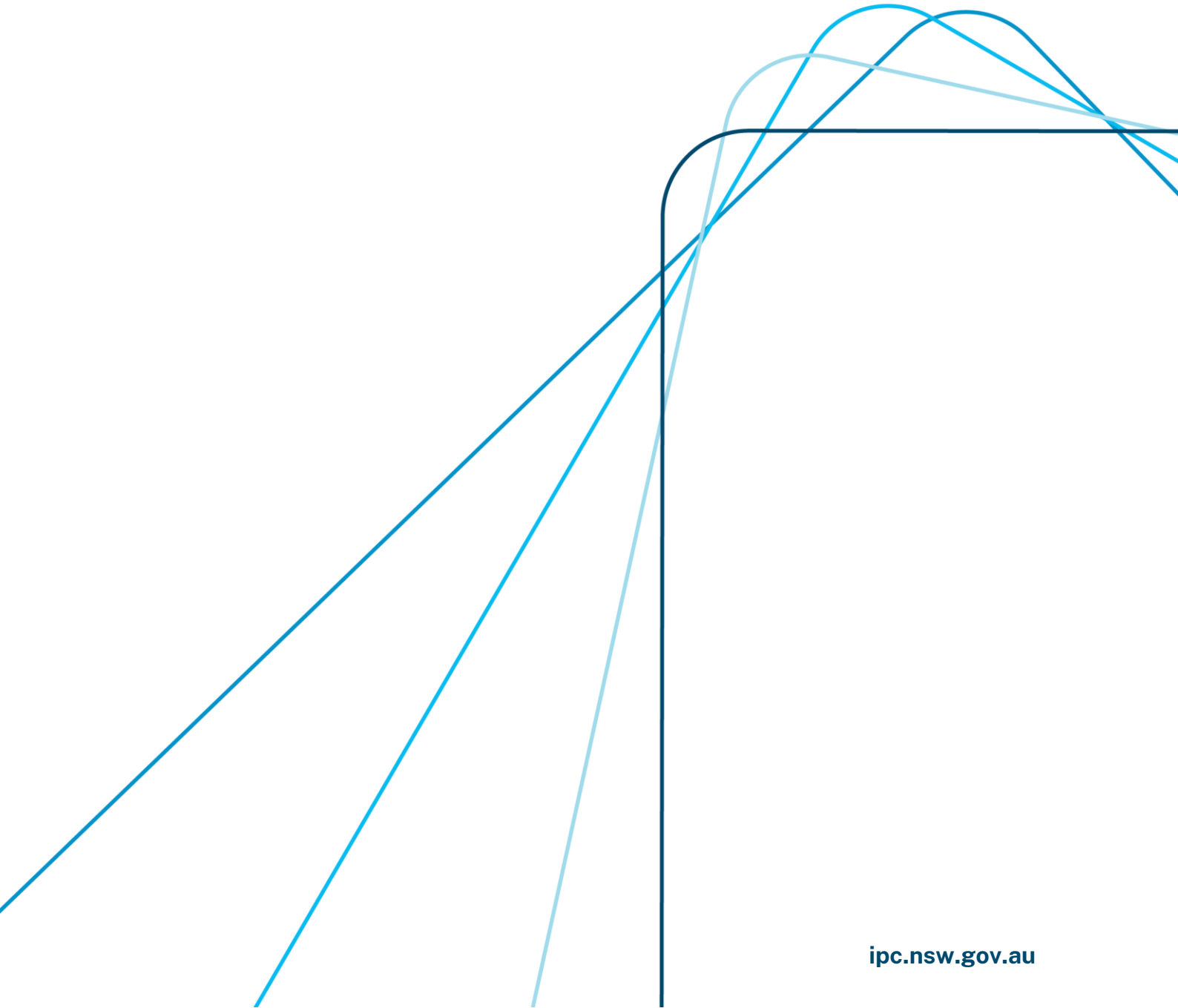
Information and Privacy Commission NSW

IPC Policy Framework

November 2025



1. Purpose

This policy:

a) provides the framework for the development and review of all corporate policies of the Information and Privacy and Privacy Commission NSW (IPC)

b) sets out the principles, scope and lifecycle of IPC policy development

c) sets out the responsibilities for IPC policy development and review

d) seeks to ensure that IPC staff have high quality, accessible and easily understandable policies on the IPC intranet

e) is a mechanism to provide overall assurance to the IPC Audit and Risk Committee.

