



Toka Tū Ake

The Earthquake Commission

Public Records Act 2005 Audit Report

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

Final Report

January 2024



# 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	10
Capability	11
Creation	12
Management	14
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 Toka Tū Ake | The Earthquake Commission (Toka Tū Ake). 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 Toka Tū Ake 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 Toka Tū Ake. 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

### TOKA TŪ AKE | THE EARTHQUAKE COMMISSION

Toka Tū Ake | The Earthquake Commission (Toka Tū Ake) was established in 1945 and is governed by the Earthquake Commission Act 1993. The Natural Hazards Insurance Act 2023 (NHI Act) will replace the Earthquake Commission Act on 1 July 2024. This new legislation incorporates the findings from a Public Inquiry into Toka Tū Ake in 2020 following the earthquakes in Christchurch and Kaikoura.

The core functions of Toka Tū Ake are to:

- Provide natural disaster insurance for residential property owners, this includes residential buildings and land, and collect premiums payable for the insurance provided.
- Administer the Natural Disaster Fund, where premiums are paid and manage its investments and obtain reinsurance.
- Fund research and education on natural disasters, to reduce risk and build resilience before natural hazard events happen.

They currently employ 380 full-time employees (FTE) with the head office in Wellington, and a regional office in Christchurch where two thirds of staff work.

High-value or high-risk information held by Toka Tū Ake includes:

- Claims handling and management records,
- Governance and strategic management records,
- Research management, funding, and sponsorships.

The Chief Data Officer (CDO) is the Executive Sponsor (ES) of information management (IM) at Toka Tū Ake and has been in the role since June 2022. The IM team has five FTE comprised of three full time internal IM staff and three contractors (two FTE). The Head of Information and Digital (whose responsibilities include Information Management) reports to the CDO.

### SUMMARY OF FINDINGS

We assessed the IM maturity of Toka Tū Ake against the five maturity levels of the IM Maturity Assessment issued by Te Rua Mahara and the results are summarised below:

#### Maturity Level and Number of Findings

<b>Beginning</b>	2
<b>Progressing</b>	8
<b>Managing</b>	9
<b>Maturing</b>	1
<b>Optimising</b>	-

## 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 Toka Tū Ake was completed in November 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 Toka Tū Ake 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 Toka Tū Ake for each topic area is highlighted under each of the respective areas. Ratings were based on responses from Toka Tū Ake staff 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 Toka Tū Ake. Te Rua Mahara is responsible for following up on the report's recommendations with Toka Tū Ake.

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.

Feedback from Toka Tū Ake 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.

Assessed Maturity Level						
No.	Topic	Beginning	Progressing	Managing	Maturing	Optimising
Governance						
1	IM Strategy			•		
2	IM Policy			•		
3	Governance Arrangements & Executive Sponsor				•	
4	IM Integration into Business Processes			•		
5	Outsourced Functions and Collaborative Arrangements		•			
6	Te Tiriti o Waitangi	•				
Self-monitoring						
7	Self-monitoring			•		
Capability						
8	Capacity and Capability			•		
9	IM Roles and Responsibilities			•		
Creation						
10	Creation and Capture of Information		•			
11	High Value / High Risk Information		•			
Management						
12	IM Requirements Built into Technology Systems		•			
13	Integrity of Information		•			
14	Information Maintenance and Accessibility		•			
15	Business Continuity and Recovery			•		
Storage						
16	Appropriate Storage Arrangements			•		
Access						
18	Information Access, Use and Sharing			•		
Disposal						
20	Current Organisation-specific Disposal Authorities		•			
21	Implementation of Disposal Decisions		•			
22	Transfer to Te Rua Mahara	•				

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

# 5. Audit Findings by Category and Topic

## GOVERNANCE

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

### Topic 1: IM Strategy

High-level statement outlining an organisation’s systematic approach to managing information across all operational environments of an organisation.	Managing
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#### OBSERVATIONS

The IM strategy is incorporated into the wider Data and Digital Strategy 2023 (the Strategy) at Toka Tū Ake, which the Board of Commissioners (the Board) approved in 2023. The new Strategy was subsequently communicated to staff via email and InSite (the intranet at Toka Tū Ake).

