

— STATE RECORDS ACT 1997 (SA)

# South Australia

## Archiving Social Media: A Guide For SA Government

 SA LAW ACCESS LAW RETENTION & DISPOSAL CHECKLIST ARCHIVE-READY

Everything your council or agency needs to know about social media recordkeeping: the records Act, the access regime, retention and disposal, and a ready-to-use readiness checklist.



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**SOCIAL MEDIA ARCHIVING FOR SA GOVERNMENT**

# SA social media records, ready when an **FOI request** arrives.

**Ready to find it, review it and export it.** Posts, comments, replies, edits, deletions and associated media on official accounts can be government records when they evidence official business — and when a FOI application arrives, the response duty is statutory. The statutory period governs the decision and notice; locating the complete record set is the operational work needed to make that decision defensibly.

**Freedom of Information Act 1991 No. 20** — An agency must deal with an FOI application as soon as practicable and within 30 calendar days after receiving it. Under section 14A the principal officer may extend the period for a reasonable time where the application is unusually large or requires an extensive search that would substantially and unreasonably divert the agency's resources, or where required consultation cannot reasonably be completed in time — and written notice of the extension must be given within 20 days of receipt. An application not determined in time is taken to be refused (s 19(2)).

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**THE LEGAL CONTEXT**

## Social media records carry legal obligations. **A reliable archive helps your team meet them.**

**State Records Act 1997 (SA).** Agencies, including state agencies, ministerial offices, councils and universities, must maintain official records in their custody in good order and condition and may dispose of them only under a determination made under the State Records Act 1997. State Records' current guidance uses 'information asset' as an umbrella term that incorporates the Act's definition of 'official record' and also encompasses government information and data.

**Retention in South Australia.** Retention follows the function the record documents, not the channel. Social media content sits under the same disposal schedule as the activity it evidences. Confirm the applicable class with State Records of South Australia or your legal adviser.

### Primary sources

- **State Records Act 1997 (SA)**
- **Freedom of Information Act 1991 (SA)**
- **State Records of South Australia — managing information**
- **Ombudsman SA — freedom of information**
- **Ombudsman SA — Adelaide Hills Council determination (2021/06161)**

Reviewed against current official sources: 30 August 2026 · General information, not legal advice.

# The SA framework

Four things shape the social media record in South Australia: the records Act, the access regime, retention and disposal, and the consequences of getting disposal wrong.

## RECORDS ACT

### State Records Act 1997 (SA)

#### State Records Act 1997 No. 8

State Records of South Australia lists information communicated via social media among the digital records that agencies create and must manage in the course of government business.

## ACCESS TO INFORMATION

### Freedom of Information Act 1991 (SA)

#### Freedom of Information Act 1991 No. 20

An agency must deal with an FOI application as soon as practicable and within 30 calendar days after receiving it. Under section 14A the principal officer may extend the period for a reasonable time where the application is unusually large or requires an extensive search that would substantially and unreasonably divert the agency's resources, or where required consultation cannot reasonably be completed in time — and written notice of the extension must be given within 20 days of receipt. An application not determined in time is taken to be refused (s 19(2)).

## RETENTION & DISPOSAL

### General Disposal Schedules issued by State Records of South Australia

#### Retention and disposal authorities

Retention follows the function the record documents, not the channel. Social media content sits under the same disposal schedule as the activity it evidences.

## CONSEQUENCES

### Intentional unauthorised damage or disposal is a criminal offence

#### State Records Act 1997 (SA) s 17

Under s 17 of the State Records Act 1997, a person who knows they lack proper authority and intentionally damages, alters, disposes of or removes an official record faces a maximum penalty of \$10,000 or two years' imprisonment, and the court may order compensation. Under the FOI Act, an application not determined in time is taken to be refused, with internal review ordinarily preceding Ombudsman review.

**If it was posted, commented on, edited or deleted on an official channel — it can be a government record when it evidences official business.**

# Who oversees the record

The authorities that set the recordkeeping standards, publish the social media guidance and review how requests are handled in South Australia.

## RECORDS AUTHORITY

### State Records of South Australia

#### Managing information guidance

Sets the recordkeeping standards and publishes the guidance that applies to official social media in South Australia. Your retention and disposal decisions are made under its authorities.

## OVERSIGHT

### Ombudsman SA

#### [www.ombudsman.sa.gov.au](http://www.ombudsman.sa.gov.au)

Reviews how FOI applications are handled, including complaints about delay or refusal — which makes a findable, exportable record the easiest way to keep a request routine.

## WHO IS COVERED

### SA agencies · Councils

The FOI Act's 'agency' expressly includes a council (s 4(1)).

## SA DETERMINATION

### Ombudsman SA — Adelaide Hills Council (2021/06161)

#### Ombudsman SA determination, 24 January 2022

A s 14A extension notice issued one day after the statutory 20-day notice deadline was invalid, and the agency was consequently taken to have refused access. The extension-notice clock is enforced — the 20-day written-notice condition is not a formality.

Without a complete archive, **responding with confidence** to a request, audit or inquiry gets harder every day.

— READY TO GET STARTED

# Social Media Records **Readiness Checklist.**

A social media archive is a critical part of your recordkeeping strategy — one shared source of truth for your records, legal, IT and communications teams.

**Get the right people involved.**

Bring together records, communications, legal, governance and IT.

**Understand what laws apply.**

Know your records Act, access regime and retention authorities.

**Know your formats.**

Preserve original content, context, metadata, links and attachments.

**Think about privacy.**

Protect personal information and control access appropriately.

**Know which accounts are in scope.**

Identify every account used to conduct official business.

**Define what needs to be captured.**

Include posts, comments, replies, edits, deletions and media.

**Set your retention rules.**

Sentence records under your retention and disposal authority.

**Capture edits and deletions.**

Preserve content even after it changes or disappears.

**Plan for information requests.**

Make records easy to search, retrieve and export.

**Protect record integrity.**

Maintain authentic, complete and defensible records.

**Control access to your archive.**

Set clear permissions and maintain an audit trail.

**Test your process regularly.**

Make sure you can find and export records when needed.

## **Captured. Searchable. Defensible.**

Ready to see how Brolly supports the capture, search, integrity and export steps on this list? Turn the page.



— TRUSTED BY GOVERNMENT

## Keep the social record ready before the request arrives.

Social content can change or disappear long before an information request is received. Brolly gives authorised teams a searchable archive of supported content from connected official accounts, preserving available context so records can be found, reviewed and exported when needed.



*"Find a tool you can trust, especially when working in the public sector. We have that with Brolly – if you ever need those records, you know they're there."*

Anthony, Manager Marketing & Campaigns — NSW Department of Communities and Justice

[Read the NSW DCJ story →](#)

### GOVERNMENT ORGANISATIONS THAT USE BROLLY

**ROXBY  
COUNCIL**



**SOUTH AUSTRALIA POLICE**  
SAFER COMMUNITIES



**Government of South Australia**

Department for Trade  
and Investment

**Renewal SA**



Government  
of South Australia

**Gawler** |

- ✓ Capture supported posts, comments, edits & deletions automatically
- ✓ Search and export response-ready record sets with metadata intact
- ✓ Nothing disposed of without your instruction

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[The SA law guide](#)

**Captured. Searchable. Defensible.**