



Social Workers Registration Board |
Kāhui Whakamana Tauwhiro
Public Records Act 2005 Audit Report

Prepared for Archives New Zealand

April 2022



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1. Disclaimers

Use of Report

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Independence

Deloitte is independent of Archives NZ in accordance with the independence requirements of the Public Records Act 2005 (the 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 the PRA 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 considered the views of SWRB 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 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 SWRB 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

Social Workers Registration Board

The Social Workers Registration Board (SWRB) was established in November 2003 by the Social Workers Registration Act 2003. SWRB's primary responsibilities are establishing the criteria for registering New Zealand and overseas qualified social workers, developing a social worker's code of conduct, establishing the policies and procedures for complaints and discipline, and setting up a social work registration database. As part of their roles and responsibilities, SWRB makes recommendations to the Minister for Social Development and Employment about matters relating to the regulation of the social work profession.

SWRB:

- Sets and promotes standards for social work education
- Recognises providers of education programmes for social work qualifications
- Provides insights and regulatory guidance, including sharing outcomes from the independent Social Worker's Disciplinary Tribunal with its members
- Has recently been assigned the permanent function, as the lead agency for Social Work Workforce Planning.

SWRB has approximately 34 staff and its only office is in Wellington.

The high-value / high-risk information SWRB holds under the PRA includes board papers, social worker registrations and applications, and complaints regarding social workers and decisions made.

Summary of Findings

We assessed SWRB information management maturity against the five maturity levels of Archives NZ's Information Management (IM) Maturity Assessment model. The results are summarised below:

Maturity Level	Beginning	Progressing	Managing	Maturing	Optimising
No. of Findings	9	9	2		

3. Introduction

Background

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

- full and accurate records are created and maintained, improving business efficiency, accountability and government decision-making, and in turn, enhancing public trust and confidence in government.
- government is open, transparent, and accountable by making public sector IM practices known to the public.

Section 33 of the 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 commissioned Deloitte to undertake these audits for certain public offices.

Objective

To identify areas of IM strengths and weaknesses within the public office, prioritising areas that need attention and what needs to be done to strengthen these areas. 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 SWRB's IM practices, against Archives NZ's IM Maturity Assessment Model (PRA requirements). 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). SWRB's maturity level for each topic area assessed is highlighted under each of the respective areas. Ratings were based on SWRB's 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. Deloitte completed the onsite audit and audit report, of which Archives NZ reviewed before release to SWRB. Archives NZ is responsible for following up on the report's recommendations with SWRB.

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.

SWRB'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
Governance	1	IM Strategy			●		
	2	IM Policy		●			
	3	Governance arrangements & Executive Sponsor		●			
	4	IM Integration into business processes	●				
	5	Outsourced functions and collaborative arrangements	●				
	6	Te Tiriti o Waitangi	●				
Self-monitoring	7	Self-monitoring	●				
Capability	8	Capacity and Capability		●			
	9	IM Roles and Responsibilities		●			
Creation	10	Creation and capture of information		●			
	11	High value / high-risk information	●				
Management	12	IM requirements built into technology systems		●			
	13	Integrity of information		●			
	14	Information maintenance and accessibility	●				
	15	Business continuity and recovery		●			
Storage	16	Appropriate storage arrangements			●		
Access	18	Information access, use and sharing		●			
Disposal	20	Current organisation-specific disposal authorities	●				
	21	Implementation of disposal decisions	●				
	22	Transfer to Archives NZ	●				

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

5. Audit Findings by Category and Topic

Governance

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

Observations

SWRB has a current Information Strategy (IS) and Roadmap, which the Senior Leadership Team (SLT) approved in April 2020. The IS was developed to raise the level of IM maturity across the organisation, to meet the requirements of the PRA and to establish practices suited to a growing and changing organisation. The IS has been championed by the Executive Sponsor (ES), who is a member of the SLT.

The IS is both a strategic plan and operational guide. It includes recommendations and an implementation plan in uplifting and achieving IM, and implications of the IS not being supported. Currently, the IS implementation plan is behind schedule but there is an intention to leverage this review to reprioritise actions.

There is nothing apparent which ties the IS to the wider SWRB strategy or direction including no reference to the values or other core aspects of SWRB.

In the initial rollout, the ES provided weekly updates to staff, however, these have since ceased. The IS has not been widely communicated to staff.

Recommendations

1. Establish regular IM activity reporting on identified initiatives and roadmap implementation activities updates.
2. Link the IS to the wider SWRB strategy and direction to ensure alignment to wider SWRB strategic goals.

