

New Queensland Registered Lobbyists Code of Conduct: Explanation of changes and requirements

The Integrity Commissioner has approved a new code of conduct for registered lobbyists in Queensland (Code). The new Code will come into effect on **1 July 2026**.

The Integrity Commissioner has also made 4 new directives to support the new Code. These directives will also come into effect on 1 July 2026.

The new Code and directives follow a comprehensive review of the existing Code by the Office of the Queensland Integrity Commissioner (OQIC). They have been informed by stakeholder feedback from a public consultation, the OQIC's regulatory work, and a review of lobbying codes of conduct in other jurisdictions around Australia and internationally.

This fact sheet outlines the changes to the Code (pp. 1–5), and the requirements in the new directives (pp. 5–7).

About the public consultation

- **Consultation paper:** Published on the OQIC website in May 2025.
- **Submissions:** Invited from all registered lobbying entities, the Justice, Integrity and Community Safety Committee, and 217 other stakeholders.
- **Feedback received:**
 - 18 written submissions from registered lobbyists, Queensland Government departments, local councils, industry associations and others.
 - Input from 3 roundtables (with ministerial staff, departmental representatives and lobbyists) and one-on-one meetings with stakeholders.

Changes to the Code

A focus on principles

Compared to the existing Code, which includes both rules- and principles-based elements, the new Code is focused on principles, outlining expected behaviours for lobbyists. Technical and procedural requirements previously contained in the Code are now in Integrity Commissioner directives made under section 57 of the *Integrity Act 2009* (Integrity Act). This approach was supported by most stakeholders and keeps the Code shorter and easier to follow.

Additional and amended standards of conduct

Compared to the existing Code, the new Code includes some additional standards of conduct for registered lobbyists.

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Focus	Paragraph/Standard	Reason for Change
Ensuring no improper influence	18. Lobbyists will not lobby representatives where the representative could reasonably be seen to have a sense of obligation towards the lobbyist, including because of: a. a close personal relationship between the lobbyist and the representative; or b. paid or unpaid political work the lobbyist has done directly for the representative in the last 2 years.	To address stakeholder calls for more guidance and examples regarding improper influence and clarify expectations for lobbyists. In conjunction with the standard in paragraph 16, the new standards replace paragraph 3.1(l) in the existing Code, drawing on examples from the lobbying codes of conduct in Canada and Ireland.
	19. Lobbyists will not attempt to influence representatives' engagement with other parties who hold different or opposing interests to their clients.	
	20. Lobbyists will not seek to influence representatives other than by providing evidence, information, arguments and experiences that support their lobbying activities.	
Acting with professionalism	13. Lobbyists will maintain a high level of professional knowledge and understanding of all requirements, obligations and standards of conduct applying to them under the Integrity Act, this Code, and Integrity Commissioner directives.	To address non-compliance and integrity risks identified through the OQIC's regulatory work.
Acting transparently	22. Lobbyists will be open and frank about their lobbying activities while respecting confidentiality (see paragraph 25). In particular, when engaging and communicating with representatives, lobbyists will: <i>(continued on next page)</i>	To address non-compliance and integrity risks identified through the OQIC's regulatory work and to further align the Code with good practice in other jurisdictions (new standard informed by the Western Australian code).

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Acting transparently (continued)	a. make sure the representative is clearly and accurately informed about the nature of their engagement with the representative, including whether they are undertaking lobbying activities on behalf of a client or are engaging with the representative in some other capacity; and b. disclose to the representative if they have any interest in the matter about which they are lobbying beyond the receipt of their professional fees (for example, if the lobbyist owns shares in the client's company).	
Demonstrating respect for public institutions	14. Lobbyists will operate in a way that shows respect for public institutions, including the duty of government representatives to act in the public interest. 15. Lobbyists will not ask for or expect preferential access to, or treatment from, representatives they lobby. 17. Lobbyists will not propose or take any action that may cause a representative to breach any law, regulation or rule that applies to them.	To further align the Code with good practice in other jurisdictions (new standards informed by the Irish and Scottish codes, as well as the <u>APGRA Code of Conduct</u>).
Promoting regulatory compliance	28. Lobbyists who have officers or employees will make sure all officers and employees are aware of both the lobbyist's obligations and their own obligations under the Integrity Act, this Code, and Integrity Commissioner directives.	To further align the Code with good practice in other jurisdictions (new standard informed by the Irish code).

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Focus	Paragraph/Standard	Reason for Change
Promoting regulatory compliance <i>(continued)</i>	29. Businesses or entities that are registered as lobbyists, and employ or engage former Queensland representatives (former representatives) in any capacity, will take reasonable steps to make sure former representatives are aware of their post-separation obligations and will implement procedures to make sure former representatives do not breach those obligations.	To address non-compliance and integrity risks identified through the OQIC's regulatory work and to further align the Code with good practice in other jurisdictions (new standard informed by the Irish code).
Conflicts of interest	12. Lobbyists will avoid, identify, disclose and manage conflicts of interest in accordance with this Code's conflicts of interest policy.	To link to the Code's new conflicts of interest policy (see page 5).

The new Code also includes a substantially amended standard of conduct from the existing Code.

