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Archives New Zealand
Public Records Act Audit Findings Report

Ministry of Justice
February 2015

CONFIDENTIAL

Te Rua Mahara o te Kāwanatanga



ARCHIVES
NEW ZEALAND

Contents

This report summarises the findings of your Public Records Act 2005 audit. The report is set out as follows:

SUMMARY

A visual representation of your recordkeeping capabilities.

VALIDATED RATINGS

The findings for the 50 areas/questions covered by the audit.

BUSINESS RISK

An overview of the business risks associated with recordkeeping.

STORAGE INSPECTION REPORT

The findings of the onsite physical storage inspection.

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How to read your report

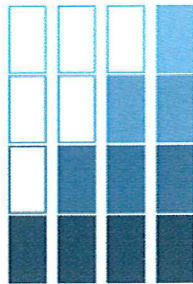
The first four pages summarise your ratings (which were determined by validating your self-assessment through an independent audit). This summary covers eight areas of recordkeeping.

Areas of Recordkeeping	
General Business Activities (Management Activities) <ol style="list-style-type: none">1. Planning2. Resourcing3. Training4. Reporting	Specific Recordkeeping Practice (Operational Requirements) <ol style="list-style-type: none">5. Creation and Capture6. Retrievability and Security7. Maintenance and Storage8. Disposal and Transfer

Stages of Achievement
<ol style="list-style-type: none">1. Initiation – needs identified, evidence of planning i.e. solutions examined, systems designed2. Establishment – evidence of practical application3. Extending Capability – evidence of good practice, including regular review, monitoring and continuous improvement

Understanding the ratings

Legend



absent
aware
actioned
embedded

No evidence of management understanding. No systematic approach
Some management understanding. Uncoordinated, incomplete approaches providing inconsistent results
Managed approach
Effective management of records is fully integrated and practicing continuous improvement

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General Business Activities - Summary

Planning

Stage	Description	Achievement
Initiation	Policy and planning initiated.	Coordinated planning, documentation and review of the management of records is evident.
Establishment	Policy and plans are being implemented.	Coordinated planning, documentation and review of the management of records is evident.
Capability	Policy and plans are regularly reviewed and updated.	Coordinated planning, documentation and review of the management of records is evident.

Resourcing

Stage	Description	Achievement
Initiation	Resourcing requirements for recordkeeping identified.	Effective management of resourcing requirements is fully integrated with strategic and operational activities.
Establishment	Resourcing for recordkeeping established.	Effective management of resourcing requirements is fully integrated with strategic and operational activities.
Capability	Succession planning and resourcing is part of business plans.	Effective management of resourcing requirements is fully integrated with strategic and operational activities.

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Training

Stage	Description	Achievement
Initiation	Training needs analysis undertaken.	Uncoordinated, ad hoc, incomplete processes for identifying training requirements for the management of records.
Establishment	Training programme established.	Uncoordinated, ad hoc, incomplete processes for identifying training requirements for the management of records.
Capability	Training programme actively monitored, reviewed and updated.	Uncoordinated, ad hoc, incomplete processes for identifying training requirements for the management of records.

Reporting

Stage	Description	Achievement
Initiation	Reporting requirements identified.	Effective management of reporting programme is fully integrated with strategic and operational activities.
Establishment	Basic operational reporting established.	Effective management of reporting programme is fully integrated with strategic and operational activities.
Capability	Recordkeeping is part of organisational risk and reporting framework.	Uncoordinated, ad hoc, incomplete processes for identifying reporting requirements for the management of records.

Legend

				absent
				aware
				actioned
				embedded

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Specific Recordkeeping Practice - Summary

Creation & Capture

Stage	Description	Achievement
Initiation	Recordkeeping requirements have been identified.	Uncoordinated, ad hoc, incomplete systems and/or controls for the creation and capture of records.
Establishment	Systems and controls are implemented.	Uncoordinated, ad hoc, incomplete systems and/or controls for the creation and capture of records.
Capability	Systems and controls are actively monitored and reviewed.	Uncoordinated, ad hoc, incomplete systems and/or controls for the creation and capture of records.

Retrievability & Security

Stage	Description	Achievement
Initiation	Recordkeeping requirements have been identified.	Uncoordinated, ad hoc, incomplete systems and/or controls for the retrievability and security of records.
Establishment	Systems and controls are implemented.	Uncoordinated, ad hoc, incomplete systems and/or controls for the retrievability and security of records.
Capability	Systems and controls are actively monitored and reviewed.	Uncoordinated, ad hoc, incomplete systems and/or controls for the retrievability and security of records.

















