Information Access in the Era of GIPA

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Records Managers Forum
17 March 2026

Introduction

[Acknowledgment of traditional custodians]

Thank you to Martyn Killion for the opportunity to speak to you all today. We bonded over our love of records at first meeting, during Privacy Awareness Week last year.

I thought I would tell you a little bit about my pathway to my current role and then to talk about the importance of the Information Commissioner and the IPC in the information management landscape – including the evolution of the current model of 'FOI' as 'GIPA'; the issues of concern to the public; and some emerging challenges.

I need to open with a confession. I love records. This grew from my study of history in my BA, where for my Honours thesis, I undertook a biography of the Renaissance diplomat, Sir Nicholas Throckmorton. My PhD was then in legal history, and it was the 'history' part that kept drawing back into records – and especially into the magic and mystery of manuscripts holdings and Archives Offices. During my doctoral work, I spent many hours at Kingswood reading room and also at the Rocks. I was grateful that so many records had been kept by people and organisations from so many years ago. (Hence 'records destruction' or 'sentencing' does cause me a bit of a shiver).

The highpoint was perhaps during a sabbatical undertaken in London in the first months of 2003, when I was a Professor at Macquarie Law School and taking a break from being Dean.

I was curious about an 18th century case that was the foundation of a particular legal doctrine.[1] The journey took me to the reading room of the Public Record Office, in Kew, and into the wonderful mysteries of the court records. Another building whose exterior masks the magic of what's inside.

It was easy to be distracted by the work of others, especially those working on the Tudor Rolls, wearing white gloves and with special props and weights for these treasured tomes. The 18th century court documents I was looking at were large, vellum sheets, inscribed in at least something of a modern script. It was the combination of the work at the PRO and in the British Library and their collection of judicial records, that provided the foundation for a series of publications.

Other adventures in records were exploring parliamentary records, manuscript collections, and other historical sources – in Sydney (both at Kingswood and in the marvellous collections at the State and Mitchell libraries), and in similar repositories in Adelaide, and in New Zealand. There have been a number of 'Eureka' moments through all of that. Slow and steady research – and then uncovering the 'gem'. You observe it at times in others in the reading rooms, when they sit up and look out with a smile, and sometimes a sigh.

[1] *Dufour v Pereira* (1769) 1 Dick 419; 21 ER 332.

You may find something small that later becomes crucial – like the handwritten transcription I found in the British Library of the notebook of a handful of key judgments of the then Lord Chancellor who had decided the case I was exploring. Here is a page. Then look at the underlined passage – that enabled me many years later to rebuff an argument that the doctrine should be considered as entirely independent of contract.

I am grateful for the increasing digitisation of records: the Probate and UK Census records were a fantastic resource in a biography I wrote about a 19th century woman who had an amazing career in the maritime world.[2]

Leap forward to last year when, on 2 June 2025, I commenced my appointment as CEO and Information Commissioner of the Information and Privacy Commission NSW. This is my third position as a statutory officeholder and my first in the state government world.

I have been broadly involved in information and privacy issues over many years, both in a practical sense – in the University and government sectors; and in a more conceptual and policy sense in my work at the ALRC – roaming widely over, and at different points on, the information spectrum between information access and secrecy.[3] Now I have the opportunity to play an active role in aspects of this at the state level, and as a regulator – and to navigate all the particular legislative niceties of the GIPA and GIIC Acts.

The IPC's role in the information landscape

The IPC as an agency was established as part of a package of legislative reforms to FOI and privacy in NSW in 2009.[4] The new statutory office of Information Commissioner was brought together with the existing office of the independent Privacy Commissioner within a new administrative agency, the IPC, which commenced on 1 January 2011 to support both Commissioners. Unlike the ALRC and the AHRC, and indeed the federal OAIC, the IPC is not created through distinct constituting legislation. Each Commissioner has a distinct legislative base. In addition, the Information Commissioner acts as the agency head for employment and management purposes.[5]

Together, the Privacy Commissioner and I have jurisdiction over NSW government agencies and departments, local councils, NSW universities, NSW state-owned corporations and some private health service providers. As part of our regulatory work, we undertake reviews and complaints in relation to information access and privacy.[6]