Focus	Paragraph/Standard	Reason for Change
Gifts and benefits to representatives	21. Lobbyists will not offer or provide, either directly or indirectly, any gifts or benefits to representatives they lobby or expect to lobby, other than modest gifts or benefits that a member of the public would consider reasonable to offer or provide in the circumstances. In complying with this standard, lobbyists will have regard to relevant policies and procedures applying to representatives and will make sure any gifts or benefits they offer or provide to representatives are consistent with these.	To clarify and strengthen expectations for lobbyists. Paragraph 3.1(m) in the existing Code merely requires lobbyists to be mindful of relevant policies applying to representatives; the new standard adds specific parameters around gift giving, responding to stakeholder calls for a stronger standard and further aligning the Code with good practice in other jurisdictions (new standard informed by the Irish and Canadian codes).

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A new conflicts of interest policy

The new Code includes a policy relating to conflicts of interest for registered lobbyists (see paragraphs 30 to 38). This is a requirement under section 55(4) of the Integrity Act, following legislative changes that took effect on 28 May 2024.

The conflicts of interest policy incorporates relevant standards from the existing Code. New requirements for avoiding, identifying, disclosing, recording and managing conflicts of interest have also been included, reflecting good practice regarding conflicts of interest and addressing calls from stakeholders for mandatory requirements for lobbyists in these areas.

Written to help lobbyists understand their obligations

The new Code features:

- simpler and more concise language
- notes that provide examples and explanatory information
- links to definitions and related content in the Code and other parts of Queensland's lobbying regulation framework.

These changes aim to help lobbyists in understanding and complying with their obligations, especially noting some stakeholders' concerns that splitting content between the Code and directives could create confusion for lobbyists and increase the risk of non-compliance.

Requirements in new directives

Lobbyists must only use official business channels for lobbying activities

Directive 03/26 requires lobbyists to only use official business channels when undertaking lobbying activities with government and Opposition representatives. This means not contacting representatives via their private email address or phone number or social media platforms such as LinkedIn.

This directive responds to feedback the Integrity Commissioner has received from representatives about lobbyists contacting them via social media and other personal channels.

Lobbyists must disclose specified information in their first communication with a representative

Directive 04/26 requires lobbyists to make specified disclosures to representatives when undertaking lobbying activity that is the first communication they have with a representative on a particular matter

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or issue. This reflects lobbyists' current obligations under sections 3.2 and 3.3 of the existing Code, with minor changes to clarify and strengthen the requirements:

- Disclosure must be explicit.
- Lobbyists making a first communication on behalf of multiple clients must disclose relevant information for each client.
- Lobbyists must disclose enough information for the representative to properly understand why the lobbyist has contacted them.
- Former Queensland representatives must disclose information about their official dealings if requested by a representative.

Lobbyists must record new clients in the Queensland Lobbying Register before undertaking lobbying activity

Directive 05/26 requires lobbyists to record clients in the Queensland Lobbying Register (QLR) before starting lobbying activity for them. While lobbyists are already required to record their clients in the QLR, there is no requirement for this to be done before lobbying activity begins. This directive therefore addresses a gap in the current regulatory framework to improve transparency in lobbying.

Lobbyists must record specified information about lobbying activities in the Queensland Lobbying Register

Directive 06/26 requires lobbyists to record specified information about their lobbying activities in the QLR. This reflects lobbyists' current obligations under section 4 of the existing Code, with minor changes that reflect established practices in the QLR (e.g. recording portfolio/policy area and mode of communication), and some new requirements as outlined below.

Record activities within 10 business days

Lobbyists must now record details of lobbying activity in the QLR within 10 business days after the activity takes place, rather than by the 15th day of the following month. This aligns with the existing timeframe within which lobbyists are required to update their recorded particulars in the QLR, and will ensure lobbying activities are open to public scrutiny in closer to real time.

Record all meeting requests

Lobbyists must now record every request for a meeting with a representative in the QLR, regardless of whether the request is successful in obtaining a meeting. This differs from the current requirement, where a communication by a lobbyist to request a meeting with a representative only needs to be recorded if a meeting is granted. Lobbyists have previously raised concerns about the ambiguity of this approach and its administrative complexity.

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While many stakeholders argued against requiring meeting requests to be recorded in the QLR, the Integrity Commissioner has ultimately determined that any request for a meeting forms part of a lobbyist's overall effort to influence decision-making, and requiring these requests to be recorded maximises the transparency of lobbying. Compared to the current position, this approach also makes lobbyists' obligations clear and unambiguous.

To balance this change, the new directive also makes it clear that follow-up communications about the same request and communications about logistical arrangements do not need to be recorded in the QLR. This will streamline administration for lobbyists and ensure the QLR better reflects the communications between lobbyists and representatives about discrete issues by reducing the recording of repeated contacts about the same matter.

Provide more information about the purpose of commercial-in-confidence activities

To assist the Integrity Commissioner in discharging their regulatory responsibilities, lobbyists who select 'commercial-in-confidence' as the purpose of an activity must also provide a free text description of the purpose that makes the nature of the lobbying activity clear.

Most stakeholders supported such a requirement to ensure lobbyists are not misusing the commercial-in-confidence option to avoid transparency. Recognising concerns from lobbyists about risks to client relationships and commercial interests arising from such a requirement, the further information they provide will not appear on the public QLR and will only be accessible by OQIC staff for auditing and compliance purposes.

Record the full name and title/position of representatives

Lobbyists must now record the full name and title/position of each representative involved in a lobbying activity. The existing Code permits lobbyists to record the representative's "title and/or name", which means it is not always clear who a lobbyist communicated with. The directive includes examples of how representatives' details should be recorded.