Maintenance & Storage

Stage	Description	Achievement
Initiation	Recordkeeping requirements have been identified.	No evidence of systems and/or controls in place for the maintenance and storage of records.
Establishment	Systems and controls are implemented.	The existence of coordinated systems and/or controls for the maintenance and storage of records is evident.
Capability	Systems and controls are actively monitored and reviewed.	The existence of coordinated systems and/or controls for the maintenance and storage of records is evident.

Disposal & Transfer

Stage	Description	Achievement
Initiation	Development of disposal authorities and implementation plans initiated.	The existence of coordinated systems and/or controls for the disposal of records is evident.
Establishment	Authorised disposal authorities and implementation plans established.	Uncoordinated, ad hoc, incomplete processes in place for the disposal of records.
Capability	Disposal of records actively managed.	Effective systems and/or controls for the disposal of records is fully integrated within operational activities.

Legend

				absent
				aware
				actioned
				embedded

General Business Activities

Planning

Initiation

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
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1	Recordkeeping is a directive from the Chief Executive to management and staff	Operational	Completed and up to date	All	Completed
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There was clear evidence of appropriate policies and guidance seen during the onsite audit. The Ministry of Justice Code of Conduct is available to all staff on the Intranet as is the Records Management Policy. The Information Security Policy provides a high level overview for the whole organisation. It was due for review in July 2014 but this has not yet occurred. Staff advised that the intention is to complete the review within three months. Despite the fact that the policy is beyond its anticipated review date, it is still considered applicable to the organisation.

RATING CHANGE

Progress changed from 'Under way' to

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Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
2	Operational	Completed and up to date' The Ministry of Justice has a new Director of Strategy and Architecture. He is currently working on a revision to the Enterprise Architecture information. The timescale for completion is not yet specified but is expected to be within the next three months.	Under way	Some	Plans in place
3	Operational	Evidence provided supports ratings	Completed and up to date	All	Completed

Establishment

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1	Strategic	The issue of strategic/business planning was discussed in detail during the onsite audit. There is a clear focus on the strategic place of business records within the Ministry of Justice. A number of initiatives are planned to further improve the current situation. The desktop review recommendations are appropriate based on observations during the audit.	Completed and up to date	All	Completed



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Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
2 Procedures that include records management have been documented and are in use	Operational	<p>RATING CHANGE Progress changed from 'Under way' to 'Completed and up to date'</p> <p>Finance and Human Resources (HR) records are handled as separate operations within the Ministry of Justice.</p> <p>Section 9(2)(ba)(ii)</p> <p>[REDACTED]</p> <p>There are clearly identified records management policies, procedures and support services in evidence across the organisation.</p> <p>RATING CHANGE Progress changed from 'Under way' to 'Completed - some out of date' Coverage changed from 'Most' to 'All' Intentions to Progress 'Plans in place' to 'Completed'</p>	Completed - some out of date	All	Completed
Capability					
Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress

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Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Policies and procedures that include records management are monitored and regularly reviewed	Operational	The Information Security Policy provides a high level overview for the whole organisation. It was due for review in July 2014 but this has not yet occurred. Staff advised that the intention is to complete the review within three months. Despite the fact that the policy is beyond its anticipated review date, it is still considered applicable to the organisation.	Completed - some out of date	Most	Completed
2 Objectives and risks that include records management are monitored and regularly reviewed	Compliance	<p>RATING CHANGE</p> <p>Progress changed from 'Under way' to 'Completed - some out of date'</p> <p>Evidence provided supports ratings</p>	Under way	Most	Plans in place

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Resourcing

Initiation	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Records management is resourced appropriately	Strategic	Evidence provided supports ratings	Completed and up to date	All	Completed
2 Responsibility for records management is assigned	Compliance	Evidence provided supports ratings	Completed and up to date	All	Completed

Establishment

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Staff assigned to records management have been given appropriate training	Operational	There was clear evidence of appropriate training seen during the onsite audit. The Senior Advisor and Information Advisor roles are records management professionals who belong to the Records and Information Management Professionals Association (RIMPA). Staff attend seminars as appropriate and there are a number of formal and informal training opportunities available. On the job training is used within the Ministry of Justice and	Completed and up to date	All	Completed

