



Manapou ki te Ao

Education New Zealand

Public Records Act 2005 Audit Report

Prepared for Te Rua Mahara o te Kāwanatanga

Archives New Zealand

December 2022

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# 1. Disclaimers

## USE OF REPORT

This report has been prepared in accordance with the Consultancy Order Services dated 1 December 2020 and variation dated 23 September 2021. We have prepared this report solely for Te Rua Mahara o te Kāwanatanga Archives New Zealand (Archives NZ) and Education New Zealand. 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 the New Zealand Auditing and Assurance Standards Board's Professional and Ethical Standard 1 (Revised): Code of Ethics for Assurance Practitioners. 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 Education New Zealand and Archives NZ, and both have 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 Archives NZ and Education New Zealand. 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

### EDUCATION NEW ZEALAND

Manapou ki te Ao | Education New Zealand (ENZ) is a Crown Agency, established and governed by the Education Amendment Act 2011. ENZ's overall purpose is to realise the social, cultural and economic benefits of international education.

ENZ:

- Promotes New Zealand as a study destination for international students and supports the delivery of education services offshore.
- Administers scholarships to help New Zealanders study overseas.

A Board appointed by the Minister of Education governs ENZ.

ENZ employs approximately 105 staff globally. In New Zealand, ENZ has offices in Auckland, Wellington and Christchurch. Offshore ENZ staff are generally co-located with other government agencies in New Zealand Embassies and High Commissions.

The organisation holds high-risk/high-value records including statistical information related to international students in New Zealand, policy documentation and board papers.

ENZ does not have a standalone information management (IM) team. IM is one of the responsibilities of the ICT team, alongside providing ICT and digital services to the organisation. As there is no IM team, ENZ have employed a part-time IM Consultant who provides limited IM support. The Senior ICT and Property Specialist, and the IM Consultant are the main IM experts with some additional support from the ICT Support Coordinator.

### SUMMARY OF FINDINGS

We assessed ENZ's IM maturity against the five maturity levels of Archives NZ's IM Maturity Assessment model. The results are summarised below:

#### Maturity Level and Number of Findings

<b>Beginning</b>	2
<b>Progressing</b>	13
<b>Managing</b>	4
<b>Maturing</b>	0
<b>Optimising</b>	0

## 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 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 of certain public offices and this audit was completed in October 2022.

### 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. These audits 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 ENZ'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). ENZ's maturity level for each topic area is highlighted under each of the respective areas. Ratings were based on the ENZ'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 ENZ. Archives NZ is responsible for following up on the report's recommendations with ENZ.

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.

The ENZ'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.

### ASSESSMENT MATURITY LEVEL

#### Governance

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
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

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
7	Self-monitoring		•			

#### Capability

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
8	Capacity and Capability		•			
9	IM Roles and Responsibilities			•		

#### Creation

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
10	Creation and capture of information		•			
11	High value / high-risk information		•			

#### Management

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
12	IM requirements built into technology systems		•			
13	Integrity of information		•			
14	Information maintenance and accessibility		•			
15	Business continuity and recovery			•		

#### Storage

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
16	Appropriate storage arrangements			•		

#### Access

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
18	Information access, use and sharing			•		

#### Disposal

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
20	Current organisation-specific disposal authorities	•				
21	Implementation of disposal decisions	•				
22	Transfer to Archives New Zealand	N/A				

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

# 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.	Progressing
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#### OBSERVATIONS

ENZ does not have an IM Strategy (the ‘Strategy’) but is currently drafting one. The draft includes alignment to ENZ’s broader strategic direction, IM principles and an implementation roadmap, which sets out how ENZ is to implement the strategic recommendations. ENZ has indicated that they intend to integrate this strategy as part of the 2023 ICT Strategy.

ENZ advised that the recommendations from this PRA audit will be used to help further inform the Strategy and roadmap.

#### RECOMMENDATION

Finalise and implement the Strategy, ensuring it follows Archives NZ’s guidance and aligns with business needs.

