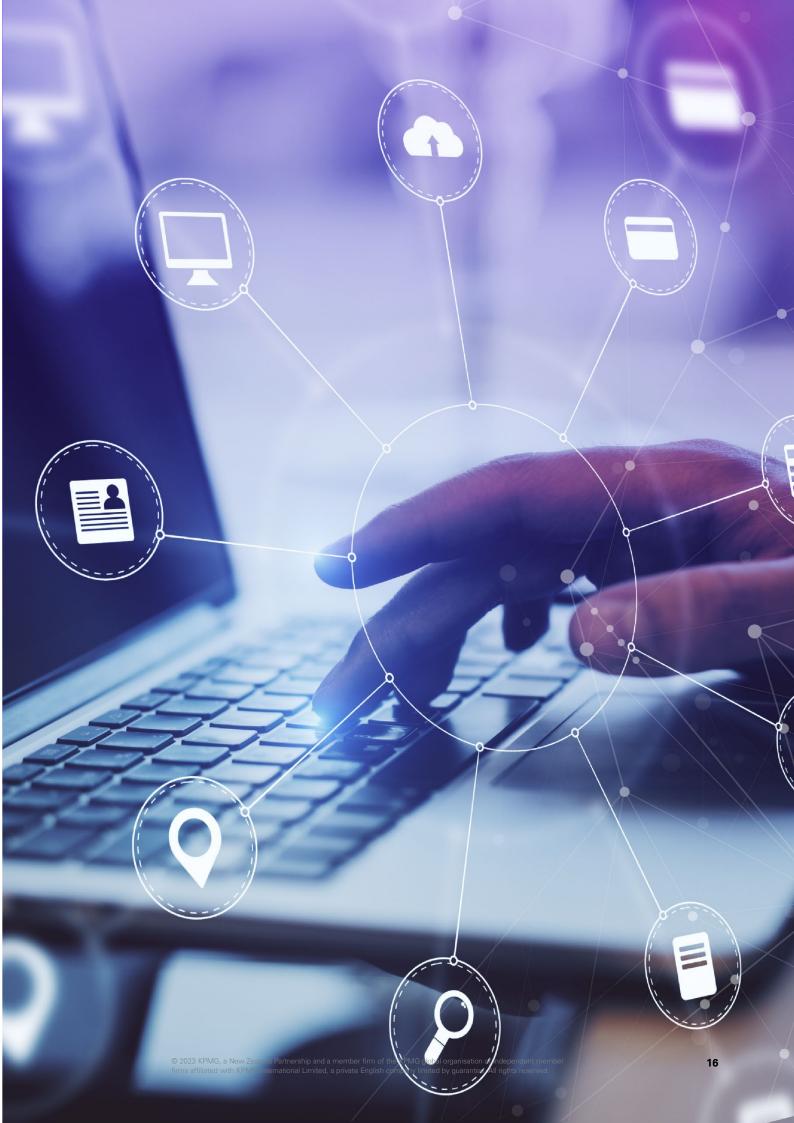
Summary of findings

There has been no information transferred to Archives New Zealand in either physical or digital format. Information of archival value over 25 years old has not been identified or determined as open or restricted access.

Recommendation

Create a plan to identify and transfer digital and physical information of archival value to Archives New Zealand when appropriate and discuss with Archives New Zealand.





6. Summary of feedback

AgResearch Feedback - Public Records Act Audit Report

28 February 2023

AgResearch welcomes the draft audit report and thank the auditors for their engagement with us, and the insights which they provide.

Overall, we consider the report is a fair evaluation of the information maturity at AgResearch. We note the observations, and acknowledge the recommendations made in the report. We are pleased to note that the recommendations align with work earmarked for action prior to audit. The Executive Sponsor, supported by the Chief Executive is committed to improving maturity and internal discussions have commenced on how to incorporate the recommendations into our existing action plan, and prioritise future activity.

We would like to respond to five topics where we are of the opinion the auditors may not have fully appreciated the evidence we presented and thus rated our maturity level as lower than we anticipated.

Topic 6 – Te Tiriti o Waitangi

We have been rated Beginning even though the report states "AgResearch is in the early stages of locating and identifying information of importance to Māori" (evidence provided), as opposed to the requirement under Beginning which states "Information of importance to Māori is not identified." The report also notes our engagement with internal Māori staff and the pan-CRI Māori Data Sovereignty Working Group. Additionally, as per the IMMA, we feel all the requirements as listed to comply with Progressing are met.

Topic 7 – Self-monitoring

We have been rated Beginning and note the conflicting comments: "there is no monitoring of compliance" (line 2) and "IM staff perform ad hoc monitoring and corrective actions" (line 3). We acknowledge that a formal programme of monitoring does not exist, and we were unable to supply documentary evidence of auditing, but the requirement for Progressing is "some monitoring of compliance," which the auditors note we undertake. Similarly, the remaining requirements under Progressing are being met: we provided evidence of documentation and understanding of our PRA requirements; we undertake some monitoring (as noted above), and we acknowledge that corrective actions are inconsistent (i.e. they exist, and serious instances would be reported to the Executive Sponsor if any had occurred) (again, noted above). We feel that the report's Summary of findings does not justify a rating of Beginning and that the requirements for Progressing are met.

Topic 11 – High-value/high-risk information

We note the auditor's comment "no identification in the register for high-value or high-risk information" (line 5) and feel there has been a misunderstanding in the auditor's reading of our evidential document Information Asset Register – Context and maintenance, which makes it clear



that the criteria for inclusion in the register is primarily that the asset contains high-value/high-risk information. To re-state this in the register would be tautologous. We ask that the Summary of findings be corrected.

