INTERNAL AUDIT REPORT:
RECORD KEEPING

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August 2025

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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 the record keeping requirements of the CoA was performed. The objective, scope, approach and findings are outlined below.

2. OBJECTIVES

The Record Keeping Audit for 2025 focused on a selection of SharePoint sites to ensure that our record keeping compliance obligations are being met. This audit was developed and facilitated in conjunction with Information Management as per the requirements in the Records Management Operating Guideline.

This review is included in the 2024-25 Internal Audit Plan to provide assurance to the CoA Executive Team, the Strategic Risk & Internal Audit Group (SRIA) and the CoA Audit & Risk Committee (ARC).

3. BACKGROUND

The *State Records Act 1997* (SA) governs councils' obligations and responsibilities regarding the management of official records. Under this Act, the Council has an obligation to maintain official records in its custody in good order and condition.

An official record is a record made or received by the council in the conduct of its business. This means that because employees of the Council act as a representative of the Council, any record created, sent, received, forwarded or transmitted by Council employees in the performance and discharge of their functions and duties may be classified as an official record.

The Records Management Operating Guideline (Operating Guideline) applies to all areas of Council, including subsidiaries, electronic business, and social media. It concerns records created, collected, processed, used, sentenced, stored, and disposed of in the conduct of official business. It applies to all Council employees and employees of the subsidiaries. The Operating Guideline provides the framework for the Council to effectively fulfil its obligations and statutory requirements under the *State Records Act 1997* (SA).

Good records management is of key importance to good governance. All official records recreated or used by employees while conducting Council business are to be retained and, where appropriate, registered into the corporate Electronic Document Records Management System (EDRMS). The current EDRMS that the CoA uses is Content Manager.

4. METHODOLOGY

During May to July, a list documenting all SharePoint / Teams sites were provided by Information Management. A targeted selection was identified which included SharePoint / Teams sites created in 2015 – 2018. Discussions were held with the relevant stakeholders who manage the relevant SharePoint site in relation to record keeping as per the Operating Guideline. Fifty-two SharePoint / Teams sites were reviewed independently by Annette Pianezzola, Risk and Audit Analyst. The following review was undertaken:

- Determine if the SharePoint / Teams site was being used
- Determine if the information such as documents found on the SharePoint / Teams site was also stored in Content Manager.

A desktop review was conducted, with forty-one of the SharePoint / Teams sites deemed to be satisfactory. Eleven of the SharePoint / Teams sites deemed further review is required as documents currently exist on these webpages. These findings are listed below:

SharePoint Site	Created	Documents Attached	Comments	Reference to Finding
Governance & Strategy				
Report Review Team	2017	No	Not currently used.	2
Strategic Plan Reporting	2017	No	Not currently used.	2
Strategic Plan Reporting – Development	2017	No	Not currently used.	2
Strategic Plan Group	2017	Yes	To be reviewed and saved in Content Manager.	1
PMO Reporting Tool	2018	Yes	Documents are available in Modern Gov and a record is retained in Content Manager.	N/A
Council Elections	2018	Yes	Saved in Content Manager.	N/A
People				
Daily Edition	2017	No	Not currently used.	2
L & P Administrators	2018	No	Not currently used.	2
Information Management				
IM Transform priorities	2017	No	Not currently used.	2
Transform Support	2017	Yes	Documents have been saved to Content Manager. Not currently used.	2
Create What's Possible	2018	No	Site to provide staff with instructions on how to create webpages. Training material.	N/A
Ten Gig Industry Analysis	2018	No	Not currently used.	2
Finance & Procurement				
IM Procurement	2017	Yes	To be reviewed and saved in Content Manager.	1
Adelaide Economic Development Agency				
SharePoint Users Group	2017	Yes	Documents have been saved to Content Manager. Not currently used.	2
Rundle Mall Management Authority	2018	Yes	To be reviewed and saved in Content Manager.	1
Economic Insights	2018	Yes	Documents have been saved to Content Manager. Not currently used.	2
Regulatory Services				
DA/0459/2017	2017	No	Not currently used.	2
ePlanning – UAT	2017	No	Not currently used.	2

