Deloitte.



Te Reo Whakapuaki Irirangi

Māori Broadcasting Funding Agency

Public Records Act 2005 Audit Report

Prepared for Te Rua Mahara o te Kāwanatanga | Archives New Zealand November 2023



Table of Contents

| 1. | Disclaimers | 2 |
|----|---|----|
| 2. | Executive Summary | 3 |
| 3. | Introduction | 4 |
| 4. | Information Management Maturity Summary | 5 |
| 5. | Audit Findings by Category and Topic | 6 |
| | Governance | 6 |
| | Self-Monitoring | 9 |
| | Capability | 10 |
| | Creation | 12 |
| | Management | 15 |
| | Storage | 16 |
| | Access | 17 |
| | Disposal | 18 |
| 6. | Summary of Feedback | 20 |

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 (Te Rua Mahara) and Te Reo Whakapuaki Irirangi | Māori Broadcasting Funding Agency (Te Māngai Pāho). It was prepared at the direction of Te Rua Mahara 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 Te Rua Mahara 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 Te Rua Mahara.

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 Te Māngai Pāho and Te Rua Mahara, 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 Information Management (IM) Maturity Assessment of Te Rua Mahara.

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 Te Rua Mahara and Te Māngai Pāho. 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 Te Rua Mahara. These procedures are designed to identify control weaknesses but cannot be relied upon to identify all weaknesses.

2. Executive Summary

TE REO WHAKAPUAKI IRIRANGI | MĀORI BROADCASTING FUNDING AGENCY

Te Reo Whakapuaki Irirangi | Māori Broadcasting Funding Agency (Te Māngai Pāho) is a Crown Entity established under the Broadcasting Amendment Act 1993. Te Māngai Pāho is governed by a Board that reports to the Minister for Māori Development. The primary function of Te Māngai Pāho is to promote Māori language and culture. This involves making available funding streams to create, deliver and promote Māori media projects, as well as opportunities for industry training and development.

The mission of Te Māngai Pāho is: Tuhia te hā o Te Reo Māori ki te rangi, e kaha ai te mapu o te manawa ora, e rekareka ai te taringa whakarongo, e Waiwai ai, te karu mātakitaki | Bringing the joy of Māori language to all listeners and viewers.

Te Māngai Pāho holds the following high-value/high-risk information:

- Board papers
- Research papers
- Funding frameworks
- Budget bids.

The Executive Sponsor (ES) is the Acting Manager Corporate Services, who has been responsible for information management (IM) since July 2023. There are 15 full-time employees (FTE) at Te Māngai Pāho, most of whom work remotely across New Zealand, with the head office in Wellington.

SUMMARY OF FINDINGS

We assessed the IM maturity of Te Māngai Pāho against the five maturity levels of the IM Maturity Assessment issued by Te Rua Mahara. The results are summarised below:

Maturity Level and Number of Findings

| Beginning | 3 |
|-------------|----|
| Progressing | 15 |
| Managing | 2 |
| Maturing | - |
| Optimising | - |

3. Introduction

BACKGROUND

Te Rua Mahara provides IM leadership across the public sector. This is achieved through monitoring public offices' 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 Te Rua Mahara monitoring and reporting on the state of public sector IM. It is one of the key components of their Monitoring Framework, which also includes a biennial 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 of Te Māngai Pāho was completed in September 2023.

OBJECTIVE

The objective of the audit is to identify IM strengths and weaknesses within the public office, prioritising areas that need attention and recommending improvements. These audits assist organisations to improve their IM maturity and to work more efficiently and effectively.

SCOPE

Deloitte has undertaken an independent point-in-time assessment of the IM practices at Te Māngai Pāho against the IM Maturity Assessment. The IM Maturity Assessment aligns with the PRA and the mandatory Information and Records Management Standard (the Standard) issued by Te Rua Mahara. Topics 17 and 19 of the IM Maturity Assessment are only applicable to local authorities and have therefore been excluded for the purposes of this audit.