The Strategy informs the IM work programme and IM roadmap and includes IM initiatives and implementation activities at a high level. These are detailed in the IM roadmap including a key action of rolling out the IM uplift project.

The ES champions IM across the organisation, and regularly speaks to staff about the importance of IM. In addition, the introduction of the Information Advisory Forum (IAF), an internal advisory forum for business change, has increased IM staff exposure to wider Toka Tū Ake staff to advise and ensure IM is considered. Areas such as Procurement, where IM has historically not necessarily been considered can utilise this forum to enhance IM practices further across Toka Tū Ake.

#### RECOMMENDATION

Ensure the IM strategy continues to set the direction and influences IM aspects of other strategies and policies.

### 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
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#### OBSERVATIONS

Toka Tū Ake has an Information Policy (the Policy). The Board approved the Policy in 2023, which the Data and Information Governance Forum (DIGF), Executive Leadership Team (ELT), and the Audit and Risk Committee (ARC) have all endorsed. In addition, the Policy links to an IM directive which identifies IM roles and responsibilities in more detail. The Policy and Directive are linked to 19 other relevant policies and legislation, these include the PRA, Privacy Act, Official Information Act (OIA), IM Maturity Assessment issued by Te Rua Mahara, Privacy Policy, and OIA Naming Policy.

Processes are in general documented, approved and up to date, although some are still to be updated in the current review cycle. As part of this review, job description templates have been updated to include IM responsibilities. Existing job descriptions do not include this information, however all new ones will.

The Policy is on InSite and included in the induction training, furthermore the Policy requirements are built into some information systems and business processes to ensure compliance.

**RECOMMENDATION**

Continue to update processes incorporating IM requirements that support the Policy.

**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.

Maturing
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**OBSERVATIONS**

The ES is a member of the DIGF, which oversees data, IM and information security initiatives at Toka Tū Ake. The DIGF’s objectives as set out in their Terms of Reference include:

- Providing strategic leadership of the overall quality and integrity of information
- Establishing and maintaining standards, guidelines, and processes.

Meeting minutes evidenced updates on the progress of IM initiatives at Toka Tū Ake. Furthermore, the ES receives weekly updates on IM from the Head of Information and Digital and team, who stated the ES is highly engaged with IM progress. These weekly updates are collated and reported more formally to the ES in a monthly performance meeting. Subsequent updates are provided to the ARC and Board. In addition, the DIGF gets monthly updates on IM and IM Maturity Assessments are reported quarterly to the DIGF, as part of the IM roadmap for 2023-2024.

The IAF is an additional internal forum that includes IM staff. The IAF was established in October 2023 and meets biweekly to oversee business changes, IM staff are involved to ensure IM is considered.

The ES champions IM wherever they can at Toka Tū Ake, including reporting on IM issues to ELT and the Board, when required. As a result, senior management support the Strategy and strategic direction of IM. The ES actively networks with other executive sponsors as they attend the monthly Chief Information Officer meetings run by the Department of Internal Affairs.

**RECOMMENDATION**

The DIGF, IAF and ES should further champion IM to be integrated into all facets of Toka Tū Ake.

**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
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**OBSERVATIONS**

Business owners are consistently assigned responsibility for IM and have some understanding of their individual and team’s responsibilities.



Requirements for managing information are integrated into core business processes and activities. This is achieved through forums, such as the IAF and DIGF. Furthermore, some IM staff are members of other governance forums with IM implications such as the Tech Advisory Board (TAB).

IM induction training is mandatory for all staff and is provided through Click (the e-learning platform at Toka Tū Ake) modules. Staff reported using governance forums for IM advice and can navigate InSite to find documented IM processes.

**RECOMMENDATION**

Ensure business owners are actively fulfilling their responsibilities for managing IM within their business units.

