KPMG

Public Records Audit Report for Transpower New Zealand Limited

Prepared for Te Rua Mahara o te Kāwanatanga Archives New Zealand

December 2023

kpmg.com/nz

Disclaimers

Inherent Limitations

This report has been prepared and is delivered by KPMG, a New Zealand partnership (KPMG, we, us, our) subject to the agreed written terms of KPMG's CSO with the Department of Internal Affairs (Client, you) dated 26 November 2020 (Engagement Contract).

Unless stated otherwise in the Engagement Contract, this report is not to be shared with third parties without KPMG's prior written consent. However, we are aware that you may wish to disclose to central agencies, relevant Ministers' offices, monitoring agencies/departments or other specific Crown Ministries or Departments consulted on this work elements of any report we provide to you under the terms of this engagement. In this event, we will not require central agencies, relevant Ministers' offices, monitoring agencies/departments or other Crown Ministries or Departments consulted on this work to sign any separate waivers.

The services provided under our Engagement Contract (Services) have not been undertaken in accordance with any auditing, review or assurance standards. The term "Audit/Review" used in this report does not relate to an Audit/Review as defined under professional assurance standards.

The information presented in this report is based on information that was made available to us in the course of our work/publicly available information/information provided by the Department of Internal Affairs and Transpower. We have indicated within this report the sources of the information provided. Unless otherwise stated in this report, we have relied upon the truth, accuracy and completeness of any information provided or made available to us in connection with the Services without independently verifying it. Nothing in this report constitutes legal advice or legal due diligence and you should not act upon any such information without seeking independent legal advice.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by, Transpower management and personnel / stakeholders consulted as part of the process.

This report was based on information available at the time it was prepared. KPMG is under no obligation in any circumstance to update this report, in either oral or written form, for events occurring after the report has been issued in final form.

Third Party Reliance

This report is solely for the purpose set out in Section 2 and 3 of this report and for the Department of Internal Affairs information and is not to be used for any other purpose or copied, distributed or quoted whether in whole or in part to any other party without KPMG's prior written consent.

Other than our responsibility to the Department of Internal Affairs, none of KPMG, any entities directly or indirectly controlled by KPMG, or any of their respective members or employees assume any responsibility, or liability of any kind, to any third party in connection with the provision of this report. Accordingly, any third party choosing to rely on this report does so at their own risk.

Additionally, we reserve the right but not the obligation to update our report or to revise the information contained therein because of events and transactions occurring subsequent to the date of this report.

Independence

We are independent of Te Rua Mahara o te Kāwanatanga Archives New Zealand (Te Rua Mahara) in accordance with the independence requirements of the Public Records Act (PRA) 2005.

KPMG

© 2023 KPMG, a New Zealand Partnership, and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

Contents

1. Executive summary

Transpower New Zealand Limited (Transpower) is a state-owned enterprise that has a dual role of grid owner and system operator. Transpower builds, maintains, and owns the national transmission grid that connects generators of electricity with users around the country. Transpower also runs the wholesale electricity market and operates the power system. Transpower creates high-value public records including research and analysis, electricity maps and drawings, asset-related information, and policies.

Transpower has over 850 staff, including permanent staff and contractors. The Executive Sponsor is the General Manager, Information Services and Technology. The Executive Sponsor is supported by the Enterprise Information Management (EIM) Team, made up of five information management (IM) staff. The EIM Team provides information and records management services and expertise across the organisation.

Transpower's primary repository for electronic documents and records is SharePoint. Information is also maintained in, but not limited to, a customer relationship management system, an asset management system, and a drawings management system. Most records are maintained electronically, however approximately 131,750 physical files are stored at a third-party storage facility.

The IM maturity of Transpower is summarised below. Further detail on each of the maturity assessments can be found in Sections 4 and 5 of this report.

Beginning	**2**
Progressing	**3**
Managing	**9**
Maturing	**5**
Optimising	**1**

© 2024 KPMG, a New Zealand Partnership, and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

2. Introduction

KPMG was commissioned by Te Rua Mahara o te Kāwanatanga Archives New Zealand (Te Rua Mahara) to undertake an independent audit of Transpower under section 33 of the Public Records Act 2005 (PRA). The audit took place in November 2023.

Transpower's IM practices were audited against the PRA and the requirements in the Information and records management standard (the Standard) as set out in the Te Rua Mahara IM Assessment.

Te Rua Mahara provides the framework and specifies the audit plan and areas of focus for auditors. Te Rua Mahara also provides administrative support for the auditors as they undertake the independent component of the audit process. The auditors are primarily responsible for the onsite audit and writing the audit report. Te Rua Mahara is responsible for following up on the report's recommendations with your organisation.

3. This audit

This audit covers all public records held by Transpower including both physical and digital information.

The audit involved the review of selected documentation, interviews with selected staff, including the Executive Sponsor, the Enterprise Information Management Team, the Information Technology team, and a sample of Transpower staff. The Executive Sponsor is the Senior Responsible Officer for the audit.

The audit reviewed Transpower's IM practices against the PRA and the requirements in the Standard and provides an assessment of current state maturity. As part of this audit, we completed systems assessments over the Transpower's key systems that act as a repository for public records. The systems assessed were SharePoint, a drawings management system, a customer relationship management system, and an asset management system. Where recommendations have been made, these are intended to strengthen the current state of maturity or to assist with moving to the next level of maturity.

The summary of maturity ratings can be found at Section 4, with detailed findings and recommendations following in Section 5.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

4. Maturity Assessment

This section lists all assessed maturity levels by topic area in a table format, refer to Appendix 1 for an accessible description of the table. For further context about how each maturity level assessment has been made, refer to the relevant topic area in the report in Section 5.