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

SLT recently approved the IM Policy (the Policy), which has not yet been published and distributed to staff. As such, staff awareness of relevant legislation and IM requirements is largely dependent on individual experiences based on their previous roles. Staff interviewed were not yet aware of the development of the Policy or its contents.

The Policy does not include IM roles and responsibilities, but some position descriptions do, such as the Business Support Coordinator, the Business Operations Manager, and the Digital Officer. The Policy references relevant legislation and other internal policy (such as the Computer Use Policy and SWRB Values).

There are localised IM processes such as the 'IM Filing' guidelines. However, based on staff interviews these guidelines have been inconsistently applied and the design of them is not applicable for all business units. Some business units have edited these guidelines to make it fit for purpose for their teams.

Recommendations

1. Update the IM Policy to include staff roles and responsibilities.
2. Communicate the IM Policy to all staff and contractors as soon as possible.

Topic 3: Governance Arrangements and Executive Sponsor

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

Progressing

Observations

SWRB does not have an IM governance group dedicated to IM. The IM team consists of the following roles: the Business Operations Manager (ES), Business Support Coordinator and the Digital Officer. The IM team provides informal reporting to the ES about any IM incidents or IM activity updates. The ES may include any updates from the IM team in their weekly report to the Chief Executive (CE) / SLT and, items may be included in the CE report to the bimonthly Board meeting.

The Board does not receive regular reporting on wider IM matters from the ES and IM team. Without this regular reporting on wider matters, the Board does not have the ability to appropriately support the ES.

The ES provides support to the IM team when required and actively champions IM within the organisation. Staff reported that the ES actively promotes the value and importance of IM across the organisation.

Recommendations

1. Due to the size of the organisation, SWRB should consider including IM with another related governance group or establish an IM governance group at a lower level which could report to SLT.
2. IM team to provide regular reporting to the ES that provides useful and actionable information that can also be provided to SLT.

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.

Beginning

Observations

Due to the absence of a Board approved Policy with defined staff roles and responsibilities, IM responsibilities have not been assigned or documented. Therefore, staff are not fully aware of their IM responsibilities. Staff understand what information is required to be created for their day-to-day role. However, staff require more education on other IM practices such as, appropriate filing structure and responsibilities for retaining information.

Despite the lack the of formalised processes and training, the IM team is highly regarded by the SWRB staff as they continue to provide IM expertise and guidance to all business areas.

Recommendations

1. Refer to recommendation in Topic 2 regarding defining responsibilities for IM practices.
2. Ensure that IM team is involved in educating staff including business owners on their roles and responsibilities and the skills required to accurately capture and store information.

Topic 5: Outsourced Functions and Collaborative Arrangements

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

Beginning

Observations

SWRB collaborates with other organisations such as, the Aotearoa New Zealand Association of Social Workers through a Memorandum of Agreement. The collaborative agreements reviewed referenced privacy, ownership of information and data security. SWRB has outsourced some of its function with individual contractors. The service contracts reviewed referenced privacy and confidentiality. However, the contracts and agreements do not explicitly include clauses on the requirements for IM such as, creating and retaining information, and disposing processes when the contract ends.

There is no monitoring currently conducted on contracted third parties to ensure IM requirements are met.

A revised Terms of Use Agreement has been developed which is required to be accepted by all contractors or third parties who have an account in the SWRB Active Directory, as part of renewing contracts. This includes requirement for compliance with IM procedures, security and storage.

Recommendations

1. Updated current contracts with third party providers to include IM clauses and statements. These clauses should ensure IM requirements are met.
2. Establish regular compliance monitoring for outsourced contracts.

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

SWRB may hold information of significance to Māori but has not developed a process to identify the information. As a result, SWRB has not been able to actively improve access and use of information that is of importance to Māori.

SWRB has recently developed a Māori Development Strategy, which aims to develop strong te reo and tikanga competencies across the organisation including a Te Ao Māori approach to all aspects of their work. The Chief Advisor Māori Development is responsible for continuing to champion and help implement this strategy.

There is no current use of te reo metadata to improve accessibility of information, which is of value to Māori. SWRB has recently developed an add-on table for their social work application database (IMIS) which provides the ability of the system to correctly input te reo words (i.e., macrons).

Recommendation

1. Undertake an exercise to identify and assess whether the information SWRB holds is 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.

Beginning

Observations

Due to resourcing constraints and lack of published Policy, there is no formal and periodic monitoring of compliance of the Policy or the PRA. As a result, there are no formal monitoring activities or proposed corrective actions that are regularly reported to SLT.

SWRB has recently engaged ComplyWith to help monitor and assess what standards and legislation SWRB is required to adhere to. SWRB is currently undergoing their first assessment which includes a section relating to requirements of the PRA.