ePlanning	2017	No	Document not considered a record, so not required to be saved. Not currently used.	2
ACP Building Audits	2018	Yes	To be reviewed and saved in Content Manager.	1
Building Fire Safety	2018	Yes	To be reviewed and saved in Content Manager.	1
Plan & Dev Public	2018	No	Not currently used.	2
Plan & Dev Mgmt	2018	No	Not currently used.	2
Plan & Dev	2018	No	Not currently used.	2
Infringements	2018	No	Not currently used.	2
ePlanning Mgm UAT	2018	No	Not currently used.	2
Planning & Development Communication Site	2018	No	Not currently used.	2
Strategic Property & Commercial				
PowerBI-SRC-UPark	2017	No	Not currently used.	2
PowerBI UPark	2018	No	Not currently used.	2
City Community				
Regional Aquatic Centre	2017	Yes	To be reviewed and saved in Content Manager.	2
Infrastructure				
Infrastructure Management Governance	2018	No	Data on the sites if for information only for staff, there are no documents that are considered a record.	N/A
City of Adelaide Transport Data	2018	Yes	To be reviewed and saved in Content Manager.	1
CoA Innovation Forum for Urban Mobility, Movement and Modelling	2018	No	Not currently used.	2
CoA Research Forum for Urban Mobility, Movement and Modelling	2018	No	Not currently used.	2
Pedestrian Movement	2018	No	Not currently used.	2
Customer & Marketing				
The Daily Edition	2018	No	Information platform for internal staff. No documents that are considered a record.	N/A
Commercial Businesses Marketing	2018	Yes	To be reviewed and saved in Content Manager.	1

Online Forms Design Principles	2018	Yes	To be reviewed and saved in Content Manager.	1
Marketing Central	2018	Yes	To be reviewed and saved in Content Manager.	1
Miscellaneous				
OCTFolio Redevelopment	2016	No	Not currently used.	2
PowerBI-Admin	2016	No	Not currently used.	2
Business Improvement Team	2018	Yes	To be reviewed and saved in Content Manager. Not currently used.	1
Reporting x 6	2018	No	Not currently used.	2
Miscellaneous	2018	No	Not currently used.	2
Azure Audit Logs	2018	No	Not currently used.	2
Business Insights	2018	No	Not currently used.	2
Sandbox	2018	No	Not currently used.	2

5.   CONSULTATION

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

- Anthony Criscitelli, 0365 Platform Analyst

- Shelley Palmer, Team Leader Corporate Records

- Michael Mallamo, Strategic Planner

- Tania De Palma, Coordinator Brands & Partnerships Rundle Mall

- Merissa Decelis, Lead Service Desk

- Daniel Clisby, Project Lead City Lifestyle

- Kristen Mackintosh, Lead Project Manager & Enterprise Delivery

- Kathryn Goldy, Manager Corporate Governance & Risk

- Jordan Tomopoulos, Advisor Economic Research & Business Development

- Daniel Stevens, Manager Marketing & Communication

- David Penrose, Lead Web & User Experience

- Simon Cope, Manager Procurement & Contract Management

- Sean Howie, Team Leader Traffic & Transport

- Sonjoy Ghosh, Associate Director Information Management

6. SUMMARY OF FINDINGS

Ref #1 Records not retained in Content Manager	Rating: High
Finding and Recommendation	**Agreed Actions**

Finding:
SharePoint /Teams sites are web-based platforms that enable staff at Council to collaborate, share information and manage content. It is essentially containers for web pages, lists and library of documents. The main types of SharePoint sites are team sites for collaboration and communicate sites for sharing of information with the broader Programs within Council.
 	
The overarching management of these SharePoint / Teams sites is performed by Information Management who will create a SharePoint / Teams site upon request by the Program/Team. The site is created so team members can collaboratively work on a project, a document or report. These documents are considered an official council record, so once the project has been completed, or the SharePoint / Teams site is no longer required, all relevant records should be stored in Content Manager, Council's record management system.
 	
