



information  
and privacy  
commission  
new south wales

# Governance Framework and Action Plan 2023-24

January 2023



## Contents

1. Governance Framework .....	4
2. Action Plan 2023-24.....	6

## Introduction

The Information and Privacy Commission (IPC) is committed to the governance principles outlined in the Audit Office of NSW's Governance Lighthouse Model<sup>1</sup>. These principles are embedded in our Governance Framework and guide our everyday business practices. The Commissioners and Executive Team demonstrate the elements of good governance through:

- a well-articulated strategy and direction,
- clearly defined management structures,
- internal and external accountability measures; and
- sound risk management practices.

The Governance Framework consists of six pillars which work together to provide strategic direction, ensure objectives are achieved, manage risks and use resources responsibly and in a transparent way.

The Governance Framework describes the principles and practices which guide the IPC in achieving corporate objectives effectively, efficiently and ethically. The IPC has assessed these principles and practices against the Governance Lighthouse Model<sup>2</sup> to develop a 2 Year Governance Action Plan to implement best practice governance.

Elizabeth Tydd

**IPC CEO, Information Commissioner**

**NSW Open Data Advocate**

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<sup>1</sup> Audit Office of NSW – Lighthouse Governance Model at <https://www.audit.nsw.gov.au/our-work/resources/governance-lighthouse>

# 1. Governance Framework

The Governance Framework consists of the following six pillars that work together to ensure the IPC's strategic and operation objectives are achieved. This is demonstrated in the image shown on page 5. Each pillar sets out the board principles that it aims to achieve through the efficient effective application of the elements within that pillar. The Action Plan details the elements for each of the pillars and the actions that are planned for the next 2 years to improve the IPC's Governance practices.

## 1. Strategy

### Principle

To set the strategic direction for the operations of the IPC.

## 2. Ethics

### Principle

That the IPC has the highest ethical standards.

## 3. Audit

### Principle

That the IPC has an effective internal and external audit function that reflects best practice and is open and transparent.

## 4. Compliance

### Principle

That the IPC has an effective policy and legislative framework in place to meet operational and legislative requirements.

## 5. Risk

### Principle

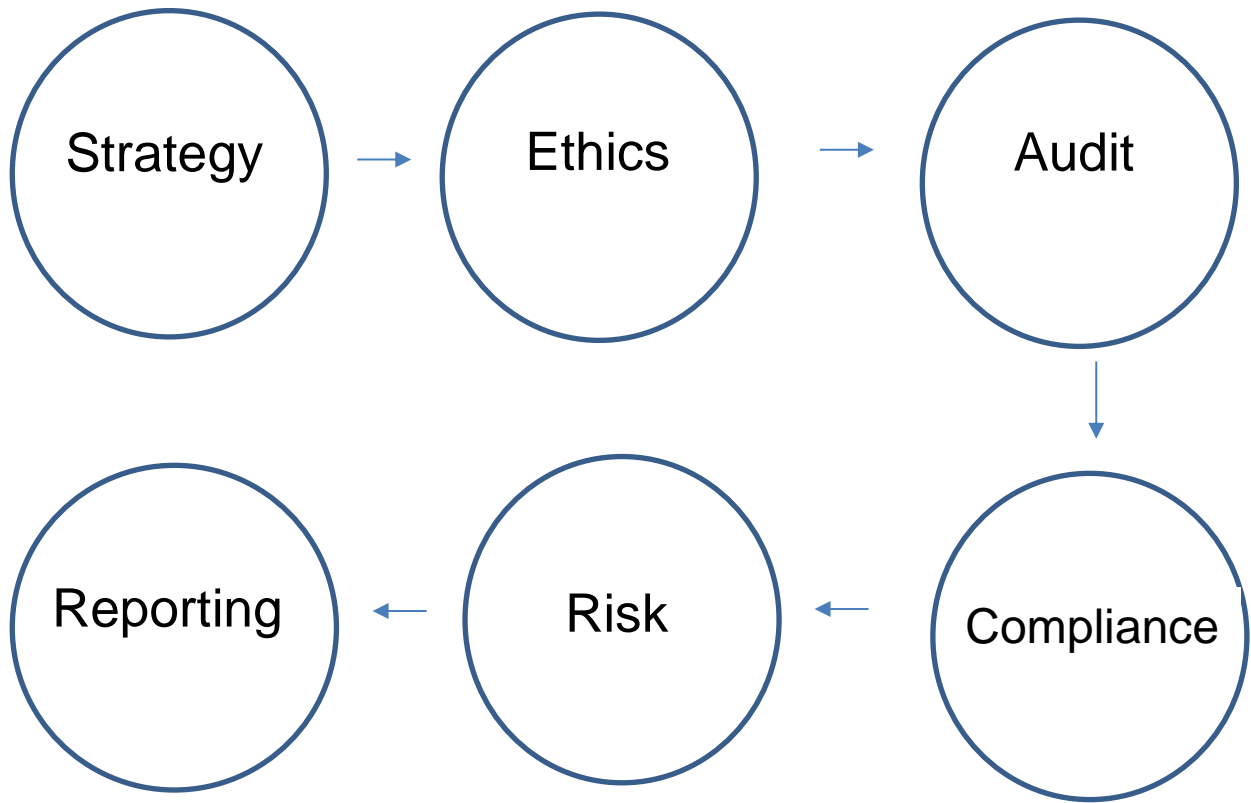
That the IPC has an effective system in place for management of risks and providing a safe working environment.

