Deloitte.

Arts Council of New Zealand

Toi Aotearoa

Public Records Act 2005 Audit Report

Prepared for Archives New Zealand

July 2022

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1. Disclaimers

Use of Report

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

Independence

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

Statement of Responsibility

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

- This assessment is based on observations and supporting evidence obtained during the review. This report has taken into account the views of the Arts Council of New Zealand Toi Aotearoa and Archives NZ who reviewed this report.

- Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. The procedures were not designed to detect all weaknesses in control procedures as the assessment was performed by interviewing relevant officials and obtaining supporting evidence in line with the guidelines of the Archives NZ's Information Management (IM) Maturity Assessment.

- The matters raised in this report are only those which came to our attention during the course of performing our procedures and are not necessarily a comprehensive statement of all the weaknesses that exist or improvements that might be made. We cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of operations and their responsibility to prevent and detect irregularities, including fraud. Accordingly, management should not rely on our deliverable to identify all weaknesses that may exist in the systems and procedures under examination, or potential instances of non-compliance that may exist.

We have prepared this report solely for the use of The Arts Council of New Zealand Toi Aotearoa 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

Arts Council of New Zealand Toi Aotearoa

The Arts Council of New Zealand Toi Aotearoa (Creative NZ) was established in 1994 and is the national arts development agency of the New Zealand Government. Creative NZ invests in artists and arts organisations, offering capability building programmes and developing markets and audiences for New Zealand arts domestically and internationally.

Creative NZ has about 85 employees with its national office in Wellington, and regional offices in Auckland and Dunedin.

Information of high-risk / high-value includes governance documentation, records around policy reviews, funding process management documentation including funding applications, contracts, project completion and panel meetings.

Summary of Findings

We assessed Creative NZ'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	4	7	9		

3. Introduction

Background

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

- full and accurate records are created and maintained, improving business efficiency, accountability and government decision-making, and in turn, enhancing public trust and confidence in government;

- government is open, transparent and accountable by making public sector IM practices known to the public.

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

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

Objective

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

Scope

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

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

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

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.

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

4. Information Management Summary

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

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

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

5. Audit Findings by Category and Topic

Governance

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

Topic 1: IM Strategy

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

Beginning

Observations

Creative NZ does not currently have an IM Strategy to provide a strategic direction and support over IM activities. Management is currently discussing developing one though it has not been formalised.

Recommendation

1. Develop an IM Strategy or incorporate IM into an existing strategy.

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.

Managing

Observations

Creative NZ has an approved and current IM policy (the IM Policy). The IM Policy identities record management systems, relevant legislation, recordkeeping principles, roles and responsibilities, and monitoring and reviewing requirements. However, it does not explicitly link to other policies e.g., security or privacy

The IM Policy is available to all staff and contractors on Microsoft 365, which staff are aware of, as it forms part of their induction training.

Breaches of the IM Policy are reliant on self-reporting and Business Managers monitoring.

Recommendation

1. Update the IM Policy to link to other relevant policies such as, security, privacy, and risk management.

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.

Progressing

Observations

Creative NZ does not have a standalone IM governance group. Issues of non-compliances or significance may be tabled at the Audit and Risk Committee (ARC).

Any updates on IM are informally communicated between the IM Senior Advisor and the Executive Sponsor (ES), though there is no regular reporting. The ES actively champions IM at a senior level, for example advocating at the ARC, and is actively involved in current IM activities.

Recommendation

1. Identify and agree aspects of IM to be regularly reported to the ES, with any significant updates escalated to the ARC.

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.

Managing

Observations

Staff generally understand and consistently fulfil their responsibilities for managing the information they create, use and maintain. Roles and responsibilities are outlined in the IM Policy and all staff have induction training and regular refresher sessions available to them on Microsoft 365. Staff stated they would approach the IM Senior Advisor and supporting business managers if they required help or resources.

Practices are largely consistent across business areas, which is helped by the small size of the organisation. Any issues within the smaller teams are picked up on and addressed as they are easier to notice.

Recommendation

1. Continue to offer refresher training for business owners to actively fulfil and promote their IM role and responsibilities within each business unit.

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.

Beginning

Observations

Creative NZ uses the All of Government and Ministry for Business, Innovation and Employment templates for their contracts. Creative NZ has clear process guidance on how to document contracts in the Grant Management System (GMS). There is also regular monitoring over contracts through a Master Contracts Register for all contracts for service.