### 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
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#### OBSERVATIONS

ENZ has a current IM policy (the ‘Policy’), which the Board approved in August 2022. The Policy aligns with the PRA, including IM and records management requirements and references relevant legislation such as, the Official Information Act 1982 and the Privacy Act 2020. The Policy identifies record management systems, recordkeeping principles and roles and responsibilities. However, there are no references to other relevant policies such as privacy or security.

The Policy forms part of the induction training and is available to all staff and contractors on their intranet, which staff confirmed. Staff interviewed noted that there is no up-to-date IM process guidance in place to support the implementation of the Policy.

Compliance with the Policy is not actively monitored. However, when breaches are identified these are reported to the Executive Sponsor (ES), and the Chief Security and Privacy Officer, to be addressed as required. The ES is the General Manager Corporate Services and Chief Financial and Information Officer.



## RECOMMENDATION

Decide which IM processes should be documented and plan to document them.

### 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
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## OBSERVATIONS

IM governance was previously included in the ICT Steering Committee but has recently been transitioned to the Digital Working Group, which the ES chairs. The Digital Working Group is a formalised governance group with its own Terms of Reference and provides IM governance over information privacy, security and management (including physical records). However, IM governance is not formally included within the Terms of Reference nor is it a standing agenda item at the monthly meetings. IM issues and work is instead discussed as required.

There is no regular IM reporting to the ES or the Digital Working Group. However, the ES would be consulted about an IM incident or update, and would be responsible for tabling at the Digital Working Group.

Feedback provided consistently indicated that the ES is a leader for IM at ENZ. The ES performs their role through attending the Digital Working Group, supporting the development of IM documentation (e.g. the Policy) and actively promoting the value and importance of IM across the ENZ.

## RECOMMENDATION

Ensure that IM is included in the Terms of Reference and is a standing agenda item at the Digital Working Group meeting.

### 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
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## OBSERVATIONS

Business owners have some understanding of their individual and team's responsibilities for managing information. Certain areas, such as the Accountability team has effectively integrated management of information into their business activity and processes. This includes following a set naming and filing structure. In other areas, IM is more basic and adhoc with staff determining the naming and filing structure. This includes where documents are saved in SharePoint, ENZ's document management system).

Administration staff provide general advice and support to business owners and business units for managing information, particularly on how to use SharePoint. There is some support provided through the ICT team and the ES actively promotes IM principles during at ENZ-wide stand up meetings.

## RECOMMENDATION

Assign responsibility for managing information within business units to business owners.



## 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
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### OBSERVATIONS

ENZ uses the All of Government and the Ministry for Business, Innovation and Employment templates for their contracts to ensure that managing information requirements are met. Contracts and agreements with external parties reviewed referenced mandatory compliance with PRA, confidentiality and intellectual property obligations. These requirements also specifically outlined information about storage, privacy and security.

A partnership agreement between ENZ and the Ministry of Foreign Affairs and Trade outlines IM 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

Develop a periodic monitoring process to ensure suppliers are compliant with IM requirements under the PRA.

## 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
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### OBSERVATIONS

ENZ has informally identified some information of importance to Māori in consultation with its Rautaki Māori team, that was recently established. Their primary role is to ensure that Te Ao Māori principles are embedded and the implications of Te Tiriti o Waitangi settlements and other Māori agreements are acknowledged and understood.

The ICT team, particularly the IM Consultant, is working closely with the Manukura Chief Advisor Māori and the Rautaki Māori team. This is to formally identify information of importance to Māori and develop appropriate ways to improve accessibility, discoverability and care for information of importance to Māori.

### RECOMMENDATION

In consultation with the Rautaki Māori team, formally identify all information of importance to Māori and document it within the Information Asset Register (IAR) or similar.

## 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

ENZ monitors compliance with PRA requirements, standards and other relevant legislation through an annual ComplyWith survey but not the Policy. Until IM processes are developed, there is no organisation-wide monitoring of them.