In review of the fifty-two SharePoint / Teams sites, it was noted eleven sites contained records that may be considered as an official Council record.
 	
Recommendations
Review and confirm if the documents are required to be saved in Content Manager for the following Sharepoint /Teams sites:
 	
• Strategic Plan Group (Governance & Strategy)
 	
• IM Procurement (Finance & Procurement)
	Management comments:
	
	1a. Agreed. The data located on the SharePoint sites have been saved in Content Manager for the following sites:
	
	• Strategic Plan Group
	• City of Adelaide Transport Data - Home
	
	These SharePoint sites can now be closed.
	
	Responsibility: Associate Director Governance & Strategy / Associate Director Infrastructure
	
	Target Date: Completed
	
	1b. Agreed. The data on the following SharePoint sites will be reviewed and relevant documents will be saved in Content Manager, then will inform Information Management that the site can be closed.:
	• IM Procurement (Finance & Procurement)
	  Responsibility: Associate Director Finance & Procurement
	  Target Date: 31 December 2025
	
	• Rundle Mall Management Authority
	  Responsibility: General Manager Adelaide Economic Development Agency
	  Target Date: 31 December 2025
	
	• ACP Buildings Audits
	• Building Fire Safety
	  Responsibility: Associate Director Regulatory Services

• Rundle Mall Management Authority (Adelaide Economic Development Agency) • ACP Building Audits (Regulatory Services) • Building Fire Safety (Regulatory Services) • Regional Aquatic Centre (City Community) • City of Adelaide Transport Data (Infrastructure) • Commercial Businesses Marketing (Customer & Marketing) • Online Forms Design Principles (Customer & Marketing) • Marketing Central (Customer & Marketing) • Business Improvement Team (miscellaneous) If the documents are considered a Council record, save the document in Content Manager. Following from the review, consider if the SharePoint / Teams site is current and required. If not required, inform Information Management to close the SharePoint site.	**Target Date**: 31 December 2025 • Regional Aquatic Centre (City Community) – SharePoint site to remain active until end of January 2026 **Responsibility**: Associate Director City Community **Target Date**: 31 Decemer 2025 • Commercial Businesses Marketing (Customer & Marketing) • Online Forms Design Principles • Marketing Central **Responsibility**: Associate Director Customer & Marketing **Target Date:** 31 December 2025
Position Responsible:	Associate Director Governance & Strategy, Associate Director Information Management, Associate Director Finance & Procurement, General Manager AEDA, Associate Director Regulatory Services, Associate Director City Community, Associate Director Infrastructure, Associate Director Customer & Marketing
Target Date:	As above

Ref #2 SharePoint sites not used	Rating: Low
Finding and Recommendation	**Agreed Actions**
Finding: The overarching management of Council internal SharePoint / Teams sites is performed by Information Management who will create a SharePoint /Teams site upon request by the Program/Team. Program / Teams will request a SharePoint or Teams site with the intention of collaborating on a report, a project, a document or sharing of information with the team or broader Council staff. Once the site is created by Information Management, a member group is created that is attached to the relevant SharePoint / Teams site. At times, these sites are created but no content is placed on the SharePoint / Teams site. For sites that have had no activity for 90 days or have external viewers, an automated notification is sent to the content owner of the site. The notification asks the content owner if they would like to retain the site or if external viewers still require access. If the site or access is no longer required, the member group is deleted however due to retention levels, the SharePoint / Teams site is retained for 7 years prior to deletion. As of 31 May 2025, there are 1,214 active SharePoint / Teams sites. It was noted as part of this review, of the fifty-two sites reviewed, thirty-seven SharePoint / Teams sites either had no document or information on the site, or it was identified that the SharePoint / Teams site is no longer utilised by the team. This has placed more onerous on the Information Management team to manage. **Recommendations** All 32 sites have been identified in the table above that they can be closed. Delete the member group and place on the retention schedule for deletion.	**Management comments:** 2a. User access will be disabled and placed on a retention schedule for all 32 sites identified in the table above. **Responsibility**: Associate Director Information Management **Target date**: 31 December 2025

