

INTERNAL AUDIT REPORT: ARCHIVES

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1. EXECUTIVE SUMMARY

In accordance with the 2024-25 Internal Audit Plan for the City of Adelaide (CoA), an internal audit focussing on how archive processes are performed at CoA [was conducted](#). The objective, scope, approach, and findings are outlined below.

2. OBJECTIVES

This internal audit project aimed to review the processes and practices of the Archive function. It covered how the organisation manages record-keeping practices in line with legislative requirements, in particular how records are maintained, retention periods and disposal practices. This audit included:

1. Review of backlog of items
2. Resourcing
3. Storage

This review is included in the 2024-25 Internal Audit Plan to [assure-advise](#) the CoA Executive Team, the Executive Strategic Risk and Internal Audit Group (SRIA), and the CoA Audit and Risk Committee (ARC).

3. SCOPE

This audit has assessed the overall processes and practices of the Archive function.

3.1 Scope Topics

The four main audit areas are:

- **Governance Framework** – Are there relevant policies/procedures and guidelines in place regarding archive management and record-keeping? Is this communicated to the organisation?
- **Compliance** – Are we adhering to legislative requirements, including retention and disposal? Is the process being managed correctly and appropriately?
- **Roles and Responsibilities** – What support do Archive staff provide to the organisation and the community?
- **Storage and Resources** – Is there enough storage and resources available to manage the Archives function? Are there opportunities to consolidate or is additional storage space for future archive material required?

3.2 Timeframes

The scope was developed and approved by SRIA on 15 August 2024. The audit began in August 2024.

Consultation and meetings with relevant stakeholders occurred from August to October 2024 to gather and source information.

- Meetings with action owners and report finalisation occurred in November 2024.
- The report will be presented to SRIA in December 2024.
- The final report will be presented to the ARC in February 2025.

4. METHODOLOGY

The audit focused on the Archives framework and processes against the following guidelines and procedures:

- *State Records Act 1997*
 - Information Management Standard
- *General Disposal Schedule No. 40* – Local Councils and Local Governing Bodies and Authorities in South Australia
- *General Disposal Schedule No. 21* – For disposal of hardcopy source records after digitisation
- Record Management Operating Guideline (draft)
- Records Management – Applying GDS40 to Legacy Hard Copy Files / Scanning and Registration of Documents for GDS21 Retention and Secure Disposal.

The engagement was performed using the following approach:

- CoA staff member Annette Pianezzola, Risk and Audit Analyst performed the audit.
- One-on-one discussions with relevant CoA programs:
 - Information Management
 - Finance & Procurement
 - Regulatory Services
 - Strategic Property & Commercial
- Review relevant documentation associated with the records management and archives functions.
- Site visits and review of current storage facilities to optimise space and reduce backlog.
- Review of current project plans to address the issue of backlog of hardcopy files.
- Review of services provided by the Archives team.
- Identification of any performance improvement opportunities.

5. BACKGROUND

5.1 Corporate Records

The Corporate Records team, a team within the Information Management Program under the Corporate Services Portfolio at the City of Adelaide, receives a record either via email or Australia Post. The Corporate Records team will place a retention and destruction order on the record as per the *State Records Act 1997* and *General Disposal Schedule 40 (GS40) and 21 (GDS21)*.

The *State Records Act 1997* sets out the conditions that the Council must comply with when handling its records, including the disposal of official records. Information can only be destroyed if it is no longer required and in accordance with the *State Records Act 1997*.

The Information Management Standard requires agencies to dispose of records in a timely manner once all requirements have been met. The principles of records are set out in the Information Standard as set out by State Records of South Australia:

- The value of information is known

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- Information assets are created and managed appropriately to risk
- Ownership of information assets is assigned
- Information assets can be relied upon
- Information assets are available as required

To ensure records remain accessible for as long as required and are not destroyed without authorisation, the Information Management Plan needs to be underpinned by a disposal program and approved disposal determinations in accordance with the *State Records Act 1997* and the relevant disposal standards.

Disposal is made up of a range of processes associated with implementing record retention, destruction or transfer decisions which are documented in disposal determinations. A permanent record is a record that has archival value and will be retained permanently for the community subject to appropriate access restrictions. A temporary value record is a record that does not have archival value and may be physically destroyed when a prescribed retention period has passed.

