Report

External engagement on the Regulatory Programme

December 2018

Te Tari Taiwhenua
Internal Affairs

New Zealand Government

Contents

Executive summary

The purpose of this report is to present the findings from external engagement on the Regulatory Programme, which was conducted in September and October 2018. The specific objective of external engagement was to get stakeholders' thoughts on what Archives New Zealand (Archives) is planning and a sense of where they think Archives should target its efforts, so that it undertakes the right activities. Due to response rates, the data collected through external engagement could not be considered representative of regulated organisations as-a-whole. However, it did provide sufficient insights to identify priorities. The report recommends that Archives focuses its efforts on designing and implementing a new relationship management model, and demonstrating that it can and will lead public sector information management (IM). It also recommends that it continues external engagement during development of individual activities, to ensure that they meet stakeholder needs and expectations.
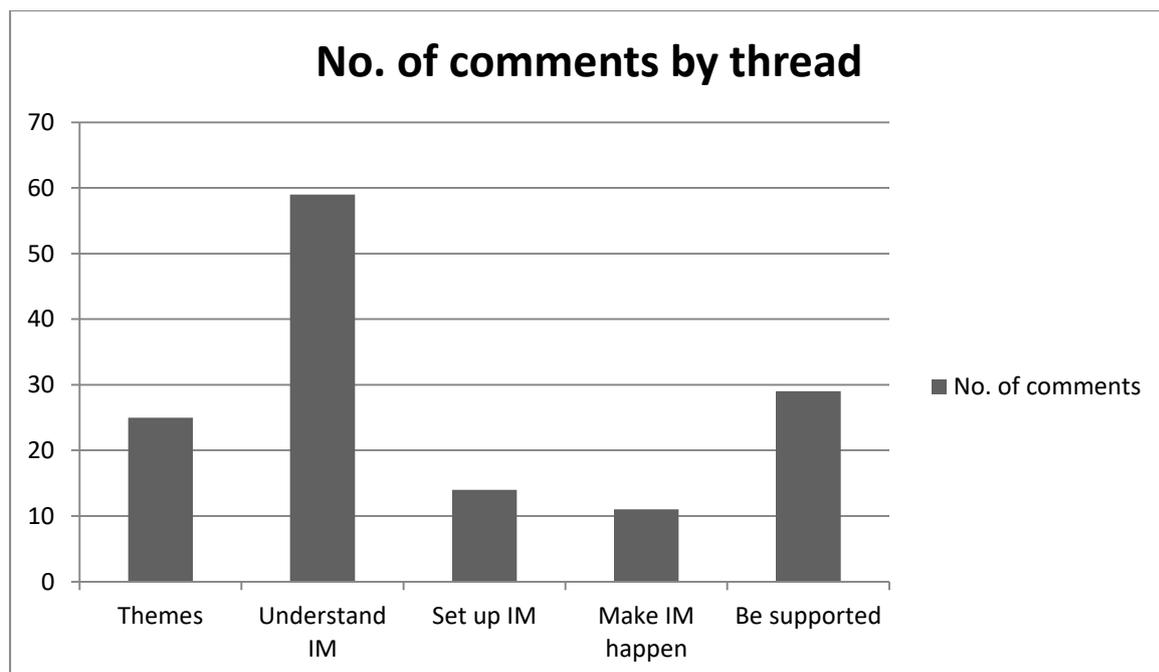
Discussion

This section covers participation rates, findings from polls and the conclusions drawn from external engagement. Findings from the comments received and online channels research are covered in Appendix A.

Participation

Online discussion

Archives had 144 people sign-up to the online discussion forum.[1] Of these, 44 voted in polls and 30 posted comments, either in a thread or as a component of polling. In total, there were 131 votes cast and 138 comments posted.[2] The majority of people who signed-up were from regulated organisations.

- ✓ 144 members
- ✓ 44 voters + 131 votes
- ✓ 30 commenters + 117 comments

No. of comments by thread

Thread	No. of comments
Themes	25
Understand IM	59
Set up IM	14
Make IM happen	11
Be supported	29

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[1] This figure excludes Archives staff.

