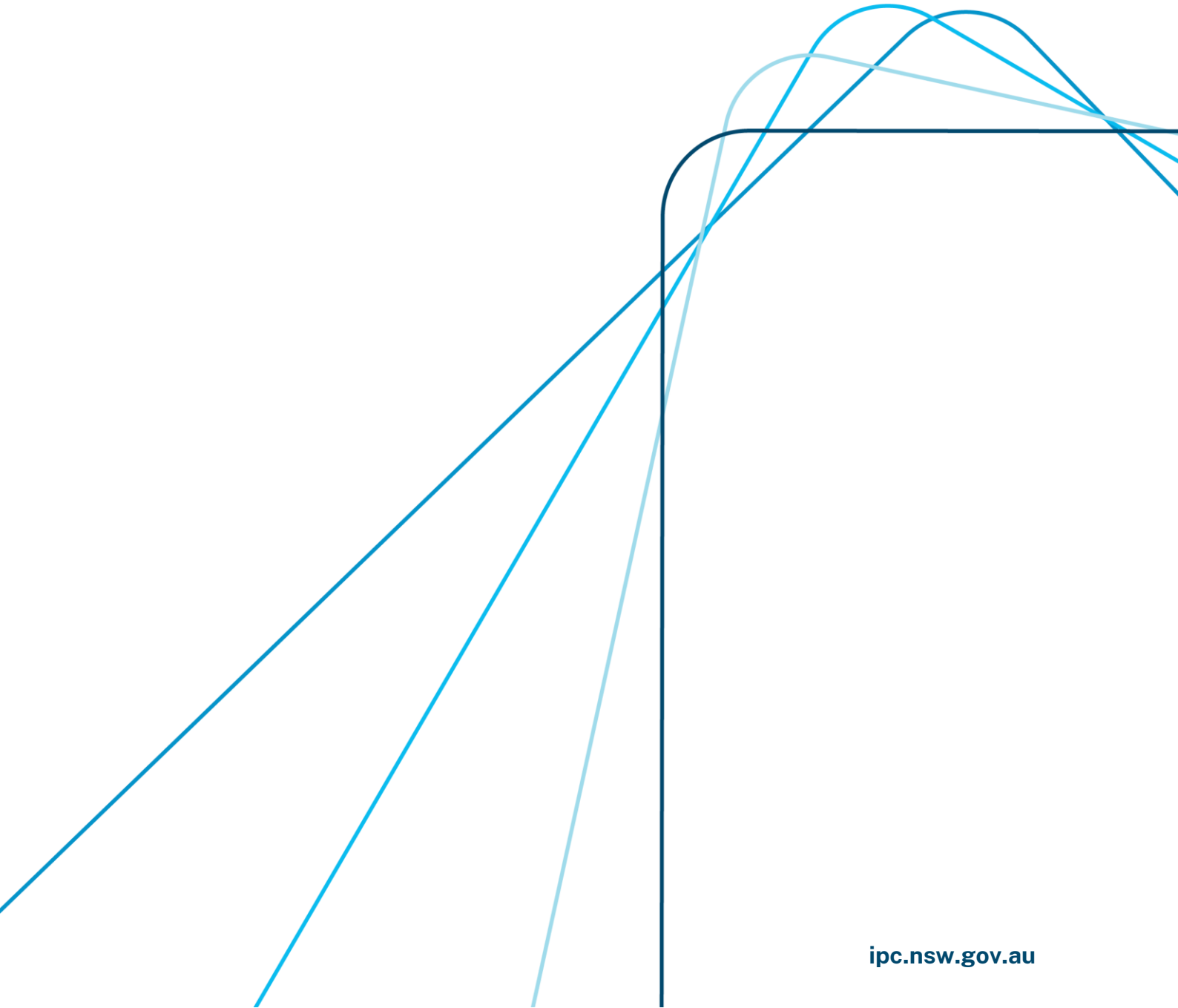
Information and Privacy Commission NSW

IPC Corporate Complaints Handling Policy

April 2026



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1. Introduction

1.1 Purpose

This policy is intended to ensure that the Information and Privacy Commission New South Wales (IPC) handles corporate complaints fairly, efficiently and effectively.

Our corporate complaint management system is intended to:

- enable the IPC to respond in a timely and effective way to issues raised by people making corporate complaints
- provide accountability and boost public confidence in our administrative processes
- provide information that can be used by the IPC to drive continuous improvements in the delivery of our services.

This policy provides guidance to our staff and on the key principles and processes of our corporate complaints management system.

1.2 Scope

This policy applies to all IPC staff receiving or managing corporate complaints from the public, expressed in writing, and made to or about the IPC regarding the delivery of services by the IPC and its staff.