**Topic 5: Outsourced Functions and Collaborative Arrangements**

<p>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.</p>	<p>Progressing</p>
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**OBSERVATIONS**

Requirements for IM are included in contracts with outsourced functions and collaborative agreements. This includes detailing PRA obligations and IM roles and responsibilities. IM responsibilities in contracts are not actively monitored, although staff advised that this occurs by exception when an issue arises.

The IAF is responsible for reviewing all contracts and IM staff will suggest contract wording changes to ensure IM is sufficiently covered in them. Although historically, IM staff would only do this on an ad hoc basis. Recently, draft wording on IM requirements was sent to Procurement and Legal to include in a Master Service Agreement. However, Toka Tū Ake predominately uses the All of Government (AoG) contracts.

Toka Tū Ake leverage information managed by other organisations such as Land Information New Zealand (LINZ) and local councils’ data. As a result, they do not own a lot of the information they use and only access it during a claim.

**RECOMMENDATION**

Ensure IM responsibilities in outsourced functions and collaborative agreements are actively monitored.

**Topic 6: Te Tiriti o Waitangi**

<p>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.</p>	<p>Beginning</p>
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**OBSERVATIONS**

Toka Tū Ake has not yet identified information of importance to Māori and there are no formal plans in place to identify this information. However, IM staff intend to address this in line with the Te Ao Māori Strategy. This work will likely be included in the 2024-25 IM roadmap.

## RECOMMENDATION

Develop a process to locate and identify information of importance to Māori.

## 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.

Managing

#### OBSERVATIONS

Toka Tū Ake regularly monitor compliance with the PRA, standards, and other relevant legislation. In line with the Strategy, IM staff complete the IM maturity assessment issued by Te Rua Mahara quarterly and provide updates to DIGF on how they are tracking. Furthermore, a third party was recently contracted to complete an independent IM audit, the findings and recommendations have been incorporated into the IM roadmap. The self-assessment results were reported to ARC.

The organisation monitors and reports on IM. For example, a third-party legislative compliance monitoring tool is used across business units and includes obligations under the PRA. Annual reports created from this tool are provided to forums such as the ARC and DIGF. The viewed report directed the Risk and Compliance team to monitor open corrective actions.

Compliance with the Policy is not actively monitored however, breaches are addressed on a case-by-case basis. The ES is informed about breaches of Policy, and furthermore ELT and forums such as DIGF receive regular compliance reporting.

#### RECOMMENDATION

Create and implement a plan to actively monitor compliance with the Policy.

## 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

As mentioned above, five FTE are responsible for IM at Toka Tū Ake. Capability and capacity across Toka Tū Ake are assessed annually and the most recent review saw the internal IM team capacity double to meet business needs.

All IM employees have access to a professional development budget, which has been used to attend IM conferences, and complete courses. For example, staff have attended business writing courses and an IM employee is completing a course on management of Māori information.

As mentioned above, IM staff are members of, or attend, governance group forums such as the DIGF, IAF, and TAB. Work still needs to be done to increase exposure to IM staff as some staff stated they did not know who was in the team or how to contact them.

#### RECOMMENDATION

Ensure forums such as the IAF are well advertised at Toka Tū Ake to ensure all staff can utilise and benefit from their services.

### Topic 9: IM Roles and Responsibilities

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

Managing

#### OBSERVATIONS

Job description templates have been updated to include IM roles and responsibilities, as a result all new job descriptions include this information, but not the current ones. Furthermore, professional development plans do not currently include IM roles and responsibilities.

All staff must complete comprehensive IM induction training as part of their onboarding. This is actively monitored with an organisation wide goal, set by the Board, to have 98% compliance. There is no current plan to introduce annual ongoing IM training.

Staff understood their IM roles and responsibilities and knew where to find the Policy if required. Although some staff did not know who to approach with IM questions.

#### RECOMMENDATION

Identify ongoing training needs for IM and develop a plan to deliver targeted training to all staff in response to business needs and issues.

# 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

Staff understand and comply with their legal obligation to create full and accurate records. Information is kept in controlled environments like SharePoint, the Electronic Document Management System (EDMS) used at Toka Tū Ake. Furthermore, uncontrolled environments such as DropBox are blocked. As a result information is managed in reliable and approved environments.