Category	No.	Topic	Maturity				
			Beginning	Progressing	Managing	Maturing	Optimising
Governance							
	1	IM strategy			●		
	2	IM policy and processes				●	
	3	Governance arrangements and 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	●				

Please note: Topics 17 and 19 in the Information Management Maturity Assessment are applicable to local authorities only and have therefore not been assessed.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

5. Audit findings by category and topic

Governance

The management of information is a discipline that needs to be owned from the 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 — Managing

Summary of findings

Transpower has a current Information Management Strategy (the Strategy) that supports business needs and strategic direction. The current and updated Strategy was approved in October 2023 by the Executive Sponsor and is scheduled for review every three years.

The Strategy was developed collaboratively with the EIM Team, members of the Information Governance Committee (IGC), and members of the Information Management Working Group (IMWG). The EIM Team is responsible for providing information and records management services and expertise across the organisation. The IGC is responsible for providing oversight and a strategic view for IM across Transpower. The IMWG is responsible for exploring IM issues and impacts at a business unit level. Senior management, which includes senior leaders from business units and four General Managers are involved in these groups. The General Management Team reviewed and endorsed the Strategy prior to it being approved by the Executive Sponsor.

As the updated Strategy was recently released, Transpower is currently working towards communicating the Strategy to operational staff. The Strategy is currently available on Transpower's intranet for all staff to access.

The Strategy is aligned to the wider ICT Strategy. The Strategy influences other ICT sub-strategies such as the Enterprise Information and Data Strategy and Digital Workplace Strategies.

Transpower has an Enterprise Information Management Operating Plan 23/24 (Operating Plan) that includes initiatives and implementation activities to support the objectives set out in the Strategy. The Operating Plan includes Transpower's focus areas to uplift IM practices, including key performance indicators. Transpower does not have a formal reporting mechanism for progress against the initiatives and implementation activities. Historically, reporting against strategic initiatives have been informal through direct conversations with the Executive Sponsor.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

Recommendations

Ensure the Strategy is communicated to all staff as planned.

Establish regular reporting mechanisms against the Enterprise Information Management Operating Plan as part of the IGC meetings.

TOPIC 2 – IM policy and processes — Maturing

Summary of findings

Transpower has an Information Management Policy that was approved by the Chief Executive in January 2021. The Policy is consistent with relevant legislation including the PRA, Official Information Act 1982, the Privacy Act 2020, and the requirements and Standard issued by Te Rua Mahara. While the Policy was considered during the development of the updated Information Management Strategy, the Policy has not changed as the intention of the Policy is to not be affected by strategic or operational changes. The Policy is next scheduled for review in January 2026, and any implications of the Strategy will be considered in this review.

The Policy references the Information Security, Privacy, and Risk Management policies.

Information management roles and responsibilities are detailed in the Policy for the Chief Executive, the Executive Sponsor, Enterprise Information Manager, and all Transpower staff. Responsibilities for IM are detailed in job descriptions for all staff within the EIM Team.

The Policy is communicated to all staff and contractors as part of their on-boarding process, and all staff and contractors are encouraged to meet their IM responsibilities through monthly information sessions. The information sessions provide support on tools to enhance IM practices.

Policy requirements are actively built into SharePoint, which is Transpower's electronic documents and records management system. Some Policy requirements are built into Transpower's drawing management system, which holds engineering drawings, documents, and media of Transpower substations, assets, and network connections. Storage limits are applied in OneDrive, which Transpower has defined as an uncontrolled environment.

Transpower maintains up-to-date, approved, and documented process and guidance documents, including the Drawing Management Policy and Procedures, Retention and Disposal, Business Taxonomy, and Metadata Schema guidelines, and the Enterprise Information Management Framework.

There have been no breaches of the Information Management Policy and processes that required escalation to the Executive Sponsor and/or governance level. Minor breaches of policy and processes are addressed through educating the staff on IM practices.

Recommendation

Actively build policy requirements, such as retention and disposal schedules, into all relevant information systems.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

TOPIC 3 – Governance arrangements and Executive Sponsor — Maturing

Summary of findings

Transpower's IGC provides the overall direction, as well as support, for IM at Transpower. This includes establishing and reviewing the effectiveness of the Information Governance Framework, IM strategies, IM policies, and systems architecture. The IGC also monitors Transpower's implementation of relevant IM initiatives. The IGC meets bimonthly and includes the Executive Sponsor, Chief Data Officer, Enterprise Information Manager, and select senior managers.

The IMWG supports the IGC by monitoring business unit level implementation of relevant IM initiatives, providing advice on information governance challenges, and championing policy requirements within their business units. The IMWG includes the Chief Data Officer, and senior representatives from all business units.

The Executive Sponsor consistently fulfils their oversight and monitoring role. While reporting to the Executive Sponsor was performed in an informal basis prior to November 2022, the meeting minutes of the IGC demonstrated evidence of consistent reporting. There have been no significant issues identified that has required the Executive Sponsor to act upon.

The Executive Sponsor has been involved in the uplift of IM practices at Transpower, for example, being involved in the migration from SharePoint On-Premise to SharePoint Online, and in the implementation of the drawing management system to ensure all information is stored in a centralised repository. There is an opportunity however, for the Executive Sponsor to actively work with other Executive Sponsors in the energy sector to ensure IM is considered.

Recommendation

Consider how the Executive Sponsor could actively work with other Executive Sponsors in the energy sector regarding IM.