Position Responsible:	Associate Director Information Management
Target Date:	As above

Ref #3 Reiterate the relevance of record keeping	Rating: Process Improvement
Finding and Recommendation	**Agreed Actions**
Finding: The Records Management Operating Guideline (Operating Guideline) was recently reviewed and updated in July 2025. Its purpose is to maintain best practices for the use and user experience of the CoA's electronic document and records management system (ERDMS). The Operating Guideline provides the framework for the CoA to effectively fulfil its obligations and statutory requirements under the *State Records Act 1997* (SA). It has been noted that records stored in Teams/SharePoint are not automatically registered to Content Manager, Council's records management system. Therefore, it is the staff member's responsibility to ensure the document is registered to Content Manager. If functionality between Teams/SharePoint and Content Manager is not improved, the risk is that CoA staff will forget to register records in the Council's record management system. **Recommendations** 1. Information Management to inform staff of their responsibility to save records in Content Manager. 2. Information Management to explore the upgrade of Content Manager to enable improved functionality between Teams/SharePoint and Content Manager to create efficiencies for CoA staff.	**Management comments:** 3a. As part of the new SuccessFactors, leaders can access and view the status of online training for their staff and are responsible for following up with incompletions. This functionality enables Executive, SLT and People Leaders to view completion rates. In September, instructions were provided to the Senior Leadership Team on how to access the information. **Responsibility**: Associate Director Information Management **Target date**: Completed 3b. As part of the 2025/26 Content Manager upgrade, IM has identified that the latest version of Content Manager does support the integration of Content Manager with SharePoint Online and Microsoft Teams. However, this would require Content Manager to be migrated to OpenText's Cloud solution which we are evaluating. The upgrade to Content Manager is scheduled for completion by 30 June 2026. **Responsibility**: Associate Director Information Management **Target date**: 30 June 2026
Position Responsible:	Associate Director Information Management
Target Date:	As above

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.

6.1 CoA Risk Matrix

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

8.3 Risk & Finding Descriptions

Rating	Definition	Action	Indicative Timeframe (variations to be agreed by SRIA)
Extreme	The finding represents a control weakness which could have or is having an extreme adverse impact on the business and the ability to meet objectives. • Extreme decline in quality and customer service leading to a decrease in community's confidence in Council • Extreme breakdown in process that leads to illegal activity • Breach of legislation or contractual non-compliance that will result in litigation, prosecution and/or penalty	Finding reported to Director immediately and response plan developed with appropriate Associate Director. Implementation updates and status reporting managed through Promapp.	Actions managed in Promapp with a timeframe of no more than 3 months for completion.
High	The finding represents a control weakness which could have or is having a high adverse impact on the business and the ability to meet objectives. • Major decline in quality and customer services leading to a decrease in community's confidence in 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/or penalty	Finding reported to the appropriate Associate Director immediately and response plan developed with appropriate Manager. Managed through Promapp.	Actions managed in Promapp with a timeframe of no more than 6 months for completion.
Medium	The finding represents a control weakness which could have or is having a medium adverse impact on the business and the ability to meet objectives. • Medium decline in quality and customer services leading to a decrease in community's confidence in Council • Medium operational breakdown in process that may lead to increased and unacceptable risk • Minor breach of legislation or contractual non-compliance that will not likely result in litigation, prosecution and/or penalty	Finding reported to appropriate Manager through Internal Audit Report and managed through Promapp.	Actions managed in Promapp with a timeframe of no more than 9 months for completion.
Low	The finding represents a minor control weakness which could have or is having a low/ minimal but reportable adverse impact on the business and the ability to meet process objectives. • 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 not likely result in litigation, prosecution and/or penalty	Finding reported to appropriate Manager through Internal Audit Report and managed through Promapp.	Actions managed in Promapp with a timeframe of no more than 12 months for completion.