Answers to Senate Estimates Questions on Notice

Supplementary Budget Estimates Hearings October 2015

Communications Portfolio

National Film and Sound Archive

Question No: 73

National Film and Sound Archive Hansard Ref: Written, 30/10/2015

Topic: Attachment A – Questions relating to the NFSA Business Review Report Senator Urquhart, Anne asked:

Attachment A – Questions relating to the NFSA Business Review Report to NFSA Board March 2014 (will be referred to as 'the Review')

- 2. The Business Review: Budgetary factors (p3)
 - Q: Instead of drastic cuts to staffing, could savings have been made from more effective performance management in the years and months leading up to the Review?
 - Q: Could savings have also been made via more considered use of consultants in the months and years leading up to the Review, when the issue of over spending was first identified? We note that expenditure for consultants in 2012 was \$701,000, 2013 was \$450,000 and 2014 was \$432,000 according to NFSA Annual Reports.

2.1 Savings required (p5)

Q: How many more positions will need to be cut to reach the target of \$3 million in savings? Will this be operational staff or will the NFSA's Senior Executive team also be streamlined to achieve this?

3.2 Audience development and NFSA's competitive advantage (p5)

- Q: The programs noted on page 6 of the report aligned with the published strategic objectives at the time prior to the review. Had the NFSA Executive written a replacement strategy and/or business plan that can be cross-checked against the objectives of the programs when they existed, or were these strategic outcomes written after the Review was handed down?
- Q: Was there a requirement of NFSA Executive and Board to source non-government funds for NFSA programs prior to the Review taking place? If so, how much was expected to be raised? How much of this target was reached prior to the Review being handed down?

3.3 Deregulation agenda and federalism (p6)

Q: In querying the quote "the program in its current form appears to lack a consolidated and articulated programming direction": why wasn't this issue addressed with more effective management and direction from NFSA Executive and Senior Staff? Was there an ongoing internal management or staff performance issues that led to this result? Could these issues have been addressed through redevelopment of business models, as afforded to the Screening Loans section?

3.4 Fiscal environment and revenue generation (p7)

- Q: You quote an expectation of decreased funds from the government. What figure was your assumption, and how did you arrive at this figure?
- Q: Again, in relation to the declining revenue from such sources at the NFSA Shop, why

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wasn't this handled through improved management and business model practices? Q: Overall, what measures did the NFSA take to improve the performance and revenue of targeted programs prior to the Review? Were any other measures put in place to improve performance, and what were those measures? If measures were not put in place, why not, and why was the drastic decision made to make cuts to staff and programs before implementing better management practices?

- 4. The Business Review: objectives and terms of reference (p7)
 - Q: What has been achieved since the date of the Review on each of these proposed dot points listed in this section of the review? Have any been achieved and to what degree? How do you intend to measure these outcomes, in particular:
 - Re-alignment of strategic resources;
 - Strengthen external engagement (eg: will this be measured against previous number of events and partnerships before the Review);
 - Prioritisation of raising non-appropriation revenue (please give us an amount raised to date); and
 - Champion a safe a healthy workplace culture, and ensure strategic focus on workforce development (eg: do you plan to conduct an independent staff satisfaction survey, inclusive of mental health factors?)
- 5. The Business review: Methodology (p8)
 - Q: Was staff consultation recorded in any way for audit purposes?
 - Q: Given that the NFSA employee base is made up of technical and operational specialists, how much weight was given to staff feedback against the need for cost cuts?
 - Q: Who did the Business Review Team consist of, and what are their qualifications, particularly with regards to experience in cultural institutions, film and sound archives, and the Arts in general? If any staff on this team were recruited from outside the NFSA, how was this deemed appropriate given the need to cut costs?
- 6. Executive summary: key recommendations (p10)
 - Q: Was this "radical change" required? How was this decision reached, and by whom? What factors were considered, or was the Review simply a panic reaction to the NFSA's financial climate? Who in the Executive, Deptartment and Board have been held to account for allowing the organisation to get into this situation?
 - Q; Was it considered that the "second stage restructure" of the NFSA long term would be detrimental to the organisation, it's brand and it's connections in the short term? What risk management strategies are in place to ensure that the NFSA does not become vulnerable to losing its independent status during this period of redevelopment?
 - Q: The NFSA answered in BE15/072 that there have been "no discussions about the possibility of moving the NFSA HQ out of Canberra in the mid to long term". What does "exiting the current HQ" in the Review document refer to? Does this mean the NFSA plans to relocate within Canberra, or not have a Canberra administrative office and/or public programs at all?
- 7.1 The purpose of the five key principles of engagement (p11)
 - Q: In querying the dot point "Abundant: resources need to be sufficient to meet the core

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requirements set out by our strategic objectives" – given recent cuts, is there currently enough staff in the NFSA to undertake the strategic objectives, or are the remaining staff being subject to increased workloads?