[2] Figures include comments from polls but excludes comments made by moderators and written submissions from individuals

Other modes of engagement

Archives received four written submissions from individuals, including one from an Executive Sponsor and one from a fellow regulator. Around 50 Wellington-based people attended an information session hosted by the Government Information Group (GIG). Around 30 Wellington-based people attended an information session hosted by the Mezzanine group of IM practitioners. The primary purpose of the information sessions was to promote the online engagement, so feedback was not collected.

Three participants in the online discussion expressed a need for more comprehensive face-to-face engagement, for example:

> ". . . the Regulatory Programme warrants face-to-face debate and discussion among IM practitioners . . . I believe you are missing out on a richness and depth of analysis that (limited) online comment alone will not produce. Further, as what you put in place will ultimately impact all of our work, you do owe us the opportunity to have these conversations."

> "I would hope that when a programme is drafted that we get extensive online and face-to-face opportunities to discuss it."

Findings from polls

Archives ran polls on four of the five discussion threads, asking people to rank the activities associated with each theme in order of priority. People could also post a comment explaining their choice. The comments are analysed in Appendix A. The highest and lowest ranking activities are presented here.

Understand IM

Thirty-three people voted in the poll for this theme. Of those, 15 ranked an engagement strategy for Executive Sponsors as the highest priority and 21 placed it in the top three priorities. The lowest ranking activity was working with ECMaaS vendors on Te Reo translation. Ten people gave it the lowest priority, while 22 placed it in the bottom three priorities.

- ✓ 33 votes
- ✓ Top is an engagement strategy for Executive Sponsors

Set up IM

Thirty-three people voted in the poll for this theme. Of those, 13 ranked scoping an all-of-government ontology as the highest priority and 16 placed it the top three priorities. The lowest ranking activity was metadata for Māori concepts. Ten people gave it the lowest priority, while 18 placed it in the bottom three priorities.

- ✓ 33 votes
- ✓ Top priority is an all-of-government ontology

Make IM happen

Twenty-six people voted in the poll for this theme. Of those, 15 ranked education on preserving usability and integrity as the highest priority and 19 placed it in the top three priorities. The lowest ranking activity was a policy on published archives. Nine people gave it the lowest priority, while 23 placed it in the bottom three priorities.

- ✓ 26 votes
- ✓ Top priority is education on preserving usability and integrity

Be supported

Thirty-one people voted in the poll for this theme. In this poll the highest ranking priority was a tie between developing Archives' relationship management approach and a new monitoring framework. Although 10 people ranked the former as the highest priority and 20 placed it in the top three priorities, 21 placed the latter in the top three priorities. The lowest ranking activity was a position on digital-only transfers (i.e. mandating digital transition). Ten people gave it the lowest priority, while 16 placed it in the bottom three priorities.

- ✓ 31 votes
- ✓ Top priorities are developing our relationship management approach and a new monitoring framework

Conclusions

Evaluation of approach

Due to response rates, the data collected through external engagement cannot be considered representative of regulated organisations as-a-whole. In some cases, there is too little data to make a determination on the need or demand for an activity. However, it does provide sufficient insights to identify priorities. It is difficult to judge overall support for the programme, and explicit expressions of support in the form of comments were few. If Archives were to repeat the engagement again it would be worth polling support for the programme.

Although there was some demand for more comprehensive, face-to-face engagement, it seems more beneficial for both regulated organisations and Archives to engage further during development of individual activities, rather than extending engagement on this phase of the programme.

High priorities

Relationship management

Looking across the polls, comments and online channels research, relationship management is a priority for regulated organisations. The comments on the [relationship management focus area](#) highlight expectations and gaps in Archives' current practice, while the interest in influencing senior decision-makers also indicates a need for strong relationship management.