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Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
		appeared to be successful. The Manager Information Management Services (IMS) has completed the protection and salvage of records training. The Ministry of Justice is putting two people through the Archives New Zealand Public Records Act training course.			
Capability					
Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Development of staff assigned to records management is monitored and regularly reviewed	Operational	There is a Personal Development Plan (PDP) process for all staff within the Ministry of Justice. Reviews are held annually. The PDP for the Manager IMS, dated 1 July 2014, was seen during the onsite audit. The Manager meets with all of her staff every fortnight to review progress and issues. This seemed to work well in practice.	Completed and up to date	All	Completed
2 Budget planning considers resourcing and improvements for records management	Strategic	Evidence provided supports ratings	Completed and up to date	All	Completed

Training

Initiation

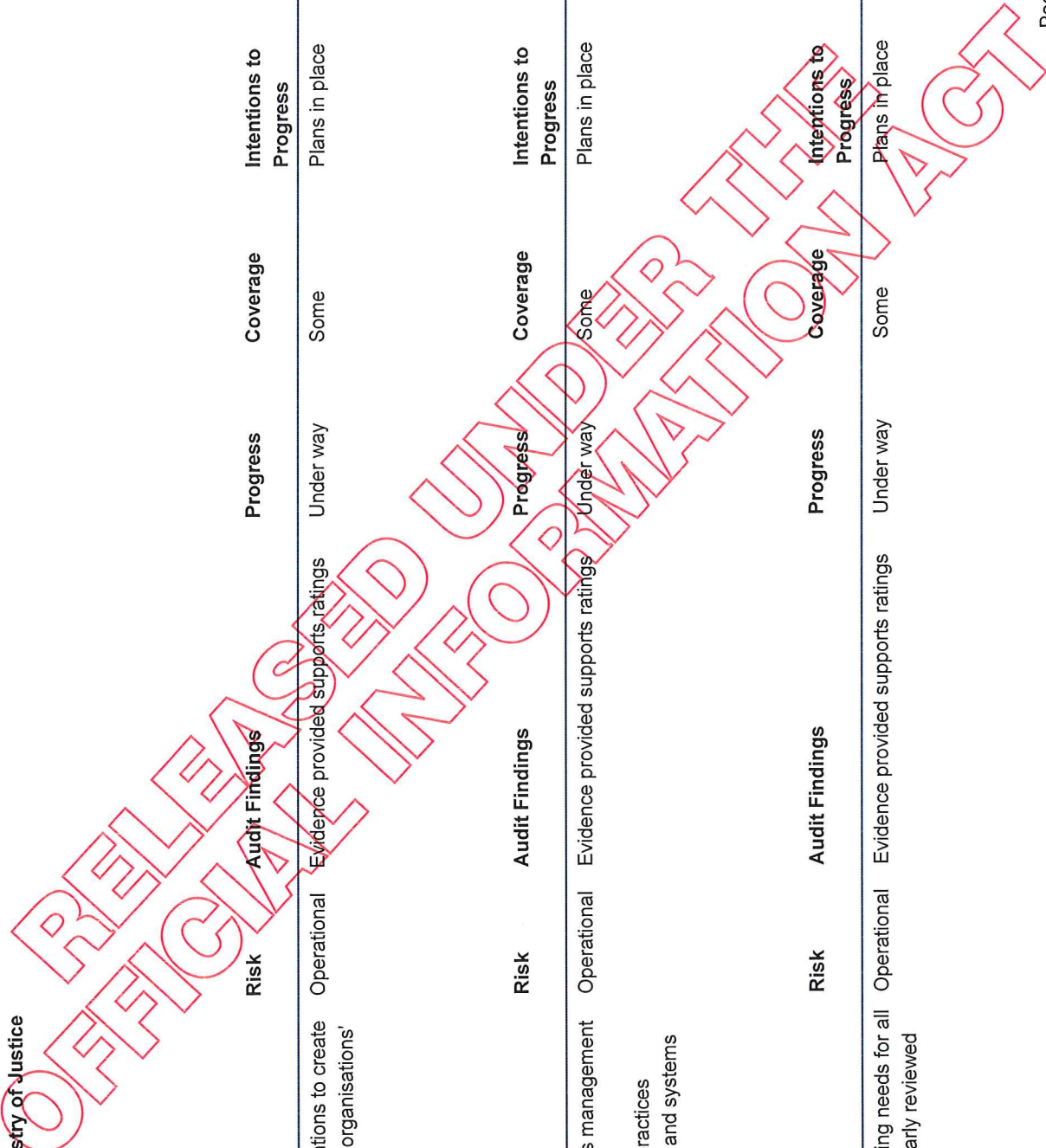
Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Staff understand their obligations to create and maintain records of the organisations' activities	Operational	Evidence provided supports ratings	Under way	Some	Plans in place

