QUEENSLAND REGISTERED LOBBYISTS

Code of Conduct

Effective: 17 September 2026

Version 3.0

OFFICE OF THE QUEENSLAND Integrity Commissioner

Acknowledgement of Traditional Owners and Custodians

The Office of the Queensland Integrity Commissioner acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Owners and Custodians of the Country on which we live and work, and pays respects to Elders past and present.

We recognise and appreciate their deep and continuing relationship to the land and waters of Queensland and the Torres Strait. We thank them for protecting our Queensland lands, coastline and ecosystems since time immemorial. We recognise and value their stories, cultures, histories and diversity.

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This document is available online at https://www.integrity.qld.gov.au/publications/lobbying-resources

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Purpose

This Code provides standards of conduct for **registered lobbyists** designed to ensure that communication between registered lobbyists and **Queensland government and Opposition representatives** (**representatives**) is carried out in accordance with public expectations of transparency and integrity.

This Code should be read in conjunction with Chapter 4 of the *Integrity Act 2009* (Qld) (Integrity Act) and directives made by the Queensland Integrity Commissioner (**Integrity Commissioner directives**), which together form the regulatory framework setting out all requirements, obligations and standards of conduct applying to registered lobbyists.

By complying with this Code, the Integrity Act and Integrity Commissioner directives, registered lobbyists:

- strengthen the ethical culture of lobbying and enhance public trust in the profession
- provide transparency to the Queensland public about engagement between representatives and those with private interests on matters of interest to the community
- manage **conflicts of interest** to prevent them from improperly influencing their **lobbying activities**
- contribute to public trust and confidence in the integrity of government decision-making.

Application and operation of this Code

1. This Code has been approved by the Queensland Integrity Commissioner (Integrity Commissioner), after consultation with the parliamentary committee, under section 55(1) of the Integrity Act.

2. All **registered lobbyists** (lobbyists) in Queensland must comply with this Code under section 55(6) of the Integrity Act.

3. This Code applies to **lobbying activities** in Queensland and lobbyists' interactions with Queensland representatives.

4. Non-compliance with this Code may result in the Integrity Commissioner taking action, such as:

a. issuing a notice (a compliance notice) requiring the lobbyist to rectify their non-compliance

b. imposing a condition on the lobbyist's registration

c. suspending the lobbyist's registration for up to 12 months

d. cancelling the lobbyist's registration.

(Refer to Chapter 4, Parts 8 and 9 of the Integrity Act.)

5. This Code applies in conjunction with:

a. Chapter 4 of the Integrity Act; and

b. directives made by the Integrity Commissioner and published on the Integrity Commissioner's website under section 57 of the Integrity Act (**Integrity Commissioner directives**).

Definitions

6. Key terms used in this Code are defined in **Appendix 1**.

Standards of conduct

7. **Lobbyists** are expected to act in accordance with the following standards of conduct when conducting **lobbying activities** and when engaging and communicating with **representatives**.

Acting with honesty, integrity and professionalism

8. Lobbyists will operate with the highest professional and ethical standards. In particular, lobbyists will uphold both the letter and the spirit of the Integrity Act, this Code, and Integrity Commissioner directives.

9. Lobbyists will act with honesty, integrity and good faith and avoid any behaviour that could discredit themselves, their employer, their **clients** or the representatives they lobby.

Example: Repeatedly contacting a representative about a matter after the representative has declined the lobbyist's request may be considered behaviour that could discredit the lobbyist, their employer and/or their clients.

10. Lobbyists will not engage in corrupt, dishonest or illegal conduct, or unlawfully cause or threaten any harm to a person.

11. Lobbyists will not knowingly make false, misleading or exaggerated claims about their access to public institutions or political parties or to individuals within them.

Note: In complying with this standard, lobbyists should also be mindful of their obligations under paragraphs 23 and 24 of this Code.

12. Lobbyists will avoid, identify, disclose and manage **conflicts of interest** in accordance with this Code's **conflicts of interest policy**.

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.

Note: Lobbyists are required to complete an approved foundational training course within 2 months of being registered (see Directive 01/25).

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.

16. Lobbyists will not propose or take any action that would place a representative in a **conflict of interest** situation.

Note: When communicating with **government representatives***, lobbyists should a) have regard to relevant policies and procedures applying to government representatives and b) understand government representatives' obligations to disclose and manage personal interests, including personal and close professional relationships with lobbyists.*

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.

Note: Lobbyists should have particular regard to policies and procedures regulating representatives' contact with lobbyists. When undertaking lobbying activities, lobbyists must only use official business channels (see Directive 03/26).

Ensuring no improper influence

18. Lobbyists shall not place government representatives or Opposition representatives in a conflict of interest by proposing or undertaking any action that would constitute an improper influence on them.