Appropriate metadata is created automatically in SharePoint to support the usability, reliability and trustworthiness of information. Furthermore, metadata created in other systems viewed met minimum metadata requirements.

Staff know where to find information as Toka Tū Ake has a small number of systems, the main one being SharePoint. The only barrier identified by staff, was the quantity of information in SharePoint, which can make it difficult to locate information quickly. Furthermore, information usability, reliability and trust issues are identified and not yet addressed or monitored.

### RECOMMENDATION

Develop a plan to address and monitor the identified issues with usability, reliability and trust with SharePoint.

## Topic 11: High-Value/High-Risk Information

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

### OBSERVATIONS

Toka Tū Ake has an Information Asset Register (IAR) which captures some high-value or high-risk information assets. A new IAR is being developed and will replace a 2021 draft IAR. Toka Tū Ake contracted a third party to complete this work although IM staff are actively involved with this engagement. The IAR is a work in progress and is part of the IM uplift project. In addition, physical information is being reviewed as part of the IM uplift project and will be included in the IAR.

There is some analysis of risks to high-value or high-risk assets, and risks are mitigated as they emerge. Furthermore, personal information is subject to additional analysis to ensure it is protected.

## RECOMMENDATION

Complete the IAR to include all high-value/high-risk information assets held in digital and physical systems.

# 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

Since establishing the IAF, the responsibility for providing collective information advice for commissioning and decommissioning information resides with them. Previously internal IM expertise was involved in configuring new systems and decommissioning of technology systems. This would involve contacting IM staff directly or be discussed at DIGF meetings. The IM team were involved in a recent decommissioning of an access card server. The decommissioning plan was documented in a paper and presented to the DIGF before the system was decommissioned.

IM staff said system documentation is available for all systems as this is part of certification and accreditation (C&A) work and is included in the design process. However, standardised IM requirements for new and upgraded systems are not documented.

### RECOMMENDATION

Identify and document standardised IM requirements for new and upgraded business 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
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### OBSERVATIONS

Staff have variable experiences finding and retrieving information, especially when accessing information used infrequently or created by others. However, most staff do not need to access information created by other business units. At Toka Tū Ake it is common practice to send a link when sharing a document to reduce findability issues. In addition, staff have confidence the information they create and manage is comprehensive and complete. This is based on the training and staff experience.

IM practices such as automated metadata and access controls are in place to ensure information is reliable and trustworthy. Furthermore, as part of the IM uplift project IM staff will review and improve the taxonomy and architecture to support findability and management of information.

### RECOMMENDATION

Assess business needs to ensure improvements to the taxonomy help facilitate the finding of information.

## 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

Most of the physical information at Toka Tū Ake is stored off site by a third-party storage provider. Risks to the ongoing accessibility of physical information are identified with plans in place to address them. For example, IM staff have recently reviewed plans for the new Wellington office to mitigate against potential building risks. In addition, a stocktake of physical information held on and off site is being conducted as part of the IM uplift project.

There are processes in places, such as migration plans, access controls, and metadata continuity to manage and maintain digital information during business and system changes. System testing, before and after change, is also conducted to ensure digital information is usable, this is included in plans which are submitted to the Change Advisory Board (CAB), and the TAB. However, Toka Tū Ake does not have a digital continuity strategy to map out long term accessibility to digital systems and there are no plans in place to create one. Furthermore, technology obsolescence risks are identified and addressed on an ad hoc basis.

### RECOMMENDATION

Once the physical stocktake is complete, identify the requirement for a digital continuity plan.

## 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

Toka Tū Ake has detailed business continuity plans (BCPs) for each business unit. The IM BCP was last reviewed in October 2023. Both digital and physical information are included in the BCP with recovery plans in place to ensure digital information can be restored.

Furthermore, system providers keep backups for all systems. Staff are unsure how frequently they occur, although a project is underway to review contracts to collate this information. In addition, service providers also test these backups, the frequency of this is also largely unknown and work is being done to collate this information.

