

# Dual Hatting: New laws to prohibit dual hatting commence from 19 April 2024

April 2024

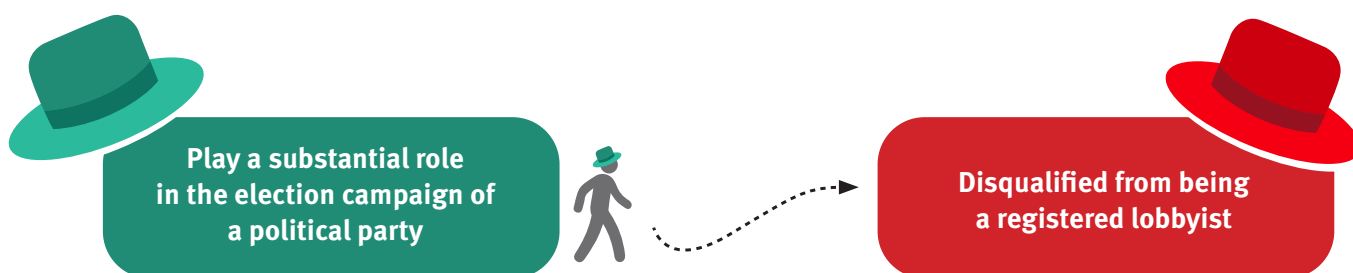
On **19 April 2024**, amendments to the *Integrity Act 2009* (Qld) (**Integrity Act**) will commence which:

- will prohibit ‘dual hatting’ by registered lobbyists
- will disqualify a previously registered lobbyist, who performed a substantial role in an election campaign for a political party who has won the election, from operating as a registered lobbyist in that term of government.

The new laws implement a recommendation made by Professor Peter Coaldrake AO in *Let the sunshine in: Review of culture and accountability in the Queensland public sector* (June 2022) to manage the potential conflicts arising from dual hatting.

## What is ‘dual hatting’?

‘**Dual hatting**’ refers to the circumstance where a currently registered lobbyist takes on a ‘**substantial role**’ in an election campaign for a political party, and seeks to wear ‘both hats’, that is, operate as registered lobbyist while ‘dual hatting’ as a political campaigner. Dual hatting is prohibited under the new laws.



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## What is a 'substantial role'?

Under the amended legislation, a **'substantial role'** in the election campaign of a political party:

- Means a role at a senior level, whether paid or unpaid, that:
  - involves employment or engagement by the party; and
  - incorporates significant involvement in the party's election strategy or policy development.
- 'Substantial role' does not include:
  - general membership of a political party
  - volunteering for, or advising, a particular candidate
  - door knocking, placing documents in letter boxes or other campaign communications
  - media liaison
  - handing out how to vote material.