Recommendation

1. In addition to regular ComplyWith reporting, establish regular internal monitoring of compliance with the Policy.

Capability

Information underpins everything 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

Due to the size of SWRB, IM staff are not solely focused on IM and have other additional responsibilities. The IM team were unable to identify the amount of their time spent on IM compared to their other job requirements.

Professional development opportunities are available to IM staff. For example, attendance at a Retention and Disposal workshop, E-records training, and Microsoft SharePoint training. The ES supports these opportunities which are funded through SWRB's professional development budget.

It was noted in interviews that SWRB would benefit from having more staff with IM specific experience. The ES believes that the current staffing levels are capable of delivering the IS and other business as usual activities. However, as the current time spent on IM activities is unknown, identifying and plotting current and future needs against capacity could be beneficial.

Recommendation

1. SWRB should assess IM capability and capacity requirements against business as usual needs and the implementation of the IS roadmap.

Topic 9: IM Roles and Responsibilities

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

Progressing

Observations

SWRB staff and contractors do not fully understand their roles and responsibilities for IM beyond creating information directly related to their day-to-day role. This is partially due to the lack of a published policy and process documentation. This means roles and responsibilities for IM have not been clearly identified, documented, and communicated to all staff and contractors. The IM staff job description does detail some IM roles and responsibilities, however, the other job descriptions do not. Confidentiality and privacy were referenced in the SWRB Values, Code of Conduct and Employee Handbook but not IM principles or responsibilities. Employment contracts do not have explicit reference to IM responsibilities.

SWRB has recently developed a Terms of Use Agreement which covers IM requirements and responsibilities. Contractors who engage with SWRB information will be prompted to accept the terms and will then have it renewed annually to make them aware of their IM responsibilities.

As part of the onboarding process, staff are taught how to use the IM system, which focuses on the technical use of SharePoint. It is unclear whether this training is mandatory for all new staff, as someone with previous experience in IM chose not to attend the training.

The IM team have previously offered and hosted refresher IM training to help increase IM knowledge within SWRB. The IM team have not formally identified the IM training needs, however, there is an understanding that further training is required across the organisation. There is a plan to develop ongoing IM training in SWRB's IS.

Recommendation

1. Further develop current IM training to also cover IM roles and responsibilities to lift IM knowledge across the organisation.

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

SWRB staff understand the basic requirement to create and capture information as part of their day-to-day role. However, this is due to general understanding rather than defined training on the importance of maintaining full and accurate records.

Most of SWRB's information is managed within SharePoint which meets metadata requirements. Currently, only basic metadata is utilised, however, following training IM staff received last year and developing the draft Disposal Authority, there is capability to utilise more detailed metadata fields.

While there are naming conventions guidelines, staff take an inconsistent approach to naming and storing documents. This results in potential issues with findability and duplication.

Most staff can find their own information and records with ease but occasionally encounter difficulty when searching for information managed by other areas of the organisation. While there are standard file structures and naming conventions, some file management processes vary between business areas as they have edited the general guidelines to make it fit for purpose for their specific business area.

Additionally, some staff are continuing to store documents in their OneDrive which is considered an uncontrolled environment. Storage of information in uncontrolled environments creates a risk of loss and may lead to inaccessibility of information.

Recommendations

1. Implement a consistent file taxonomy across business units in consultation with business areas to ensure it is fit for purpose.
2. Educate staff on using correct systems for creating and storing and monitoring the use of OneDrive.

Topic 11: High-Value/High-Risk Information

The organisation has identified its high value/high-risk information assets, including identifying and addressing any risk to those assets.

Beginning

Observations

SWRB has not formally identified any high value / high-risk information assets it holds. While IM staff understand what SWRB information assets are considered high value / high-risk, there is no formal inventory. Without an inventory of high-value / high-risk information, there is no possibility of a long-term information management plan.

Recommendation

1. Create an Information Asset Register (IAR) which identifies the information that is high value/high-risk to SWRB. This could be performed in line with an organisation specific disposal authority (Refer to Topic 20).

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 your organisation's business systems.

Progressing

Observations

SWRB has previously received IM advice from IT contractors when implementing and upgrading their technology systems. Data from an on-site server has recently been migrated to SharePoint and the external contractors identified and validated the data during mitigation. All migrated data is restricted to 'read-only' in SharePoint until the decommissioning of the system is complete.

The recent migration to SharePoint included IM requirements such as, verifying the integrity of information throughout the migration as well as a series of data testing. Metadata requirements are met through SharePoint On-Premises.

There are no documented standardised IM requirements for new and upgraded systems.