The Disposal Standard provides a set of mandatory principles and requirements to adhere to when disposing of government information, such as:

- Destroying of records
- Abandoning of records
- Migrating information from one system or platform to another
- Transferring ownership of records
- Selling records

A Disposal Program is a key element of an agency's overall Information Management Program. It should include:

- A specific Records Disposal Schedule
- Understanding of any other disposal schedules
- A Disposal Plan for a backlog of records to be assessed for retention or disposal
- A schedule for implementing regular retention and disposal actions
- Regular reviews of current disposal schedules
- Procedures for applying one or more disposal schedules
- Policy and guidance on the disposal of non-official records
- Processes for applying retention periods, including documentation of decisions and quality checking by skilled and experienced personnel
- Approval and documentation processes for the permanent retention and destruction of records
- Documentation and transfer of temporary records
- Policy and guidance on the disposal of records created or maintained as part of a contract with a third-party provider, including records disposed of by the third-party provider on behalf of the agency.

Disposal Schedules identify the minimum periods records must be kept:

- *General Disposal Schedules No. 40* – covers all records common to local government agencies.
- *General Disposal Schedules No. 21* – covers all hardcopy records after digitisation

5.2 Archives

The Archives team, a team within the Information Management Program under the Corporate Services Portfolio at the City of Adelaide, manages the collection of long-term records, including paper-based records, civic collections and some digital records.

The Archives office is located at Topham Mall; however, due to the limited storage space at Topham Mall, records are stored in three locations: Topham Mall, Eagle Chambers (level 2), and Town Hall (basement). The Archives team consists of four staff members, including a Team Leader and they manage archival material at the Topham Mall facility:

- 15,000 historic photographs
- 60,000 building development applications
- 2.2 million correspondence docketts
- 3 million hardcopy subject files
- 3,000 ledgers, registers, volumes
- 120 volumes of newspaper clippings
- 4,000 artworks and artefacts
- 130 oral history audit interviews.

On average 10 external customers will visit the Archives facility and around 5 internal requests for records to be retrieved per week. External customers will organise a time to visit the Topham Mall facility to access the information required, at times this may incur a fee, and this is specified in the Fees and Charges available on the CoA external website. Internal requests such as Section 7 searches, building plans, floor plans, freedom of information requests etc are sent via email to the Archives team, and these requests are generally attended to within 24-48 hours.

5.3 Infrastructure Opportunities

The City of Adelaide Property Strategy recognises that the Council's property portfolio is one of the most powerful levers for shaping and accelerating city liveability, growth, and investment.

The strategy aims to optimise the performance of the City of Adelaide's property portfolio, ensuring effective asset use and improved alignment with the Council's strategic, community, and financial objectives. This includes the identification of underperforming assets and strategic property holdings that are proposed to be leveraged to drive strategic outcomes, enabling projects that will underpin city liveability.

The Property Strategy was presented to Council in November 2024, and approval was received based on the investigation roadmap outlined in the report. These actions support the Council's Strategic Plan 2024-2028.

6. FINDINGS

The number of findings identified during the audit is shown in the table below.

The Summary of Findings section of the report contains a complete list of the identified findings and agreed-upon management actions. Risk ratings are listed in Appendix 1.

Findings	Risk Rating
Backlog of records	Moderate
Review Archives function and service	Low

7. CONSULTATION

The following CoA stakeholders were involved in meetings throughout this audit:

- Sonjoy Ghosh, Manager Information Management
- Shelley Palmer, Team Leader Corporate Records
- Michial Farrow, Team Leader Archives
- Ana Basic, Property & Information Officer
- Seb Grose, Manager City Development
- Mike Philippou, Associate Director Strategic Property & Commercial
- Bryn Adams, Project Manager Property Strategy

8. SUMMARY OF FINDINGS

Ref #1 Backlog of records	Rating: Moderate
Description of finding	Agreed Actions
<p>Identification:</p> <p>In recent years, the Corporate Records team have provided additional support to the Archives team for placing a retention/disposal schedule on the records stored at the City Archives. When a record is received by the Corporate Records team, they will scan the record into Content Manager in the relevant 'container' (Council's record management system) and workflow it to the relevant team for action. The retention schedule will be placed on the 'container' according to the requirements in the disposal schedule GDS40. When the 'container' reaches the retention requirement, the team will review the documents within that folder and check that the records are in the correct folder and the retention levels are correct. In addition, a monthly report is generated by the Team Leader Corporate Records to determine which 'containers' are due for disposal. If the records in the 'container' appear to be correct and hold the correct retention levels then no consultation is required by the business, and the 'container' is disposed of according to the disposal schedule GDS40.</p> <p>However, historically disposal schedules and maintenance of records were not performed as effectively as it is currently being managed by the Corporate Records team. Therefore, there is a backlog of historical paper-based records retained in three locations across CoA sites: Topham Mall, Eagle Chambers (level 2) and Town Hall (basement). The current backlog consists of approximately:</p> <ul style="list-style-type: none"> • Topham Mall – 110 rows x 180 boxes per row = 19,800 boxes • Topham Mall – 50,000 plan packets of building assessments • Eagle Chambers (level 2) – 400 boxes 	<p>The Corporate Records team will review all hardcover books located in the Town Hall (basement) to confirm if any are considered an Archival record. If Archival records are identified, relocate them to a storage facility that has appropriate fire suppression system.</p> <p>Target Completion Date: 30 September 2025</p> <p>The Corporate Records and Archives team will review the current approach to the digitising and management of records located in Topham Mall, Town Hall and Eagle Chambers and develop a business case for a strategic project submission in the 2026/27 financial year. The business case will also consider the use of external records management specialist to expedite the digitising process.</p> <p>Target Completion Date: 31 October 2025</p>

