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Office of the Clerk of the House of Representatives Public Records Act 2005 Audit Report

Prepared for Archives New Zealand February 2022



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1. Disclaimers

Use of Report

This report was prepared for the use of Archives New Zealand (Archives NZ) and the Office of the Clerk of the House of Representatives (OCHR). 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 (PRA). We also adhere to the independence requirements of Professional and Ethical Standard 1 (Revised): Code of Ethics for Assurance Practitioners issued by the New Zealand Auditing and Assurance Standards Board. Other than 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 OCHR 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 OCHR 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

The Office of the Clerk of the House of Representatives

The Office of the Clerk of the House of Representatives (OCHR) was established by section 14 of the 1988 Clerk of the House of Representatives Act. OCHR's primary responsibility is to provide specialist advice and assistance on parliamentary law and procedures to the House of Representatives and its committees.

OCHR has approximately 108 employees, and its only office is in Wellington.

The high-risk/high-value information OCHR holds under the PRA includes information such as, finance records, personnel files, and internal governance papers. However, OCHR holds a large portion of information that does not come under the PRA. For example, records relating to the proceedings of the House and select committees, which are managed under the Clerk of the House of Representatives Act 1988.

In 2020, the Parliamentary Service and OCHR support functions merged, with the former now responsible for the latter's IM team and services. In addition, OCHR and the Parliamentary Service have merged the two document storage systems into one integrated system, however they both remain as two separate entities.

Summary of Findings

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

Maturity Level	Beginning	Progressing	Managing	Maturing	Optimising
No. of Findings	2	5	13		

3. Introduction

Background

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

- full and accurate records are created and maintained, improving business efficiency, accountability and government decision-making, and in turn, enhancing public trust and confidence in government;
- the 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 OCHR'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). OCHR's maturity level for each topic area is highlighted under each of the respective areas. Ratings were based on OCHR officials' responses to questions during the interviews and the supporting documents provided in line with the IM Maturity Assessment guidelines.

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

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.

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

4. Information Management Maturity Summary

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

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

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

OCHR does not have a current IM strategy. Planning has started for an IM strategy as part of the Project Scoping Brief FY21-22 – Information Management Strategy and Roadmap. However, the strategy has been delayed to incorporate insights from this assessment into its development.

While no current strategy exists, priority is given to IM due to the nature of the work OCHR performs. The Executive Sponsor, who champions initiatives, meets regularly with the IM team to discuss relevant issues. Feedback consistently stated there is appropriate support.

Recommendation

1. Execute planning, drafting and implementing of the IM 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

The OCHR has a current IM policy (the IM policy), which was updated in June 2020 and is scheduled to be updated again in 2022. The IM policy aligns with the PRA, IM and records management requirements and references the Privacy Act. However, there is no reference to related policies such as security and no mention of IM within the Code of Conduct.

OCHR does have up-to-date guidance document available on Objective, although roles and responsibilities are described at a high level and lack specificity. Objective functions as OCHR's Enterprise Content Management (ECM). A job description for a Senior Information Analyst explicitly covers the PRA and roles and responsibilities for IM. However, there appears to be inconsistent application of IM requirements across job descriptions as direct IM responsibility is not always outlined. This was observed both through a review of job descriptions and in the focus group interview conducted.

Induction training is required for all new staff and contractors, which includes introduction to the policy, where to find it and personal and legislative responsibilities for IM. There is also further Objective training available on request for all staff, through the IM team.

Recommendation

 Ensure that IM Policy is updated when the IM Strategy is published to ensure consistency between the strategy and policy.

Topic 3: Governance arrangements and Executive Sponsor

The Executive Sponsor has strategic and executive responsibility for overseeing the management of information a public sector organisation.

Managing

Observations

OCHR has an informal IM governance group, which meets regularly, whose attendees include the Executive Sponsor and the IM Manager. It is not a formalised group, with a defined Terms of Reference, agenda, recorded meeting minutes or regular reporting. However, it does meet monthly to discuss IM related issues. The OCHR also has an Operational Management Team which IM staff can report to if required.

The Executive Sponsor performs their role through attending this IM group, supporting the merge of IM services with the Parliamentary Service, and sponsoring IM papers to the Senior Leadership Team (SLT). Staff also reported that the Executive Sponsor actively promotes the value and importance of IM across the organisation.

Recommendation

 Develop regular quarterly reporting to the Operational Management Team, which include updates on the information management strategy and roadmap progress and implementation.

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

Business owners understand their individual and team's responsibilities for managing information. Objective is the primary system used by all business units and records both physical and digital information. There is consistent taxonomy embedded in Objective, along with retention requirements. Additionally, there is an automatic notification whenever saving a document prompting consideration of whether saved information is of corporate value.