Our independence is reflected in the accountability mechanism to the parliament. Section 44 of the GIIC Act and section 44A of the PPIP Act provide for a comprehensive scheme of Parliamentary oversight over the exercise of functions of both the Information Commissioner and Privacy Commissioner. We are not amenable to Ministerial direction. (We leveraged this accountability in relation to a Standing Order 52 Notice to Produce documents that we received late last year, to argue that our accountability was not in response to such a notice.)[7]

FOI and open government

On 1 July last year, we marked the 15th anniversary of the commencement of the GIPA Act. Our first legislative expression of the move to greater government accountability in relation to

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[2] *Mistress of Science—The Story of the Remarkable Janet Taylor, Pioneer of Sea Navigation*, *with* John S Croucher, Amberley Publishing, 2016.

[3] I led these inquiries: *Secrecy Laws and Open Government in Australia* (2010): Secrecy Laws and Open Government in Australia (ALRC Report 112) | ALRC; *Privilege in Perspective: Client Legal Privilege in Federal Investigations*: Privilege in Perspective: Client Legal Privilege in Federal Investigations (ALRC Report 107) | ALRC. Under my Presidency, other Commissioners led the massive privacy inquiry and the inquiry into the design of a cause of action for serious Invasions of privacy: *For Your Information: Australian Privacy Law and Practice* (2010): For Your Information: Australian Privacy Law and Practice (ALRC Report 108) | ALRC, led by Professor Les McCrimmon; Serious Invasions of Privacy in the Digital Era (ALRC Report 123) | ALRC, led by Professor Barbara McDonald of the University of Sydney, now Emeritus Professor.

[4] Who we are. *Government Information (Information Commissioner) Act 2009* (NSW), *Government Information (Public Access) Act 2009* (NSW).

[5] *Government Sector Employment Act 2013* (NSW) s 3, 'public service agency' and Sch 1 pt 3; *Government Sector Finance Act 2018* (NSW) s 2, 'government sector agencies' and 'agency heads'

[6] Information and Privacy Commission New South Wales; Fact Sheet - Frequently asked questions for citizens: What the IPC can and cannot do.

[7] Return to Order—Cybersecurity—A return received on Monday 22 December 2025 from Information and Privacy Commission NSW, concerning the application of standing order 52 to independent entities, noting a request to vary the scope of the order and requesting that the House reconsider the order.

records in New South Wales was 20 years earlier, in the enactment of the *Freedom of Information Act 1989* (NSW), in the wake of the Commonwealth Act in 1982. These were an expression of the idea of 'open government'.[8]

As commented by the House of Lords in *R v Shayler*:

> Modern democratic government means government of the people by the people for the people. But there can be no government by the people if they are ignorant of the issues to be resolved … Experience however shows … that publicity is a powerful disinfectant. Where abuses are exposed, they can be remedied. Even where abuses have already been remedied, the public may be entitled to know that they occurred. The role of the press in exposing abuses and miscarriages of justice has been a potent and honourable one. But the press cannot expose that of which it is denied knowledge.[9]

The idea of responsible representative democracy reflected obligations to those who were electors in that democracy – to citizens – through the right and responsibility of voting in elections and referendums once they reach the age of 18. International law added another dimension to this conceptualisation, in framing rights vested in individuals *as humans*, and not because of citizenship.

My 7 years leading the Australian Human Rights Commission impressed on me the importance of thinking about government accountability and privacy through a lens of *individual* rights, underpinned by Australia's commitments in ratifying the key international human rights treaties – in this context, the *International Covenant on Civil and Political Rights* (ICCPR).[10]

Article 19(2) provides that

> Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice.

This freedom to seek and receive information is the link to FOI laws. Crucially, you do not need to be *a citizen* to invoke rights to access government information.[11] The NSW legislation from the first iteration framed this as 'a legally enforceable right' in a person.[12] This inclusive approach aligns with broader human rights principles, which affirm that access to information is a right not limited by nationality.

From 'pull' to 'push'

These 'first-generation' FOI Acts were still cautious ones. The customary constraints of the Westminster system of responsible government still rested heavily on them,[13] and the conventions of this system were seen to demand official secrecy.[14]

These Acts embodied a 'pull' model of information access, based on a request by an individual to access a document held by an agency or Minister, usually via a formal request. In essence, the 'right' to information was a 'right to request'.[15]

First generation FOI laws also included a long list of exemptions, designed to protect 'essential public interests'.