The sighted service contract with Revera outlines the service requirements including backups, security testing, storage and data migration. However, the contract does not specifically reference IM.

A sighted fund sharing agreement with Te Tairāwhiti Arts Festival references confidentiality but does not identify IM or roles and responsible. This is the same for the Memorandum of Understanding between Creative NZ and Te Taura Whiri i te Reo Māori | Māori Language Commission.

Recommendation

1. Ensure relevant IM requirements are included in all contracts where public records are created and develop a regular monitoring process.

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.

Progressing

Observations

Part of Creative NZ's purpose is to improve Māori and Pasifika access to art and representation within the arts. Therefore, Creative NZ captures information on specific outcomes for Māori, which is included in the annual report. Finance has begun identifying Māori businesses, which Creative NZ funds to support its reporting requirements. This will help identify PRA information and therefore information of importance to Māori.

Creative NZ has a Māori strategy and engagement team, Te Hā o ngā Toi Māori Arts Strategy, which the IM team engages with. The IM team currently comprises of one full time IM senior advisor and an IM manager, who is also the ES. An example of a recent engagement is that the ES attended a hui Archives NZ hosted to improve understanding on how to improve maturity.

Currently the IM team has not tagged any information of importance to Māori or introduced this as good practice. Information of importance to Māori has also not been added to the Information Asset Register (IAR).

Recommendation

1. The IM team work with the Māori strategy and engagement team to identify information of importance to Māori to tag and include on the 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

Creative NZ completes an annual ComplyWith survey, which is a legislative compliance tool. The survey report identifies areas of non-compliance, which is reported to the ARC, who monitors mitigation actions through to resolution. Examples of ComplyWith reports show any risks of non-compliance with the PRA would be reported and mitigating actions taken.

There is monitoring over third-party contracts and sharing agreements, through a collective register, though this monitoring is at a broad level of compliance, not specific to the PRA.

Recommendation

1. Develop a work programme activity for the IM team to actively monitor compliance with the IM Policy across business units.

Capability

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

Topic 8: Capacity and Capability

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

Progressing

Observations

The IM team currently comprises of one full time IM senior advisor and a Business Services Manager, who is the ES along with their broader role. The IM team has a formal broader work programme, which includes some IM activities.

Other business managers provide part time support to the IM senior advisor, on top of their other responsibilities. The current IM team has sufficient skills and capacity to provide training and services to the organisation. Prior to the IM senior advisor's appointment, IM contractors were used for specific projects. IM staff stated this approach worked well and should be considered an option for future specific projects on the work programme.

The IM team has access to broader professional development opportunities to support their professional development, which the ES supports.

Recommendation

1. Ensure the work programme aligns with the IM Strategy and identify IM resource required to deliver the work programme.

Topic 9: IM Roles and Responsibilities

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

Managing

Observations

The IM responsibilities of senior management, staff and contactors are outlined in the IM Policy. However, IM responsibilities are not referenced in the Code of Conduct, as this covers high level principles, nor in the job descriptions sighted.

As stated above, all staff undertake mandatory IM induction training, where the importance of IM and how to improve maturity in everyday processes is communicated. Weekly refresher training available to all staff. Staff stated they understand their obligations and are aware of the IM team as a resource for IM guidance.

Recommendation

1. Ensure job descriptions are updated to reflect the IM roles and responsibilities outlined in the IM Policy.

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.

Managing

Observations

Staff have a general understanding of their responsibility to create full and accurate information to support their business function. This is due to the induction training, IM guidance resources and the IM Policy. Feedback consistently stated most staff found information usable, reliable and trustworthy.

The IM team does not actively monitor all repositories; however, they respond to any service requests.

Staff are also supported in fulfilling their responsibilities through the repositories used. Microsoft 365, which is used for both corporate and core function documents, is an enterprise content management system (ECMS) which meets the Archives NZ metadata requirements. There is also a grant management system (GMS) which captures the full grants management life cycle. Boardbooks is another primary tool used for board papers, however final records are saved into Microsoft 365.

Creative NZ migrated from shared drives to Microsoft 365 in 2021. Only records that are currently being used were migrated to Microsoft 365. Shared drives are now a legacy system with all records being locked as read only. Staff do not have the ability to save any information within the shared drives.

Most information is now created digitally.

Recommendation

1. Assess information still being held in shared drives and migrate to Microsoft 365 if still being accessed, or delete according to authorised disposal authorities.