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- Town Hall (basement) – 250 boxes

Each box contains approximately 5 – 6 files, each containing approximately 100-150 pages. Therefore, there are approximately 500 – 900 pages per box. Each file will need to be scanned as a separate file, the appropriate naming convention applied and then filed in Content Manager in the relevant 'container'. In some instances, new 'containers' will need to be created.

In addition to the boxes/files in Town Hall (basement), there are in excess of 300 hardcover books dating back to 1887. Further investigation of these books, a number of these have been gifted to the CoA from State Government or other government agencies, such as New Zealand, City of Liverpool, Ottawa and City of Philadelphia.

The backlog identified approximately 20,450 boxes that need to be reviewed to determine retention and disposal schedules. This equates to, approximately 122,700 files, which is approximately over 16 million pages, that may need to be reviewed and scanned into Content Manager. From start to finish, which includes reviewing the content of the boxes, placing a retention/disposal schedule, scanning the documents, and naming conventions for Content Manager (including creating 'containers'), it will take approximately 3 hours per box. This equates to approximately 61,350 hours of work, which is 1,636 weeks to clear the backlog. In addition to this, the 50,000 envelopes will need to be digitised, and these take approximately 15 minutes per file, which equates to 12,500 hours of work, which is 330 weeks to clear the backlog. Overall, this equates to approximately 40 years to clear.

Furthermore, Archival records should be retained in a storage facility that maintains a fire suppression system that extinguishes a fire using a gas suppression system. CoA has implemented this system at the Archives facility in Topham Mall; however, this system does not extend throughout the whole Archives area. The locations identified as part of this audit where there is an excess of paper-based documents to be scanned into Content Manager are not located in

storage facilities where the fire suppression system has been installed, such as:

- Portions of Topham Mall (the location of the 19,800 boxes, in the annex)
- Eagle Chambers (level 2)
- Town Hall (basement)

The Corporate Records team have implemented a disposal plan for the backlog of files in their area. The Archives team had a redeployee staff member who assisted with the disposal schedule to the backlog and digitised the records; however, this person has since left CoA. This has now fallen onto the Team Leader Archives to assign disposal schedules when he has free time. However, when the Team Leader receives a request for an unsentenced file, he will add the GDS40 to it and if it is past the due for destruction date, he will send the details to Corporate Records who will add it to the disposal list. It has been noted that there is no dedicated resource to attend to the excess backlog at the Archive's facility in Topham Mall.

The risk of not retaining archival records in a facility with a fire suppression system installed exposes CoA to the risk of losing important documents if the identified facility is burned. Furthermore, digitising records provides efficient customer service to requests from external or internal customers when requiring certain information. For instance, internal staff will be able to search for a digitised record through Content Manager instead of requesting it via the Archives team.

Considering the above and the recently endorsed review of the Property Strategy, any opportunities that will be identified as part of this review, and the backlog of records in Topham Mall, the backlog of records will need to be addressed as a priority.

Recommendation:

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<p>1. Review all hardcover books located in the Town Hall (basement) to confirm if any are considered an Archival record. If Archival records are identified, relocate them to a storage facility that has appropriate fire suppression system.</p> <p>2. Digitising records in Town Hall and Eagle Chambers will take approximately 1.5 years of full-time work. Develop a project plan and timeline to ensure the 'sentencing' review of all records in boxes identified in the Town Hall and Eagle Chambers, the assignment of retention/disposal schedules, and the digitisation of documents in Content Manager.</p> <p>3. As for Topham Mall, perform a cost/benefits analysis to determine whether to engage a contractor or recruit additional resources, such as a trainee program, to assist with the digitisation of records in the annex of the Archive's Office. A project plan should be developed with achievable milestones that can be adhered to.</p>	
Position Responsible:	Manager Information Management
Target Date:	As above