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

TOPIC 4 – IM integration into business processes — Managing

Summary of findings

Responsibility for the management of information within business units is consistently assigned to business owners. Business owners hold roles as business unit representatives in the IMWG, and responsibilities for IM are documented in the IGC Terms of Reference. Ownership of specific information assets is assigned to Managers and associated roles and responsibilities are documented in the Information Management Policy. A register of all Managers that are assigned as information owners is documented in the Information Owner Register that is maintained on SharePoint.

Business owners understand and act upon their IM responsibilities. There is a standard practice promoted by Managers, to ensure documents are sent as links as opposed to attachments, to ensure the latest version is reviewed. Business owners are also involved in the IMWG.

Business owners are reminded of their responsibilities through drop-in sessions with the EIM Team. Transpower has recently introduced a new training for managers that is run on a quarterly basis, where IM has been integrated as a mandatory module.

Requirements for managing information are integrated into core business processes and activities. Process documents and guidelines are in place to support staff with general IM practices. Many requirements for the management of information are integrated into business processes, including metadata, and retention and disposal labels. However, Transpower still retains information that could be disposed of as they consider the cost to increase storage low and the information may be required for use in the future. There has recently been an increased awareness of the impact of retaining excess information across the organisation and the EIM Team is intending to explore ways to regularly dispose of records. The EIM Team is planning to work with information owners in 2024 to dispose of records that are beyond the relevant retention period.

The EIM Team are involved in some business process change and development, such as changes relating to Transpower's intranet and processes to share information and collaboration with external parties. There is an opportunity for the EIM Team to be regularly involved in Transpower's business process change and development to ensure IM aspects are considered.

Any issues related to IM are directed to the EIM Team. Any significant issues will be raised to the Executive Sponsor.

Recommendation

Involve the EIM Team in business process change and development on a regular basis to ensure IM aspects are considered.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

TOPIC 5 – Outsourced functions and collaborative arrangements Beginning

Summary of findings

Different business units at Transpower hold outsourcing contracts. Transpower shares its Information Management Policy with contracted parties. Transpower has not retrospectively assessed all historical contracts to include requirements from the Information Management Policy, the PRA, or the Standard.

We received a sample of existing contracts, service agreement templates, terms of reference and memoranda of understanding.

Requirements for the management of information were included in some sampled contracts. For example, clauses were included that require prevention of unauthorised access to business systems, ensuring information is complete and sufficient to show the location of works, and what system(s) information must be stored in. Sampled contracts and service agreement templates address intellectual property, confidentiality, and privacy. However, there are no roles and responsibilities defined for the management of information. There are no clauses that detail the parties' obligations to the requirements set out in the PRA or the Standard.

The public records status of information held by outsourced functions is not identified in the samples received. There is no evidence of Transpower performing monitoring over contracted parties to ensure IM requirements are met.

Recommendations

Include requirements for managing information and roles and responsibilities in all future template contracts.

Implement monitoring of contracted parties to ensure IM requirements are met.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

TOPIC 6 – Te Tiriti o Waitangi — Progressing

Summary of findings

Systems that hold information of importance to Māori are identified in the Public Records Repositories Register. Metadata fields including 'iwi' and 'mātauranga Māori' are populated on the Public Records Repositories Register depending on whether the listed system contains information of importance to Māori. Information of importance to Māori is not tagged at a document level within these systems.

Transpower has identified information of importance to Māori, including relationship agreements with iwi, consents and authorities that require engagement at a hapū or whānau level, and information relating to disputes.

Planning is underway to change IM practices to improve access, discoverability, and care for information of importance to Māori. This will include investigating adding a third metadata column on the Public Records Repositories Register to identify precedent setting cases of importance to Māori and other relevant resource management considerations. There is also a plan to add metadata fields for 'culturally sensitive information' to the photo and multimedia management system.

Transpower is working with Māori to ensure that information of importance to Māori is identified, appropriately managed, accessed, and used. Transpower staff, especially those that engage directly with iwi and hapū, are encouraged to understand the importance of the information pertaining to them. Additionally, Transpower has a Cultural Advisor and a Principal Stakeholder Advisor who advise on records.

The EIM Team is not directly involved in any new agreements with Māori or of importance to Māori. The EIM Team publish resources to enable staff who are directly involved in agreements with Māori to ensure IM implications are analysed and documented. However, IM implications from agreements with Māori have not been thoroughly analysed and documented.

Recommendation

Formally analyse and document the IM implications of Te Tiriti settlement agreements and/or any other agreements with Māori.

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

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 own internal policies and processes.

TOPIC 7 – Self-monitoring — Managing

Summary of findings

There is regular monitoring of compliance with the Information Management Policy, processes, PRA, and the Standard. Areas of greatest risk to recordkeeping practices have been identified and prioritised for monitoring. This includes tracking the number of documents added to controlled and uncontrolled environments, the number of SharePoint site administrators trained, the number of files shared, and the proportion of SharePoint sites that are recorded as public or private.

There is regular reporting on Transpower's compliance with the requirements of the PRA, the Standard, and relevant legislation. Every six months the EIM Team assesses Transpower's progress in uplifting IM practices against the maturity assessment issued by Te Rua Mahara. Additionally, six-monthly reporting of privacy breaches, and the length of time taken to respond to Official Information Act requests is produced.

The results of monitoring activities are a standing agenda item for the IGC and the IMWG in order to track progress against strategic objectives.

The EIM Team is working to develop a systemised approach to creating and tracking self-monitoring reports and corrective actions. Monitoring and reporting of compliance with IM requirements is not included in Transpower's risk management processes. There is some evidence of a structured approach to implement corrective actions to address non-compliance. For example, OneDrive as an uncontrolled environment has a 10GB limit to encourage users to store their information on controlled environments. OneDrive storage is regularly audited by the EIM Team. If the EIM Team identify users approaching their storage limit, they will send the users recommendations and provide support to free up the storage space.