Q: In querying the dot point "Predictable: program development and delivery needs to be rigorously benchmarked to allow for realistic projections of expenditure and revenue streams" – how does an ad-hoc cinema program, and the temporary closure of school programs and the exhibition gallery assist towards predictability, both for the public expectation of outreach activities and the financial management of these programs as they stop and start throughout the year?

7.2 When successfully implemented the NFSA will (p11)

- Q: How was it ascertained that the NFSA had not previously demonstrated "its unique place and value with Government, the cultural sector, and the Australian creative industries"? As the NFSA became a Statutory Authority on 1 July 2008, it could be stated that this unique place had already been determined and appreciated by the Australian Commonwealth Government.
- Q: Was this perceived failure identified as being due to previous or current organisational environments?

Principle 3 – The Creator' Archive (p13)

- Q: Given the delicate and potentially litigious environment of copyright in Australia, what measures have you or do you plan to put in place in order to mitigate legal risk? Principle 5 Sustainable Partnerships (p14)
- Q: In paragraph one of this section, you argue for demonstration of currency and relevance to the community. Weren't the popular programs of Big Screen and Arc cinema already achieving this with national outreach and ongoing high level partnerships?
- Q: Can it be assumed that most if not all of the partnerships undertaken by ceased programs such as the aforementioned Big Screen and Arc cinema programs were terminated along with the programs? How do you propose to regain the trust of those previous and potential future partners?

Changes to Existing Programs (p15)

- Q: You state with regard to Arc cinema that "attempts to strategically reposition the program to generate more mainstream appeal have been unsuccessful" please state precisely who you consulted on action taken, what was attempted, and for what duration?
- Q: With regard to Big Screen and School Screen's "increase in cost of delivery", why was this not managed more efficiently in order to deal with the financial cost?
- Q: Did you attempt sponsorship to raise the "significant capital funding" for a Gallery upgrade, as other cultural institutions including NMA and ACMI have done in the past. Which companies did you approach?
- Q: Regarding the NFSA Shop again, why wasn't this managed more efficiently, and measures put in place (such as an updated business model) in the years and months leading up to the Review? What was attempted to update products and promotional platforms? Access to Collections Programs (p17)
- Q: How do you intend to promote the access services of the NFSA without programs such as Big Screen, Arc cinema, the exhibition to cross promote other NFSA services to a wider audience?

Recommendations (p18)

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Q: Why was the decision to close down Screening Loans and the NTLC reversed since this Review was written?

Collection Development Programs (p21)

- Q: NFSA noted a focus on Indigenous activities why then was it decided to absorb the Indigenous collections activities into the main acquisition fold?
- Q: What case studies support "strategic withdrawal from photo-chemical film preservation"?
- Q: Why wasn't "random curatorial engagement with targeted approach to public program delivery" already being achieved? Were there management issues across teams, and could measures have been put in place to avoid such a Review?

Strategic focus 2014-15 (p22)

- Q: For each of the eight items on the list of dot-points of recommendations, to date what has been achieved and how have these achievements been measured?
- Q: Why are "a number of managers reporting directly to the CEO"? Is there not an acceptable Executive structure in place to allow for the CEO not to be required to take direct management a number of areas?

Resourcing (Staff resources and structure) (p22)

- Q: Has this proposed structure been successful to date and have there been staffing changes in the Senior Manager positions since the Review took effect? For example, the Senior Manager, Strategy & Communication Engagement as mentioned in BE15/072 is not part of the originally proposed structure in the Review. What other changes have been made and why?
- Q: Of the list of positions surplus to requirements on pages 24 and 25, how many of these staff have been replaced with same or similar tasks?
- Q: Of the list of positions surplus to requirements on page 30, there seems to be little to no decrease of staff against the Organisational Chart supplied, or position names changed only, particularly in PATS and Curatorial areas. How many staff were given Voluntary Redundancies from these areas, or were they simply rolled into new positions? General questions
- Q: What has been the turnover percentage of staff at the NFSA after the Review was handed down?
- Q: Were there any performance issues of the staff in the positions identified as "excess to requirements" in this Review?