Relationship management is critical for delivering support, guidance and expertise to IM practitioners and for helping them to influence their Executive Sponsors. For Archives, it is also an important mechanism for driving performance improvement in the monitoring framework. Digital self-service through the redeveloped online channels will not completely remove the need for relationship management. Archives need to find a balance between better addressing the needs and expectations of IM practitioners and setting parameters on what it can and will deliver through a new relationship management model.

Although technology to support relationship management, e.g. a customer relationship management system (CRM), did not rank highly in polls it should not be deprioritised. Archives' ability to easily form a complete picture of an organisation and track requests or interactions is fundamental for delivering effective relationship management, particularly given the number of organisations Archives regulates.

IM leadership

IM leadership is another key priority for regulated organisations. This comes through in the comments from the *Themes* thread and the online channels research. It is also implied in the demand for influencing senior decision-makers and better monitoring and reporting. People want to see Archives visibly raising both its profile and the profile of IM. It is not enough to take the position that Archives is the lead for public sector IM, it must been seen stepping up to it. People are not aware of the work Archives is already doing to collaborate with AOG leads, for example, on the ECMaaS refresh.

Monitoring and disposal

Archives has already prioritised work on monitoring and reporting, as well as transforming disposal. The findings support these priorities, but there is clearly dissatisfaction with both functions as they currently stand. Development work on the monitoring framework is already addressing public sector expectations and further engagement is planned. The comments on disposal machinery suggest a demand for quite a dramatic change.
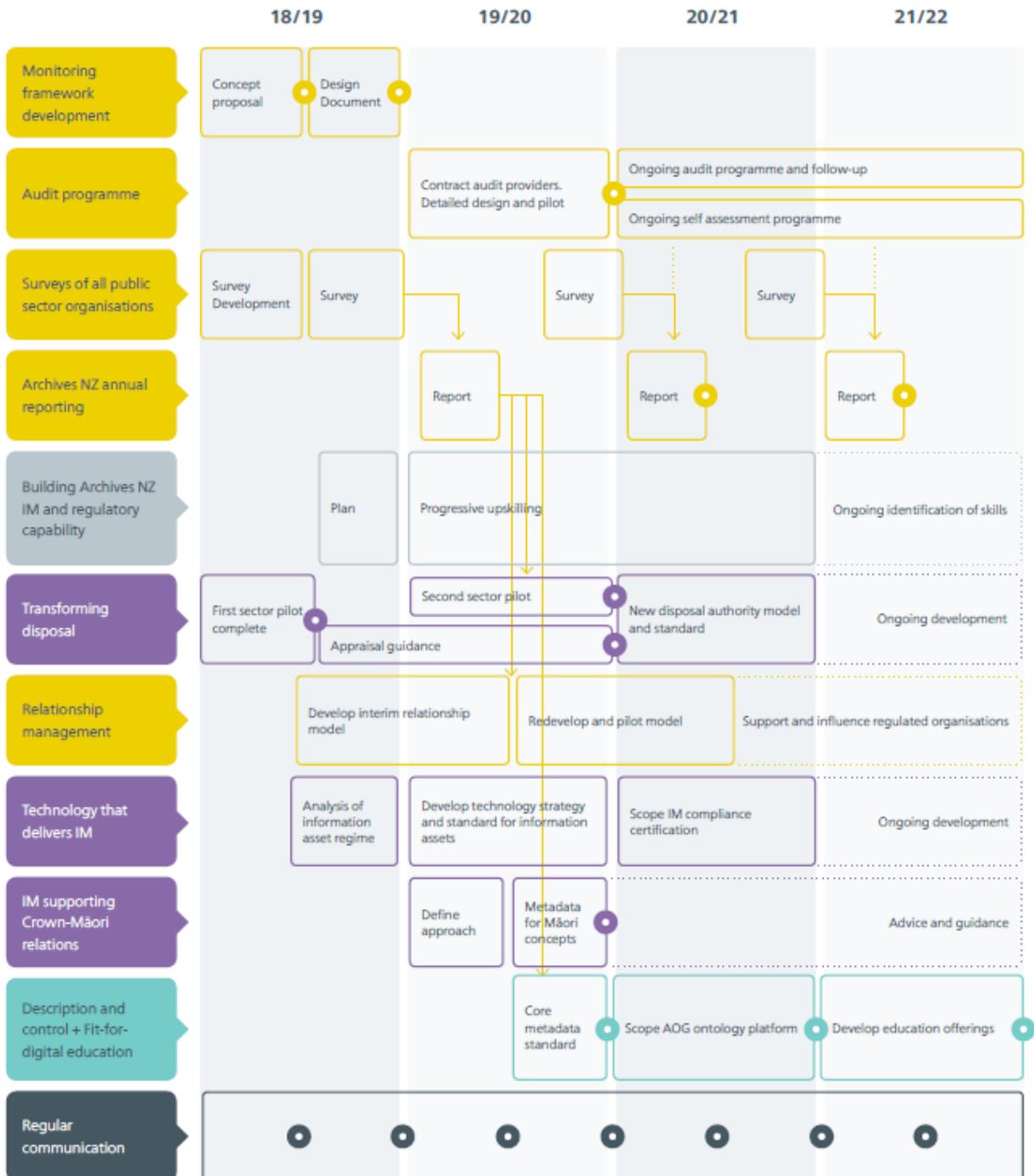
Other insights