The IM Maturity Assessment classifies the maturity of IM practices from "Beginning" (least mature) to "Optimising" (highest maturity level). The maturity level of Te Māngai Pāho for each topic area is highlighted under each of the respective areas. Ratings were based on Te Māngai Pāho staff responses to questions during in-person interviews and the supporting documents provided pre-audit.

Te Rua Mahara provided Deloitte with the framework including the specified audit plan, areas of focus for the PRA audits, and administrative support. Deloitte completed the onsite audit and audit report, which Te Rua Mahara reviewed before being released to Te Māngai Pāho. Te Rua Mahara is responsible for following up on the report's recommendations with Te Māngai Pāho.

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 in focus groups. As such, this audit does not relate to an Audit as defined under professional assurance standards.

Te Māngai Pāho feedback to this report is set out in Section 6.

4. Information Management Maturity Summary

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

| | As | sessed Matu | rity Level | | | |
|-----|--|-------------|-------------|----------|----------|------------|
| No. | Торіс | Beginning | Progressing | Managing | Maturing | Optimising |
| | | Governar | nce | | | |
| 1 | IM Strategy | | • | | | |
| 2 | IM Policy | | • | | | |
| 3 | Governance Arrangements & | | | | | |
| | Executive Sponsor | | • | | | |
| 4 | IM Integration into Business | | • | | | |
| 5 | Processes Outsourced Functions and | | | | | |
| 5 | Collaborative Arrangements | | • | | | |
| 6 | Te Tiriti o Waitangi | | • | | | |
| | | Self-monite | oring | | | |
| 7 | Self-monitoring | | | | | |
| - | Self-monitoring | Capabili | + | | | |
| 8 | | Саралії | ly | | | |
| | Capacity and Capability | | • | | | |
| 9 | IM Roles and Responsibilities | • | | | | |
| | 1 | Creatio | n | 1 | 1 | 1 |
| 10 | Creation and Capture of Information | | • | | | |
| 11 | High Value / High Risk Information | • | | | | |
| | | Managem | ient | • | • | • |
| 12 | IM Requirements Built into | | • | | | |
| | Technology Systems | | • | | | |
| 13 | Integrity of Information | | • | | | |
| 14 | Information Maintenance and Accessibility | | • | | | |
| 15 | Business Continuity and Recovery | | • | | | |
| | | Storage | e | 1 | | 1 |
| 16 | Appropriate Storage Arrangements | | | • | | |
| | | Access | | | | |
| 18 | Information Access, Use and Sharing | | • | | | |
| | | Disposa | | | | |
| 20 | Current Organisation-specific | | | | | |
| | Disposal Authorities | | | • | | |
| 21 | Implementation of Disposal | | _ | | | |
| | Decisions | | • | | | |
| 22 | Transfer to Te Rua Mahara | • | | | | |

Note: Topics 17 and 19 of the 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

OBSERVATIONS

Te Māngai Pāho intends to finalise the draft IM Strategic Framework (the Strategy) after reviewing the results of this audit. The Strategy:

- Outlines roles and responsibilities and governance requirements
- Defines the standards, expectations and responsibilities for managing information assets
- Addresses how legal obligations, business needs and stakeholder expectations are to be met.

Senior staff are aware of the Strategy and are supportive of IM objectives and any planned uplift of IM practices.

RECOMMENDATION

Approve the Strategy and socialise with relevant staff.

Topic 2: IM Policy and Processes

An information management policy supports the organisation's information management strategy and provides a foundation for information management processes.

Progressing

OBSERVATIONS

The Information Policies manual (the Manual) incorporates the IM policy requirements. The Manual contains policies on the use of the internet and email, information security, portable computing devices and privacy. The purpose of the Manual is to provide an IM framework and assigns roles and responsibilities for ensuring that full and accurate records are created. The Manual aligns with the Standard issued by Te Rua Mahara.

Staff interviewed were not all aware of the Manual. They stated that IM practices were embedded through on the job experience, with assistance from managers and/or team members when starting in a role.

The Manual was last updated in 2019 and is scheduled to be updated to align with the Strategy after this audit has completed.

Public Records Act 2005 Audit Report | Audit Findings by Category and Topic

RECOMMENDATION

Update the Manual to align with the Strategy and socialise with relevant staff and contractors.