Activity within Objective is monitored and reported on a quarterly basis. Though this monitoring only records general business unit use at a high level, rather than any specific information that enables deeper analysis.

In 2020 OCHR and the Parliamentary Service (PS), merged its support functions, though remain two separate entities. This merger included the creation of a cost to service model, which is reviewed annually. This means PS staff members act as OCHR's IM team. There are six full time IM employees within PS that are available to OCHR. This is a new model that all staff viewed as a positive change, and reported they had enough support from the IM team.

IM expertise is sometimes included in business change and development, though is not consistently applied.

Recommendations

- 1. Improve monitoring of Objective, to increase the value/analysis of information collected.
- 2. Formalise IM expertise involvement in business change process and development.

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.

Managing

Observations

OCHR has several outsourced functions, this includes service agreements with Objective Corporation Ltd, Kordia Ltd and Snaphire NZ Ltd, for recruitment services. All of these contracts contain IM statements which align with the PRA and outlined roles and responsibilities.

OCHR's most significant collaborative arrangement is with PS. There are several documents which outline the services, which PS provides to OCHR, and the use of OneObjective. Several memorandums and the cost to service model support this agreement and document roles and responsibilities.

Recommendation

1. Develop a monitoring process for outsourced functions to ensure IM requirements are met.

Topic 6: Te Tiriti o Waitangi

The Public Records Act 2005 and the information and records management standard supports the rights of Māori under Te Tiriti o Waitangi/Treaty of Waitangi to access, use and reuse information that is important to Māori.

Beginning

Observations

IM implications within the Treaty of Waitangi (ToW) settlement agreements and other agreements with Māori are not known. Information of importance to Māori is not identified under the PRA.

OCHR, in conjunction with PS, is currently developing a Te Ao Māori Strategy, which aims to develop strong te reo and tikanaga competencies across both organisations, including a Te Ao Māori approach to all aspects of their work.

Recommendations

- 1. Identify information of importance to Māori that OCHR holds, which is covered by the PRA. This may be included as a category within the Information Asset Register.
- 2. Include and consult IM expertise in developing the Te Ao Māori strategy to ensure Te Tiriti o Waitangi principles are included IM practices.

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

There is some monitoring of compliance with OCHR internal IM policy and processes. This compliance is shown through dashboard reporting of high-level Objective use per business unit and the legislative compliance ComplyWith survey. IM requirements from the PRA, standards and other relevant legislation are identified and documented through ComplyWith. ComplyWith acts as a monitoring survey to assess what standards and legislation they need to adhere to.

Corrective actions for any non-compliance of the IM policy is addressed by individual managers as a performance issue. This may lead to inconsistency in addressing the non-compliance, though staff reported non-compliance is rare.

Recommendations

- 1. Establish regular monitoring of compliance with internal IM policy and processes.
- 2. Once the IM strategy is approved, regularly monitor the implementation of this strategy.

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.

Managing

Observations

OCHR's current IM team, through the cost to service agreement with PS, consist of six full time IM staff, including a manager. The IM team have sufficient skills and capacity to provide support to both OCHR and PS and offer access to services an internal IM function would not have otherwise. Although the IM team recognised recruiting more IM staff would improve their progress in uplifting IM, they have sufficient resources to deliver their current workload.

Despite there not being an IM strategy, the IM team does have a Collections and Information Team Work Plan 2021-2022, which outlines all their current projects and who is involved. Reviewing and updating IM job descriptions is not included in the work programme.

IM staff also reported access to professional development courses, both internal and external, when requested. The Executive Sponsor has financial delegations to invest in IM training, therefore does not require approval from SLT for broader training.

Recommendation

Ensure IM job descriptions are regularly reviewed and updated to meet future business needs.

Topic 9: IM Roles and Responsibilities

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

Managing

Observations

Staff and contractors IM responsibilities are outlined in the IM policy which is available on Objective. There is also mandatory induction training on IM. All staff reported awareness of their obligations and access to the IM team's expertise if required. Additional training is available on request, though is not regularly provided.

Within the job descriptions provided, IM is referred to as a technical skill in some roles outside of the IM team. A job description specific to the IM team had sufficient and relevant detail of the staff members responsibility to manage information. Based on the information provided, it is unclear if all job descriptions include IM requirements.

Recommendation

1. Assess need for ongoing or refresher IM training for all staff and contractors.

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 understand their responsibility to create full and accurate information to support their business function due to the mandatory IM induction training and access to IM expertise. Information critical to support business functions is identified in the Information Service Business Continuity Plan (BCP) and Information Asset Register (IAR).