### RECOMMENDATION

Document the back up and testing process.



# 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

As stated above, most physical information is stored offsite with a third-party storage provider. Information retained on site is stored in the office in tambours which are kept locked. Access to the key is restricted and kept in a locked box. The office has appropriate ventilation and pest control in place and smoke alarms and fire extinguishers are located on all floors.

Digital information is largely stored in the cloud with servers located overseas. Systems have appropriate controls against unauthorised access, loss or deletion such as soft delete and access controls which are monitored in all major systems. In addition, a third-party extension software has been added to SharePoint to improve IM governance and security as well as manage long term retention requirements.

Protection and security processes are tested regularly for digital information, as staff stated this is monitored 24/7 across digital environments. This is managed by two services as follows, Security Operations Centre (SOC) and Security Incident and Event Management (SIEM). Furthermore, the C&A process occurs every two to three years or when a major system change has occurred, to ensure any systems changes are documented accurately. In addition, security breaches to digital information are raised with the DIGF and the IT team will ask for IM perspective directly when required. However, staff and contractors understanding of protection and security requirements varied.

Finally, the third-party storage provider conducts annual security audits of physical information it holds.

### RECOMMENDATION

Assess if any IM protection and security requirement training is required.

# 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

Toka Tū Ake has used the same taxonomy since 2019 when SharePoint was introduced. An external review of the taxonomy in 2022, resulted in the set up of the new file-plan and classifications for the SharePoint extension mentioned above. Furthermore, IM staff plan to engage with business functions to get a current business lens for the taxonomy. Staff were confident they know how to use systems and tools that contain and facilitate access to information and reported they have the correct access permissions. The SharePoint extension will help with the governance of access and Toka Tū Ake will move to a role-based permission system. In addition, all systems viewed meet minimum metadata requirements.

IM processes are applied to incoming and outgoing information and data-sharing agreements with external parties. Data-sharing agreements are being updated to include IM considerations and stipulations when reviewed through the IAF before going to DIGF for approval.

### RECOMMENDATION

Engage with business functions to get a current business lens of the taxonomy and metadata used and ensure they meet business requirements.

## 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.	Progressing
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#### OBSERVATIONS

Toka Tū Ake has a current approved organisation-specific disposal authority (DA). The DA has been extended multiple times while a new DA is currently being developed to include all business functions and the new governing act, the Natural Hazards Insurance Act (NHI Act) for Toka Tū Ake.

The DA will be reviewed more regularly with the SharePoint extension as part of the uplift plan.

#### RECOMMENDATION

Finalise the new DA with Te Rua Mahara to ensure it covers all business functions and the NHI Act.

### 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
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#### OBSERVATIONS

The introduction of the SharePoint extension will automate processes to ensure information is retained for as long as required for both the DA and general disposal authorities (GDAs). When information can be disposed, staff must complete a disposal request form, this is then approved by business and system owners before being taken to the DIGF for approval. All disposals are documented in a destruction register which is up to date and comprehensive.

The destruction of physical and digital information is secure, complete and irreversible. Third party suppliers destroy all physical information and some digital information, Toka Tū Ake require evidence of disposal which is included in the destruction register. When destroying information internally, checks are completed to ensure digital information is destroyed and not just deleted.

Routine disposal does not happen under the organisation-specific DA however more frequent disposals occur under GDAs. Furthermore, disposal actions are implemented across some systems, for example SharePoint, however disposal in the CMS and FMIS rarely occur.

#### RECOMMENDATION

Develop a disposal implementation plan across all systems.

## 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
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### OBSERVATIONS

Toka Tū Ake has not identified digital information that is over 25 years old. As mentioned above, work is underway to identify all physical information noting some has already been transferred to Te Rua Mahara.

In addition, the recently implemented SharePoint extension has the capability to transfer digital information to Te Rua Mahara, this is a feature IM staff are looking to use in the future.

### RECOMMENDATION

Identify and document physical information that is over 25 years old and determine if it is open or restricted access.