Establishment

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Staff receive regular records management training in: - policies, procedures and practices - organisation specific tools and systems	Operational	Evidence provided supports ratings	Under way	Some	Plans in place

Capability

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Records management training needs for all staff is monitored and regularly reviewed	Operational	Evidence provided supports ratings	Under way	Some	Plans in place



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Reporting

Initiation

Question

1 Monitoring of records management compliance is documented

Risk

Reporting

Audit Findings

There is a continual monitor of records by the IMS team and legislative compliance is an ongoing process. The organisational aim is to further improve the recordkeeping systems by the implementation of an Enterprise Content Management System (ECMS). A paper outlining the ECMS went to the Planning and Resources Committee in January 2015. The next step is for the Manager IMS to follow up with more detail, and this was completed on 15 January 2015. The paper has now gone back to the Planning and Resources Committee for approval. Funding for the ECMS will be sought from the Investments Committee on 25 March 2015.

Progress

Completed and up All to date

Coverage

All

Intentions to Progress

Completed

Establishment

Question

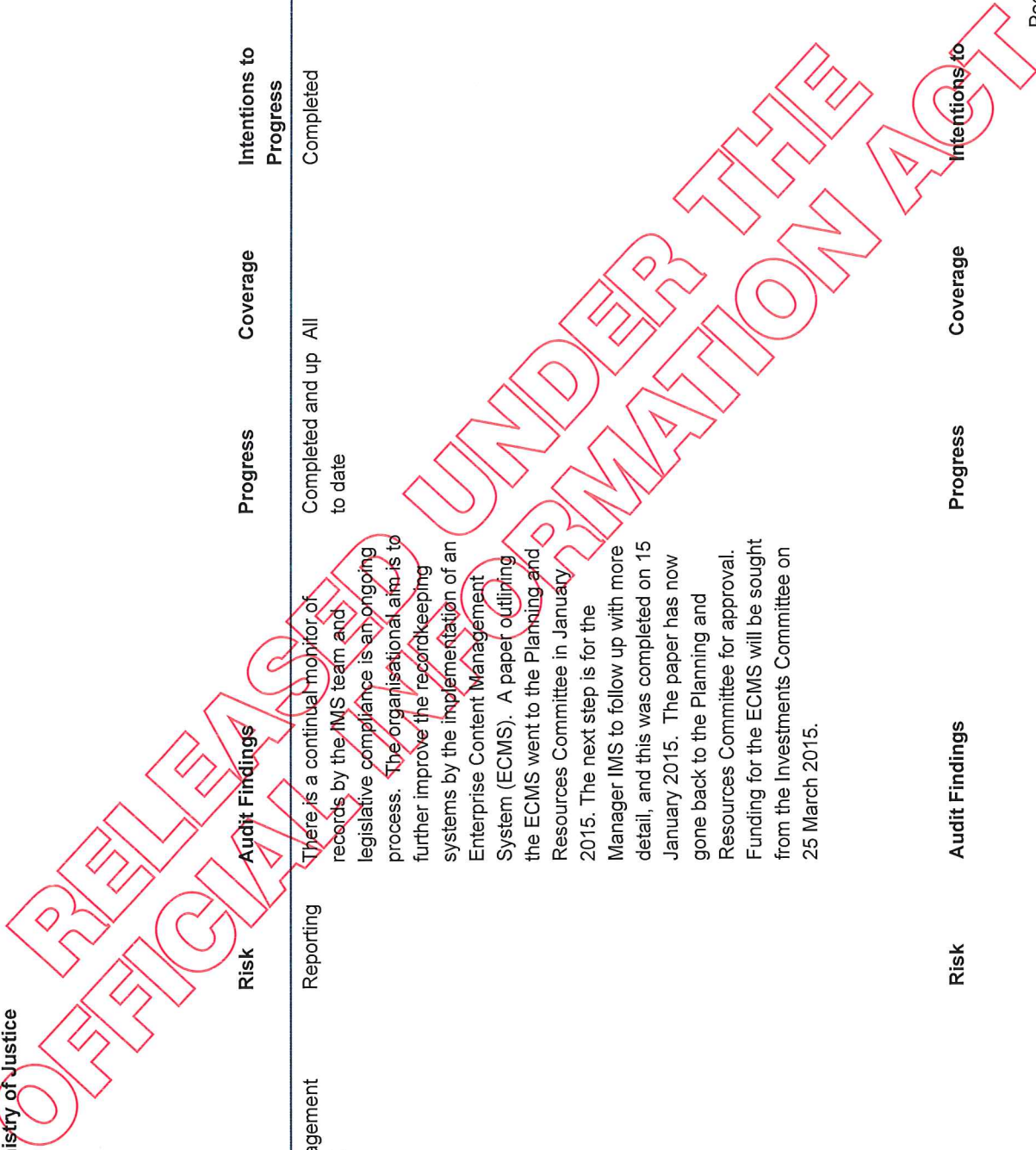
Risk

Audit Findings

Progress

Coverage

Intentions to Progress



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Progress		Progress
1	<p>Policies, procedures and processes that include records management are monitored and regularly reported on</p> <p>Reporting</p> <p>There are a number of records management policies and all have a date for review or renewal. Procedures and processes are altered and updated as required. The Manager IMS does a monthly report on business activity and the report for July-December 2014 was seen during the onsite audit. The report goes to the Chief Information Officer (CIO) and provides a focus on recordkeeping issues. The disaster recovery procedure for paper records was recently reviewed. This was to align the procedure with current practice. The revision was followed by training for various users in Wellington and Tauranga. The ICT risk register (November 2014) was seen during the audit. The next review is due in March 2015.</p>	<p>Completed and up to date</p> <p>All</p> <p>Completed</p>

Capability

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 The effectiveness of the records management capability of the organisation is regularly assessed	Reporting	Evidence provided supports ratings	Under way	Some	Plans in place

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Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
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Specific Recordkeeping Practice

Creation and capture

Initiation

Question

1 Records management requirements are identified in business processes and functions

Risk

Compliance

Audit Findings