Ref #2 Review of Archives function and service	Rating: Low
Description of finding	Agreed Actions
<p>Identification:</p> <p>The Archives function is managed by the Information Management Program under Corporate Services at the City of Adelaide.</p> <p>An Archive is defined as a collection of historical and culturally significant documents or records providing information about a place, institution or group of people. The main function of an archives team is to identify, manage and preserve the integrity of Council's official records of long-term value, this can include artwork, documents, artefacts or oral records. The reason for maintaining an archive function in Council is to ensure records are maintained according to legislation and that members of the public are able to access archival material if required.</p> <p>At CoA, from time to time, members of the public request historical information for a number of reasons via Freedom of Information or the Fees and Charges framework. This information can be requested via the Archives office; therefore, the Archives team is providing a community service. Not only does the Archive team provide relevant documents to members of the public, but they also provide information to internal stakeholders, and they do this quite effectively. For internal staff, when a request is received, well within 24 hours, the request has been actioned. As the majority of customer experience is for external customers, there is the opportunity to review the service outcome of the function to confirm if the team is better aligned to the Corporate Services or City Community portfolios.</p>	<p>As part of the current CoA 2024/25 organisational restructure, Information Management will review all of its functions including the archives function.</p> <p>Target Completion Date: 30 June 2025</p>

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<p>Recommendation:</p> <p>Consideration should be given to reviewing the functionality of the Archives team and determining if the service they are providing is more aligned with the community rather than corporate services.</p> <p>If community, then consideration should be given to whether the Archives function should sit within the Information Management program or if it is more aligned with City Culture.</p>	
<p>Position Responsible:</p>	<p>Manager Information Management</p>
<p>Target Date:</p>	<p>As above</p>

APPENDIX 1: RISK MATRIX OF INTERNAL AUDIT FINDINGS

The following framework for the internal audit ratings is consistent with the CoA Risk Management Operating Guidelines and the Risk Management International Standard ISO31000:2018. The descriptions have been tailored to illustrate risk to the business operations.

CoA Risk Matrix

CoA Risk Matrix		CONSEQUENCE				
		Insignificant	Minor	Moderate	Major	Catastrophic
LIKELIHOOD	Almost Certain	Moderate	High	Extreme	Extreme	Extreme
	Likely	Moderate	High	High	Extreme	Extreme
	Possible	Low	Moderate	High	High	Extreme
	Unlikely	Low	Low	Moderate	Moderate	High
	Rare	Low	Low	Low	Moderate	Moderate

8.3 Risk & Finding Descriptions

Rating	Definition	Action	Indicative Timeframe (variations to be agreed by SRIA)
Extreme	<p>The finding represents a control weakness that could adversely impact the business and the ability to meet objectives.</p> <ul style="list-style-type: none"> • Extreme decline in quality and customer service leading to a decrease in the community’s confidence in the Council • Extreme breakdown in process that leads to illegal activity • Breach of legislation or contractual non-compliance that will result in litigation, prosecution, and penalty 	<p>The finding was reported to the Director immediately, and a response plan was developed with the appropriate Associate Director. Implementation updates and status reporting are managed through Promapp.</p>	<p>Actions are managed in Promapp with a timeframe of at most three months for completion.</p>
High	<p>The finding represents a control weakness that could adversely impact the business and the ability to meet objectives.</p> <ul style="list-style-type: none"> • Major decline in quality and customer services leading to a decrease in the community’s confidence in the Council • Serious breakdown in process that may lead to increased and unacceptable risk • Breach of legislation or contractual non-compliance that will result in litigation, prosecution, and penalty 	<p>The finding was reported to the appropriate Associate Director immediately, and a response plan was developed with the right Manager and managed through Promapp.</p>	<p>Actions are managed in Promapp with a timeframe of at most six months for completion.</p>
Moderate	<p>The finding represents a control weakness that could negatively impact the business and the ability to meet objectives.</p> <ul style="list-style-type: none"> • Medium decline in quality and customer services leading to a decrease in the community’s confidence in the Council • Medium operational breakdown in process that may lead to increased and unacceptable risk • Minor breach of legislation or contractual non-compliance that will unlikely result in litigation, prosecution, and penalty 	<p>Findings are reported to the appropriate Manager through the Internal Audit Report and managed through Promapp.</p>	<p>Actions are managed in Promapp with a timeframe of at most nine months for completion.</p>
Low	<p>The finding represents a minor control weakness that could have or is having a low/ minimal but reportable adverse impact on the business and the ability to meet process objectives.</p> <ul style="list-style-type: none"> • Minimal decline in quality and customer services • Minor breakdown in process that is not likely to affect risk • Minor breach of legislation or contractual non-compliance that will unlikely result in litigation, prosecution, and penalty 	<p>Findings are reported to the appropriate Manager through the Internal Audit Report and managed through Promapp.</p>	<p>Actions are managed in Promapp with a timeframe of at most 12 months for completion.</p>