2. Scope

This framework applies to all IPC corporate policies and associated documentation.

3. Policy governance principles

IPC must apply IPC governance principles:

1. *Independence:* the IPC will adopt DCS policies unless the policy area or issue is significant and important enough to ensure sound governance that an 'IPC-specific' approach is required, for example policies in relation to gifts and benefits, flexible working hours arrangements and code of conduct.
2. *Strategic:* IPC policies must align with IPC strategic objectives set out in the Strategic Plan 2024–2028
3. *Self-contained:* where the policy is the result of, e.g. Direction or Whole of Government initiative, this should be specifically noted in the 'Purpose' section of the policy, and where the policy reflects a template developed as part of such initiatives, this should be indicated, and linked in the 'Related Documents' section of each policy
4. *Values-based*: the policy should reflect IPC values of Accountable, Service Focused, Proactive, Independent, Integrity and Trust.
5. *Assurance:* policies must be sufficient to provide robust assurance of compliance with legislation or other requirements.
6. *Accessible:* policies will be clear, succinct and unambiguous, and easily available to staff.
7. *Inclusive*: policies affecting staff will apply to all IPC staff, including those employed under the *Government Sector Employment Act 2013* (NSW) or as contractors (as contingent workers under labour-hire agreements).
8. *Owned:* each policy will have a designated owner
9. *Current:* policies will be regularly reviewed and updated as needed, with priority given to:
    a. policies requiring legal compliance
    b. policies intended to mitigate unacceptable risk.

4. Roles and responsibilities

Each IPC policy is assigned a policy owner to manage its development, review and implementation.

The control document for maintaining, reviewing and tracking IPC corporate documents is the IPC Policy Register (EDRMS D18/115977/DJ). The Policy Register also includes any procedures, guidelines, registers, checklists or any other document associated with a policy.

The following parties have responsibilities under this policy:

Role	Responsibility
CEO/Information Commissioner	Approving authority of any IPC-wide or whole-of-government policy or procedure, including: approval of the Policy Framework and the Legislative Compliance Register (EDRMS D18/115977/DJ) and nominated responsibilities approval of the responsibilities and accountabilities as detailed in the IPC Policy Register (EDRMS D18/115977/DJ) and Legislative Compliance Register.
Audit and Risk Committee	In accordance with the ARC Committee Charter (EDRMS D25/004859/DJ): assess whether adequate systems, policies and procedures are in place at the IPC to meet legislative, governance and operational obligations review the results of the Annual Compliance Assessment process, internal and external audits and associated management systems review and provide recommendations to the CEO on compliance and policy issues that arise.
Director, Corporate Services and Business Improvement	providing regular and annual reporting on compliance issues to the Audit & Risk Committee ensuring the Corporate Services team monitors and tracks compliance with the Policy Register ensuring that the IPC's policy requirements are properly identified and differentiated from procedures ensuring that staff are aware of policies through induction processes, face-to-face training and online training, manuals, and by being made accessible on the IPC website and IPC intranet and listed on the IPC policy list ensuring that staff are updated about changes in policies and processes through staff emails, meetings and training.
IPC Executive and Managers	ensuring policies and procedures in their area of responsibility are updated in accordance with the Policy Register and/or Legislative Compliance Register ensuring that staff are aware of the content of policies and legislation associated with their role and ensuring adequate information and training is provided fostering a compliance culture within their team.

Business Operations Coordinator	managing and monitoring the policy and document reviews required in the Policy Register advising document owners of due review dates and updating the Policy Register when completed ensuring policies are communicated to and easily accessible by staff forwarding the updated and approved policy to the Communications team for updating the Policy List on the IPC website if the document is on that list.
IPC staff	being aware of and complying with any policy or legislation required for their role reviewing and updating any policy or associated document in accordance with the Policy Register attending any training provided or required by the IPC with regard to policy or legislative compliance providing feedback on policies identifying and referring instances of non-compliance with IPC policies to your manager, or as directed by the relevant policy.

5. Related Documents

- Policy Register (EDRMS D18/115977/DJ)
- Legislative Compliance Register (EDRMS D18/115977/DJ)
- ARC Committee Charter (EDRMS D25/004859/DJ)
- DCS Policy Governance Framework

Document information

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3.0	November 2023	Review and update
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