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.

21. Lobbyists should inform themselves of the policies of the Queensland Government and local governments restricting the acceptance of gifts by officials.

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:

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).

Note: Lobbyists are required to disclose certain information in their first communication with a representative on a particular matter or issue (see Directive 04/26). Lobbyists are also required to record certain information about their clients and their lobbying activities on the Queensland Lobbying Register (Directives 05/26 and 06/26).

23. Lobbyists will make all reasonable efforts to satisfy themselves of the truth and accuracy of the statements and information they provide to their **clients**, the public, representatives and government agencies.

24. Where practicable, lobbyists will provide accurate and updated information to representatives if they become aware that previously supplied information is, or has become, materially inaccurate and they have reason to believe the representative may still be relying on it.

Respecting confidentiality

25. Lobbyists will not disclose confidential information they have received from another party unless they have the other party's informed consent or are legally required to do so.

Note: Paragraph 24 is an example of where lobbyists may be legally required to disclose confidential information received from another party.

Demonstrating and promoting regulatory compliance

26. Lobbyists will comply with all relevant laws and regulations about lobbying, including the Integrity Act, this Code, and Integrity Commissioner directives.

Note: Obligations and prohibitions in the Integrity Act that lobbyists must comply with are summarised in **Appendix 2** *for ease of reference.*

27. Lobbyists will inform their **clients** of their obligations under the Integrity Act, this Code, and Integrity Commissioner directives, including that **success fees** are prohibited in Queensland and that giving a lobbyist or a **related person** of a lobbyist, money or other reward contingent on the outcome of a **lobbying activity**, is a criminal offence under the Integrity Act (see section 66P).

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.

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.

Note: Particular regard should be given to section 62 of the Integrity Act, which prohibits former Queensland representatives, in their first 2 years after leaving office, from carrying out lobbying activity on any matter they had **official dealings** *with in their last 2 years as a representative.*

Regard should also be given to the Queensland Government's Post separation employment provisions, which prohibit **former Queensland senior government representatives***, for up to 2 years after leaving office, from conducting business meetings with departmental staff on any matter they had official dealings with in their last 18 months or 2 years as a representative.*

Example: Reasonable steps could include reminding former representatives of their post-separation obligations as part of an induction program.

Conflicts of interest policy

Avoiding conflicts of interest

30. Lobbyists will seek to avoid **conflicts of interest** when undertaking lobbying activities, including by keeping their lobbying activities completely separate from any personal activity or involvement with a political party.

Note: Lobbyists are reminded that, under the Integrity Act, they:

- *must not perform a* **substantial role in the election campaign of a political party** *(section 58)*
- *must inform the Integrity Commissioner if they intend to perform a substantial role in the election campaign of a political party (section 66A).*

Also, lobbyists who are **former representatives***, within 2 years after becoming a former representative, must not carry out lobbying activity for a* **client** *if the activity relates to their* **official dealings** *from the 2 years immediately before becoming a former representative (section 62).*

Identifying conflicts of interest

31. Lobbyists will actively identify and assess **conflicts of interest** as soon as they arise.

Note: When assessing conflicts of interest, lobbyists should consider the nature of the conflict (e.g. is it an actual, potential or perceived conflict of interest; what is the relevant personal interest) and the surrounding circumstances to help determine the most appropriate way of managing the conflict.

Disclosing conflicts of interest

32. Where a lobbyist has a **conflict of interest** in relation to a matter about which they are lobbying, or expect to lobby, a representative, the lobbyist must promptly disclose the conflict of interest to:

a. another person within their entity who is an **officer** of the entity, where applicable

b. any affected **clients**

c. any representative they are lobbying or expect to lobby in relation to the matter.

33. Disclosures must:

a. be made in writing

b. be made before any lobbying activity or further lobbying activity takes place in relation to the matter

c. include a description of the conflict, its potential impact and how the lobbyist proposes to manage the conflict.

Managing conflicts of interest

34. Where a lobbyist has a **conflict of interest** in relation to a matter about which they are lobbying, or expect to lobby, a representative, the lobbyist:

a. must develop a plan to manage the conflict of interest in a way that demonstrates integrity, transparency and respect for public institutions

b. must obtain the informed consent of each affected **client**, in writing, before proceeding or continuing with lobbying activity for the client

c. must remove themselves from the matter if the conflict of interest cannot otherwise be managed appropriately.

35. Lobbyists must not represent conflicting or competing interests without the informed consent of those whose interests are involved.

Record keeping

36. Lobbyists must make accurate records of all actions taken in relation to identifying, disclosing and managing **conflicts of interest**. These records:

a. must be retained for 5 years from the date they are made

b. must be made available for review by the Integrity Commissioner if required.