1.3 Organisational commitment

The IPC expects that staff at all levels are committed to fair, effective and efficient corporate complaint handling. The IPC Service Charter contains our values and service standards which inform our corporate complaints handling procedure. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented. IPC values are also relevant and embedded in the IPC Service Charter and Code of Conduct. The IPC Unreasonable Conduct by a Client Policy may also be relevant to consideration and management of corporate complaints.

Who	Commitment	How
NSW Information Commissioner and CEO	Promotes a culture that values corporate complaints and their effective resolution.	Reports publicly IPC's corporate complaint handling policy. Provides adequate support and direction to key staff responsible for handling corporate complaints. Regularly reviews reports about corporate complaint trends and issues arising from corporate complaints to ensure quality improvement in IPC operations. Positively acknowledges good corporate complaint handling by staff. Supports recommendations for service, staff and corporate complaint handling improvements arising from the analysis of corporate complaint data.
IPC Director Corporate Services and Business Improvement – Officer responsible for corporate complaint handling	Establishes and manages the IPC's corporate complaint management system.	Maintains policy, records and data regarding corporate complaints. Provides regular reports to NSW Information Commissioner and CEO on issues arising from corporate complaint handling work. Encourages all staff to be alert to corporate complaints and to assist those responsible for handling corporate complaints to resolve them promptly. Ensures recommendations arising out of corporate complaint data analysis are canvassed with the NSW Information Commissioner and CEO and is responsible to ensure recommendations are implemented where appropriate. Encourages staff to make recommendations for system improvements. Provides updates to Executive regarding issues and trends in IPC complaints management. Trains, provides guidance and direction to staff to resolve corporate complaints promptly and in accordance with the IPC's policies and procedures.

Staff whose duties include written corporate complaint handling	Demonstrate exemplary corporate complaint handling practices.	Treat all people with respect, including people who make corporate complaints. Assist those making a corporate complaint, if needed. Comply with this policy and its associated procedures. Keep informed about best practice in corporate complaint handling. Provide feedback to Directors on issues arising from corporate complaints. Provide suggestions to Directors on ways to improve the organisation's corporate complaints management system. Implement changes arising from individual corporate complaints and from the analysis of corporate complaint data.
All staff	Understand and comply with the IPC's corporate complaint handling practices.	Treat all people with respect, including people who make corporate complaints. Be aware of the IPC's corporate complaint handling policies and procedures. Assist those who wish to make corporate complaints to access the IPC's corporate complaints process. Be alert to corporate complaints and assist staff handling corporate complaints to resolve matters promptly. Provide feedback to Directors on issues arising from corporate complaints. Implement changes arising from individual corporate complaints and from the analysis and evaluation of corporate complaint data.

1.4 Corporate complaints

A corporate complaint is an expression of dissatisfaction made to or about services, staff or the handling of a function undertaken by the IPC where a response or resolution is explicitly or implicitly expected or legally required.

A corporate complaint covered by this Policy can be distinguished from:

- staff grievances
- public interest disclosures made by IPC staff (see the IPC Public Interest Disclosures Internal Reporting Policy)
- code of conduct complaints (see the IPC Code of Conduct)
- responses to requests for feedback about the standard of our service provision (see the definition of 'feedback' below)
- reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response (see definition of 'feedback')

- service requests
- requests for information (see the IPC Agency Information Guide and Accessing IPC Information and IPC GIPA and Privacy Manuals).
- *Feedback* includes:
    - the results of client surveys
    - phone conversations, including those that seek advice/explanation regarding IPC performance
    - informal telephone communication at manager level with IPC service recipients regarding team performance
    - written expressions of dissatisfaction regarding outcomes of complaints and reviews that do not raise any issues of conduct by the relevant review officer. This definition recognises the other avenues for review in respect of information access and privacy rights that are available to applicants/respondents.

2. Guiding principles



2.1 Facilitate corporate complaints

2.1.1 People focus

The IPC is committed to seeking and receiving feedback and corporate complaints about our services, systems, practices, procedures, products and corporate complaint handling.

Any concerns raised in feedback or corporate complaints will be dealt with within a reasonable timeframe.

People making corporate complaints will be:

- provided with information about our corporate complaint handling process
- provided with accessible ways to make corporate complaints
- listened to, treated with respect by staff, and actively involved in the corporate complaint process where possible and appropriate
- provided with reasons for our decision/s and any options for redress or review.

2.1.2 No detriment to people making corporate complaints

The IPC will take all reasonable steps to ensure that people making corporate complaints are not adversely affected because a corporate complaint has been made by them or on their behalf.

2.1.3 Anonymous corporate complaints

The IPC accepts anonymous corporate complaints and will examine them where appropriate (and to the extent possible given the nature and amount of information provided).

2.1.4 Accessibility

The IPC will ensure that information about how and where corporate complaints may be made to or about the IPC is well publicised. We will ensure that our systems to manage corporate complaints are easily understood and accessible to everyone, particularly people who may require assistance. The IPC Fact sheet – How to make a complaint about us may also be relevant.