Recommendation

Include the monitoring and reporting of compliance with IM requirements as part of Transpower's wider risk management processes.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

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 — Progressing

Summary of findings

Transpower have raised that IM capability requirements are appropriately addressed. Staff within EIM Team are IM professionals and have years of relevant experience and study.

The EIM Team have raised that there is currently sufficient IM capacity resourced to develop housekeeping standards for IM and manage business-as-usual activities. There is an opportunity to further increase capacity to ensure there is active disposal of information and further support Transpower staff to integrate IM into their business processes. There are plans to address capacity requirements by hiring one additional full-time resource in July 2024.

Information management capability and capacity is regularly assessed and monitored against business needs. The EIM Team maintain a capacity and capability matrix that details where they are appropriately resourced and potential areas where they are under-resourced. Gaps identified in the capacity and capability matrix are not regularly raised to the Executive Sponsor or the IGC.

The EIM Team have regular access to IM-related professional development courses and networks, including the Records and Information Management Practitioners Alliance (RIMPA) and the Government Information Systems Managers' Forum (GOVIS). The EIM Team also have regular access to broader professional development opportunities, including te reo, cultural awareness, and business writing courses.

Recommendation

Ensure plans are in place to utilise the additional resource to actively perform disposal actions and support the development of further IM training.

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

Summary of findings

Information management is detailed in all job descriptions for the EIM Team, and the Team's performance plans are reviewed and updated quarterly to ensure IM requirements and business needs are being met. Roles and responsibilities for the management of information are detailed in the Information Management Policy but are not detailed in job descriptions or performance plans for other staff. Transpower have made a conscious decision to not include detailed responsibilities regarding IM in the job descriptions, as job descriptions include an exhaustive amount of detail specifically related to their role. Compliance with IM responsibilities is captured in the broader requirement to abide by all Transpower policies and processes.

Information management responsibilities are communicated to all staff and contractors. As part of the on-boarding process, all new starters must complete a mandatory training module on the PRA and IM. Owners and administrators of SharePoint sites are offered in-person training and asked to complete further training modules if they wish. There are regular Microsoft 365 training sessions and targeted training is provided when there are significant changes to business systems or in response to specific business needs and issues. There is currently no formal, ongoing programme of IM training delivered to all staff and contractors. The EIM Team raised that an ongoing programme of annual IM training will be implemented in the form of online training courses, that includes an auditable completion record.

The EIM Team attend meetings with other business units to remind and support senior management to understand their IM responsibilities. Senior management understand their IM responsibilities and are exemplars of good IM practice. For example, a Senior Manager in the Grid Development Division has championed the development of metadata for grid asset documentation. Additionally, General Managers reject the request to sign-off documents stored in uncontrolled environments. The Executive Sponsor also reminds all staff within their department through email of the importance of filing final versions of contracts with suppliers in controlled environments.

Recommendation

Prioritise the development and delivery of the formal ongoing programme of IM training for all staff and contractors.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

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 — Managing

Summary of findings

All staff and contractors interviewed confirmed they understand and comply with their obligation to create full and accurate records. Staff raised that the information that is created and maintained is crucial to performing their business activities, and There is a good understanding of what information is created and maintained by Transpower.

When Transpower produced the appraisal report to support the approval of its new disposal schedule, the EIM Team held workshops with all business units to identify what information is created and maintained at Transpower, and what information is considered high-value. A total of 26 workshop sessions were conducted between February and March 2023. This exercise included determining whether information and records are covered by general disposal authorities, or an organisation-specific disposal authority would need to be applied. The purpose of this exercise was to develop a draft disposal schedule and the accompanying appraisal report. The draft disposal schedule and appraisal report were submitted to Te Rua Mahara in June 2023.

Most information is managed in controlled environments to ensure its usability and reliability. Most records of long-term value are maintained in SharePoint, and other function-specific information is maintained in controlled business systems. The use of OneDrive for public records is actively discouraged by applying a 10GB storage limit and guidance that OneDrive should only be used to store personal documents. The use of network drives is actively discouraged and can only be used in special circumstances, such as when no other system can store such files. These environments are monitored by the EIM Team.

Appropriate metadata is created to support the usability, reliability, and trustworthiness of information. This includes, but is not limited to, unique identifiers, version control, and audit trails for the systems assessed as part of this audit. Most metadata fields are automatically applied. Additional metadata fields can be added through a controlled vocabulary list.

Information usability, reliability, and trust issues are not actively monitored due to EIM Team capacity limitations. Individuals are responsible for raising concerns to the EIT when issues are identified. Concerns have been raised to the EIM Team where multiple versions of the same document would come up in the search function and staff found it difficult to identify the current version. Transpower are completing a project to ensure that the latest version of a document appears as the first search result when searched in SharePoint.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

Recommendation

Assess and address proactive monitoring around information usability, reliability, and trust issues.

TOPIC 11 – High-value / high-risk information — Managing

Summary of findings

As mentioned in Topic 10 – *Creation and capture of information*, high-value/high-risk information assets were identified in the workshop sessions to develop Transpower's new disposal schedule. These high/value/high-risk assets are formally documented in the draft appraisal report.

Transpower maintains a 'Public Records Repositories Register', which inventories all information held in digital and physical systems. For each system listed on the Public Records Repositories Register, metadata fields that describes the information assets contained within. Examples of these populated metadata fields include:

- Description of the information assets contained within the system
- Whether it contains high-value/high-risk records, as per the disposal schedule
- Retention periods
- How transfer and disposal will be handled
- Repository owner

Processes are in place to ensure the Public Records Repositories Register is current and maintained. The Register is reviewed every six months to ensure the metadata properties are up-to-date. There are scheduled reviews where information owners are required to ensure the details of the items are correct. There are occasional updates when existing systems are upgraded, or new systems have been implemented. Additionally, plans are in place to update the Public Records Repositories Register after the new organisation-specific disposal authority is approved.