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.

OBSERVATIONS

The ES is the Acting Manager Corporate Services. They are aware of their oversight and monitoring role and are supported by an external IT provider.

The Audit and Risk Committee (ARC) updated its Charter in August 2023 to include IM governance roles and responsibilities. This also includes identifying and mitigating information asset risks and advising on resource allocation to effectively manage information assets.

There is no formalised reporting on IM initiatives and programmes to the ES. However, the external IT provider provides weekly and fortnightly reports on the use of systems.

RECOMMENDATION

Ensure IM is a standing item on the ARC agenda.

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

Progressing

OBSERVATIONS

Company Drive is the main Electronic Document Management System (EDMS) used at Te Māngai Pāho and runs on SharePoint. Final versions of documents are stored in Company Drive alongside supporting documents for corporate services functions. There is also a contract management system (CMS), Te Pūahatanga, for its core business functions. Other systems include payroll and HR.

Te Pūahatanga has automatic versioning for contractual documents and both Company Drive and Te Pūahatanga meet minimum metadata standards.

Roles and responsibilities for IM were included in job descriptions reviewed based on the level of the role. These are also further elaborated in the draft Strategy and the Manual. However, staff were not aware of IM responsibilities in the job descriptions or the Manual. This may be in part due to their long employment tenure and not receiving any induction or refresher training.

Te Māngai Pāho has a draft Records and Information Management Plan 2023/2024 (draft Records and IM Plan), which supports the draft Strategy. It sets out the operational pathway for improving the quality, availability, and effective use of records.

RECOMMENDATION

Identify training needs to assist staff understand their IM responsibilities and deliver as needed.

Public Records Act 2005 Audit Report | Audit Findings by Category and Topic

Topic 5: Outsourced Functions and Collaborative Arrangements

Outsourcing a business function or activity or establishing collaborative initiatives does not lessen an organisation's responsibility to ensure that all requirements for the management of information are met.

Progressing

OBSERVATIONS

Te Māngai Pāho has contracts with third parties for outsourced business functions.

A sighted contract between a third-party and Te Māngai Pāho contains general IM details and requirements and clauses relating to confidentiality, data integrity and security. However, not all contracts reviewed explicitly outline roles and responsibilities for IM practices.

There is no regular monitoring of contracts.

RECOMMENDATION

Identify requirements for managing information and embed in contracts for outsourced functions and collaborative arrangements.

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

Te Māngai Pāho is currently determining what information to retain long-term which may be of importance to Māori (noting that this information is created to support delivering services to Māori). Productions that are broadcast are usually sent to Ngā Taonga Sound & Vision, as the audio-visual archive for Aotearoa New Zealand.

RECOMMENDATION

Finish investigating the information held to determine the degree of importance to Māori and incorporate this into an Information Asset Register (IAR) once established

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

Te Māngai Pāho uses an external third-party legislative compliance tool at six-month intervals to monitor compliance with its legislative requirements. An objective in the draft Records and IM Plan includes establishing a regular review process of IM practices. The first one has not yet been scheduled but is intended for Quarter 3 of the 2023/2024 financial year. Te Māngai Pāho does not currently monitor IM activities against the Manual.

The external IT consultant provides weekly and monthly reporting on IT usage. This reporting includes security, such as potential breaches and antivirus notifications, and system usage information.

RECOMMENDATION

Identify IM activities to be monitored when the Manual is updated and implement regular reporting on these activities.

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 ES is the only internal IM resource, and their substantive role is not IM-specific. They are supported by an external IT provider, who has consulted to Te Māngai Pāho since 2006 on a periodic basis. In addition, further external support is provided from another provider for their IT systems.

Te Māngai Pāho is currently in the process of assessing its IM capacity and whether additional support is required.

All employees have access to a professional development budget including for IM training.

RECOMMENDATION

Complete the assessment of IM capacity and capability and decide if extra resource is needed for improvement activities.

Topic 9: IM Roles and Responsibilities

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

OBSERVATIONS

Roles and responsibilities for IM are included in job descriptions, the Strategy and Manual. However, staff were not aware of the Manual and induction training on IM is not provided. Instead, managers and team leaders are relied on to provide IM knowledge to staff.