The ICT team occasionally perform informal checks of staff SharePoint usage and mailbox behaviour. Anything of concern is reported to the ES, the Chief Security and Privacy Officer and is addressed accordingly.

#### RECOMMENDATION

Develop a review process to monitor compliance with the Policy and processes once developed.

## 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
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#### OBSERVATIONS

As there is no IM team, ENZ employs a part-time IM Consultant who provides IM support to the organisation. The ICT team and some administration staff also provide IM support. The ES advised that the IM Consultant and ICT team currently have sufficient skills and capacity to provide training and services across ENZ. Staff interviewed indicated that further IM resources can and is engaged from external providers, as required.

The ICT team and administration staff have access to broader professional development opportunities to support their professional development which the ES supports. The ICT team and administration staff have not had any recent IM-related professional development opportunities.

#### RECOMMENDATIONS

As part of the implementation roadmap for the IM Strategy, assess the need for IM resources to meet business needs.

### Topic 9: IM Roles and Responsibilities

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

Staff and contractors IM responsibilities are outlined in the Policy. Job descriptions provided outlined IM responsibilities and a general requirement to comply with relevant legislation including the PRA. Based on the information provided, it is unclear if all job descriptions include IM requirements.

Induction and onboarding training on IM and SharePoint is provided to all new staff. All staff reported awareness of their obligations and how to access IM advice. Advice is provided when requested, but is not regularly provided such as in the form of email reminders or updates.

Staff interviewed report that a formal and on-going programme of IM training would be beneficial. Requests for training particularly around IM processes, a refresh on roles and responsibilities, and how to efficiently search for information were noted during the interviews.

#### RECOMMENDATION

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
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#### OBSERVATIONS

Staff have a general understanding of their responsibility to create full and accurate information to support their business function. All new information at ENZ is created digitally. ENZ’s corporate staff, who create board papers, financial information and other important documents, are aware of their IM requirements.

SharePoint meets minimum metadata requirements for Archives NZ. There is appropriate metadata routinely created to support usability and reliability of information. Access controls and permissions ensure that the information is controlled. ENZ’s other core systems are OneDrive and SpeakData, which hold student records and data. However, there is currently no monitoring of information usability or reliability over any of ENZ’s IM systems.

Although the use of uncontrolled and individual environments is actively discouraged, there are currently no tools or restrictions in place to prevent this. This is to allow ENZ to access environments that may be utilised by their clients and service providers such as students. The ICT team is aware of this and currently investigating and implementing solutions to limit information created and captured in uncontrolled environments.

ENZ does not have organisation-wide naming conventions and file management processes vary between business units. This can make it difficult for staff to find information from other business units.

#### RECOMMENDATION

Identify and document information usability, reliability and trust issues so that they can be addressed.

### 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
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#### OBSERVATIONS

ENZ is currently developing a high-level IAR that captures some high-value/high-risk information. The IAR is designed to assess value and risk using criteria such as, the value to ENZ, the broader sector and the impact if the information is lost. The IAR is also used to record information containing personal details and which systems hold the information.

Although some information has been captured in the IAR, it does not provide a complete view of all high-value/high-risk information.

### RECOMMENDATION

Finalise identifying all high-value/high-risk information and document them 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.	Progressing
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#### OBSERVATIONS

IM expertise is available and sometimes sought for new technology solutions and/or upgrades. The ES is regularly involved in any new technology solutions and upgrades, applying a Corporate, Finance, Digital, and Information lens.

An example of IM expertise applied was during the decommissioning of an onsite server and data transfer to SharePoint. An IM resource was involved in assessing which information should be kept and disposed. ENZ also performed validation and testing on the transferred data to ensure preservation of data integrity and there were no unauthorised changes or loss of metadata.

#### RECOMMENDATIONS

Formalise the IM role in all new business system implementation, system upgrades and decommissioning.

### 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
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#### OBSERVATIONS

The reliability and trustworthiness of information varies across business units. As previously indicated, certain teams within ENZ have their own IM processes in place for storing information to support information reliability. Each team reported they have their own processes for storing information to ensure its reliability and findability. Staff reported they often have issues with finding other teams' information and frequently have to rely on support from the subject owner.