The EIM Team is working on developing a framework to analyse risks to high-value/high-risk information assets.

Recommendation

Identify and document risks to high-value/high-risk information assets in metadata fields on the Public Records Repositories Register.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

Management

Management of information should be designed into systems to ensure its ongoing management and access over time, including following a business disruption event. 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 systems — Maturing

Summary of findings

Staff with IM expertise are involved in the design and configuration decisions for all new and upgraded business systems and when systems are decommissioned.

The Enterprise Information Manager is the voice for IM at the Architecture Review Board (ARB). The ARB is responsible for evaluating the functional and non-functional requirements for all new, upgraded and decommissioned business systems.

The Enterprise Information Manager and the EIM Team were involved in the migration from SharePoint On-Premises to SharePoint Online in 2019. They were also involved in the implementation of the drawing management system in 2022. The drawing management system contains engineering drawings which are critical to the grid owner and system operator role of Transpower.

The EIM Team is regularly involved during the decommissioning of business systems to ensure IM requirements are met. During the migration from SharePoint On-Premises, the EIM Team was responsible in the recordkeeping aspect of the migration. The EIM Team was involved to ensure no information remained on SharePoint On-Premises before being decommissioned. The EIM Team was also involved in the decommissioning of the former file share system.

Standardised IM requirements for new and upgraded business systems are identified and documented in the non-functional requirements questionnaire, which includes information classification and record protection.

Systems assessed as part of this audit included SharePoint and a drawing management system. These systems meet the minimum metadata requirements issued by Te Rua Mahara. Retention and disposal schedules from the general and current organisation-specific disposal authority are also applied to information in SharePoint to facilitate the retention of information of long-term value. However, retention and disposal labels are not applied across all other relevant information systems.

Risks relating to business systems that do not meet IM requirements have been identified. Transpower have identified one Software-as-a-Service platform was at risk of not meeting IM requirements. This system has subsequently been reviewed and tested to ensure compliance.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

Recommendation

Assess the appropriateness of implementing retention and disposal labels within remaining information systems to facilitate the retention of information of long-term value.

TOPIC 13 – Integrity of information — Managing

Summary of findings

Information management practices are in place for information held in SharePoint to ensure information is reliable and trustworthy. Information is maintained within a defined business classification scheme and most metadata is automatically applied, with the option to add further metadata from a controlled vocabulary list. Staff who participated in focus groups were aware of the requirement to send document links rather than attachments.

Management controls to maintain the integrity, accessibility, and usability of information are in place and mostly automatically applied. However, there is no regular testing to gain assurance over the operating effectiveness of these controls.

Staff generally have a consistent experience when finding and retrieving information they create and manage. Staff interviewed raised that finding information is getting easier due to the uplift in IM practices. Historically, information could be difficult to find due to inconsistent metadata, naming conventions, and multiple sources of the same information.

Staff have confidence that the information they create and manage is comprehensive and complete. Staff interviewed recognised the value of information and the impact if the information is not kept current or is not stored appropriately.

User-experience issues with finding and retrieving information are raised to the EIM Team. Issues raised to the EIM Team drove initiatives to ensure all information is reliable, usable, comprehensive, and complete. The EIM team has run a programme to remove duplicate files from SharePoint to ensure a single source of the truth for information. The EIM Team is improving the search function to ensure latest versions of information are the first result.

Recommendation

Regularly review management controls.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

TOPIC 14 – Information maintenance and accessibility — Managing

Summary of findings

Strategies are in place to manage and maintain physical information during business and system changes. Transpower does not maintain any physical information of value on-site. All physical information is maintained at a third-party storage provider, and list and location registers and access control reports are available to Transpower.

Strategies are in place to manage and maintain information during business and system changes. For example, when Transpower migrated from SharePoint On-Premise to SharePoint online, ShareGate was used to automate the migration process. Testing was in place to ensure information had been appropriately migrated, site owners and administrators verified the complete transfer of information, and backup and recovery processes were implemented to ensure no information was lost.

Preservation needs for physical information are identified and addressed. The third-party storage provider has produced a Records Management Security Overview report that documents measures in place to preserve physical information, such as the building being located away from natural and man-made disaster risk zones.

Technology obsolescence risks are identified, including VHS tapes, floppy disks, and CDs. The EIM Team raised that the information contained in these legacy formats is of little operational value. However, there is not currently enough resources to audit these formats for archival purposes.

Preservation and continuity needs for digital information have been addressed. Transpower has a System Lifecycle Management Strategy that was approved in March 2023 by the Executive Sponsor. The System Lifecycle Management Strategy details the approach to ensure Transpower's systems are regularly updated, protected from risks, and remain accessible. The EIM Team actively ensure that information that is critical to business activities is maintained in a PDF format.

Recommendation

Undertake audit of legacy information storage mediums at risk of obsolescence.

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

TOPIC 15 – Business continuity and recovery

Managing

Summary of findings

Transpower has an organisation-wide Enterprise Business Continuity Plan (EBCP) that was last updated in May 2020, and is tested annually by the Incident Management Team. The EBCP is currently under revision and scheduled to be published in early 2024.

Each business function, and office location, is responsible for maintaining their own function-specific business continuity plan (BCP) and testing it annually. Sampled business-function specific continuity plans were all updated between 2020 and 2022.