The current records management system is based around hard-copy paper records, Jukebox and shared drives. The Ministry of Justice is now opening up to the more strategic issues across the organisation and is investigating the implementation of an ECMS. There is also some ongoing discussion with Courts regarding the introduction of a paperless system. The IMS team has increasing exposure to records management involvement at the beginning and end of projects to ensure that recordkeeping needs are met.

Progress

Under way

Coverage

Most

Intentions to Progress

Plans in place

RATING CHANGE

Progress changed from 'None' to 'Under way'

Coverage changed from 'None' to

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Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
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2	Records of all business activities are managed within the appropriate systems	Compliance - Evidence provided supports ratings Intentions to Progress changed from 'None' to 'Plans in place' 'Most'	Under way	Some	Plans in place
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Establishment

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
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1	Records are captured routinely, documented and organised according to the organisation's business requirements	Compliance The operation of Jukebox was seen in practice during the onsite audit. Jukebox was developed in 2004 and has been in use since that time. Jukebox is apparently nearing the end of its useful life and the aim is to replace it with the ECMS. HR and Finance records are handled and stored separately from general records. The IMS team is clearly involved in ensuring that records management works. The systems should be enhanced with the planned developments. RATING CHANGE Progress changed from 'Under way' to 'Completed - some out of date'	Completed - some out of date	All	Completed
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Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
		Coverage changed from 'Some' to 'All' Intentions to Progress changed from 'Plans in place' to 'Completed'			
2	Operational	Evidence provided supports ratings Recommendation : Ensure all systems - Human Resources/Case Management and Finance Management follow the metadata schema.	Under way	Some	Plans in place

Capability

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1	Operational	Evidence provided supports ratings Recommendation : Add this to internal audit checklists to be checked as part of business units audits, e.g. during Human Resources/Finance Management and Case Management systems audits.	Under way	Some	Plans in place
2	Strategic	Systems that create and maintain records are monitored and regularly reviewed Recommendation : Ensure that Case Management systems plus Human Resources and Finance are included	Under way	Some	Plans in place

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Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
3 Disposal authorities are mapped to systems that create and maintain records	Strategic	<p>The operation of Jukebox was seen in practice during the onsite audit. There is a link to retention and disposal within Jukebox. The Ministry of Justice National Office disposal authority expires in 2016 and is currently under review. The retention and disposal schedules were seen during the audit (DA220 - current, to be reviewed. DA415 - Ministry of Justice Tribunals expires February 2020).</p>	Completed - some out of date	All	Completed