Topic 11: High-Value/High-Risk Information

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

Progressing

Observations

Creature NZ has a high-level Information Asset Register (IAR) that captures some high-value/high-risk information, however, is not a complete view of all critical information.

Recommendation

1. Ensure all high-value/high-risk information assets are formally identified in the IAR.

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

The IM team is regularly involved in any new technology solutions and upgrades. This is due to the ES sponsor involvement in senior leadership decisions, in their role as Business Services Manager, and as an attendee of the ARC.

IM requirements were a significant consideration when deciding to migrate from shared drives to Microsoft 365 in 2021. This is shown through ensuring the new system would meet metadata requirements, consulting IM experts throughout the process and a successful migration of data. GMS is also assessing for on-going suitability.

The retention and disposal of information function on Microsoft 365 is currently being developed. This will support the appropriate retention and disposal of information using the General Disposal Authorities (GDA) until the organisation specific disposal authority is authorised.

Recommendation

1. Integrate the retention function on Microsoft 365 based on the GDA. Once the organisation specific Disposal Authority is developed include this as well.

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.

Managing

Observations

The business areas consider that information is largely reliable and trustworthy. Staff interviewed noted the change to Microsoft 365 resulted in a change to taxonomies and have had to adjust to this new structure. In addition, staff reported a high level of support from the IM team and Microsoft 365 superusers in each business unit, who are available to help and train.

Staff reported they experience some minor issues with consistently applying good practice, for example naming conventions and findability in the structure. However, these issues have been improved through training.

Recommendation

1. IM team regularly reviews each business unit use of Microsoft 365 to identify areas for improvement.

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

Creative NZ does not have a formalised plan for long term access for physical and digital information.

The ES is regularly involved in business and system changes, due to their role in senior leadership. Though the involvement of IM expertise in business and system changes is not a formalised requirement.

General accessibility to physical information is ensured through long-term ongoing storage, which is retained off-site with a commercial storage provider. Creative NZ retains a summary of contents and index of all physical information which has been moved to off-site storage to ensure information is still accessible to request back.

Security process and continuous updates of systems ensure digital information remains accessible over time. Revera maintains Microsoft 365; and Fusion5 and Revera maintain GMS on behalf of Creative NZ.

Shared drives have been maintained as a legacy system to ensure past records are still able to be viewed.

Recommendation
1.   Update the IM Policy to formalise IM involvement in business or system changes.

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.

Beginning

Observations
Creative NZ does not have a formalised business continuity plan with a focus on IM. As Creative NZ's primary repositories are maintained by third-party IT providers, the recovery of these systems is built-into the service contracts.

Digital backups are sent to separate and offline storage providers. Backups occur hourly, daily, weekly, monthly and yearly. The previous week backups are stored offsite and easily retrievable. Currently backups are kept for at least seven years and will be changed to a minimum of 10 years on Microsoft 365. There is regular quarterly testing of digital system backups to ensure information can be restored.

Recommendation
1.   Develop a business continuity and recovery plan that includes all critical 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

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

Managing

Observations

Creative NZ has most physical information stored with a third-party storage provider, with a contents list and index register of all information stored off-site. As almost all information is created digitally there is limited physical information stored onsite. The physical information kept onsite is in lockable cabinets in an office environment, which includes fire safety, flood mitigation and access control.

Any physical security breaches would be escalated to the ARC. Any digital security incidents would be escalated by the IT service provider to the ARC via the ES. The IT service providers may produce updates on information protection and security, however, are not regularly reported.

Most of Creative NZ's backups are stored on disks and replicated between three different data centres: Auckland, Wellington and Christchurch. Microsoft 365 specific backups are stored offshore.

Staff and contractors do not have a high level of understanding of their protection and security requirements.

Recommendation

1.   Request regular information protection and security updates from external IT providers.

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.

Managing

Observations

Creative NZ applies access controls for digital information across all digital systems including restricting access to SharePoint as part of the Microsoft 365 package and on GMS. A large portion of the information used on a daily basis is not sensitive information and therefore has no need for complex permissions. Staff reported having appropriate access to perform their roles and would reach out to the IM team if they required further access.

Due to the nature of their work, Creative NZ staff undertake a lot of external sharing, especially media files. Creative NZ stated the process for external sharing may be improved through developing clear and efficient processes.

Recommendation

1.   Review and improve external information sharing processes.

Disposal

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

Topic 20: Current Organisation-Specific Disposal Authorities

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

Beginning

Observations

Creative NZ does not have a current approved Disposal Authority (DA), as the previous one expired in July 2021.