Technology that supports IM generated a substantial amount of online discussion compared to other focus areas. Some IM practitioners believe that Archives should not expend effort on influencing ECMaaS. There are clearly a number of challenges that IM practitioners are facing with technology, including cloud, Office 365, shadow IT and the ever present dominance of IT over IM. People want more assistance and expertise from Archives in the technology space, although one person had reservations about its involvement because of its perceived lack of understanding. Such reservations have a connection with IM leadership; Archives is seen as being behind technology trends affecting IM rather than ahead of them.

An all-of-government ontology platform and education on preserving usability and integrity polled highest in their respective threads. The reasons for this are not elaborated on in the comments. Ontology concept modelling being conducted by the cross-government ontology working group is underway and will be further tested with stakeholders.

Generally, activities associated with IM supporting Crown-Māori relations did not rank highly or attract much comment. However, it was not expected that IM practitioners would rank them above other activities that address the day-to-day challenges they face with leading IM in their organisations.

The data collected did not provide sufficient insights to make a determination on the external need or demand for other activities in the Regulatory Programme. Consequently, Archives Leadership Team will have to make a call on whether to continue to prioritise those activities that currently feature in Years 1 and 2 of the indicative timeline (see below).

	18/19	19/20	20/21	21/22
Monitoring framework development	Concept proposal / Design Document			
Audit programme		Contract audit providers. Detailed design and pilot	Ongoing audit programme and follow-up / Ongoing self assessment programme	
Surveys of all public sector organisations	Survey Development / Survey	Survey	Survey	Survey
Archives NZ annual reporting		Report	Report	Report
Building Archives NZ IM and regulatory capability	Plan	Progressive upskilling		Ongoing identification of skills
Transforming disposal	First sector pilot complete	Second sector pilot / Appraisal guidance	New disposal authority model and standard	Ongoing development
Relationship management		Develop interim relationship model	Redevelop and pilot model	Support and influence regulated organisations
Technology that delivers IM	Analysis of information asset regime	Develop technology strategy and standard for information assets	Scope IM compliance certification	Ongoing development
IM supporting Crown-Māori relations		Define approach / Metadata for Māori concepts		Advice and guidance
Description and control + Fit-for-digital education		Core metadata standard	Scope AOG ontology platform	Develop education offerings
Regular communication	●	●	●	●	●	●	●

Priority areas

It is recommended that:

1. Archives should prioritise designing and implementing a new relationship management model that includes roles dedicated to relationship management and supporting technology

2. As well as having relationship skills, relationship managers will need to have the expertise to provide people with the answers they need

3. Archives needs to clearly define its IM leadership role and frequently communicate it to external stakeholders

4. As with relationship management, to truly lead IM Archives needs the expertise on staff in order to be taken seriously. This could include the development of an IM policy role to support the Chief Archivist