Topic 16 – Appropriate storage arrangements

We have been rated Progressing even though we self-rated at Managing (75% compliance) and 50% compliance for Maturing. The auditors note that physical and digital information is well protected, and we feel that the auditors have placed too much emphasis on their comment "IM staff noted there is limited visibility over physical information held by individual staff" (line 6). It is unrealistic to expect that any New Zealand agency's IM staff have full visibility over the physical information of all that agency's individual staff

Topic 20 – Current organisation-specific disposal authorities

We note that the auditor's comments in the Summary of findings whilst technically correct, adhere to the letter of the law, but not the spirit of the law. As the auditors note, an application to extend our DA had been with Archives New Zealand since July 2022 (four months prior to audit) but was delayed due to Archives New Zealand's internal processes, and not poor practice on our part. In fact, we received notification of the approval of our extension a week after the audit. We ask that the Summary of findings more accurately reflect the situation.

Typographic error -- Topic 8 – Capacity and capability

In the Summary of findings, line 4, it states "August 2020". This should read "August 2022". We ask that this is corrected.

Regards,

Greg Rossiter

Executive Sponsor - Information and Records Management

Director, Information Technology.



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 Progressing
- Topic 3, Governance arrangements & Executive Sponsor Managing
- Topic 4, IM integration into business processes Progressing
- Topic 5, Outsourced functions and collaborative arrangements Beginning
- Topic 6, Te Tiriti o Waitangi Progressing
- Topic 7, Self-monitoring Beginning
- Topic 8, Capability and capacity Progressing
- Topic 9, IM roles and responsibilities Beginning
- Topic 10, Creation and capture of information Progressing
- Topic 11, High-value / high-risk information Progressing
- Topic 12, IM requirements built into technology systems Progressing
- Topic 13, Integrity of information Progressing
- Topic 14, Information maintenance and accessibility Progressing
- Topic 15, Business continuity and recovery Beginning
- Topic 16, Appropriate storage arrangements Progressing
- Topic 18, Information access, use and sharing Progressing
- Topic 20, Current organisation-specific disposal authorities Progressing
- Topic 21, Implementation of disposal decisions Beginning
- Topic 22, Transfer to Archives New Zealand Beginning



kpmg.com/nz **y** in f □ © 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved. The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organisation.



5 May 2023

Te Rua Mahara o te Kāwanatanga Archives New Zealand
10 Mulgrave Street
Wellington
Phone +64 499 5595
Websites www.archives.govt.nz
www.dia.govt.nz

Sue Bidrose Chief Executive AgResearch Limited Sue.Bidrose@agresearch.co.nz

Tēnā koe Sue

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of AgResearch Limited 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 (Archives) is mandated by the PRA to regulate public sector information management (IM). The audit programme is a key regulatory tool in our Monitoring Framework.

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

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

Audit findings

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

Kia pono ai te rua Mahara – Enabling trusted government information

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

Organisations that are assessed as having a maturity level of 'Managing' across all IM topics are broadly meeting the minimum requirements expected by the PRA and Archives' mandatory Information and records management standard. In its IM practice, AgResearch is operating mostly at 'Progressing' maturity level. The opportunity for improvement is enabled by the approval of the organisation-specific disposal authority and the implementation of SharePoint.

Consideration should be given to the set-up of SharePoint and Teams so that information can be easily shared across the organisation. This will support effective business operation without unnecessary restrictions.

Prioritised recommendations

The audit report lists 28 recommendations to improve your organisation's IM maturity.

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

What will happen next

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

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

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

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

Nāku noa, nā

Anahera Morehu Chief Archivist

Te Rua Mahara o te Kāwanatanga Archives New Zealand

Cc Greg Rossiter, Director Technology and Digital Services (Executive Sponsor), greg.rossiter@agresearch.co.nKP

APPENDIX

Category	Topic Number	Auditor's Recommendation	Archive's Comments
Governance	4: IM integration into business processes	Ensure business owners understand their IM responsibilities s documented and monitor their application of these.	Clear communication of IM roles and responsibilities is needed across the organisation to uplift maturity including documentation and training. Monitoring is also needed to ensure that expectations are met.
Self- monitoring	7: Self- monitoring	Design and implement regular information monitoring procedures and report findings to the Executive Sponsor.	This would enable the organisation to overview IM practice and identify and monitor issues and trends.
Capability	8: Capacity and Capability	Regularly assess IM capacity and capability requirements against BAU needs and the implementation of the strategy to ensure the IM team is appropriately resourced.	When new environments are set up and existing ones still maintained the IM work for the organisation is increased. If systems need to be reconfigured and improved that also impacts on BAU.
Capability	9: IM roles and responsibilities	Develop a mandatory IM induction plan for staff and contractors to address the business needs which is ideally delivered by IM staff.	This will help embed good IM practice for all new staff which will benefit the organisation.
Creation	10: Creation and capture of information	Plan to identify, address and mitigate the risks involved with the incorrect use of IM storage environments.	With the project to improve information searchability underway the issues should be surfaced, and solutions sought. This also involves the recommendation for Topic 13: Integrity of information. Document management systems should facilitate sharing of information across the organisation and functionality corrected if it does not support this.

Category	Topic Number	Auditor's Recommendation	Archive's Comments
Management	12: IM requirements built into technology systems	Identify and document standardised IM requirements for new and upgraded systems.	The organisation should look at retiring the Shared Drives where possible for better protection of information. This will also lessen the number of systems needing to be monitored and maintained.
Disposal	21: Implementation of disposal decisions	Develop a disposal implementation plan for action when the extension of the organisation-specific disposal authority is approved.	This should include a disposal register to record approved disposal activity.