Creative NZ is aware of requirements to improve disposal practices and is currently part of the, unofficial, plan for the IM team. Staff are aware they are not allowed to delete any information that would come under an organisation specific DA, which is not covered by the GDAs.

Recommendation

1.   Prioritise developing a new organisation-specific DA.

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.

Progressing

Observations

Creative NZ does not dispose of digital information under the GDAs. Physical information is disposed of under the GDAs on an ad hoc basis and each business owner decides when the retention period is met. The IM senior advisor is currently creating a new process template for disposal of physical information under the GDAs.

The IM senior advisor is currently adding the retention period of records on Microsoft 365. This function will automatically retain information for its approved retention period and notify the information owner when this has ended.

Recommendation

1.   Implement disposal of digital information under the GDAs until the organisation-specific DA is approved.

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.

Progressing

Observations

Creative NZ does hold information of archival value. Creative NZ regularly transferred physical information to Archives NZ up until 2014. Since Archives NZ has been closed for physical transfers, Creative NZ has not maintained a register of information to send when available in the future.

No digital information has been transferred; however Creative NZ has been in communication with Archives NZ about undertaking digital transfer in the future.

Recommendation

1.   Continue discussion with Archives NZ on digital transfer when the organisation-specific DA is approved.

6. Summary of Feedback

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

Thank you for the opportunity to provide feedback on this report.

Creative New Zealand acknowledges and accepts the findings and recommendations within this report, which will inform the development and implementation of our information strategy and roadmap for our organisation.

Deloitte.

Archives New Zealand, 10 Mulgrave Street, Wellington

Phone +64 499 5595

Websites www.archives.govt.nz

www.dia.govt.nz

Stephen Wainwright
Chief Executive
Arts Council of New Zealand Toi Aotearoa
Stephen.wainwright@creativenz.govt.nz

Tēnā koe Stephen

Public Records Act 2005 Audit Recommendations

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

Introduction

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

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

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

Audit findings

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

Kia pono ai te rua Mahara – Enabling trusted government information

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

Organisations that are assessed as having a maturity level of 'Managing' across all IM topics are broadly meeting the minimum requirements expected by the PRA and Archives' mandatory Information and records management standard. Creative NZ has most topics at 'Managing' with the remainder at 'Progressing' and a few at 'Beginning'. Development of an IM strategy and redevelopment of the organisation's disposal authority are the major pieces of work to be completed to raise maturity. Temporary resourcing may be needed for the disposal authority work considering the size of the IM team.

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 Angus Evison, Business Services Manager (Executive Sponsor),
angus.evison@creativenz.govt.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Governance	1: IM Strategy	*Develop an IM Strategy or incorporate IM into an existing strategy.*	This will support the organisation in prioritising the work around IM maturity uplift and in understanding the associate resource.
Governance	3: Governance arrangements and Executive Sponsor	*Identify and agree aspects of IM to be regularly reported to the ES, with any significant updates escalated to the ARC.*	This will assist with understanding issues across the organisation and with mitigating any risks to information. This also ties in with the recommendation for Topic 7: Self-Monitoring.
Governance	5: Outsourced Functions and Collaborative Arrangements	*Ensure relevant IM requirements are included in all contracts where public records are created and develop a regular monitoring process.*	It is important for all parties to understand their IM responsibilities under contracts and agreements and for Creative NZ to monitor these.
Governance	6: Te Tiriti o Waitangi	*The IM team work with the Māori strategy and engagement team to identify information of importance to Māori to tag and include on the IAR.*	Considering that Creative NZ has a large role with Māori and Pasifika, this topic is significant. Relevant information should be identified to support the business need.
Creation	10: Creation and Capture of Information	Assess information still being held in shared drives and migrate to Microsoft 365 if still being accessed or delete according to authorised disposal authorities,	For a small organisation, managing fewer repositories would be a useful improvement.
Creation	11: High-Value/High-Risk Information	Ensure all high-value/high-risk information assets are formally identified in the IAR.	This will help the organisation prioritise effort by understanding the value of its IM assets.

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Management	12: IM Requirements built into Technology solutions	*Integrate the retention function of Microsoft 365 based on the GDAs. Once the organisation specific Disposal Authority is developed include this as well.*	This would be useful work to automate considering the small IM team.
Disposal	20: Current Organisation-Specific Disposal Authorities	*Prioritise developing a new organisation-specific DA.*	This task should be included in the IM Strategy and resourced adequately.