OCHR's primary system is Objective with retention controls and audit trails of how much each business unit is using Objective. IM staff monitor and address information usability in an ad hoc manner through fixing reported issues and spot checking, rather than through a structured approach which includes regular reviews. Within the training, use of other systems such as personal drives or Dropbox, are discouraged.

New information is created digitally, though Objective can track files of both physical and digital information.

Recommendation

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

Topic 11: High-Value/High-Risk Information

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.

Managing

Observations

The IM team has created an Information Asset Register (IAR) to capture information, including information classified as high-value/high-risk. The IAR assesses value and risk using criteria. The IAR also records information containing personal information and the security classification (which will determine who can have access to the information).

It unclear when the IAR was last updated or when it will be reviewed next.

Recommendation

1. Ensure the IAR is regularly updated and risks on the register are addressed.

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. It must be 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

Observations

IM expertise is available and sometimes sought for new technology solutions and/or upgrades. However, this does not include all technology solutions. The most recent involvement was merging OCHR and PS's document management systems to form OneObjective, which automatically meets mandatory metadata requirements. The move to OneObjective was a significant piece of work for the IM team, and has allowed for a positive merger of information and services.

The IM team is wanting to expand their involvement in new technology solutions and/or upgrades.

Recommendation

 Formalise the requirement to involve IM staff in all new business systems, implementations, system upgrades and system 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.

Managing

Observations

The reliability and trustworthiness of information is largely consistent across business units. Staff reported a positive user experience, with appropriate access controls and integrity of information. They reported a high level of understanding of their responsibility to create full and accurate records, and access to IM expertise through a service request, if something arises outside of their capability. An area for improvement staff reported on, is some inconsistency within naming convention outside of systems which meet metadata requirements.

Within OneObjective there is a function to separate the PS and OCHR information to make finding information specific to each organisation easier.

Recommendation

1. Develop consistent naming conventions and guidance for teams on all PRA requirements when using systems that do not automatically meet requirements.

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

There is a clear process to manage and maintain physical or digital information during business and system changes in place.

General accessibility to physical information is ensured through long-term storage of information, which is retained onsite in two basement storage rooms. OCHR retain a summary of contents and an index of all physical information moved to on-site storage in Objective.

Most information is created digitally, with the majority of business units having moved towards a digital model. The IM team has recently tabled a paper advocating for Human Resources to be paperless. The implementation of this is currently underway.

Digital information remains accessible overtime through auto retention functions per systems, on-going development of a retention policy, security processes and continuous updates of systems to prevent technological obsolesce.

Recommendation

1. Identify IM risks and mitigation strategies for physical and digital records.

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

PS has multiple Business Continuity Plans (BCP) that apply to systems that are provided to OCHR. All BCP's include an activation guide, decision tree, incident response team, risk analysis and outline of roles and responsibilities. They focus more on ensuring on-going information, rather than specifics to IM. The plans are all thorough and up to date.

OCHR also has a Disaster Management Plan for Paper Records. This plan identified critical information, key risks, disaster prevention, roles, and responsibilities, then a prioritisation of records. Although the plan is thorough it has not been updated since 2018.

Internal systems are regularly backed up and comprehensive access controls are in place. Backups are taken daily, weekly, monthly, and annually and there is regular testing of digital system backups to ensure information can be restored.

Recommendation

1. Update the Disaster Management Plan for Paper Records.

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

Physical information is kept onsite in two access-controlled basement storage rooms. They include fire safety, pest control, flood mitigation and ventilation. There are several access-controlled doors before reaching either basement, and audit logs of entry may be obtained from security. However, there is no regular monitoring or reporting on physical security risks or unauthorised access.

A large portion of digital information storage is managed through third-party providers, for example, Objective. Requirements for information security and protection are built-in to the respective service contracts.

There is appropriate protection and security in place for digital information. This includes cyber security, malware technology, access controls and principle of least privileged. Staff do not have permission to delete files. All digital information is stored in New Zealand and follows the Government Chief Digital Officer policy. Risk assessments are done on new systems which the Executive Sponsor signs off.

Recommendation

 Identify and regularly report physical information protection and security risks to the Executive Sponsor and IM governance group.

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, in order 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

OCHR applies access controls for both physical and digital information. Access controls are in place across all digital systems, including restricting access to folders within shared drives or access to whole systems. Access request permission is a rigorous process which is assessed through role requirements and is approved by the IM team.

Objective automatically meets metadata requirements, though it was acknowledged that the taxonomy could be improved. Staff reported a high level of understanding of requirements, and access to IM expertise if they require help. Staff also reported instances where the IM team has actively contacted individuals when information is stored incorrectly.

There was a significant amount of work done due to the merging of two Objectives (OCHR and PS) into OneObjective to investigate why things were structured in a certain way and to develop consistency.