There were minor amendments to the NSW Act between 1989 and its replacement by the

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[8] For an excellent consideration of the federal initiatives, see G Terrill, *Secrecy and Openness: The Federal Government from Menzies to Whitlam and Beyond* (2000), 43.
[9] *R v Shayler* [2003] 1 AC 247, [21], Lord Bingham of Cornhill.
[10] *International Covenant on Civil and Political Rights*, opened for signature 16 December 1966, 999 UNTS 171 (entered into force 23 March 1976).
[11] For example, non-citizens can apply under the *Freedom of Information Act 1982* (Cth) in Australia: Make a freedom of information request | OAIC.
[12] FOI Act 1989 s 16(1); GIPA Act s 9(1).
[13] See the consideration of this in the ALRC, *Secrecy Laws and Open Government in Australia* (Report 112, December 2009), ch 2: Secrecy Laws and Open Government in Australia (ALRC Report 112) | ALRC.
[14] Freedom of Information Review Panel, *The Right to Information: The Report of the FOI Independent Review Panel* (2008), 158.
[15] Office of the Victorian Information Commissioner, Inquiry into the Freedom of Information Act 1982, Submission, 15 January 2024, [69]: LRP-Full-Review-of-FOI-Act-OVIC-submission-December-2023.pdf.

GIPA Act. One notable feature of amendments in 1992[16] was the inclusion of two considerations about argued public interests. The fact that disclosure of information 'may cause embarrassment to, or loss of confidence in, the Government' or 'might be misinterpreted or misunderstood by any person' were 'irrelevant and must not be taken into account'.[17]

The reach of the legislation was extended to local government in 1993. Then in 2004, a new exemption was included for documents relating to counter-terrorism measures; and in 2006, an extra disclosure provision requiring disclosure of information about government contracts.

Reforming FOI legislation, once introduced, proved a bit of a battle. 'Releasing information goes against the natural instincts of government', said Bruce Barbour, then NSW Ombudsman, in reviewing the FOI Act in 2008:

FOI legislation creates a fundamental and significant conflict of interests for government and senior public officials. On the one hand, they have a duty to implement the legislation in accordance with its terms and spirit. However, implementing the legislation will quite often have a serious and occasionally damaging impact on their personal and political interests.[18]

This is redolent of the pre-FOI era.

Barbour's report,[19] and a further consultation process via draft exposure bills,[20] led to its repeal and replacement by the *Government Information (Public Access) Act 2009,* which came into effect on 1 July 2010.

The GIPA Act 2009 is an example of 'second generation' FOI laws. (Similarly, the amended Commonwealth act and the Queensland Act).[21] These are 'push models' and reflect a paradigm shift, essentially reversing the onus from a person having to request, to an agency having to provide. The GIPA Act creates a framework under which there is a presumption in favour of disclosure of government information, rather than one under which information would be disclosed subject to formal request only.

A 'push' model contains more extensive requirements for agencies to proactively publish (as 'open access') and informally release information on an ongoing basis. Under a 'push' model, such mechanisms are prioritised, with formal requests for information positioned as a last resort, so that the place for access requests is only occupied by matters that cannot be released proactively.

The idea of publishing information, both as required under these second-generation laws and proactively, gets ahead of GIPA requests – reducing the need to make and respond to formal requests.

This does not mean that everything is accessible. Rather than using the first-generation language of 'exemptions', the GIPA Act allows access *unless* there is an overriding public interest against disclosure (or 'OPIAD'). However, the Act provides for the *equivalent of exemptions* in the form of a list of factors against disclosure and a list of factors in respect of which there are 'conclusive presumptions of an overriding public interest against disclosure' – or CPOPIADS. Balancing competing interests is again at the heart of the release assessment.[22]

Not everything is amenable to this wide sweep of proactivity. Personal information deserves

