



22 June 2018

PGPA Act Review
Attention: Review Secretary
Department of Finance
One Canberra Avenue
FORREST ACT 2603
By email: pgpaactreview@finance.gov.au

Dear Review Secretary

Public Governance, Performance and Accountability Act 2013 and Rule Independent Review – Consultation Draft

Thank you for inviting the National Film and Sound Archive of Australia (NFSA) to provide comments on the consultation draft of the independent review of the Public Governance, Performance and Accountability Act 2013 (PGPA Act) and the Public Governance, Performance and Accountability Rule 2014.

Background

The NFSA was established on 1 July 2008 by the *National Film and Sound Archive of Australia Act 2008*. We are Australia's 'living' archive, whose purpose is to collect, preserve and share Australia's national audiovisual collection and to make it available to audiences worldwide for enjoyment, learning, insight and creativity.

The NFSA is the custodian of the national audiovisual collection of over 2.8 million items which represents the cultural diversity and breadth of experience of all Australians and is the most significant and engaging place for encounters with our memories, stories, creativity and imagination.

NFSA Submission

Recommendation 8

Any such standard must take into account the spectrum of performance reporting when comparing small and large entities to ensure that reporting burdens that are reduced by other recommendations are not increased by a requirement to meet a 'one-size' performance reporting framework. The guidance in the report makes no note of the impact a standard could have for small entities.

Recommendation 15

This recommendation poses a concern where the Accountable Authority is a Board, as opposed to a single person. Having a Board member sit on the Audit Committee facilitates engagement and information flow between the Committee and the Board. It also provides the Audit Committee with a member who has deep knowledge of the governance of the organisation which can be a significant advantage to committee discussions.

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This also poses a disproportionate budget impact for small entities as independent members will need to be renumerated. The proposal to change the definition of independent should consider that there is a broad spectrum of risk profiles across government agencies and that the best composition for a Committee would be reflective of the agency's risk profile.

Recommendation 17

The report discusses that membership is often made up of Canberra based members. Again, any requirement to diversify the geographic membership of Audit Committees would have a disproportionate financial impact on small agencies, as 'tele' meetings are not always viable and travel costs would need to be incurred.

Recommendation 20

The NFSA finds this recommendation impractical as it does not see how it would improve efficiency, effectiveness or accountability. Entities will still be responsible for their own Risk Management Framework, internal controls, financial statements, internal audit processes, annual performance statement etc. It is difficult to see how a joint committee could provide satisfactory oversight and advice, specific to the agency's objectives and resources, in a more efficient manner.

Recommendation 25

Often standardised templates can increase the burden placed on small entities, as they can require substantial manipulation to fit a standard approach. The report's recommendation that it be optional should be included in any implementation of the recommendation.

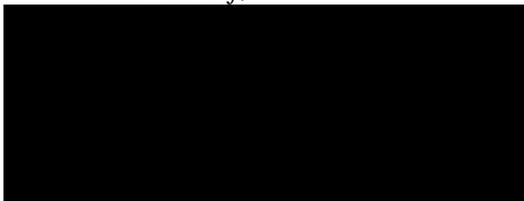
Recommendation 29 & 30

The finalisation of auditing and reporting for some entities (most often small entities) can be substantially later than other entities, which delays the ability to finalise and check content. The NFSA supports the report's view that any change to the tabling deadline must be supported by sufficient capacity of the ANAO to meet the earlier deadline. The NFSA supports the report's view that the deadline cannot be brought forward until digital publication is implemented.

If you would like to discuss any comments or seek further information, please do not hesitate to contact the NFSA Governance Team on 02 6248 2063 or governance@nfsa.gov.au.

We thank you for this opportunity to provide feedback.

Yours sincerely,



Gabrielle Trainor AO
Chair, NFSA Board