PROJECT BRIEF

Project Title:	Social Media Management Internal Audit
Project Contact:	**Rebecca Hayes, Associate Director, Governance & Strategy**
Project Objective:	This internal audit will assess the effectiveness of the Council's governance, monitoring, and response processes for managing third-party comments on social media platforms. The review will consider the adequacy of policies and procedures for moderating content, escalation protocols for inappropriate or reputationally sensitive posts, roles and responsibilities, and alignment with legislative and reputational obligations. It will also evaluate whether social media management practices support transparency, consistency, and appropriate community engagement.
Scope & Approach:	The scope of the Social Media Management Review will consider the following areas: • Governance and policy framework • Roles, responsibilities and delegations • Moderation and content management practices • Escalation and incident response arrangements • Legal and regulatory compliance • Records management and information handling • Capability, resourcing and training • Oversight, monitoring and reporting • Community engagement, transparency and reputation management. The project will also assess alignment with relevant legislation, regulatory guidance and better practice frameworks, including but not limited to: • *Local Government Act 1999 (SA)* • *Defamation Act 2005 (SA)* • *Freedom of Information Act 1991 (SA)* • *State Records Act 1997 (SA)* • *ICAC Act 2012 (SA)* and *PID Act 2018 (SA)* • *Privacy Act 1988 (Cth)* and Information Privacy Principles • *Copyright Act 1968 (Cth)* • LGA SA Model Social Media Policy template and guidance • OAIC, Ombudsman SA and State Records guidance • Relevant case law including Voller (2021) • ISO 31000, ISO 15489 and ISO 37301. The internal audit will be undertaken in consultation with Governance and Strategy representatives at CoA, as well as relevant stakeholders, including but not limited to: • Associate Director Customer and Marketing • General Manager Adelaide Economic Development Agency • Executive Manager Marketing and Tourism • Executive Manager Rundle Mall • General Manager Adelaide Central Market Authority

- Marketing and Communications Manager ACMA
- Lead, Media Relations and Associate Director Parklands, Policy & Sustainability (Kadaltilla)
- Associate Director Information Management

Our approach includes the following phases:

Phase 0: Project Kick Off and Planning

Project Kick Off and Planning will focus on establishing the foundation for an effective engagement, including consultation, confirmation of timelines and deliverables, identification of any issues and scope exclusions, outlining our information requests and commencing access to relevant documentation.

An initial kick off meeting will confirm roles and responsibilities, introduce CoA representatives and the BDO team and confirm contact details of nominated engagement personnel.

Phase 1: Process Discovery

The Process Discovery phase included the following two (2) stages:

1a - Document Collation and Process Interviews

- Obtain and review CoA's social media management documentation, including policies, procedures, delegations of authority, organisational charts and position descriptions, incident response plans and registers, records management and reporting, obligation / compliance register, community engagement plans, training materials and any other relevant documentation
- Conduct interviews with nominated Governance and Strategy representatives to gain an understanding of the social media management processes and systems
- Identify the key risk areas within the social media management processes.

1b - Process and Documentation Review

- Gain an understanding of CoA's suite of social media management related documentation obtained in Phase 1a
- Document CoA's social media management processes (at a high-level), highlighting key controls in place (manual and system based) to address the identified risk areas with a focus on:
  - Governance and policy framework
  - Roles, responsibilities and delegations
  - Moderation and content management practices
  - Escalation and incident response arrangements
  - Legal and regulatory compliance
  - Records management and information handling
  - Capability, resourcing and training
  - Oversight, monitoring and reporting
  - Community engagement, transparency and reputation management.

Phase 2: Assessment of Process Adequacy

The Process Adequacy phase includes the following two (2) stages:

2a - Adequacy Assessment and Risk/Control Gap Analysis

PROJECT BRIEF

- Consider the alignment of the social media management framework (including policy and procedures) and processes against *Local Government Act 1999 (SA), Defamation Act 2005 (SA), Freedom of Information Act 1991 (SA), State Records Act 1997 (SA), ICAC Act 2012 (SA) and PID Act 2018 (SA), Privacy Act 1988 (Cth)* and Information Privacy Principles, *Copyright Act 1968 (Cth),* LGA SA Model Social Media Policy template and guidance, OAIC, Ombudsman SA and State Records guidance, relevant case law including Voller (2021), ISO 31000, ISO 15489 and ISO 37301 and leading business practices
- Using a Risk and Control Matrix, map current controls and processes to key social media management risk areas
- Based on the control gap analysis and assessment, identify areas requiring improvement from a control and/or process improvement perspective
- Agree areas that require specific 'walkthroughs' and/or 'testing'.

2b - Walkthroughs and Testing

- Via review of organisation charts and discussion with CoA representatives, select a sample of business units (BU) with increased exposure to social media management risk
- Via interviews with selected BU and review of documentation, conduct 'walkthroughs' and/or 'testing' key social media management controls to assess:
  - Compliance with CoA's social media management policies and procedures
  - Compliance with relevant legislation, regulatory guidance and better practice frameworks
  - Operating effectiveness of internal controls within the social media management processes.
- Based on the results of interviews and walkthroughs/testing, identify areas requiring improvement from a control and/or process improvement perspective.

Phase 3: Process Improvement

- Hold preliminary discussions with CoA representatives to confirm accuracy of audit findings
- Work with CoA's representatives to develop tailored solutions to address any identified control gaps and/or process improvement opportunities.

Phase 4: Report Results

- Prepare a summary of findings providing CoA with recommendations for enhancing processes, policies and procedures
- Hold closing meetings with CoA representatives regarding audit outcomes
- Prepare draft report and provide to CoA representatives for management comments
- Finalise report.

Timeframe:	Project delivery by September 2026.

PROJECT BRIEF

Project Resources:	The project will be resourced as follows: • Peter Horsman (Engagement Partner) • Tania Occhiuto (Engagement Manager) • TBC (Graduate/Consultant/Senior Consultant) The estimated total cost to complete this project is $25,300 (GST exclusive). Out of pocket costs (including travel and accommodation, if required) will be billed at cost, kept to a minimum and agreed with you prior to them being incurred.
Prepared by:	BDO
Agreed by:	**Peter Horsman - Partner BDO** 20 / 07 / 2026 **Rebecca Hayes, Associate Director, Governance & Strategy** / / 2026