5. Development of the monitoring framework should continue to be a priority

6. Archives should further expand, accelerate and communicate its thinking on the future of appraisal and disposal and should consider co-design with organisations to come up with a model that works for everyone

7. Archives should revisit the *Technology that supports IM* focus area to ensure that the component activities are fit-for-purpose and reconfirm which to prioritise in Years 1 and 2 of the programme

8. Archives should continue external engagement during development of individual activities, to ensure that they meet stakeholder needs and expectations. Engagement should incorporate face-to-face modes, for example, working groups and co-design. Archives will therefore need the expertise on staff to effectively lead co-design

9. Despite engagement findings, Archives should proceed with work on IM supporting Crown-Māori relations even if at a smaller scale

Appendix A: Findings from comments

The themes thread

The purpose of this discussion thread was to test the four themes at the core of the programme and generate discussion about what IM practitioners need from Archives. In practice, people used the online discussion thread for other purposes, outlined below. [3]

General thoughts

Four people expressed explicit support for the programme. However, several people also highlighted the challenges associated with delivering the programme. One commented that "so often we see these wonderful projects for improvement burst onto the scene and we get our hopes up, only to see them dwindle as the "too hard basket" begins to fill up." Another said "given the breadth of the proposed programme, I believe implementation will require significant capability development and/or additional funding."

Other general thoughts about the programme covered terminology, Archives' goals and problem statements, and the role of standards. One person felt that the term "IM practitioner" was too narrow: "I think an effective regulatory programme will need to engage with information and technology professionals of all kinds, as well as people responsible for core business and data systems." Another said that they "would have expected more of a focus on data." Yet another person commented that "the end-goal of having accessible information available through Archives NZ somewhat obscures the need for open access to information prior to that point." Several people wanted more information about the role of standards in supporting the programme.

Role of Archives

Online engagement commenced shortly after public consultation by the National Archival and Library Institutions (NALI) Ministerial Group closed. As a result, several people posted comments relevant to NALI subject matter, in both this thread and others. One person commented multiple times on the subject, for example: "the real debate we perhaps ought to be having is what is the role of an institution like ANZ in 2018, what is needed, and whether there are better ways to achieve those outcomes." The same person questioned Archives' capability and willingness to lead IM across government. Several others commented that there is a gap in IM leadership:

> "We have a GCTO, GCPO, GCFO etc. but no GCIMO . . . we need strong leadership in the IM space, and right now Archives NZ is seen as the guardian of historical records only."

> "There is a yawning chasm in the NZ government and local government space for IM leadership and knowledge sharing just waiting for ANZ to step up to – where is the GCIMO?"

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[3] Comments posted in this thread relating to specific components of the programme are addressed under the relevant theme thread.

"If ANZ is positioning itself to lead the IM sector, where does that leave non-regulated records and archives?"

"We would argue that there has been little evidence of [AOG or cross-sector focus] happening to date. If ANZ have been fulfilling this role, it would be good to see this shared more widely with agencies."

Understand IM

The following table summarises the number of comments relevant to the focus areas in this theme.[4]

Focus area	Number of comments
Influencing senior decision-makers	23
"Fit-for-digital" education	11
IM supporting Crown-Māori relations	7
Strategically managing information assets	8

Influencing senior decision-makers

Suggestions made about this focus area included:

- Help IM practitioners to promote or translate IM with their Executive Sponsors
- Bring Executive Sponsors and IM practitioners together at the same event
- Collect evidence about what works in IM to help demonstrate the value of information and IM to senior decision-makers
- Bundle Executive Sponsor engagements with sponsorship activities in related domains, such as privacy, security and open data, to avoid over-burdening sponsors
- Provide clarification on how the proposed engagements will improve working relationships between IM practitioners and senior decision-makers

Other topics discussed that did not include explicit suggestions were:

- IM practitioners are not able to engage meaningfully with Executive Sponsors and the profession needs to get better at being the voice for IM
- Concern about the willingness of Executive Sponsors to fill the role and their understanding of its significance
- A range of opinions on whether senior decision-makers see IM as a priority and, if not, how to make that happen
- A lack of people in senior decision-making positions with an IM background

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[4] The figures provided in this do not equate to the total number of comments received for the thread and are provided as a rough measure of engagement only. Relevant comments from across all discussion threads and written submissions are included in the figures provided.