## 6. Reporting

### Principle

That the IPC have in place reporting frameworks to review performance of its operations.

Pillars of the Governance Framework



## 2. Action Plan 2023-24

### 1. Strategy

**Elements:** Strategic Plan, Regulatory Plan, Diversity and Inclusion Plan, People and Culture Strategy, IT Strategic Plan, Regulatory Framework

#### Action Plan 2023-24

Governance Element	Action	Timeframe	Responsibility
Diversity and Inclusion Plan	G111 - Revise Plan	01/12/2023	CCA
Strategic Plan	G112 - Develop new Plan	01/12/2023	Executive
	G113 - Establish linkages between the Enterprise Risk Management Framework and the Strategic Plan	01/12/2023	Executive & ARC (by invitation)
Regulatory Plan	G114 - Develop new Plan	01/12/2023	Executive
People and Culture Plan	G115 – Revise Plan	31/01/2023	DBI
Regulatory Framework	G116 – Revise Framework	31/10/2024	DIR

### 2. Ethics

**Elements:** Code of Conduct, IPC Values statement, Gifts and Benefits, Conflicts of Interest, Private Employment, Disclosures, Delegations and Authorisations

#### Action Plan 2023-24

Governance Element	Action	Timeframe	Responsibility
Gifts and Benefits	G211 - Review Gifts and Benefits register for completeness	Annually	Manager SCS
	G212 - Undertake Annual Attestation process of Gifts and Benefits	Annually	Manager SCS
	G213 - Provide annual staff training on Gifts and Benefits	Annually	DBI
	G214 - Report to Audit and Risk Committee on Gifts and Benefits trends	Annually	DBI
Statement of Business Ethics	G216 - Review Statement of Business Ethics	31/10/2023	Manager SCS
Disclosures	G217 - Review Continuous Disclosure Policy	31/10/23	Manager SCS
Code of Conduct	G218 - Review Code of Conduct	30/04/2024	Manager SCS
IPC Values statement	G219 - Include in staff meetings and PDPs	Monthly Quarterly	Executive Managers
Delegations	G210 - Review HR and Financial Delegations	30/11/2024	Manager SCS

### 3. Audit

**Elements:** Internal Audit, External Audit, Procurement Framework, Fraud Control Framework and Audit and Risk Committee

#### **Action Plan 2023-24**

Governance Element	Action	Timeframe	Responsibility
Internal Audit	G311 - Internal Audit Plan published on the website	30/06/2023	Chief Audit Executive
Audit and Risk Committee	G312 - Review Internal Audit Manual and Charter	Annually	Chief Audit Executive
Fraud Control Framework	G313 - That the Fraud Policy and Control Framework be published on the website and reviewed annually.	Annually	DBI
Audit and Risk Committee	G313 - Review Charter	Annually	Chief Audit Executive

### 4. Compliance

**Elements:** Policy Framework, Policy Register, Legislative Compliance Register

#### **Action Plan 2023-24**

Governance Element	Action	Timeframe	Responsibility
Policy Framework	G411 - Review Framework	30/11/2023	Manager SCS
Policy Register	G412 - Ensure policies are reviewed in accordance with policy review dates	Ongoing	Manager SCS
Legislative Compliance Register	G413 - Review register for compliance with new or amended legislation	Annually	LCRA/BI

### 5. Risk

**Elements:** Enterprise Risk Management Policy and Framework, Risk Register, Work, Health and Safety Plan

#### **Action Plan 2023-24**

Governance Element	Action	Timeframe	Responsibility
Enterprise Risk Management	G511 - Publish the IPC's Enterprise Risk Management Policy and Framework on the website and ensure it is regularly reviewed.	Annually	Chief Audit Executive
Work Health and Safety	G512 - Review Policy and Plan	30/11/2023	Manager SCS
PMES Action Plan	G513 – Finalise actions in Plan	31/07/2023	EA & Office Manager

## 6. Reporting

**Elements:** Annual Report, Quarterly Report to Ministers, Report on Regulatory Plan, Agency Information Guide

### Action Plan 2023-24

Governance Element	Action	Timeframe	Responsibility
Annual Report	G611 - Prepare and Publish an Annual Report on operations	Annually	Manager CCA
Quarterly Report to Ministers	G612 - Prepare Quarterly Report to Minister	Quarterly	Manager CCA
Report on Regulatory Plan	G613 - Prepare Quarterly Report on Regulatory Plan	Quarterly	Manager CCA
IPC Agency Information Guide	G614 - Review and publish Agency Information Guide	Annually	Manager CCA/SCS



## Document information

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