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[16] *Freedom of Information (Amendment) Act 1992* (NSW).
[17] FOI Act (NSW) s 59A; now contained in GIPA Act s 15(c) and (d).
[18] NSW Ombudsman, *Opening up Government: Review of the Freedom of Information Act 1989*, a special report to parliament under s 31 of the *Ombudsman Act 1974*, February 2009, 2. Patrick Birkinshaw has observed, similarly, that 'FOI laws will always by unpopular with governments in power and some of the officials who serve them. That is probably the true test of their importance.' P Birkinshaw, 'Freedom of Information and Openness: Fundamental Human Rights' (2006) 58(1) *Administrative Law Review* 177, 217.
[19] NSW Ombudsman, *Opening up Government: Review of the Freedom of Information Act 1989*, a special report to parliament under s 31 of the *Ombudsman Act 1974*, February 2009.
[20] See Second Reading speech introducing GIPA Act and GIIC Act – the Hon Tony Kelly on behalf of the Hon John Della Bosca, Legislative Council, 24 June 2009.
[21] Barbour had recommended calling the legislation the 'Open Government Information Act' – OGIA – which, like GIPA, does not sit 'trippingly on the tongue', as Hamlet said*: Hamlet*, Act 3 scene 2.
[22] K Smark, *Freedom of Information and Privacy in Australia,* 3rd ed, 2024, [5.4]. GIPA Act s 12 includes a note setting out illustrations of public interest considerations in favour of disclosure.

high order protection and is at the intersection point of the work of the Privacy Commissioner and Information Commissioner.

One significant shift between the old FOI and the new GIPA regime was the abolition of the 'conclusive certificate', by which a Minister could issue a certificate stating that certain information was exempt, thereby preventing external review.

Because the GIPA Act does not contain any provision allowing conclusive certificates – and instead emphasises openness, transparency, and independent review – NSW agencies cannot issue conclusive certificates for information access decisions.

This conceptual shift is reflected in the objects of the GIPA Act which are set out in s 3:

(1) In order to maintain and advance a system of responsible and representative democratic Government that is open, accountable, fair and effective, the object of this Act is to open government information to the public by—

> (a) authorising and encouraging the proactive public release of government information by agencies, and
>
> (b) giving members of the public an enforceable right to access government information, and
>
> (c) providing that access to government information is restricted only when there is an overriding public interest against disclosure.

This is reinforced in s 3(2), which spells out that 'it is the intention of Parliament':

> (a) that this Act be interpreted and applied so as to further the object of this Act, and
>
> (b) that the discretions conferred by this Act be exercised, as far as possible, so as to facilitate and encourage, promptly and at the lowest reasonable cost, access to government information.

It is interesting to observe that, while the first part anchors the objects in responsible democratic government, this is achieved by providing information 'to the public' – and this that wider notion than the electorate of citizens.

(Coming from the human rights world I noticed that many of our resources used the language of 'citizens' and I am consistently working on them to ensure the wider 'rights' focus.)

Public attitudes

What does the public think of this right to information? And in exercising it, what issues do they find problematic? Here I will draw upon two sets of survey data, in relation to community attitudes and the reports on the GIPA Act the Information Commissioner has to deliver each year.

On 1 October 2025, Australian Information Commissioners and the ACT Ombudsman jointly released the findings of the fourth cross-jurisdictional study of community attitudes on access to government information.[23] The study, first undertaken in 2019, gives us national insights into the public's views and experiences of the right to access government-held information.

The study found that the majority of respondents (91–96%) across all jurisdictions perceived the right to access government-held information as important, with over half (53–59%) rating it as very important.

The majority (86–90%) in each jurisdiction agreed that the government and its agencies should publicly report on the information they maintain. And the older we get the more we expect it!

The study highlighted that accountability, transparency and access to personal information are key considerations that people across all jurisdictions believe governments should consider, when deciding whether to release information.

[23] Information Access Study - cross-Jurisdictional Results.

Across all jurisdictions, around 90% of people agreed that access to government information improves transparency and accountability, including around 60% agreeing strongly.

A curious bit of information was in regard to the helpfulness of staff. Universities came off relatively well, but in other agencies, over 1 in 10 reported staff as being unhelpful.

Trends revealed in s 37 Reports

Going to a more granular level, in this part of my presentation, I will draw on the reports that the Information Commissioner is required to present each year under section 37 of the GIPA Act.[24] This year's report, for the last financial year, will be the 14th, and it will be submitted in May.

The annual reports provide a comprehensive assessment of the operation of the right to information legislation in NSW and examine the performance of over 270 public sector agencies.

What we see is a steady increase in demand, beginning in 2020–21 and continuing to rise year on year, reflecting higher expectations of transparency, increased legal representation, and growing complexity in requests, particularly where personal and non-personal information intersect. Data also highlights that proactive release – both mandatory and authorised – are the critical levers in the GIPA system.