A business impact analysis was conducted in 2016 to determine the maximum tolerable outage of business systems. Transpower's approach to the restoration of systems is prioritised in tiers. Tier 1 core functions, including those that manage and support the system operator, grid service delivery, and some aspects of information services and technology, are aimed to be restored in less than a day. Tier 2 applications, that include ICT application management, are considered a second priority that are aimed to be restored in one day.

Critical information is stored digitally to enable business continuity and recovery; however, this critical information is not identified in BCPs. Transpower rarely produce physical records. There are copies of critical information, such as key operational guides and registers, that are available offline on laptops for all operational staff in case there was nation-wide power loss. For physical information maintained at the third-party storage provider, the provider's staff are trained in disaster management and are experts for the salvage and restoration of physical information.

Transpower perform annual back-up and restoration testing for critical systems, and service providers assist in the process on an as-needed basis. Any issues identified are remediated and documented for future reference.

The EIM Team were not involved in the prioritisation of what information is required following a business disruption event. This responsibility lies within business units to define what high-value/high-risk information they need to continue their operations.

Recommendation

Identify information critical to business activities in all function-specific business continuity plans.

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

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 — Optimising

Summary of findings

All physical information is stored at a third-party storage provider, that has appropriate protection and security in place to protect physical information against unauthorised access, loss, and destruction.

There is appropriate protection and security in place to protect digital information against unauthorised access, loss, deletion, or destruction. There is two-factor authentication for SharePoint, access control across Transpower's repositories with controls on memberships, and accounts on external sharing sites are deleted if inactive for over six months. Cloud risk assessments are performed for all information that is stored by cloud-storage providers.

Protection and security processes are tested regularly by the Security Team, which includes stress and penetration tests on all systems. The testing and any information protection and security risks are regularly reported to the Technical Action Advisory Group (TAAG). The TAAG is responsible for discussing the results of environment testing and the results of monitoring from audits performed by the Security Team. The Enterprise Information Manager receives a summary of these discussions and works closely with the Security Team.

Transpower has an Office 365 Governance Group that has oversight of information and security risks associated with the Office 365 environment. The Enterprise Information Manager is part of this group, and if any issues are identified, these would be escalated to the Executive Sponsor.

There have been no instances of significant loss, destruction, and deletion. The Security Team monitors these activities. For example, if there has been a mass deletion of files from a staff member's OneDrive, the Security team would raise this to the EIM Team.

Staff and contractors are informed of protection and security requirements through their on-boarding training and ongoing campaigns. Staff interviewed demonstrated strong awareness around the use of security classifications, use of disclosure statements, and data sharing license agreements for particular projects.

Recommendation

Due to the assessment of 'Optimising' for this topic, we have not made a recommendation.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

Access

Ongoing access to and use of information enables staff to do their work and the public to hold government accountable. To facilitate this, public offices need mechanisms for finding and using this information efficiently. Information and/or data sharing between public offices and with external organisations should be documented in specific information sharing agreements.

TOPIC 18 – Information access, use and sharing — Maturing

Summary of findings

Transpower actively maintains their file plan, global term store, and metadata schema to ensure reliable management and discovery of information.

Staff and contractors know how to use the systems and tools that contain and facilitate access to information. Advanced training in the use of metadata and search techniques is available to staff and contractors, and additional training can be requested from the EIM Team. This includes the Microsoft 365 skills site that provides guidance on using SharePoint and addresses external sharing.

Metadata used to find and manage information complies with the minimum metadata requirements issued by Te Rua Mahara for the systems assessed in this audit. Metadata is automatically applied where possible, and staff are able to select additional metadata fields from a controlled vocabulary list. Transpower have not yet implemented auto-classification tools which can facilitate reliable information discovery and use.

Metadata values are regularly updated by the EIM Team to facilitate reliable discovery and use of information. For example, if Transpower adds a new substation, they would add the location and substation to the metadata library.

Access to physical information maintained at the third-party storage provider is limited to some EIM Team members. Access controls for digital information are documented and are addressed as part of non-functional system requirements that must be approved by the ARB. The EIT is responsible for monitoring the administrators and owners of SharePoint sites. The Security Team are responsible for performing access control audits on a quarterly basis.

Information management processes are applied to incoming and outgoing data shared with external parties. Staff interviewed raised that the default security classification of 'In Confidence' is applied to all documents shared externally. The user is responsible for upgrading the classification if the default security classification is not appropriate. If external parties are working with Transpower, external sharing sites are created on SharePoint to securely manage information.

Recommendation

Investigate the use of auto-classification tools to facilitate reliable information discovery and use.

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

Disposal

Disposal activity must be authorised by the Chief Archivist under the Public Records Act. 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 access".

TOPIC 20 – Current organisation-specific disposal authorities — Maturing

Summary of findings

Transpower had an approved disposal authority (DA552) that covers information relating to all business functions, and all formats. This was due to expire in November 2022, however Te Rua Mahara granted Transpower an extension to use the disposal authority until June 2025. Transpower submitted an appraisal report to obtain a new organisation-specific disposal authority to Te Rua Mahara in June 2023.

During the development of the appraisal report, the EIM Team consulted all business units to evaluate what information is considered as high-value in early 2023. The EIM Team developed a proposed disposal schedule spreadsheet that determines the type and description of information and records, minimum retention periods, and disposal actions. Following the development of the draft disposal schedule and accompanying appraisal report, these documents were internally reviewed by the IMWG, IGC, and presented to the General Management Team. The draft disposal authority and appraisal report was approved by the Executive Sponsor.

Staff interviewed raised that generally, information that is relevant to a grid asset is retained for the entire lifespan and for additional 10 years after it has been decommissioned. Staff interviewed also showed an awareness that the information they create, and use is subject to a retention and disposal schedule and that these features are applied to information maintained on SharePoint. Transpower retains information after its retention period has elapsed. Transpower has not prioritised disposal given that the cost to increase storage is low and the information may be required for use in the future.