Answer:

- 2. The Business Review: Budgetary factors (p3)
 - Q: Instead of drastic cuts to staffing, could savings have been made from more effective performance management in the years and months leading up to the Review?

Answer: No

Q: Could savings have also been made via more considered use of consultants in the months and years leading up to the Review, when the issue of over spending was first identified? We note that expenditure for consultants in 2012 was \$701,000, 2013 was \$450,000 and 2014 was \$432,000 according to NFSA Annual Reports.

Answer: No

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2.1 Savings required (p5)

Q: How many more positions will need to be cut to reach the target of \$3 million in savings?

Answer: None

Will this be operational staff or will the NFSA's Senior Executive team also be streamlined to achieve this?

Answer: N/A

3.2 Audience development and NFSA's competitive advantage (p5)

Q: The programs noted on page 6 of the report aligned with the published strategic objectives at the time prior to the review. Had the NFSA Executive written a replacement strategy and/or business plan that can be cross-checked against the objectives of the programs when they existed, or were these strategic outcomes written after the Review was handed down?

Answer: The five key principles of engagement set out on page 11 of the Business Review are the strategic objectives against which the programs were assessed.

Q: Was there a requirement of NFSA Executive and Board to source nongovernment funds for NFSA programs prior to the Review taking place?

Answer: There was no requirement.

If so, how much was expected to be raised?

Answer: N/A

How much of this target was reached prior to the Review being handed down?

Answer: N/A

3.3 Deregulation agenda and federalism (p6)

Q: In querying the quote "the program in its current form appears to lack a consolidated and articulated programming direction": why wasn't this issue addressed with more effective management and direction from NFSA Executive and Senior Staff?

Answer: This was addressed through the Business Review process.

Was there an ongoing internal management or staff performance issues that led to this result? Answer: No.

Could these issues have been addressed through redevelopment of business models, as afforded to the Screening Loans section?

Answer: No.

3.4 Fiscal environment and revenue generation (p7)

Q: You quote an expectation of decreased funds from the government. What figure was your assumption, and how did you arrive at this figure?

Answer: The Business Review notes at page 7 that there was no figure available until the May budget.

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Q: Again, in relation to the declining revenue from such sources at the NFSA Shop, why wasn't this handled through improved management and business model practices?

**Answer: This was addressed through the Business Review process.

Q: Overall, what measures did the NFSA take to improve the performance and revenue of targeted programs prior to the Review? Were any other measures put in place to improve performance, and what were those measures? If measures were not put in place, why not, and why was the drastic decision made to make cuts to staff and programs before implementing better management practices?

Answer: The purpose of the Business Review process was to identify issues and make recommendations in relation to the operation of the NFSA's programs and business areas. Changes were made to the programs in light of the findings of the Business Review and stakeholder consultation.

4. The Business Review: objectives and terms of reference (p7)

Q: What has been achieved since the date of the Review on each of these proposed dot points listed in this section of the review?

Answer:

Achievements against each of the proposed dot points is as follows:

- *Delivery of a revised strategic plan (3-5 year planning cycle)*. The NFSA's Strategic Plan 2015-18 was released in 2015.
- Focus on fewer yet 'big' organisational goals aligned with the corporate plan, and clearly establishing competitive edge for NFSA. The NFSA's Strategic Plan 2015-18 outlines five strategic objectives for the organisation.
- Re-alignment of strategic resources (governance, planning, project management, business development, stakeholder management systems) creation of a 'business hub' /'command bridge' to support the branches. This is an ongoing objective which is implemented through increased communication structures across the NFSA's Executive and through revised Budget planning and reporting processes.
- Fostering ideas and driving innovation and R&D. This is an ongoing objective which is implemented through increased communication structures across the NFSA's Executive and through training and development opportunities.
- Evaluate potential of consolidating existing programs and facilities, exploring potential synergies, incorporating programs, and a reduction of NFSA's lease footprint. This is an ongoing objective which is being implemented through a range of measures including the development of a Community Engagement Strategy, a Site Master Plan and increased communication structures across the NFSA's Executive.
- *Strengthen external engagement.* This is being met through the development of a Community Engagement Strategy.
- *Prioritisation of raising non-appropriation revenue.* The Board has established a Fundraising and Stakeholder Development Subcommittee.
- Harnessing the Board's potential expert advice and influence for those purposes. New appointments were made to the Board during 2014-15.
- Champion a safe and healthy workplace culture, and ensure strategic focus on workplace development. A Senior Manager, Human Resources has been appointed to focus on implementation of this objective.