Mandatory Proactive Release

- General compliance with Open Access requirements improved sharply in 2020–21, and has remained broadly stable since, with principal Departments consistently outperforming smaller agencies.
- From 2023–24, mandatory publication of grants administration information introduced a significant new transparency obligation. Early monitoring indicates:
    - variable agency implementation
    - practical limitations in monitoring compliance, particularly due to platform design and searchability
- Complaints relating to Open Access have consistently formed a significant proportion of IPC complaints, underscoring the visibility of this pathway to the public.

Authorised Proactive Release

- In 2020–21, authorised proactive release was operating at a high level of maturity, with most agencies conducting annual reviews and releasing additional information as a result.
- Since then, there has been a gradual but consistent decline:
    - fewer agencies conducting annual reviews
    - fewer reviews resulting in additional information being released.
- This decline is most pronounced in the Council and University sectors, but is evident across the system.
- At the same time, voluntary reporting through the GIPA Tool has begun to provide richer insights into agency practice, showing:
    - increased use of governance structures
    - greater reliance on application data to identify proactive release opportunities
    - early consideration of transparency issues linked to digital systems, AI and automated decision-making.
- Despite these positive signals, authorised proactive release is not yet operating consistently as a demand-reduction mechanism.

[24] Last year's s 37 report: Report on the Operation of the Government Information (Public Access) Act 2009: 2023-24.

Informal Release

- Informal release has, across all four years, remained the most frequently used access pathway, significantly outstripping formal applications in volume.
- Since 2020–21, the IPC has progressively strengthened guidance, training and tools, resulting in:
  - improved timeliness
  - increased willingness to grant access
- However, data capture and consistency remain incomplete, and many agencies still lack embedded policies and reporting discipline.

Formal Access Applications

- 2020–21 marked a turning point, with a dramatic increase in formal access applications, driven largely by members of the public and legally-represented applicants.
- Since then, application numbers have continued to rise steadily, reaching successive record highs.
- Across the four years:
  - invalid application rates have remained consistently high, particularly in the Council sector, though agencies are increasingly assisting applicants to correct defects.
  - timeliness of decision-making has remained strong, even as volumes increased.
  - overall release rates have remained stable, indicating resilience in agency decision-making.
- There has been a clear and sustained increase in applications seeking partly personal and partly other information, reflecting:
  - more complex information environments
  - increased digitisation and dispersed data holdings
- Review activity shows a gradual shift toward internal review, with external reviews by the Information Commissioner declining proportionally, while remaining a critical quality and oversight mechanism.

How was the public interest test applied in weighing up requests for information? The 2023–24 report revealed that 2,245 applications (7% of total applications received) were refused wholly or partly because of a CPOPIAD. This is more than double the number refused in 2022−23 (1,060 applications; 4% of total applications received).[25]

The CPOPIAD most relied on was the care and protection of children – 40% of all the times that CPOPIADs were invoked. This is consistent with 42% in 2022-23.[26]

The legal professional privilege consideration was the third most invoked CPOPIAD, being relied on 20% of all the times that CPOPIADs were applied; a decrease from 25% in 2022−23. It was most applied in the University and State-Owned Corporations sectors in 2023−24 –100% in the University sector, and 86% in the State-Owned Corporations sector.[27]

Emerging issues – Automated Decision-Making & AI

The report tabled in 2024 by the NSW Ombudsman, *A map of automated decision-making in the NSW Public Sector* (Ombudsman's report),[28] provided instructive insights on a trend that has well and truly emerged for us all in information access and management world.

An automated decision-making (ADM) system describes a computerised process that either assists or replaces the judgment of human decision-makers. Increasingly, NSW government

[25] Report on the Operation of the Government Information (Public Access) Act 2009: 2023-24, 44.
[26] Report on the Operation of the Government Information (Public Access) Act 2009: 2023-24, 45.
[27] Report on the Operation of the Government Information (Public Access) Act 2009: 2023-24, 45, Figure 29.
[28] A map of automated decision-making in the NSW Public Sector.

information is held in digital form, and decision-making and services are increasingly automated. This has implications for how governments can improve outcomes for people seeking access to government information – and in relation to accountability.[29]

To fully exercise their rights, it is important that individuals are able to access information on *how a decision is made* and what information was used to reach that decision. Agencies should keep this in mind when they are required to explain how a decision was made, as this information can be the subject of an access application.