All staff interviewed reported variable experiences finding the final/current version of documents and often use the latest date the document was edited/saved to find it.

#### RECOMMENDATION

Document and implement standardised IM processes to support the Policy.

## 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

ENZ has strategies in place to manage and maintain digital information during business and system changes. This includes using a test environment during system implementations to ensure the quality of information is not impacted. In addition, the ICT team minimises technology obsolescence risk by ensuring that systems are updated as new versions are released.

The preservation and digital continuity needs for digital information have not been formally identified.

General accessibility to physical information is ensured through long-term storage of information, which is retained on-site. ENZ advised they plan to engage IM expertise to develop an index of all physical information and evaluate their retention requirements. As part of this work, ENZ plan to identify risks to ongoing accessibility and preservation needs for the physical information.

### RECOMMENDATIONS

List physical information so it can be effectively managed.

## 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

ENZ has a business continuity plan (BCP) and a Cyber Incident Response procedure. Both were reviewed and include recovery plans, actions required for restoring digital information, and identified critical digital systems with specific roles and responsibilities outlined. The BCP was last updated in November 2021 and the Cyber Incident Response procedure was last updated in November 2019 .

Internal systems are regularly backed up and comprehensive access controls are in place. However, there is no regular testing of the digital system backups.

The BCP does not indicate any requirement for it to be tested. Staff reported no disruption to their work when transitioning to a work from home schedule during the Covid-19 lockdowns of 2020 and 2021.

### RECOMMENDATIONS

Update the Cyber Incident Response procedure.



## 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
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#### OBSERVATIONS

Physical information is kept onsite in one of the access-controlled storage rooms in the main Wellington office. The room includes fire safety, pest control and ventilation. Access to the storage room requires an access card and a physical key, which is stored securely. All physical information is stored in labelled boxes on shelves which is sufficient to identify information.

There are appropriate storage requirements in place for digital information against unauthorised access, loss or deletion. Confidential and sensitive information is restricted to specific staff. ENZ advised of no major incidents or unauthorised access.

Digital information is stored in both Australia and Singapore.

Protection and security processes are not tested regularly. ENZ advised of no breaches or concerns regarding the protection and security of its information.

#### RECOMMENDATION

Develop a plan for regularly testing protection and security processes.

## 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
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### OBSERVATIONS

ENZ applies access controls for both physical and digital information and are in place across all digital systems, including restricting access to folders within SharePoint. The ICT team is currently updating access controls within SharePoint following a recent re-organisation of some business units within ENZ.

Some staff reported functional issues with the findability of information, naming conventions and taxonomy. Within business units there are adhoc and inconsistent IM processes. The IM Consultant and ICT team worked directly with business owners to develop structures within SharePoint during the initial set up of the system. However, some staff interviewed report that the current structures are not always reflective of their current business needs and require re-assessment.

### RECOMMENDATIONS

In consultation with business units, identify issues with the current SharePoint structure and amend to ensure it is appropriate and fit-for-purpose.

## 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 determined as either open access or restricted access .**

### 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

ENZ does not have a current and approved organisation-specific disposal authority (DA).

#### RECOMMENDATION

Develop an organisation-specific DA in line with the IAR and submit to Archives NZ for approval.

### 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.

Beginning

#### OBSERVATIONS

ENZ does not have current DA and there has been no reported instances of any disposal under the General Disposal Authorities (GDAs).

ENZ has a culture of retaining information. If staff were to delete information, this information is visible in the staff member's recycling bin for three months. Following this, it would be visible in the administrative recycling bin for six months which is monitored by the ICT team. ENZ uses a preservation hold library, which allows SharePoint to preserve files and emails for seven years. If ENZ were to permanently delete information, SharePoint alerts the ICT team to review.

#### RECOMMENDATION

Develop a plan for regular disposal to ensure that information is retained for as required.