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Have any been achieved and to what degree?

Answer: The NFSA's activities in relation to achieving all of these outcomes is ongoing.

How do you intend to measure these outcomes, in particular:

- Re-alignment of strategic resources;
- Strengthen external engagement (eg: will this be measured against previous number of events and partnerships before the Review);
- Prioritisation of raising non-appropriation revenue (please give us an amount raised to date); and
- Champion a safe a healthy workplace culture, and ensure strategic focus on workforce development (eg: do you plan to conduct an independent staff satisfaction survey, inclusive of mental health factors?)

Answer: Measurement of these outcomes is conducted through regular reporting to the NFSA's Board, reporting in relation to the NFSA Corporate Plan, and the NFSA's Annual Report.

In relation to non-appropriation revenue, \$1.877m was raised in 2014-15 as reported in the 2014-15 Annual Report.

5. The Business review: Methodology (p8)

Q: Was staff consultation recorded in any way for audit purposes?

Answer: Records of the Business Review process, including consultations, were kept as part of the operations of the NFSA as required by the *Archives Act* 1983.

Q: Given that the NFSA employee base is made up of technical and operational specialists, how much weight was given to staff feedback against the need for cost cuts?

Answer: All NFSA staff were given the opportunity to provide input and consultation as part of the Business Review process.

Q: Who did the Business Review Team consist of, and what are their qualifications, particularly with regards to experience in cultural institutions, film and sound archives, and the Arts in general?

Answer: The Business Review Team consisted of the Interim CFO and Business Analyst and the General Manager, Organisational Development and Corporate. The team included a mix of skills covering the areas of financial management and accountancy, performance improvement, cultural institutions management particularly in relation to film and sound archives.

If any staff on this team were recruited from outside the NFSA, how was this deemed appropriate given the need to cut costs?

Answer: No staff were recruited from outside the NFSA.

6. Executive summary: key recommendations (p10)

Q: Was this "radical change" required?

Answer: Yes.

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How was this decision reached, and by whom?

Answer: The Business Review methodology is outlined on page 8.

What factors were considered, or was the Review simply a panic reaction to the NFSA's financial climate?

Answer: The Business Review methodology is outlined on page 8.

Who in the Executive, Department and Board have been held to account for allowing the organisation to get into this situation?

Answer: Accountability was addressed through the findings of the Business Review, which identified issues relating to the NFSA's resources and operations. The NFSA has since implemented a restructure and introduced new reporting and accountability structures as part of implementing the Business Review's recommendations.

Q: Was it considered that the "second stage restructure" of the NFSA long term would be detrimental to the organisation, it's brand and it's connections in the short term?

Answer: No.

What risk management strategies are in place to ensure that the NFSA does not become vulnerable to losing its independent status during this period of redevelopment? **Answer:** The NFSA operates under the *National Film and Sound Archive Act of Australia* 2008 which is an Act of the Australian Parliament. Any decision regarding its status is a matter for the government of the day.

Q: The NFSA answered in BE15/072 that there have been "no discussions about the possibility of moving the NFSA HQ out of Canberra in the mid to long term". What does "exiting the current HQ" in the Review document refer to?

Answer: This refers to the development of a Strategic Master Plan for NFSA's property.

Does this mean the NFSA plans to relocate within Canberra, or not have a Canberra administrative office and/or public programs at all?

Answer: No. No plan has been developed at this stage.

- 7.1 The purpose of the five key principles of engagement (p11)
 - Q: In querying the dot point "Abundant: resources need to be sufficient to meet the core requirements set out by our strategic objectives" given recent cuts, is there currently enough staff in the NFSA to undertake the strategic objectives, or are the remaining staff being subject to increased workloads?

Answer: There is currently enough staff in the NFSA to undertake the strategic objectives.