OCHR still use digital systems that do not meet metadata requirement, such as shared drives.

Recommendations

- 1. Decommission systems that do not meet metadata requirements.
- 2. Continue to develop consistent taxonomy for use across the organisation.

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.

Managing

Observations

OCHR has a current approved Disposal Authority (DA). A regular review cycle of the DA is planned to be included in the 2022-2023 workplan for the IM team.

Staff and contractors understand the disposal requirements relevant to the information they create, which is a core part of the induction training. In addition, the IM team is used as knowledge resource.

Recommendation

 Monitor changes to business functions and the operational environment to inform updates to the organisationspecific 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

OCHR has information retention embedded in Objective but it does not cover information contained in emails or shared drives. Management has recently approved the disposal of personnel and financial records which will now occur regularly. However other types of information disposal only occur on an ad-hoc basis. The DA covers most formats and there is evidence of disposal being actioned from the OCHR.

The OCHR requires internal approval to carry out the disposal of information. A memo is sent to the relevant manager to notify them of the disposal and final sign off is provided by the Executive Sponsor. The digital file is moved to a shadow taxonomy. Physical files are destroyed in secure bins.

Recommendation

1. Ensure the destruction of physical and digital information is secure, complete, irreversible and regular.

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

OCHR does have information over 25 years old of archival value. This is identified within a tab of the IAR with its location, owner, access, format and risks. The register includes both physical and digital information.

Physical information which is identified of archival value was regularly transferred to Archives NZ in the past. However, no physical information is currently being transferred to Archives NZ due to restrictions. OCHR is not maintaining a list of information for when Archives NZ starts re-accepting physical information.

Recommendation

1. Develop a transfer plan for digital information to Archives NZ, and physical information when they are able to receive it in the future.

6. Summary of feedback

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

This report is a reasonable evaluation of the current information management maturity at OCHR. Generally the ratings given align with our internal assessments.

Observations and recommendations from this report are timely, as they will inform the upcoming review of IM functions, and the development of an IM strategy and roadmap. OCHR appreciates the work of the audit team in developing these recommendations.

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Archives New Zealand, 10 Mulgrave Street, Wellington Phone +64 499 5595

> Websites <u>www.archives.govt.nz</u> www.dia.govt.nz

David Wilson Clerk of the House of Representatives Office of the Clerk of the House of Representatives David.wilson@parliament.govt.nz

Tēnā koe David

Public Records Act 2005 Audit Recommendations

This letter contains our recommendations related to the recent independent audit of the Office of the Clerk of the House of Representatives (OHCR) 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. Except for a few areas the OCHR is operating solidly at the 'Managing' level. Having a larger IM team operating across the Parliamentary Service and the OCHR provides a resource which reportedly meets the current capacity and capability needs. With their current level of IM expertise, the OCLR can benefit from their skills when designing and implementing digital information and data systems and solutions.

As is stated in the audit report, this audit covers OCHR's corporate records. The OCHR also creates and maintains parliamentary records, which are not covered by the PRA and therefore not included in this audit.

Prioritised recommendations

The audit report lists 24 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 six 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, we 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

Antony Moss

Acting Chief Archivist Kaipupuri Matua

Archives New Zealand Te Rua Mahara o te Kāwanatanga

Cc James Picker, Clerk Assistant (Executive Sponsor)

APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Governance	1: IM Strategy	Execute planning, drafting of the IM strategy.	Section 6: Summary of Feedback from the audit report states that the organisation will use the recommendations to inform their upcoming work on their IM strategic direction.
Governance	7: Self-Monitoring	Establish regular monitoring of compliance with internal IM policy and processes.	Monitoring for consistency across the organisation would be beneficial. Also relates to the recommendation for Topic 10: Creation and capture of information to monitor information reliability and usability specifically around document naming.
Creation	11: High-Value/High- Risk Information	Ensure the IAR is regularly updated and risks on the register are addressed.	The organisation already has established an IAR but the work of maintaining it in a usable condition needs to be prioritised and scheduled.
Management	12: IM Requirements built into Technology Solutions	Formalising the requirement to involve IM staff in all new business system implementations, system upgrades and system decommissioning.	IM staff have completed the significant merger to the OneObjective system and are well positioned to be involved in other systems and upgrades. This should be supported at the senior leadership level.
Access	18: Information Access, Use and Sharing	Decommission systems that do not meet metadata requirements.	Decommissioning the shared drives means less monitoring and maintenance of a system that does not meet IM requirements.
Disposal	21: Implementation of Disposal Decisions	Ensure the destruction of physical and digital information is secure, complete, irreversible and regular.	This applies across all repositories containing information and records.