Recommendation

1. 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

Observations

There are localised IM practices across SWRB with staff noting that the introduction of SharePoint has improved the integrity of information and filing within the organisation. SWRB also uses the IMIS system as a social work registration application database, that also holds supporting documents and any comments SWRB has on the application. Their IM systems have a good search functionality that allows a search for information across all systems, search filters and the ability to search using metadata. However, not all migrated data from the older system is easy to find, as there is no clear expectation of where each type of information should be saved.

The reliability and trustworthiness of information varies greatly across business units. Certain business units such as Legal have a thorough IM process which supports the reliability and integrity of information. Others do not, which has resulted in some difficulties when it comes to finding some information.

Staff have variable experiences when trying to find and retrieve information. Staff can find information within their business areas, however its more challenging finding information outside of their business areas due to a varying taxonomy structure. Staff interviewed reported that they encountered issues where they were unsure which folder they should use to find or save documents (such as whether to save documents under BAU or under project) and issues with folder duplications.

Recommendation

1. Review current taxonomy structure in consultation with the organisation to ensure it is fit for purpose and consistent.

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.

Beginning

Observations

SWRB does not have a strategy in place to manage and maintain accessibility of physical and digital information during business and system changes. There has been some consideration of the risk to ongoing accessibility of information. For example, in a recent data migration, contractors were engaged to ensure that data accessibility was addressed during the migration.

General accessibility of physical information is ensured through long-term storage of information with an off-site commercial provider. Daily updates from the digital storage provider are received by SWRB relating to the digital information.

SWRB does not have a digital continuity plan and has not identified accessibility risks to either physical or digital information.

Recommendation

1. Establish formal and periodic review of ongoing accessibility risk and digital continuity needs for physical and digital information.

Topic 15: Business Continuity and Recovery

This covers the capability of the organisation to continue delivery of products or services, or recover the information needed to deliver products or services, at acceptable pre-defined levels following a business disruption event.

Beginning

Observations

SWRB does have a business continuity and recovery plan in place. However, it has not identified critical information, IM services required in a disruption event or information recovery methods for business continuity.

Recommendation

1. Update the business continuity plan to identify critical information.

Storage

Good storage is a very important factor for information protection and security. Appropriate storage arrangements for both physical and digital information ensures information remains accessible and usable for as long as it is required for business and legal purposes and for accountable government.

Topic 16: Appropriate Storage Arrangements

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

Managing

Observations

SWRB has not had any recent issues with unauthorised or unlawful access to its storage arrangements for both digital and physical information.

Physical information is stored at an offsite commercial storage facility. Digital information is stored within SharePoint, OneDrive and IMIS which are managed through third-party providers. Information security requirements are built into these respective third-party contracts.

Digital information is secured by access and permission controls which the ES approves. When staff are working offsite, they are required to use VPNs and multifactor authentication to be able to securely access information. If accidental deletion of digital information were to occur, the IM team have access to the administrative recycling bin which has an extended 30/60-day file retention to be able to restore information.

SWRB does not regularly monitor or report on security risks.

Recommendation

1. Ensure that information protection and security risks are regularly reported to SLT and remediation actions are identified.

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 can 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.

Progressing

Observations

Staff understand how to use SharePoint, as this is covered as part of their onboarding process. Induction training includes an introduction to SharePoint and its technical application.

SharePoint automatically creates and generates metadata except for the name of the document which ensures that metadata requirements are met. Staff are required to facilitate the discovery and use of information by manually naming their documents in a way which ensures they represent the content of the document.

The ES approves and IM team manage access controls. Staff interviewed confirmed they have adequate access to systems to find and use information.

SWRB has a Memorandum of Understanding with some entities for information sharing. External stakeholders may be provided restricted guest access to SharePoint to ensure data security and protection. There is no oversight over whether IM processes are being applied to incoming and outgoing information and data shared with external parties. SWRB has configured their SharePoint so that files cannot be shared directly by email; documents must be downloaded before attaching to an email. This helps ensure that only the intended information is being distributed.

Recommendation

1. Ensure that IM processes are documented and applied to incoming and outgoing information and data shared with external parties.

Disposal

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

Topic 20: Current Organisation-Specific Disposal Authorities

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

Beginning

Observations

Currently, SWRB has no organisation-specific disposal authority (DA) in place. A disposal authority has been drafted which is currently going through the approval process. As a result, no information is being disposed under the DA.

Recommendation

1. Complete the work on the organisation-specific disposal authority and submit to Archives NZ for approval.

Topic 21: Implementation of Disposal Decisions

This is about the implementation of disposal decisions, whether from organisation-specific disposal authorities or the General Disposal Authorities.