Q: In querying the dot point "Predictable: program development and delivery needs to be rigorously benchmarked to allow for realistic projections of expenditure and revenue streams" – how does an ad-hoc cinema program, and the temporary closure of school programs and the exhibition gallery assist towards predictability, both for the public expectation of outreach

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activities and the financial management of these programs as they stop and start throughout the year?

Answer: The NFSA continues to offer a secondary schools program and to release a quarterly seasonal calendar of programs and activities.

7.2 When successfully implemented the NFSA will (p11)

Q: How was it ascertained that the NFSA had not previously demonstrated "its unique place and value with Government, the cultural sector, and the Australian creative industries"? As the NFSA became a Statutory Authority on 1 July 2008, it could be stated that this unique place had already been determined and appreciated by the Australian Commonwealth Government.

Answer: The statement on page 11 of the Business Review regarding the NFSA demonstrating its "unique place and value with Government, the cultural sector, and the Australian creative industries" does not state that the NFSA has not previously achieved this goal.

Q: Was this perceived failure identified as being due to previous or current organisational environments?

Answer: N/A

Principle 3 – The Creator's Archive (p13)

Q: Given the delicate and potentially litigious environment of copyright in Australia, what measures have you or do you plan to put in place in order to mitigate legal risk?

Answer: All risk is managed in line with the NFSA's Risk Management Framework.

Principle 5 – Sustainable Partnerships (p14)

Q: In paragraph one of this section, you argue for demonstration of currency and relevance to the community. Weren't the popular programs of Big Screen and Arc cinema already achieving this with national outreach and ongoing high level partnerships?

Answer: No.

Q: Can it be assumed that most if not all of the partnerships undertaken by ceased programs – such as the aforementioned Big Screen and Arc cinema programs – were terminated along with the programs?

Answer: No.

How do you propose to regain the trust of those previous and potential future partners? **Answer:** The NFSA continues to proactively manage its stakeholder relationships and engagement.

Changes to Existing Programs (p15)

Q: You state with regard to Arc cinema that "attempts to strategically reposition the program to generate more mainstream appeal have been unsuccessful" – please state precisely who you consulted on action taken, what was attempted, and for what duration?

Answer: The Business Review notes at page 8 that the "review team met with 116 staff in the initial consultation period with additional staff input provided by email."

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Q: With regard to Big Screen and School Screen's "increase in cost of delivery", why was this not managed more efficiently in order to deal with the financial cost?

Answer: The Business Review made its finding in relation to these programs on the basis of a range of issues which included an increase in the cost of delivery as well as technological change and market changes.

Q: Did you attempt sponsorship to raise the "significant capital funding" for a Gallery upgrade, as other cultural institutions – including NMA and ACMI – have done in the past. Which companies did you approach?

Answer: No; N/A.

Q: Regarding the NFSA Shop – again, why wasn't this managed more efficiently, and measures put in place (such as an updated business model) in the years and months leading up to the Review?

Answer: Issues relating to the NFSA Shop were addressed as part of the Business Review, including transitioning it to a fully online space. Updated business models have been put in place in relation to the online shop during 2015.

What was attempted to update products and promotional platforms?

Answer: Updates to products and promotional platforms for the online shop are ongoing.

Access to Collections Programs (p17)

Q: How do you intend to promote the access services of the NFSA without programs such as Big Screen, Arc cinema, the exhibition to cross promote other NFSA services to a wider audience?

Answer: The NFSA is continuing to develop its online presence as a mechanism to promote the access services of the NFSA through activities such as online exhibitions. The NFSA continues to present curated activities at its Acton headquarters and in collaboration with partners across Australia.

Recommendations (p18)

Q: Why was the decision to close down Screening Loans and the NTLC reversed since this Review was written?

Answer: This decision was made as part of the findings of the Business Review and subsequent stakeholder consultation.

Collection Development Programs (p21)

Q: NFSA noted a focus on Indigenous activities – why then was it decided to absorb the Indigenous collections activities into the main acquisition fold?

Answer: The NFSA has an Indigenous Connections section that focuses on Indigenous curation and connections within communities. Acquisitions continue to be managed in consultation with the Indigenous Connections section and the other curatorial teams.

Q: What case studies support "strategic withdrawal from photo-chemical film preservation"?