RATING CHANGE
 Progress changed from 'Under way' to 'Completed - some out of date'
 Coverage changed from 'Some' to 'All'
 Intentions to progress changed from 'Undecided' to 'Completed'



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Retrievability and security

Initiation

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Access to and use of records is managed within the appropriate systems	Operational	Evidence provided supports ratings	Under way	Some	Plans in place

Establishment

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Sensitive and restricted records are identified, documented and controlled	Compliance	Evidence provided supports ratings	Under way	Some	Plans in place
2 Access to sensitive and restricted records is provided in accordance with the appropriate legislation or security classification	Compliance	There are some access permissions applied in both Jukebox and the shared drives which is manager driven. Records management across the Ministry of Justice is further developing with the planned implementation of the Enterprise Content Management System (ECMS). Sensitive and restricted records will be focused on as part of this development.	Under way	Some	Plans in place

3 Records 25 years of age or older are covered by an Access Authority	Compliance	Evidence provided supports ratings	Under way	Most	Plans in place
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Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
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Capability

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
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1 The ability to locate and use records is monitored and routinely audited	Operational	Evidence provided supports findings	Under way	Some	Plans in place
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Maintenance and storage

Initiation

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 All records are managed so they cannot be altered, deleted or disposed of without permission	Operational	Evidence provided supports ratings	None	None	None
2 An assessment of records storage has been undertaken to ensure records are stored appropriately	Compliance	Evidence provided supports ratings	Under way	Some	Undecided

Establishment

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Records are reviewed/appraised and stored in accordance with their value and security needs	Strategic	Evidence provided supports ratings	Under way	Some	Plans in place
2 Disaster Recovery/Business Continuity Plan includes the protection and salvage of records	Operational	Evidence provided supports ratings	Completed and up to date	All	Completed

Capability

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress

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					Progress
1	Disaster Recovery/Business Continuity Plan is tested, monitored and regularly reviewed	Operational	Evidence provided supports ratings	Completed and up to date	Some Completed
2	Storage arrangements for records are monitored and regularly reviewed	Strategic	Evidence provided supports ratings	Completed and up to date	Some Completed

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Disposal and transfer

Initiation

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Records have been appraised and disposal authorities agreed	Compliance	Evidence provided supports ratings	Completed and up to date	All	Completed
2 Regular and efficient disposal of the organisation's records is planned and documented	Operational	Evidence provided supports ratings	Under way	Some	Plans in place

Establishment

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Disposal procedures and processes are implemented and in use regularly	Compliance	Evidence provided supports ratings	Under way	Some	Plans in place
2 All records 25 years of age and over which are still required by the organisation are covered by a deferral of transfer agreement	Compliance	The Ministry of Justice has one current Deferral of Transfer (DT) in place. This is DT33, it only applies to very old adoption records and case files which arose from the change from the old Department of Courts. There are no records that are 25 years of age or older [REDACTED]	Completed - some out of date	Some	Completed

Section 9(2)(b)(ii)