If a person prefers or needs another person or organisation to assist or represent them in the making and/or resolution of their corporate complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a corporate complaint with their written and specific consent (eg, advocate, family member, legal or community representative, Member of Parliament, another organisation). However, a proper written authority will be required.

2.1.5 No charge

There is no charge for making a complaint to the IPC.

2.2 Respond to corporate complaints

2.2.1 Early resolution

Where possible, corporate complaints will be resolved informally at first contact with the IPC, in accordance with the procedures set out in the IPC Fact Sheet – How to make a complaint about us.

2.2.2 Responsiveness

The IPC will acknowledge receipt of corporate complaints within three (3) working days.

The IPC will assess and prioritise corporate complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible, of the following:

- the corporate complaints process
- the expected timeframes for our actions
- the progress of the corporate complaint and reasons for any delay
- their likely involvement in the process
- the possible or likely outcome of their corporate complaint.

We will advise people as soon as possible when we are unable to deal with any part of their corporate complaint and provide advice about where such issues and/or corporate complaints may be directed – if known and appropriate.

We will also advise people as soon as possible when we are unable to meet our timeframes for responding to their corporate complaint and the reason for our delay.

We will ensure that publicly available information relevant to the management of their compliant and the issues raised is available to the complainant including:

- Fact sheet – How to make a complaint about us
- the IPC Service Charter.

2.2.3 Objectivity and fairness

We will address each corporate complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling a corporate complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, where a complainant remains dissatisfied, an internal review of how a corporate complaint was managed will be conducted by a person other than the original decision maker. In general, that review will be conducted by the Director, Corporate Services and Business Improvement.

2.2.4 Responding flexibly

The IPC's staff are empowered to resolve corporate complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making corporate complaints and/or their representatives.

We will assess each corporate complaint on its merits and involve people making corporate complaints and/or their representative in the process as far as possible.

2.2.5 Confidentiality

We will protect the identity of people making corporate complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by the IPC as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

2.3 Manage the parties to a corporate complaint

2.3.1 Corporate complaints involving multiple agencies

Where a corporate complaint involves multiple organisations, we will work with the other organisation/s where possible, to ensure that communication with the person making a corporate complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the corporate complaint.

Where a corporate complaint involves multiple areas within our organisation, responsibility for communicating with the person making the corporate complaint and/or their representative will also be coordinated.

If required, the IPC will contact contracted service providers to inform our review of the complaint and response to the complainant. This may occur in complaints regarding our information technology systems or mail services.

2.3.2 Corporate complaints involving multiple parties

When similar corporate complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

2.3.3 Empowerment of staff

All staff managing corporate complaints are empowered to implement our corporate complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our corporate complaint management system.

2.3.4 Managing unreasonable conduct by people making corporate complaints

The IPC is committed to being accessible and responsive to all people who approach us with feedback or corporate complaints. At the same time, our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible
- the health, safety and security of our staff
- our ability to allocate our resources fairly across all the corporate complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. It may also affect the wellbeing of IPC staff. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

For further information on managing unreasonable conduct by people making corporate complaints please see IPC Unreasonable Client Conduct Policy.

3. Corporate complaint management system



3.1 Introduction

When responding to corporate complaints, staff should act in accordance with the IPC's corporate complaint handling policy and procedures, as well as any other internal documents providing guidance on the management of corporate complaints.

Staff should also consider any relevant legislation and/or regulations when responding to corporate complaints and feedback.

The five key stages in our corporate complaint management system are set out in paragraphs 3.2 – 3.6 below.

3.2 Receipt of corporate complaints

Unless the complaint has been resolved at the outset, the IPC will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- the contact information of the person making a complaint
- issues raised by the person making a complaint and the outcome/s they want
- any other relevant information
- any additional support the person making a complaint requires.

The record of the corporate complaint should include:

- the contact information of the person making a corporate complaint
- issues raised by the person making a corporate complaint and the outcome/s they want
- any other relevant and additional support the person making a corporate complaint requires.

3.3 Acknowledgement of corporate complaints

The IPC's Intake Team will acknowledge receipt of each corporate complaint within three (3) working days as far as practicable.

3.4 Initial assessment and addressing of corporate complaints

3.4.1 Initial assessment

After acknowledging receipt of the corporate complaint, the Intake Team in consultation with Directors will confirm whether the issue/s raised in the corporate complaint is/are within the IPC's control. We will also consider the outcome/s sought by the person making a corporate complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a corporate complaint will be managed, we will consider:

- the subject matter of the complaint and the IPC's role and functions
- how serious, complicated or urgent the corporate complaint is
- whether the corporate complaint raises concerns about people's health and safety
- how the person making the corporate complaint is being affected
- the risks involved if resolution of the corporate complaint is delayed
- whether a resolution requires the involvement of other organisations.