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Answer: The NFSA currently supports analogue film and photo-chemical preservation where possible, in line with international trends, and as practicable working within its existing resources and in light of decreasing access to external service providers and raw stock.

Q: Why wasn't "random curatorial engagement with targeted approach to public program delivery" already being achieved?

Answer: "[R]andom curatorial engagement" was being achieved. The Business Review recommended that it be replaced with a "targeted approach to public program delivery".

Were there management issues across teams, and could measures have been put in place to avoid such a Review?

Answer: No; no

Strategic focus 2014-15 (p22)

Q: For each of the eight items on the list of dot-points of recommendations, to date what has been achieved and how have these achievements been measured?

Answer:

- Centralising existing partnerships management. Existing partnerships management was centralised into the Executive Office at the start of the 2014-15 financial year. The NFSA Senior Executive oversee and report on partnerships of significance and strategic importance to the NFSA to the Board, as appropriate.
- Centralising management of major projects, including reporting to Board and relevant stakeholders. Major NFSA projects and their progress are overseen Senior Executive and reported to the NFSA Board, as appropriate.
- Developing and implementing a clear stakeholder engagement strategy based on the five key principles for engagement. A stakeholder engagement strategy is planned for development.
- Developing and implementing a fundraising program including strategic grants applications, a sponsorship program and a philanthropic giving program. The NFSA Funding and Stakeholder Development Subcommittee was formed in early 2015 to oversee the direction and implementation of NFSA's funding and sponsorship goals.
- *Discontinuation of the majority of existing legacy programs.* A summary is as below:

Service/Program	Status
Big Screen	In this form, ceased November 2014
School Screen	In this form, ceased after 30 June 2014
NFSA Library	Open by appointment since 30 June 2014
NFSA Shop	Physical shop ceased since 30 June 2014. Shop continues online
Arc cinema	In this form, ceased after 31 August 2014
program	
Acton Exhibition	The Gallery space is open to the public for special events and
Gallery	programs.
Scholars and	In this form, ceased after 31 December 2014.
Artists in	
Residence	

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Service/Program	Status
Screening	Existing screening loan commitments and new bookings under
Loans	current system will continue unchanged until end of 2015. A new
(including the	business model is in development.
NTLC)	

- Developing a reduced number of new NFSA audience engagement programs. NFSA audience engagement programs have been developed and are currently being delivered. A Community Engagement Strategy is being developed.
- Delivery of a limited number of milestones 'highlight' programs demonstrating the NFSA's principles of engagement. Highlight programs continue to be developed and will be measured against the NFSA's Corporate Plan key performance indicators.
- Developing a close alignment with the curatorial sections (Programs), collection management (MAM Governance Project and STC), and Commercial (product development). This is being implemented through a range of measures including increased Executive-level communication.
- Q: Why are "a number of managers reporting directly to the CEO"? Is there not an acceptable Executive structure in place to allow for the CEO not to be required to take direct management a number of areas?

Answer: This is the structure found to be optimal as part of the Business Review process.

Resourcing (Staff resources and structure) (p22)

Q: Has this proposed structure been successful to date and have there been staffing changes in the Senior Manager positions since the Review took effect?

Answer: Yes; ves

For example, the Senior Manager, Strategy & Communication Engagement as mentioned in BE15/072 is not part of the originally proposed structure in the Review. What other changes have been made and why?

Answer: The position mentioned doesn't exist. Changes continue to be made, as required, as part of the ongoing operation of the NFSA.

Q: Of the list of positions surplus to requirements on pages 24 and 25, how many of these staff have been replaced with same *or similar* tasks?

Answer: None.

Q: Of the list of positions surplus to requirements on page 30, there seems to be little to no decrease of staff against the Organisational Chart supplied, or position names changed only, particularly in PATS and Curatorial areas. How many staff were given Voluntary Redundancies from these areas, or were they simply rolled into new positions?

Answer: No staff from PATS and the curatorial areas were given voluntary redundancies, nor were they rolled into new positions.

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General questions

Q: What has been the turnover percentage of staff at the NFSA after the Review was handed down?

Answer: The staff turnover in 2014-15 was 14%, and in 2013-14 was 7.5%, as reported in the NFSA's Annual Report.

Q: Were there any performance issues of the staff in the positions identified as "excess to requirements" in this Review?

Answer: No.