Transpower reviews their organisation-specific disposal authority every 10 years, as per the requirement from Te Rua Mahara. There have been some mid-cycle reviews to ensure that the organisation-specific disposal authority accurately reflects business activities and needs.

Recommendation

Promote understanding across business units of the retention and disposal schedules that apply to their information. This includes raising awareness of the impact of retaining excessive information.

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

TOPIC 21 – Implementation of disposal decisions — Progressing

Summary of findings

Processes ensure that digital information is retained for as long as required for business use as identified in general and organisation-specific disposal authorities. Retention and disposal schedules are applied to information maintained in SharePoint. When information is nearing the end of its retention period, the EIM Team is notified, and this is disposed of manually. Disposal is only completed by the EIM Team, and actions are fully documented in Microsoft Purview. The EIM Team raised that copies of disposed information would cease to exist after a 12-month period.

Adequate and appropriately trained resources are assigned to ensure some disposal actions are carried out for information maintained on SharePoint. The EIM Team has begun to dispose of records under general disposal authorities on SharePoint. The EIM Team is planning to work with information owners in 2024 to further dispose of records on SharePoint that have exceeded their retention period for information under Transpower's organisation-specific disposal authority.

Transpower destroyed some physical information in 2016. Disposal of physical information is documented on a log that is maintained by both Transpower and the third-party storage provider. The destruction of information was secure, complete, and irreversible. Transpower does not currently have the capacity to dispose of further physical information.

Recommendation

Develop a plan for appropriate disposal of information across all formats and ensure that this is included in the Strategy.

TOPIC 22 – Transfer to Te Rua Mahara — Beginning

Summary of findings

Physical and digital information of archival value that is over 25 years old has not been formally identified and transferred to Te Rua Mahara.

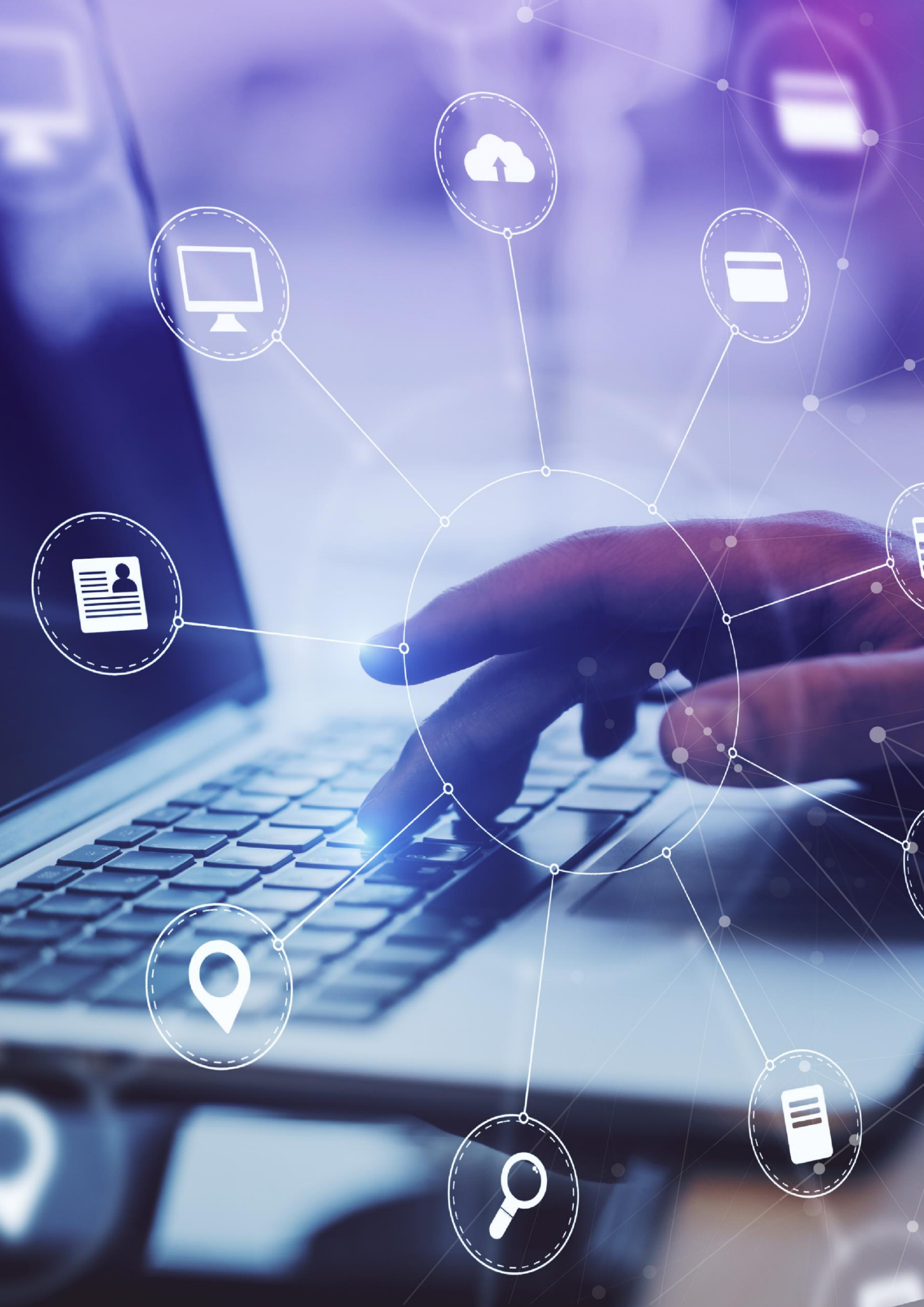
There are no current plans to transfer physical and digital information to Te Rua Mahara. Transpower has not resourced this as they have not yet implemented a systematic approach to disposal decisions. Transpower intends to begin planning for disposal when their new disposal schedule is approved.

