
Appendix one – Response from entity

Transport for NSW



Ms Margaret Crawford
Auditor General
Audit Office of NSW
GPO Box 12
SYDNEY NSW 2000

RE: Performance Audit Report into DRIVES

Dear Ms Crawford

Thank you for the opportunity to respond to the Performance Audit Report (the Report) into the DRiver Vehicle System (DRIVES). Transport for NSW (TfNSW) has carefully considered the audit report and accepts its six recommendations in full. It is however important that TfNSW places on the public record our response to the Report's commentary, particularly on cybersecurity and monitoring of access to DRIVES.

The Report recognises that DRIVES is a complex digital environment that has been upgraded and altered over time to respond to changes in technology, legislative and policy developments and to meet customer needs and the challenges of an evolving cybersecurity landscape. We at TfNSW acknowledge the vigilance, effort and cost required to maintain and uplift to contemporary standards this aging infrastructure. It is in this context that we have initiated the RegStar (DRIVES replacement) program to establish a new technology environment; one that will be more resilient, adaptable, and better aligned with the evolving needs and expectations of our stakeholders and customers.

I welcome the Report's acknowledgement that TfNSW has a rigorous process to manage risks associated with upgrading or changing DRIVES, and a clear framework to control access. As the custodians of the personal information of many NSW citizens, we at TfNSW take seriously the need to maintain privacy and security of DRIVES, to protect our digital assets generally and the information of those we serve. In recent years, TfNSW has uplifted and enhanced the security guard-rails and features of DRIVES. The DRIVES modernisation program and the cloud migration have provided significant uplift, including additional cyber security defences. I wish to emphasise that TfNSW complies with NSW Government Cyber Security Policy and works closely with Cyber NSW.

It is important to acknowledge new criteria introduced into the self-assessment standards framework in 2023 altered TfNSW's score as referenced in the Report, but that this change does not represent a

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deterioration in actual performance or service delivery.

Regarding automatic detection of unusual or anomalous patterns of access to DRIVES, TfNSW acknowledges this is an in-flight recommendation stemming from a Service NSW (SNSW) breach investigated by the Independent Commission Against Corruption. TfNSW can confirm our work to assist SNSW in the implementation of this recommendation has been partly delivered, with full roll out on track by the end of the first quarter of 2024. While this capability has been in development, other detection measures have been in place, and TfNSW has no evidence to support the Report's assertion that further instances of misuse of personal data may have occurred.

TfNSW accepts the need for, per the Report's recommendations, better mechanisms for reporting unplanned downtime. I note though that the core components of the DRIVES platform consistently meet industry benchmarks for performance and availability, which is noteworthy given its complexity, real-time integration with diverse external systems and government agencies, and the volume of transactions managed. The DRIVES core platform consistently maintains an impressive 99.9% availability rate. The Report's remarks pertain primarily to minor outages in the MyRTA service only, which is not a central component of DRIVES. The outages occurred during a defined period and did not impact a majority of customer services.

I also wish to address the Report's characterisation that DRIVES has changed from a database wholly focused on managing transport regulatory activities to a whole-of-government service. TfNSW has various regulatory obligations to maintain driver licensing and vehicle registration data under the *Road Transport Act 2013*. The DRIVES system was created as TfNSW's repository of such registers to discharge the department's legislative obligations, which aligns with a national approach to road safety via driver licensing, vehicle registration and standards. This continues to be the core purpose of DRIVES, and any system changes need to be tested to ensure compliance with TfNSW's statutory obligations can be maintained.

Furthermore, repositioning DRIVES as a whole-of-government service at this stage presents a range of significant challenges as the information it holds is collected for the limited purposes set out in legislation. It is accessed by other NSW agencies under legislative exceptions which allow driver and vehicle information to be used in limited circumstances for purposes unrelated to road safety, or where there is consent from the individual involved. Access to DRIVES (including DRIVES24) and the personal information contained within it is governed by road transport, state records and privacy laws and robust access assurance frameworks.

Regarding the recommendation to implement a service management framework for DRIVES, TfNSW's challenge lies in effectively articulating to stakeholders the intricate and complex nature of the DRIVES environment and the statutory requirements it serves. TfNSW actively manages a robust service

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management framework. I acknowledge the coordination and integration of support services could be enhanced, and TfNSW is committed to taking a collaborative approach to DRIVES upgrades via stakeholder engagement and governance forums.

I wish to acknowledge the challenges faced in the planning of the RegStar program. Factors such as the COVID-19 pandemic and a constrained fiscal environment have played a role. Our agency is also acutely aware of the significant challenges other state jurisdictions and agencies have encountered in large-scale transformation programs, and TfNSW suggests the Report's findings are not fully reflective of such risks. That being said, Transport has made significant progress to date. Our investment in the RegStar program so far has delivered comprehensive planning and process re-engineering, and detailed service design blueprints that will reduce costs in the detailed design and future stages of the program.

TfNSW is committed to a strategic evaluation of the Lic.NSW platform and determining whether it is fit-for-purpose. We are actively collaborating with key stakeholders to determine the platform's core and common functionalities.

Once again, I appreciate your review of this important digital infrastructure and the opportunity to respond to the findings and recommendations in the Report.

Yours sincerely



Josh Murray
Secretary

12 February 2024