3.4.2 Timeframe

Our priority is to respond to complaints within fifteen (15) working days unless it involves a complex matter or requires specialist investigation. Variations in timeframes will be advised to the complainant.

A final written response is to be sent to the complainant within fifteen (15) working days of receipt of the corporate complaint.

3.4.3 Addressing corporate complaints

After assessing the corporate complaint, the IPC will consider how it should be managed. To manage a corporate complaint, we may:

- make enquires to inform our response in particular with the relevant manager and Director to ensure that the technical or subject specific aspects of the relevant functions are understood and taken into consideration
- give the person making a corporate complaint information or an explanation
- gather information from the person or area that the corporate complaint is about.

The IPC will keep the person making the corporate complaint up to date on progress, particularly if there are any delays. We will also communicate the outcome of the corporate complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

3.5 Providing reasons for decisions

Following consideration of the corporate complaint and any investigation into the issues raised, the IPC will contact the person making the corporate complaint and advise them:

- the outcome of the corporate complaint and any action taken
- the reason/s for the decision
- the remedy or resolution/s that have been proposed or put in place

- any options for review that may be available to the complainant in accordance with the IPC Fact Sheet – How to make a complaint about us. If, in the course of investigation, the IPC makes any adverse findings about a particular individual, we will consider any applicable privacy obligations under the *Privacy and Personal Information Protection Act 1998* and any applicable exemptions in or made pursuant to that Act, before sharing our findings with the person making the corporate complaint.

3.6 Closing the corporate complaint, record keeping, redress and review

The IPC will keep comprehensive records on:

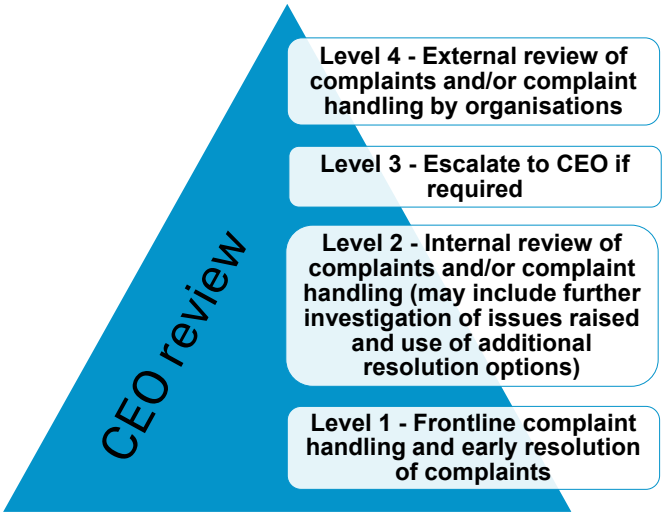
- how the corporate complaint was managed
- the outcome/s of the corporate complaint – including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations
- any outstanding actions that need to be followed up.

The IPC will ensure that outcomes are properly implemented, monitored and reported to the Leadership Team.

3.7 Alternative avenues for dealing with corporate complaints

The IPC will inform people who make corporate complaints to or about us about any internal or external review options available to them (including any relevant Ombudsman or oversight bodies).

The four levels of corporate complaint handling



The IPC aims to resolve corporate complaints at the first level – the frontline. Wherever possible, staff will be adequately equipped to respond to corporate complaints, including being given appropriate authority, training and supervision.

Where this is not possible, the IPC or the complainant may decide to escalate the corporate complaint to a more senior officer within the IPC. This second level of corporate complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the corporate complaint and decision/s already made
- facilitated resolution (where a person not connected with the corporate complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

Where a person making a corporate complaint is dissatisfied with the outcome of the IPC's review of their corporate complaint, they may seek a review by the IPC Chief Executive Officer.

If a person is not satisfied with the handling of the complaint by the IPC, they may seek an external review of the decision by the Ombudsman. If they believe there has been corruption or serious misconduct, they may contact the Independent Commission Against Corruption.

When all avenues to address the complainant's complaint have been explored, the complainant is advised that the IPC considers the matter closed and will not engage further in regard to the specific complaint. In such instances if the complainant raises new issues they are to be treated as a new complaint.

4. Accountability and learning

4.1 Analysis and evaluation of complaints

The IPC will ensure that complaints are recorded in a systematic way within the IPC's corporate management record system so that information can be easily retrieved for reporting and analysis of trends and provided to the IPC Executive.

4.2 Monitoring of the complaint management system

The IPC will continually monitor its complaint management system to:

- ensure its effectiveness in responding to and resolving complaints
- identify and correct deficiencies in the operation of the system.

Monitoring may include the use of audits and customer satisfaction surveys. Monitoring should be conducted monthly in preparation of the IPC Dashboard.

4.3 Continuous improvement

The IPC is committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints management system and complaint data
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

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