**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.

Not applicable
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**OBSERVATIONS**

Topic 22 not applicable as ENZ was established in 2011.

## 5. Summary of Feedback

ENZ agrees with many of the findings in the report and we have started progressing many of the recommendations, however we would like the following comments to be taken into consideration:

- Re: Topic 15: Business Continuity and Recovery. We believe that we have demonstrated a greater level of maturity than reported. Our BCP is a living document in the sense that operations continue regardless of whether staff are working in the office or remotely. This has been fully enabled by ENZ's 100% cloud-based IT environment and early adoption of Zoom VC technology. All our internal processes have been digitised. ENZ has never experienced a major business disruption (through the earthquakes, office shutdowns (asbestos) and the pandemic). In regard to the recommendation, we believe that our Cyber Response procedure remains fit for purpose.
- Topic 16: Appropriate Storage Arrangement. ENZ engage Aura Security on an annual basis to conduct a security audit which includes document management in the scope. The 2022 audit identified four recommendations related to SharePoint which in part addresses the recommendation that has been made.

We have enjoyed working with Deloitte to complete the audit and believe this process will add value for us.

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Tēnā koe Grant

## Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of Manapou ki te Ao Education New Zealand (ENZ) completed 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*

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. ENZ is assessed as mostly operating the 'Progressing' maturity level.

As a small organisation, ENZ has no inhouse specialist IM staff, but contracts this expertise as needed. This works well to some extent but more specialist attention to IM is needed to improve maturity. For example, attention to improved consistency of IM in SharePoint to support staff in the use and trust of the system; understanding the information held; and disposal of information would be useful starters. Other recommendations are included in the Appendix.

### *Prioritised recommendations*

The audit report lists 19 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, and we will contact your Executive Sponsor shortly in relation to this.

Nāku noa, nā



Anahera Morehu  
Chief Archivist

**Te Rua Mahara o te Kāwanatanga Archives New Zealand**

Cc Matt Penney, Chief Financial Officer (Executive Sponsor) [matt.penney@enz.govt.nz](mailto:matt.penney@enz.govt.nz)

## APPENDIX

Category	Topic Number	Auditor's Recommendation	Archive's Comments
<b>Governance</b>	1: IM Strategy	<i>Finalise and implement the Strategy, ensuring it follows Archives NZ's guidance and aligns with business needs.</i>	This will provide a good platform to determine priorities and resources necessary to implement the roadmap.
<b>Capability</b>	8: Capacity and Capability	<i>As part of the implementation roadmap for the IM Strategy, assess the need for IM resources to meet business needs.</i>	As well as resources needed to implement the roadmap, BAU needs should be factored in.
<b>Capability</b>	9: IM Roles and Responsibilities	<i>Assess the need for ongoing IM training and deliver a programme to meet the identified needs.</i>	Staff are reported as stating that formal and on-going training would be beneficial. This request should be factored into the assessment of the need for IM resources and determined if it can be met inhouse or contracted in.
<b>Creation</b>	10: Creation and Capture of Information	<i>Identify and document information usability, reliability, and trust issues so that they can be addressed.</i>	Documentation and consistency of IM processes including standardised structures and naming conventions for SharePoint would be helpful for staff in finding and using information.
<b>Creation</b>	11: High-Value/High-Risk Information	<i>Finalise identifying all high-value/high-risk information and document them in the IAR.</i>	When the IAR is completed use this as the basis for creating an organisation specific Disposal Authority. The IAR should be kept up to date through regular and systematic maintenance.
<b>Management</b>	14: Information Maintenance and Accessibility	<i>List physical information so that it can be effectively managed.</i>	The organisation should know the information that it has created and stored as this will help determine its management. This work will also contribute to the IAR and development of a disposal authority.

Category	Topic Number	Auditor's Recommendation	Archive's Comments
Disposal	21: Implementation of Disposal Decisions	<i>Develop a plan for ensuring that information is retained for as long as required.</i>	A plan to apply the General Disposal Authorities can be developed and implemented to ensure that information is not being kept longer than is required.