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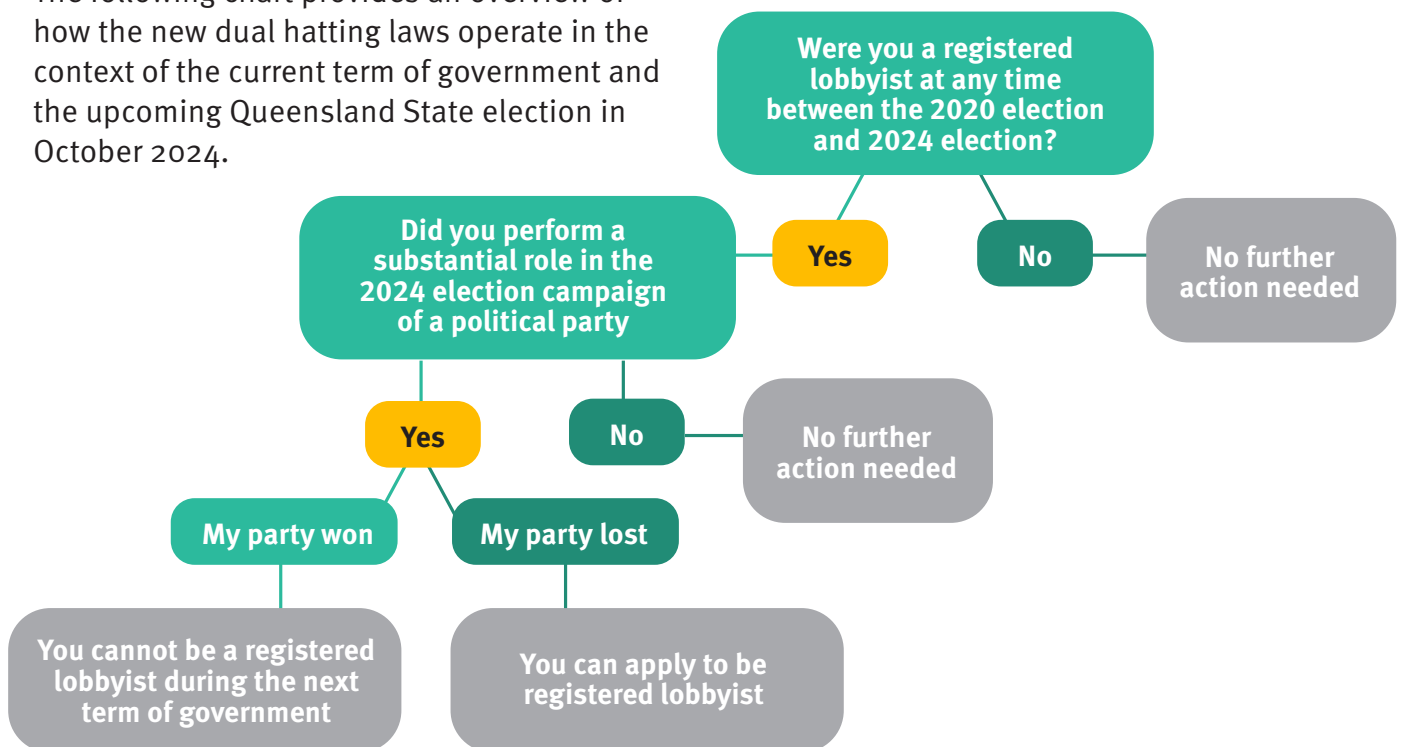
## How do the new laws work and what is prohibited?

The new law means:

- A person is disqualified from being a registered lobbyist if they perform a substantial role in the election campaign of a political party.
- A registered lobbyist who intends to perform a substantial role in an election campaign must, immediately after forming the intention, give the Queensland Integrity Commissioner a notice stating the individual's intention.
- A person who plays a substantial role in an election campaign for a political party that wins the election, and who was a registered lobbyist at any time in the term of government leading to the election, is disqualified from being a registered lobbyist at any time in the new term of government (i.e. for the following four years).

If, however, the political party did not win the election, the person who played a substantial role in the election campaign for that political party can register as a lobbyist in the new term of government.

The following chart provides an overview of how the new dual hatting laws operate in the context of the current term of government and the upcoming Queensland State election in October 2024.



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## What action is required by current and former registered lobbyists?

All registered lobbyists, and all individuals who have previously been a registered lobbyist at any time during the current term of government (i.e. since 31 October 2020) must ensure they have read and understood this factsheet.

### *A registered lobbyist performing or intending to perform a substantial role in election campaign*

From Friday 19 April 2024, you must immediately notify the Queensland Integrity Commissioner using the online [form](#) or by emailing us at [lobbying@integrity.qld.gov.au](mailto:lobbying@integrity.qld.gov.au) if you:

- are currently a registered lobbyist in Queensland; and
- are already performing, or intend to perform, a ‘substantial role’ in the election campaign of a political party.

### *Former registered lobbyist who is performing or is intending to perform a substantial role in election campaign*

If you are a person who has been registered as a lobbyist in this term of government (i.e. since 31 October 2020) and who is currently performing a substantial role for a political party in the current election campaign, or intends to, please contact our Office on the details below.

## Further information about dual hatting prohibitions

This fact sheet is the first of several which will be communicated and published on our website about the dual hatting prohibition and other changes to the Integrity Act which will come into effect over the coming weeks.

Please visit [www.integrity.qld.gov.au](http://www.integrity.qld.gov.au) to access new publications and announcements. You can also follow us at [in](#) [Queensland Integrity Commissioner](#) to get the latest news and updates.

You may also wish to sign up to our news and updates email subscription service – subscribers to this service will receive email updates from the Queensland Integrity Commissioner about changes to the Integrity Act, new publications and resources, projects such as the review of the Lobbyists Code of Conduct and other information about the Office. If you would like to subscribe to this service please [sign up here](#).

If you have questions about the new dual hatting laws, you can get in touch by:

- calling us on **07 3033 2888**
- emailing us at [lobbyist@integrity.com.au](mailto:lobbyist@integrity.com.au).