Transpower had enquired Te Rua Mahara on the deferral of transfer process in May 2023.

Recommendations

Develop a plan to identify physical and digital information of archival value that is over 25 years old.

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.



6. Summary of feedback

Transpower welcomes the audit of our performance under the Public Records Act 2005 and the Archives NZ Information and records management standard. We acknowledge the recommendations provided by the auditors and have identified actions and action owners to address identified opportunities for improvement.

Topic 18 – We believe this has been addressed with previous investigations into auto-classification tools to facilitate information discovery, which were found to be overly expensive and/or ineffective, and we concluded would not be a good investment at the time. We do have some auto-classification which automatically apply security labels to content. However we will continue to assess new auto-classifier technologies that may be more appropriate to our needs.

KPMG

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

7. Appendix 1

The table in Section 4, on page 3 lists all assessed maturity levels by topic area in a table format. This table has been listed below for accessibility purposes:

Topic 1, IM strategy – Managing

Topic 2, IM policy and processes – Maturing

Topic 3, Governance arrangements & Executive Sponsor – Maturing

Topic 4, IM integration into business processes – Managing

Topic 5, Outsourced functions and collaborative arrangements – Beginning

Topic 6, Te Tiriti o Waitangi – Progressing

Topic 7, Self-monitoring – Managing

Topic 8, Capability and capacity - Progressing

Topic 9, IM roles and responsibilities - Managing

Topic 10, Creation and capture of information - Managing

Topic 11, High-value / high-risk information - Managing

Topic 12, IM requirements built into technology systems - Maturing

Topic 13, Integrity of information - Managing

Topic 14, Information maintenance and accessibility - Managing

Topic 15, Business continuity and recovery – Manging

Topic 16, Appropriate storage arrangements – Optimising

Topic 18, Information access, use and sharing – Maturing

Topic 20, Current organisation-specific disposal authorities – Maturing

Topic 21, Implementation of disposal decisions – Progressing

Topic 22, Transfer to Te Rua Mahara – Beginning

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

kpmg.com/nz

© 2023 KPMG, a New Zealand Partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved. The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organisation.

Te Rua Mahara o te Kāwanatanga
ARCHIVES
NEW ZEALAND

18 March 2024

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

Alison Andrew
Chief Executive
Transpower New Zealand Limited
alison.andrew@transpower.co.nz

E te rangatira e Alison, tēnā koe

Public Records Act 2005 Audit Recommendations

This letter contains my recommendations related to the recent independent audit of the Transpower New Zealand Limited completed by KPMG 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.

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. Transpower's IM is assessed as mostly operating at Managing or above. Although there is still improvement work to do in some areas this is an exemplary result.

The audit report shows that staff confidence in IM has lifted due to the work that has been done to increase consistency and trust in information through improved metadata, naming conventions, and duplicate removal. This all contributes to increased productivity for staff with systems that are easier to use to find information.

Feedback in the audit report section 6 on Topic 18: *Information access, use and sharing* describes the work already done to investigate auto-classification. Although Transpower has determined it is not currently viable it would be useful to keep an eye on further technology developments to automate IM processes.

Prioritised recommendations

The audit report lists 21 recommendations to improve your organisation's IM maturity.

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

What will happen next

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

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

We will follow up this letter with a request to your Executive Sponsor that your organisation provides us with an action plan to address the prioritised recommendations. Our follow up process will track your progress against the action plan. We will also use the action plan process to connect on auto-classification opportunities.

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 Cobus Nel, General Manager Information Services and Technology, (Executive Sponsor), Cobus.nel@transpower.co.nz

APPENDIX

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Governance	1: IM strategy	*Establish regular reporting mechanisms against the Enterprise Information Management Operating Plan as part of the IGC meetings.*	This will ensure that all involved and responsible are well informed of activity underway or completed.
Governance	5: Outsourced functions and collaborative arrangements	*Include requirements for managing information and roles and responsibilities in all future template contracts.*	This is important for control of information and should be followed by targeted monitoring as assurance for Transpower as the information owner.
Governance	6: Te Tiriti o Waitangi	*Formally analyse and document the IM implications of Te Tiriti settlement agreements and/or any other agreements with Māori.*	Transpower has made a good start to understanding information held of importance to Māori. More work to fully understand the holdings and how they can be made more accessible would be useful.
Capability	8: Capacity and capability	*Ensure plans are in place to utilise the additional resource to actively perform disposal actions and support the development of further IM training.*	Actively disposing of physical and digital information would be useful in managing the risk of over retention and storage costs.
Creation	11: High-value/high-risk information	*Identify and document risks to high-value/high-risk information assets in metadata fields on the Public Records Repository Register.*	Ensuring firstly that the assets are correctly identified as some may well be held in several systems. Information asset assessment is different to considering a system as an asset. Information assets overview
Management	14: Information maintenance and accessibility	*Undertake audit of legacy information storage mediums at risk of obsolescence.*	This should be revisited, where possible, before the format condition deteriorates so as to be inaccessible and could be done when the new staff member is on board.

Category	Topic Number	Auditor's Recommendation	Comments from Te Rua Mahara
Disposal	21: Implementation of disposal decisions	*Develop a plan for appropriate disposal of information across all formats and ensure that this is included in the Strategy.*	An agreed plan would ensure that the need for regular disposal is understood and supported across the organisation and give enough assurance with processes in place.