RECOMMENDATION

As for Topic 4: Identify training needs to assist staff understand their IM responsibilities and deliver training as needed.

CREATION

It is important to take a systematic approach to the management of government information, and this starts with an understanding of what information must be created and captured. It is expected that public offices create and capture complete and accurate documentation of the policies, actions, and transactions of government. Knowing what information assets are held by public offices is essential to IM practice.

Topic 10: Creation and Capture of Information

Every public office and local authority must create and maintain full and accurate information documenting its activities.

Progressing

OBSERVATIONS

Te Māngai Pāho uses Company Drive and Te Pūahatanga as their main document management systems. Staff are aware of their responsibilities for creating information, particularly when created in Te Pūahatanga.

Staff reported frequent collaboration to create information between business units. Experiences with creating and capturing information differs between business units, though all reported that these were easily resolved. Te Māngai Pāho has a taxonomy within Company Drive, however this requires updating to ensure it reflects core business function requirements. This will assist in the findability of information stored within Company Drive.

RECOMMENDATION

Update the taxonomy and file structure within Company Drive to reflect business practices and needs.

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. Beginning

OBSERVATIONS

Te Māngai Pāho does not have an IAR. Developing and maintaining an IAR is included as a priority in the draft Records and IM Plan.

RECOMMENDATION

Ensure that the development of an IAR is included in the Strategy.

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

OBSERVATIONS

Te Māngai Pāho has not customised their Company Drive software from its default settings.

Previous staff who acted as the ES, and the external IT provider, have not been involved in system changes such as the transition from a shared drive to Company Drive. However, the updated ARC Charter includes a requirement to provide oversight over the procurement of new business systems to ensure IM requirements are met. The ARC has not yet met since updating the Charter in August 2023.

RECOMMENDATION

Formalise requirements to include IM expertise when commissioning new or upgraded systems.

Topic 13: Integrity of Information

| Information should be managed so that it is easy to find, retrieve and use, while also being secure | |
|---|-------------|
| and tamper-proof. | Progressing |

OBSERVATIONS

Staff interviewed were confident in the integrity of information available on Company Drive within their business unit's file structure. There was more variability in the experience of finding and accessing information between business units due to file structures and naming conventions. However, due to the size of the organisation, staff advised it was as easy to ask the document owner directly.

Within Te Pūahatanga, documents are regarded as being highly reliable and trustworthy and staff were confident in the integrity of this information.

RECOMMENDATION

Ensure that user experience issues with finding and retrieving information are identified, documented, and addressed.

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

Te Māngai Pāho holds the majority of its physical information in an off-site third-party storage facility. Information held offsite was reviewed for some categories of information in 2021, which resulted in some information being disposed. Te Māngai Pāho does not have a formalised plan for preserving physical information.

Te Māngai Pāho recently moved from an on-site server to the cloud for their main document repository system. Other systems are also cloud-based, though their legacy finance system runs on a server, which will be decommissioned after the files are cleared for disposal.

RECOMMENDATION

Identify digital continuity needs for digital information and ensure plans are in place to address these.

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.

Progressing

OBSERVATIONS

Te Māngai Pāho has an organisation-wide Business Continuity Plan (BCP) which was last updated in 2017. The BCP outlines:

- Plans for accessing information in the event of a staff member's extended leave of absence
- Frequency of back-ups to the cloud
- That physical information is held but does not include a plan for its preservation.

The BCP does not state what critical information has been identified for recovery.

The ES would be included in reviewing and contributing to the BCP when it is updated.

A Software-as-a-Service agreement sighted showed that there were contractual targeted recovery times for one of the systems Te Māngai Pāho uses. The external IT provider ensures that back-ups are taken every eight hours for systems they oversee. These back-ups are stored in a server in another New Zealand city or in Australian servers. Testing the recovering of back-ups generally occurs every two years. The IT provider is intending to perform another restoration test with Te Māngai Pāho early in 2024.

RECOMMENDATION

Update the BCP to ensure that it is current and outlines the critical information to be recovered.