## 6. Summary of Feedback

Toka Tū Ake EQC would like to thank Te Rua Mahara o te Kāwanatanga Archives New Zealand and Deloitte for their work on this audit, the recommendations, and the opportunity for comment.

Uplifting information management maturity has been a focus for Toka Tū Ake EQC for several years. We have taken careful consideration of the recommendations in this report and will continue to uplift information management maturity based on them. The recommendations will be prioritised and factored into the Information Management maturity improvement roadmap to ensure they are resourced and implemented.



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18 March 2024

Te Rua Mahara o te Kāwanatanga Archives New Zealand  
10 Mulgrave Street  
Wellington

Tina Mitchell  
Chief Executive  
Toka Tū Ake the Earthquake Commission  
[tmitchell@eqc.govt.nz](mailto:tmitchell@eqc.govt.nz)

Phone +64 499 5595  
Websites [www.archives.govt.nz](http://www.archives.govt.nz)  
[www.dia.govt.nz](http://www.dia.govt.nz)

E te rangatira e Tina, tēnā koe

## Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the Toka Tū Ake the Earthquake Commission (Toka Tū Ake) 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*

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. Toka Tū Ake is assessed as having IM maturity fairly equally at the 'Progressing' and 'Managing' levels.

With the approved IM strategy and Information Policy and regular reporting to and support from the Executive Sponsor, the organisation is well placed for overall improvement to the 'Managing' level or higher. With the finalisation of the Disposal Authority (DA) there will be the opportunity for improvement across the other disposal topics.

### **Prioritised recommendations,**

The audit report lists 20 recommendations to improve your organisation's IM maturity.

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

### **What will happen next**

The audit report and this letter will be proactively released on 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 iti noa, nā



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

Cc Rob Hodgson, Chief Data Officer (Executive Sponsor), [RHodgson@eqc.govt.nz](mailto:RHodgson@eqc.govt.nz)



## APPENDIX

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
<b>Governance</b>	5: Outsourced Functions and Collaborative Arrangements	<i>Ensure IM responsibilities in outsourced functions and collaborative agreements are actively monitored.</i>	Even if using AoG contracts additional IM requirements can be added if necessary.
<b>Governance</b>	6: Te Tiriti o Waitangi	<i>Develop a process to locate and identify information of importance to Māori.</i>	This activity would support realisation of the Te Ao Māori Strategy.
<b>Creation</b>	10: Creation and Capture of Information	<i>Develop a plan to address the identified issues with usability, reliability, and trust with SharePoint.</i>	Quantity of information in SharePoint is identified as one issue which disposal would potentially alleviate.
<b>Creation</b>	11: High-Value/High-Risk Information	<i>Complete the IAR to include all high-value/high-risk information assets held in digital and physical systems.</i>	A new IAR is reported as being developed so the organisation should continue with this work and ensure that it is kept up-to-date.
<b>Management</b>	12: IM Requirements built into Technology Solutions	<i>Identify and document standardised IM requirements for new and upgraded business systems.</i>	This would increase awareness of IM requirements across all areas of the organisation involved with system administration and support.
<b>Management</b>	13: Integrity of Information	<i>Assess business needs to ensure improvements to the taxonomy help facilitate the finding of information.</i>	This also supports the recommendation from Topic 10: <i>Creation and Capture of Information</i> .
<b>Management</b>	14: Information Maintenance and Accessibility	<i>Once the physical stocktake is complete, identify the requirement for a digital continuity plan.</i>	When the physical stocktake is complete and the DA finalised, physical disposal across all Toka Tū Ake information can be done as appropriate. The digital continuity plan can be informed by the identification of high-value/high-risk information assets Topic 11: <i>High-Value/High-Risk Information</i> .

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
<b>Disposal</b>	20: Current Organisation-Specific Disposal Authorities	<i>Finalise the new DA with Te Rua Mahara to ensure it covers all business functions and the new NHI Act.</i>	Once the DA is approved the organisation is well placed to improve maturity in the remaining two disposal topics.