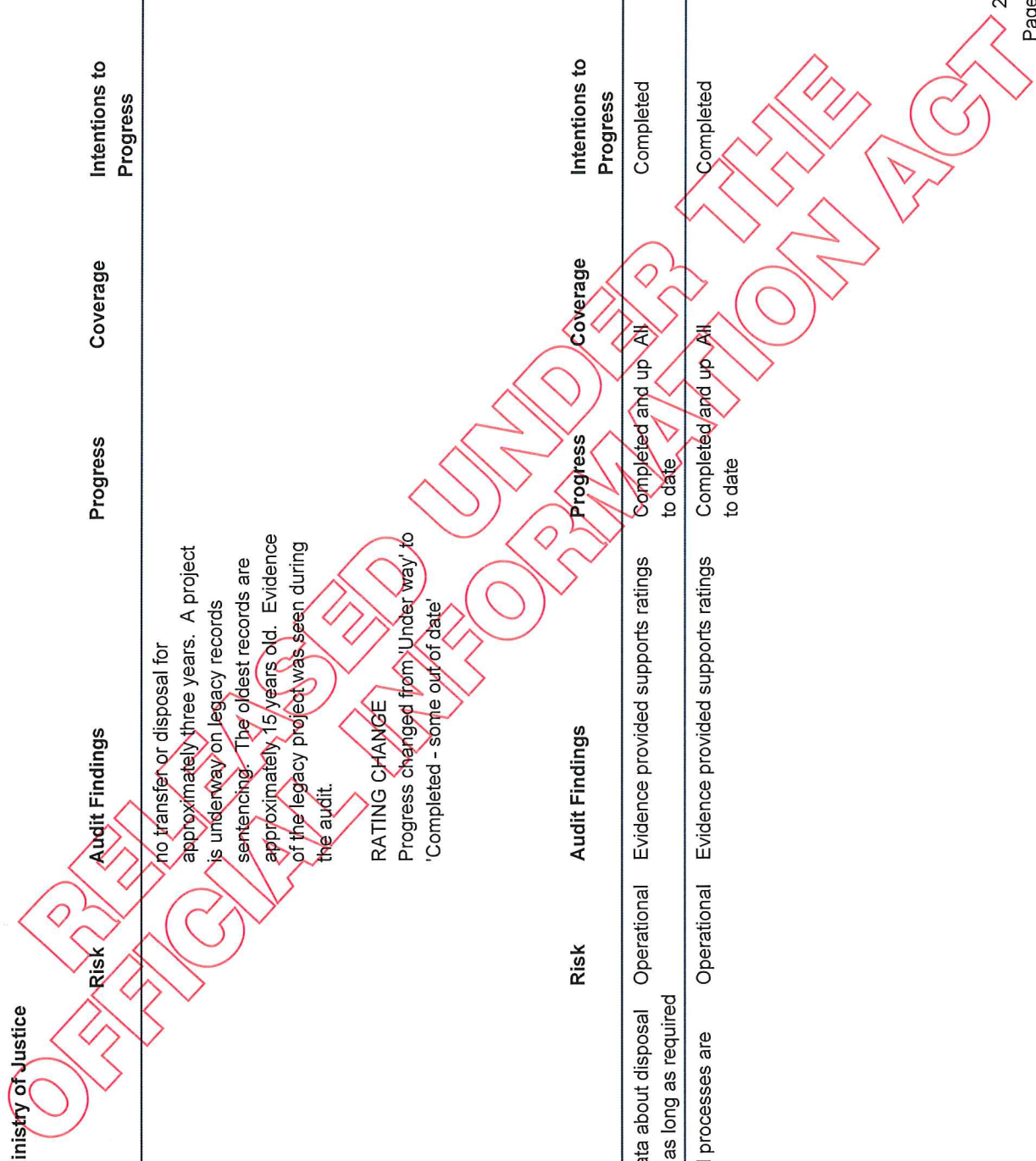
← All records that should have gone have done so. There has been

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Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
		no transfer or disposal for approximately three years. A project is underway on legacy records sentencing. The oldest records are approximately 15 years old. Evidence of the legacy project was seen during the audit.			
		RATING CHANGE Progress changed from 'Under way' to 'Completed - some out of date'			

Capability

Question	Risk	Audit Findings	Progress	Coverage	Intentions to Progress
1 Records management data about disposal of records is retained for as long as required	Operational	Evidence provided supports ratings	Completed and up to date	All	Completed
2 Disposal procedures and processes are monitored and reviewed	Operational	Evidence provided supports ratings	Completed and up to date	All	Completed



RISKS

Compliance

- Failure to meet legislative and regulatory requirements
- Unlawful disposal of records
- Inability to provide assurance of legislative compliance
- Inability to provide records or provide evidence

Reporting

- Inability to provide reliable evidence summarising activities or undertakings
- Reduced capability to demonstrate good performance
- Misleading the minister or other key stakeholders

Strategic

- Loss of records which support New Zealand's cultural and national identity
- Poor strategic planning and poor decisions made on inaccurate information
- Inability to use organisational information and knowledge to full potential
- Constrained business and information management strategies
- Inability to automate processes and to secure efficiency benefits

Operational

- Inability to transfer data across organisational systems
- Inability to deliver services due to the loss of information
- Inability to retrieve and interpret records in obsolete formats or systems
- Information is inaccessible or unsuitable for the conduct of business
- Inability to provide a record of specific transactions
- Inconsistent, ineffective and inefficient conduct of business

Reputation

- Embarrassment to the chief executive, minister, the government and individuals
- Damage to reputation, loss of credibility, lowered public confidence

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Storage Checklist for Onsite Audit

Client: Ministry of Justice

SRO: Bronwen Clifton, Manager Information and Document Management

Date: 26/27 February 2015

This checklist is a tool for managing risks to records in storage. It can be used to assess compliance with the standard. Where a requirement is not met, an organisation must assess and treat the storage risks involved over time.