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 held on-site is stored in a locked room which only selected staff members can access. The ES controls access to this room. This physical information is largely a duplicate of the digital files due to some staff preferring physical file copies. Fire controls are in place and files are stored off the floor either in boxes or plastic binders, which are clearly labelled. Current physical files are stored in a locked file cabinet in the main office.

Company Drive has a soft-delete function which places deleted documents in a recycling bin for 30 days. This allows for retrieval if an unauthorised deletion were to occur. It is also able to generate audit logs if required.

There is no formalised reporting to the governance group (ARC) about destruction and storage arrangements. However, if incidents were to occur regarding security, privacy, or breaches of the Manual, these would be reported to the ES.

RECOMMENDATION

Identify risks to information storage and ensure these are monitored and reported to ARC.

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.

OBSERVATIONS

Te Māngai Pāho has a taxonomy and file structure, however it is inconsistently applied across business units. The file structure requires updating as the same document could be filed within two or more places within its taxonomy due to the file structure having folders with overlapping functions for some areas.

Access controls for digital information are updated regularly and the ES has full administrative privileges across all systems. Staff access is restricted from files they do not need to access, such as HR and payroll files. Company Drive and Te Pūahatanga both meet minimum metadata requirements.

IM processes are applied to some information shared with third parties. This includes access controls within Te Pūahatanga that are applied to a partner organisation which requires access to facilitate funding. This restricts the partner organisation's staff to viewing only documents required for their role.

RECOMMENDATION

Actively maintain the taxonomy to ensure reliable management and discovery of information.

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 Te Rua Mahara (or have a deferral of transfer) and be determined as either "open access" or "restricted

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

Te Māngai Pāho has a current and approved agency-specific Disposal Authority (DA). The DA covers all information and business functions and was authorised in February 2019. Te Māngai Pāho intends to review its DA in 2024 and subsequently if there is a change to the internal classifications of documents they create.

RECOMMENDATION

Regularly review the organisation-specific DA to ensure that it reflects business and legislative changes.

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

Te Māngai Pāho does not regularly dispose of digital information. There is a culture of retaining digital records. However the draft Records and IM Plan includes a plan to routinely dispose of information.

Te Māngai Pāho has disposed of physical information through their third-party storage provider. In 2021, they used an external IT provider for disposing some physical information. They have produced a report showing how General Disposal Authorities (GDAs) were applied to files determining whether they could be disposed.

RECOMMENDATION

Ensure the Strategy includes the development of a disposal implementation plan for physical and digital information.

Topic 22: Transfer to Te Rua Mahara

Information of archival value, both physical or digital, should be regularly transferred to Te Rua Mahara or a deferral of transfer should be put in place.

Beginning

OBSERVATIONS

Te Māngai Pāho has identified some of the information they hold which is over 25 years old. However, Te Māngai Pāho does not have a plan regarding the transfer of information to Te Rua Mahara.

RECOMMENDATION

Identify digital records that could be transferred and discuss transfer with Te Rua Mahara.

Summary of Feedback

TMP Management Response

We agree with the auditors' recommendations on all areas for improvement. We acknowledge that we need to improve our information management, particularly in the areas of training, upskilling and raising awareness of IM responsibilities and roles among our staff. Additionally, we agreed that our taxonomy and file structure should be improved to enhance findability, as well as our BCP, IAR, and strategy documents should be updated to incorporate the audit recommendations.

We will update our IM strategy and policies, including the current yearly plan, to address each recommendation. This will require more resourcing than we currently allocate to IM, so we will take this into consideration as we examine our organisational needs. Our aim will be to move all our assessments to 'managing' as soon as is practicable and to ensure IM receives appropriate resourcing for implementation and long-term sustainability.



Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organisation"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte Asia Pacific Limited is a company limited by guarantee and a member firm of DTTL. Members of Deloitte Asia Pacific Limited and their related entities, each of which is a separate and independent legal entity, provide services from more than 100 cities across the region, including Auckland, Bangkok, Beijing, Bengaluru, Hanoi, Hong Kong, Jakarta, Kuala Lumpur, Manila, Melbourne, Mumbai, New Delhi, Osaka, Seoul, Shanghai, Singapore, Sydney, Taipei and Tokyo

Deloitte is a leading global provider of audit and assurance, consulting, financial advisory, risk advisory, tax and related services. Our global network of member firms and related entities in more than 150 countries and territories (collectively, the "Deloitte organisation") serves four out of five Fortune Global 500[®] companies. Learn how Deloitte's approximately 330,000 people make an impact that matters at www.deloitte.com.

Deloitte New Zealand brings together more than 1500 specialist professionals providing audit, tax, technology and systems, strategy and performance improvement, risk management, corporate finance, business recovery, forensic and accounting services. Our people are based in Auckland, Hamilton, Rotorua, Wellington, Christchurch, Queenstown and Dunedin, serving clients that range from New Zealand's largest companies and public sector organisations to smaller businesses with ambition to grow. For more information about Deloitte in New Zealand, look to our website www.deloitte.co.nz.

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms or their related entities (collectively, the "Deloitte organisation") is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.

© 2023. For information, contact Deloitte Global.



14 December 2023

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

Larry Parr Chief Executive Te Reo Whakapuaki Irirangi Māori Broadcasting Funding Agency larry@tmp.govt.nz

Tēnā koe Larry

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of Te Reo Whakapuaki Irirangi Māori Broadcasting Funding Agency (Te Māngai Pāho) 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 (Te Rua Mahara) 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 the mandatory Information and records management standard. Information management practice at Te Māngai Pāho is mostly assessed at the 'Progressing' level.

For a very small organisation, Te Māngai Pāho is well placed to improve its IM maturity due to the move from shared drives to Company Drive/SharePoint, and the current organisation-specific disposal authority. The management response in the audit report section 6: *Summary of feedback* shows awareness of the improvement needed and support to make it happen.

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 seven recommendations as identified in the Appendix.

What will happen next

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

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

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

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

Nāku noa, nā

RA

Anahera Morehu Poumanaaki Chief Archivist Te Rua Mahara o te Kāwanatanga Archives New Zealand

Cc Ruiha Anderson, Assistant Manager, Corporate Services (Executive Sponsor), ruiha@tmp.govt.nz

APPENDIX

| Category | Topic Number | Auditor's Recommendation | Comments from Te Rua Mahara |
|------------|--|--|---|
| Governance | 1: IM Strategy | Approve the Strategy and socialise with relevant staff. | It is a useful starting point to develop and agree a strategy to direct improvement of IM. <u>Information</u> and records management strategy |
| Governance | 2: IM Policy and Processes | Update the Manual to align with the Strategy and socialise with relevant staff and contractors. | Having up-to-date, approved, and documented processes is important in supporting consistent IM practice across the organisation. |
| Governance | 4: IM Integration into Business Practices | Identify training needs to assist staff to understand their IM responsibilities and deliver as needed. | For a small organisation with stable staff, it would be useful to have basic IM training resources/programme to ensure all are on the same page. This is also the recommendation for Topic 9: IM Roles and Responsibilities |
| Capability | 8: Capacity and Capability | Complete the assessment of IM capacity and capability and decide if extra resource is needed for improvement activities. | Once the IM strategy is agreed then the required resourcing can be aligned. |
| Creation | 10: Creation and Capture of Information | Update the taxonomy and file structure within Company Drive to reflect business practices and needs. | This will need some specialist IM input in consultation with Te Māngai Pāho staff. This is also the issue identified in Topic 13: Integrity of Information. While it is practical to ask others to help find information not easily found due to system structural issues this is not a sustainable approach. |
| Creation | 11: High- Value/High-Risk Information | Ensure that the development of an IAR is included in the Strategy. | Identifying the key information assets will help the organisation prioritise IM activity. <u>Information</u> <u>assets - Identification and management</u> |

| Category | Topic Number | Auditor's Recommendation | Comments from Te Rua Mahara |
|----------|---|--|--|
| Disposal | 21: Implementation of Disposal Decisions | Ensure the Strategy includes the development of a disposal implementation plan for physical and digital information. | It is important to apply disposal across physical and digital information to mitigate risks in over retention. |