Following the Ombudsman's report, the Privacy Commissioner and Acting Information Commissioner (Chris Clayton) initiated a joint desktop review to understand the extent to which information on the use of ADM or AI by public sector agencies is included in publicly available Agency Information Guides and Privacy Management Plans. The report was published in November.[30]

In summary, the desktop review found that of the 119 sample agencies reviewed, in relation to two key questions:

Transparency – does the AIG include information about the use of AI or ADM as part of the agency's exercise of functions (specifically or generally)?

- 3% provided a direct reference
- 1% provided an indirect reference
- 83% did not provide a direct or indirect reference
- 9% accounted for agencies whose AIG was unable to be located online
- 4% followed the AIG of their parent department and did not have a separate AIG available.

Accountability – does the AIG or PMP describe how the use of AI or ADM affects the public?

- 93% did not provide a direct or indirect reference
- 0% provided a direct reference
- 0% provided an indirect reference
- 7% followed both the AIG and PMP of their parent department and did not have a separate AIG and PMP available.

The desktop review highlighted that there is an opportunity for the IPC to support agencies to utilise the existing avenues of an AIG and PMP to engage with the public as they adopt the use of AI or ADM into their environments. By using these existing avenues, agencies can demonstrate greater transparency, visibility and accountability, which in turn builds and fosters trust and understanding in the community.

(Remember Robodebt. It's not quite 'remember the Ides of March', which was last Sunday, but of similar impact.)

AI and ADM can help in records management – to enhance searches for records, better categorise records and maintain records. This is an interesting consideration for the future, particularly as it relates to information access applications and increasing the speed at which records can be retrieved. Plus the problem of sheer volume and assisting the public to understand the nature of material released – a topic from the Right To Know panel discussion on environmental information last year.[31]

[29] Adapted from: Fact Sheet - Automated decision-making, digital government and preserving information access rights – for citizens.
[30] Desktop Review of Documented AI or ADM Use within AIGs and PMPs – November 2025.
[31] Right to Know Week NSW 2025 Panel: Ensuring Access to Environmental Information in the Digital Age.

information and privacy commission new south wales

Concluding thoughts

I remember well 'the old days' – of card catalogues and microfiche. I even have the Compact Oxford Dictionary – the two volume set in tiny, tiny print, that came with its own magnifying glass. It was like a hardcopy microfiche edition. I was also so excited when Macquarie University bought the CD-ROM version of the English Reports, which made them searchable! And then the era of 'google' searching was like the shift from the motorcar to the aeroplane.

I think in a few short years we will be having a very different conversation about the use and impact of AI as it becomes standard use across the digital space. (I also wonder if it will atrophy our brains, or rather develop the skill of framing search questions to a fine art).

In my five years as Information Commissioner there are two areas of particular interest to me.

I have an abiding interest in effective communications and am paying particular attention to the wide range of content in relation to information access that the IPC has developed over the years. It was something I observed in first doing some deep diving into IPC resources in advance of taking on the role. The content may be technically perfect, but is it all meeting its mark? Who is the target audience, and what is the 'voice' of the content? I've begun on a longterm project here: starting with 'mindmapping' the various resources (around 150 of them) to see how they relate to each other and what kind of tree structure could be imposed on them. Then developing a methodology of approach to revising them, with a strong emphasis on audience and corresponding tone and voice of each particular resource. This is a longterm project and one I am committed to – and your feedback and other input will be most welcome!

Secondly, I am innately a law reformer, which was refined greatly during my 10 years at the ALRC. The 20th anniversary of the GIPA Act in 2029 presents an excellent opportunity in this respect. In recent years, my predecessors in the role of NSW Information Commissioner have called for legislative reform of the GIPA Act in a number of areas, in their annual s 37 reports. I have a bigger idea in mind. I would like to see a comprehensive review undertaken of the GIPA Act and the effectiveness of the IPC as a structure to deliver all our functions. It would be a nice way to contribute.

I look forward to your thoughts, guidance and insights in helping making our work more effective – yours as record managers, and me as the regulator – in meeting the aspirations set out as the objects and expectations of the GIPA Act.

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