Identification and Control <i>(Applies to all records and archives)</i>	YES	NO	Comments
Records are controlled so that they are able to be identified and retrieved easily, and to prevent damage or loss.	✓		Section 9(2)(ba)(ii)
Records are identified and registered in a system which controls and allows efficient retrieval.	✓		
Records are arranged in a meaningful sequence to be easily located and retrieved.	✓		
Procedures are in place for retrieving, handling and re-shelving of records (including returning records to offsite storage).	✓		
Inactive records of archival value must be identified so that they can be stored appropriately.	✓		
Facilities <i>(Applies to inactive records and archives)</i>	YES	NO	Comments
Records not in active use are stored in a dedicated storage area.	✓		
Storage areas allow ongoing access to the records by authorised users.	✓		Section 9(2)(ba)(ii)
Records are stored in locations which reflect the characteristics of their format and their retention period.	✓		
The building in which records are stored comply with the New Zealand Building Code that applied at the time of construction and associated codes and standards, and is appropriate for use in storing records. (Building of Warrant of Fitness)	✓		Certificate dated 9 September 2014.
The building in which records are stored must have adequate drainage systems to prevent flooding.	✓		

The storage area must be insulated from the climate outside.	✓		
Storage areas must be protected against internal hazards.	✓		
A building maintenance programme must be in place.	✓		
Protection against Disaster (Applies to all records and archives)	YES	NO	Comments
Disaster management programmes are established and maintained to minimise risks.	✓		Disaster management programmes available to all staff via the intranet.
Records are located as far as possible from natural and man-made hazards.	✓		
Disaster management plans and procedures are in place, kept current and known to staff.	✓		Disaster management plan available to all staff via the intranet.
Staff who are responsible for records are trained in emergency procedures to protect and salvage the records.	✓		Bronwen has completed the training course.
There is a comprehensive fire protection system and equipment for the building, in compliance with the New Zealand Building code.	✓		Sprinklers and smoke detectors throughout.
Security (Applies to inactive records and archives)	YES	NO	Comments
Records are secure against theft, vandalism, misuse, or inadvertent release.	✓		
Records which contain sensitive or classified information are identified and protected.	✓		Section 9(2)(ba)(ii)
Access to records storage are controlled and restricted to authorised staff.	✓		
Storage areas are intruder resistant and have an intruder alarm system.	✓		
Shelving and Packaging (Applies to inactive records and archives)	YES	NO	Comments
Records are protected through appropriate packaging and shelving or storage equipment.	✓		
Records are to be stored using shelving or equipment appropriate to the format and size of the items.	✓		

Inactive records of archival value are packaged in containers which are clean, in good condition and appropriate to the format and retention period of the records.	✓		
Environmental Control <i>(Applies to inactive records and archives)</i>	YES	NO	Comments
Records are stored in environmental conditions which will ensure they are preserved for as long as they are required.	✓		
Records must be stored away from light.	✓		
Magnetic media must be stored away from magnetic fields.	✓		
Storage areas must be kept clean.	✓		
Records of short-term value must be stored in conditions which ensure preservation until they are no longer required.	✓		
Inactive records of archival value must be stored in conditions where the relative humidity is never above 60% or below 30%.	✓		Humidity is not routinely monitored. Given the standard of the building, it is reasonable to assume that the requirements are met.
Inactive records of archival value must be stored in conditions where the temperature is never above 25 degrees centigrade.	✓		Temperature is monitored every three months by the air conditioning firm. Results were not provided during the audit. Given the standard of the building, it is reasonable to assume that the requirements are met.
Archives must be stored in conditions where the relative humidity does not fluctuate by more than 10% in a 24-hour period, or 20% in a year.	✓		Humidity is not routinely monitored. Given the standard of the building, it is reasonable to assume that the requirements are met.
Archives must be stored in conditions where the temperature does not fluctuate by more than 4 degrees centigrade over a 24-hour period or 10 degrees centigrade over a year.	✓		Temperature is monitored every three months by the air conditioning firm. Results were not provided during the audit. Given the standard of the building, it is reasonable to assume that the requirements are met.
Environmental conditions for records of archival value must be regularly monitored and records of monitoring must be kept.		✓	Temperature is monitored every three months by the air conditioning firm. Results were not provided during the audit. There is no routine monitoring of humidity.