Beginning

Observations

SWRB does not have a current approved DA and there is currently no information being disposed of outside of the General Disposal Authorities (GDAs).

If a staff member were to delete information under the GDAs, this information is directed to an administrative recycling bin which has a 60-day retention cycle. IM staff irregularly review, and may query information in this bin. They also can restore information if required.

SWRB maintains a strong culture of retaining information and all staff reported an inclination to retain information and not actively dispose using the GDAs. Interviews indicated that this was largely due to a lack of understanding of what can and cannot be deleted.

Recommendation

1. Once the DA is approved, develop an implementation plan for regular disposal of information under the GDAs and the DA.

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.

Beginning

Observations

SWRB has not identified any information of archival value and does not have a DA so has not transferred any records. They do not have information that is older than 25 years.

Recommendation

1. Once SWRB has developed their DA, identify information of archival value and transfer to Archives NZ when appropriate.

6. Summary of feedback

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

This report is a fair reflection of the SWRB's journey to IM good practice and compliance with the PRA. As noted in this report, SWRB will use this to develop the next stage of our IM planning.

SWRB wish to thank the Deloitte team for their professionalism and supportive manner during the audit process. The feedback from staff involved was very positive and supported better understanding for the wider staff.

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3 June 2022

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Sarah Clark
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Tēnā koe Sarah

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the Social Workers Registration Board (SWRB) 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. Although the SWRB is assessed at the lower IM maturity levels the organisation is well placed to improve. The Executive Sponsor actively champions IM and despite the small size of the organisation there is an IM team supporting IM practice alongside their core work. The SharePoint implementation has improved the management of information. When approved, the organisation-specific disposal authority will provide a basis for further improvement. Periodically sourcing external IM expertise would support maturity uplift when specialist skills are needed.

Prioritised recommendations

The audit report lists 26 recommendations to improve your organisation's IM maturity.

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

What will happen next

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

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

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

Thank you again for your support with the audit. We would greatly appreciate further feedback on the audit process and the value it provides to organisations. We will contact your Executive Sponsor shortly in relation to this.

Nāku noa, nā



Honiana Love
Acting Chief Archivist Kaipupuri Matua
Archives New Zealand Te Rua Mahara o te Kāwanatanga

Cc Mary Weddell, Business Operations Manager, mary.weddell@swrb.govt.nz (Executive Sponsor)

APPENDIX

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Governance	2: IM Policy and Processes	<i>Communicate the IM Policy to all staff and contractors as soon as possible</i>	Regular communication related to the Policy will assist staff to understand IM requirements especially if roles and responsibilities are included in the Policy.
Governance	3: Governance Arrangements and Executive Sponsor	<i>Due to the size of the organisations, SWRB should consider including IM with another related governance group or establish an IM governance group at a lower level which could report to SLT.</i>	The SWRB should decide what IM governance group arrangement would be appropriate for their size to support the ES in their role. Also consider what reporting would be useful for the group to receive.
Governance	5: Outsourced Functions and Collaborative Arrangements	<i>Updated contracts with third party providers to include IM clauses and statements. These clauses should ensure IM requirements are met.</i>	It is a good start to have IM responsibilities and requirement included in contracts and collaborative agreements where public records are created and shared. These also need to be monitored.
Self-monitoring	7: Self-Monitoring	<i>In addition to regular ComplyWith reporting, establish regular internal monitoring of compliance with the Policy.</i>	A monitoring plan should be agreed based on assessment of risks to information to ensure that priority areas are covered e.g. uncontrolled environments as described under Topic 10: <i>Creation and Capture of Information</i> and sharing information under Topic 18: <i>Information Access, Use and Sharing</i> .
Capability	8: Capacity and Capability	<i>SWRB should assess IM capability and capacity requirements against business as usual needs and the implementation of the IS roadmap.</i>	When the disposal authority (Topic 20: <i>Current Organisation-Specific Disposal Authorities</i>) is approved the implementation of disposal activities will need to be factored into the workload.

Category	Topic Number	Auditor's Recommendation	Archives New Zealand's Comments
Creation	10: Creation and Capture of Information	<i>Implement a consistent file taxonomy across business units in consultation with business areas to ensure it is fit for purpose.</i>	This will also support the recommendation in Topic 13: <i>Integrity of Information</i> . Sourcing external IM expertise may be useful to improve the taxonomy across the organisation.
Disposal	20: Current Organisation-Specific Disposal Authorities	<i>Complete the work on the organisation-specific disposal authority and submit to Archives NZ for approval.</i>	This will increase understanding of the organisation's information and provide the basis for prioritising its management.