"Fit-for-digital" education

Suggestions and concerns about this focus area included:

- Deliver education "in conjunction with tertiary education institutions with experience in this field"
- Provide "more guidance on how to incorporate [digital] visual records into textual recordkeeping frameworks"
- Provide education for 'end users' as well as IM practitioners
- Reuse what has worked in other jurisdictions
- A staff capability matrix "will make it easier for agencies to build internal digital IM capability at all levels"
- Online education offerings will not "speak to the information culture, context and holdings of an agency" and Archives should not ignore face-to-face education offerings
- "Take an agile approach to this" rather than comprehensive review, to avoid education offerings becoming rapidly outdated

IM supporting Crown-Māori relations

Suggestions and concerns about this focus area included:

- Re-use the work of other organisations on Māori subject headings and storage or provision of access to taonga
- Expand Te Reo Māori translation beyond ECMaaS
- Ensure ECMaaS supports the use of macrons as a standard requirement
- Tease this theme out more "to articulate activities which speak to the implications for how agencies store and provide access to Māori information/taonga"
- "Te Reo is very important but the basics need to be sorted first"

Strategically managing information assets

Suggestions and concerns about this focus area included:

- IARs should be used within an information governance framework that includes risk management
- Provide evidence that IARs have delivered real benefits for organisations, given the investment required to create and maintain them
- Collaborate with other parts of DIA to provide "concrete guidance about the best approach and frameworks for digital asset registers"
- Not all organisations view information as an asset yet
- Digitised assets are not considered assets by Audit New Zealand, which creates financial implications for activities such as migration to new formats

Set up IM

The following table summarises the number of comments relevant to the focus areas in this theme.[5]

Focus area	Number of comments
Standardising description and control	8
Technology that supports IM	23
Transforming disposal	6

Standardising description and control

Suggestions and concerns about this focus area included:

- There are unknowns regarding the maintenance, skill sets and ownership of an all-of-government ontology that will be difficult to resolve

- Conduct a cost-benefit analysis first to see whether ontologies have delivered anticipated outcomes

- Due to scope, developing an all-of-government ontology might affect other project deliverables

- "The current standard has been overly simplified" and a metadata standard is needed

- Clarify "how the proposed sets of metadata standards would differ from previous standards"

Technology that delivers IM

Suggestions and concerns about this focus area included:

- The focus area seems quite ECMaaS-heavy and needed more of a future focus

- The ECMaaS approach is flawed, under-delivering and becoming outdated

- "There is no reason to put effort into ECMaaS as they are becoming redundant"

- Archives is not well-placed to set the direction for ECMaaS because it does not understand how organisations use ECM

- The suitability of the products on the ECMaaS panel needs to be re-examined and a wider selection of offerings made available to "match different environments, scales and requirements"

Other topics discussed that did not include explicit suggestions were:

- Issues with cloud, shadow IT and line-of-business systems

- Archives' inability to provide help and guidance on Office 365 roll outs

- Issues with synchronicity and communication between IM and ICT

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[5] Ibid.

- Getting ahead of 'cloud first' and large scale data management
- Archives' role in relation to data sovereignty
- Support for Archives working with vendors "so that IM requirements can influence what vendors offer"

Transforming disposal

Suggestions and concerns about this focus area included:

- Section 20 of the Public Records Act needs to be amended for a digital world and to improve the lengthy and complicated process for receiving authorisation
- Commit to leading the appraisal process for the new disposal authority model otherwise it will not work. More detail is needed on how Archives will be changing its processes
- The current disposal authority model "lends itself to traditional paper-based recordkeeping systems . . . but is much harder to pragmatically implement in digital information systems"
- Allow organisations to manage disposal authorities as living documents and use principal-based disposal decisions that enable quicker, pragmatic implementation across environments
- Consider better consultation models used in other jurisdictions to replace the intention to dispose process
- Clarify the rationale for reviewing the general disposal authorities

