DIRECTIVE

OFFICE OF THE QUEENSLAND Integrity Commissioner

Queensland Integrity Commissioner's Directive — Registered lobbyists to make disclosures in first communication with a representative

Directive: 04/26 (version 1.2) **Effective date: 01/12/2026**

Purpose

This directive requires registered lobbyists (lobbyists) to make specified disclosures to government representatives and Opposition representatives (representatives) when undertaking lobbying activity that is the first communication they have with a representative on a particular matter or issue.

Who must comply with this directive?

All registered lobbyists in Queensland.

What information must be disclosed?

The lobbyist must explicitly disclose each of the following to the representative in their first communication with the representative on a particular matter or issue:

a) that they are a lobbyist currently listed in the Queensland Lobbying Register

b) that they are making the communication on behalf of a client (or multiple clients if that is the case)

c) the name of the client/each client

d) the nature of the client's/each client's issue or issues

e) the reason or reasons for the approach (for example, what outcome is the client seeking from the meeting?).

Note: Explicit disclosure requires that the lobbyist clearly state each of the above matters when making the first communication. For example:

- *If the communication is a written communication, the required information must be included in the body of the communication and not, for instance, in a footnote or as part of a signature block.*
- *If a lobbyist uses an email address, signature block or other identifier that belongs to or is associated with their client, they must still specifically inform the representative of the client's name and that they are making the communication on behalf of that client.*

If the lobbyist is making the communication on behalf of more than 1 client, the lobbyist must disclose the matters in (c) to (e) for each client.

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The lobbyist must disclose enough information about the matters in (d) and (e) to enable the representative to properly understand why the lobbyist has contacted them and to make an informed decision in response to the lobbyist's communication (e.g. in deciding whether to agree to meet with the lobbyist and/or their client).

If a lobbyist is already engaging in lobbying activity with a representative (for example, they have scheduled a meeting with a representative) and the lobbyist decides to raise a new or unrelated matter or issue for their client, or a new matter or issue on behalf of a different client, they are required to make the specified disclosures in both instances.

Further requirements for lobbyists who are former Queensland representatives

If the lobbyist became a former Queensland representative less than 2 years before the date of the first communication, the lobbyist must also disclose each of the following to the representative:

a) that they are a former Queensland senior government representative or a former Queensland Opposition representative

b) the date on which they became a former Queensland senior government representative or a former Queensland Opposition representative

c) that the communication is not an activity prohibited under section 62 of the *Integrity Act 2009* (Lobbying activity relating to official dealings of previous 2 years).

If the representative requests any information about the lobbyist's official dealings as a former Queensland senior government representative or a former Queensland Opposition representative (see definition of official dealings in section 41 of the *Integrity Act 2009*), the lobbyist must also disclose that information to the representative.

How does the information need to be disclosed?

The lobbyist may disclose the required information to the representative in writing or orally, unless the representative requests that the lobbyist disclose the information in writing. If such a request is made, the lobbyist must disclose the required information in writing.

Authority

This directive is made by the Queensland Integrity Commissioner under section 57(1) (a) and (c) of the *Integrity Act 2009*. Compliance with this directive is mandatory for all registered lobbyists. Failure to comply with a directive is a ground for taking regulatory action, for example, issuing a compliance notice under section 66F of the *Integrity Act 2009* or imposing sanctions including suspension and cancellation of registration under section 66H of the *Integrity Act 2009*.

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Definitions

The table below provides definitions for special terms used in this directive. Other terms used in this directive have the meaning provided in the *Integrity Act 2009* (see section 41 and Schedule 2).

Term	Definition
former Queensland representative	A former Queensland senior government representative or former Queensland Opposition representative, where: • a former Queensland senior government representative means a person who held, but no longer holds, any of the following offices in Queensland: ◦ Premier ◦ Minister ◦ Assistant Minister ◦ Councillor ◦ ministerial staff member ◦ assistant minister staff member ◦ an office of a public sector officer that is an office of chief executive, senior executive or senior executive equivalent • a former Queensland Opposition representative means a person who held, but no longer holds, any of the following offices in Queensland: ◦ Leader of the Opposition ◦ Deputy Leader of the Opposition ◦ staff member in the office of the Leader of the Opposition. (see sections 59 to 61 of the Integrity Act)