Make IM happen

The following table summarises the number of comments relevant to the focus areas in this theme.[6]

Focus area	Number of comments
Preserving usability and integrity	2
Taking action on disposal	15

Preserving usability and integrity

Suggestions and concerns about this focus area included:

- Digital preservation activities are not an issue for organisations and "it would be challenging to make a successful business case for digital preservation due to the cost and specialist capability required"
- "It may be more effective for New Zealand to actively contribute to well-funded international programmes and to adapt relevant research findings to local conditions, than to fund and conduct independent research"

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[6] Ibid.

Taking action on disposal

Suggestions and concerns about this focus area included:

- Disposal implementation plans could place more burden on organisations, particularly if Archives does not balance this out by taking over most of the responsibility for appraisal. More detail is needed on how Archives will support organisations with disposal implementation

- Demystify the process and make it "logical, practical and achievable" because some IM practitioners are terrified of doing digital disposal in case they get it wrong

- Make clear technical requirements for digital transfer and continuing transfer a top priority

- "Consider and support the digital preservation and transfer of new information formats, such as CAD drawings and Buildings Information Management (7D infrastructure models)"

Be supported

The following table summarises the number of comments relevant to the focus areas in this theme.[7]

Focus area	Number of comments
Relationship management	9
"Fit-for-digital" tools	3
Monitoring and reporting	17
Driving digital transition	7

Relationship management

Suggestions and concerns about this focus area included:

- Although there are helpful individual staff, Archives currently offers very little in the way of relationship management

- Develop "a more client-oriented approach to the delivery of tools and support"

- Provide a key contact that understands the organisation and can provide support, second opinions and mentoring

- Set service level expectations and providing timely responses

- Establish clear specialists in certain areas and making proactive contact with organisations

- Provide answers to big questions, like cloud-first policy

- Build and maintain relationships across the sector to "take the pressure of [sic] Archives being the oracle of all knowledge . . . and act as a relationship broker on different topics"

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[7] Ibid.

"Fit-for-digital" tools

Suggestions and concerns about this focus area included:

- Establish a research and development branch and subsidise development of software, for example, a digital macro-appraisal tool

- End users want intuitive tools

- If organisations do not recognise information as an asset then "it will be hard . . . to get any traction for budgets to purchase these "fit-for-digital" tools"

Monitoring and reporting

Suggestions and concerns about this focus area included:

- Be mindful of using enforcement approach because it may divert already stretched resources away from activities that are delivering long-term change. More detail is needed on how Archives will work with organisations to understand the "challenges they are facing and how that might be impacting on any lack of compliance"

- Increase public education, visibility and senior decision-makers' awareness by talking openly about enforcement actions or investigations underway and issue media statements

- Be mindful of pushing towards "meeting requirements that aren't a top priority of senior leaders" because it may "derail traction on other areas that will deliver real system change"

- Include local government in the monitoring framework and amend the Public Records Act "so that local government agencies are treated the same as public offices and are audited by Archives NZ"

- Design monitoring and reporting products so that they are suitable for Executive Sponsors

- Monitoring methodologies should "stand up to highly rigorous statistical analysis"

- Be wary of consultation fatigue and try to co-monitor where possible

- Bring problems identified in audit to the attention of other regulators for possible follow-up

- Look at how audit might fit with the Investor Confidence Rating for asset management

- Gather data on the reduction of IM roles and their drop in seniority

- Increase the penalties in section 62 of the Public Records Act to reflect Archives' position on the value of information

Driving digital transition

Suggestions and concerns about this focus area included:

- End users are a barrier to full digital information and IM practitioners cannot trust that the digital record is complete

- The risk of creating a focus on digitising paper over digital processes has already occurred
- Accompany any shift in position with "practical advice on embedding good IM into digital processes and systems"
- Provide organisations with sufficient time to prepare for a transition