Accountability

37. Individual lobbyists are personally responsible for identifying, disclosing, managing and recording **conflicts of interest** in accordance with this policy.

38. Lobbying entities are expected to establish, where appropriate, internal procedures for identifying, disclosing, managing and recording **conflicts of interest**. These procedures should support individual lobbyists to comply with the requirements of this policy.

Note: Procedures could address where, when and how conflicts of interest will be recorded and who in the entity may approve a conflict of interest management plan.

Appendix 1: **Definitions**

The table below provides definitions for key terms used in this Code. Where indicated, these reflect statutory definitions from the *Integrity Act 2009* (Qld) (Integrity Act).

Readers should refer to the Integrity Act for definitions for additional terms.

Term	Definition
client	An entity that engages a lobbyist to provide services constituting or including a **lobbying activity**, for a commission, payment or other reward (financial or otherwise) that is agreed to before the lobbyist provides the services. (see section 41 of the Integrity Act, definition of 'third party client')
conflict of interest (of a lobbyist)	Where a lobbyist's **personal or business interests** interfere or appear to interfere with their professional responsibilities as a lobbyist, including their responsibilities under the Integrity Act, the Queensland Registered Lobbyists Code of Conduct and Integrity Commissioner directives. A conflict of interest can be: • actual, where a lobbyist's personal or business interests conflict with their professional responsibilities *Example: A lobbyist owns a company that is competing with a client for the same outcome from government.* • potential, where a lobbyist's personal or business interests could conflict with their professional responsibilities in the future *Example: A lobbyist owns shares that may be impacted by a change to government policy being sought by a client.* • perceived, where it may appear to a reasonable person that a lobbyist's personal or business interests could interfere with their ability to perform their professional responsibilities, even if that is not in fact the case. *Example: A lobbyist has a close personal relationship with a representative they are lobbying.*
conflict of interest (of a representative)	Where a representative's personal interests affect or appear to affect their ability to perform their official duties fairly and impartially. A conflict of interest can be: • actual, where a representative's personal interests conflict with their official duties • potential, where a representative's personal interests could conflict with their official duties in the future • perceived, where it may appear to a reasonable person that a representative's personal interests could improperly influence how they perform their official duties, even if that is not in fact the case.

Term	Definition
employee (of a registered lobbying entity)	Includes a person contracted or otherwise engaged by the registered lobbying entity. (see section 41 of the Integrity Act)
former Queensland representative	See **former representative**.
former Queensland senior government representative	See **former representative**.
former 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 (see definition in section 41 of the Integrity Act) – 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 (see definition of public sector officer in section 41 of the Integrity Act) • 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)
government representative	Any of the following people in Queensland: • the Premier • a Minister • an Assistant Minister • a councillor (see definition in section 41 of the Integrity Act) • a ministerial staff member • an assistant minister staff member • a public sector officer (see definition in section 41 of the Integrity Act) (see section 44 of the Integrity Act)

Appendix 1 *(continued)*

Term	Definition
Integrity Commissioner directives	Directives made by the Integrity Commissioner and published on the Integrity Commissioner's website under section 57 of the Integrity Act. Directives may be about: • the operation of a provision of Chapter 4 of the Integrity Act or this Code (e.g. a procedural or technical requirement) • the application of the **conflicts of interest policy** in this Code • any other matter the Integrity Commissioner considers appropriate.
lobbying activity	Communicating with a **government representative** in an effort to influence decision-making of the State government or a local government, or communicating with an **Opposition representative** in an effort to influence decision-making of the Opposition. (see section 42 of the Integrity Act; section 43 also lists a number of activities that are not lobbying activity)
lobbyist	See **registered lobbyist**.
officer (of a registered lobbying entity)	A person who: • holds an office, or position of authority, in the entity; or • carries out, or has a duty to carry out, the functions of an office of the entity; or • has a right to participate in the administration or management of the affairs of the entity. (see section 41 of the Integrity Act)
official dealings (in relation to a person who is a former representative)	Any of the following dealings that the person engaged in as part of their ordinary duties on a regular basis: • government or Opposition business or activities • negotiations, briefings, contracts and the making or receipt of representations relating to government or Opposition business or activities. (see section 41 of the Integrity Act)
Opposition representative	Any of the following people in Queensland: • the Leader of the Opposition • the Deputy Leader of the Opposition • an opposition spokesperson • an opposition assistant spokesperson • a staff member in the office of the Leader of the Opposition. (see section 45 of the Integrity Act)

Term	Definition
personal or business interests (of a lobbyist)	Personal interests of a lobbyist include both: • financial interests, such as shares in public or private companies, property ownership, business partnerships, and liabilities or debts • non-financial interests, including: – close personal relationships (e.g. with immediate family, close friends, romantic partners) – close professional relationships (e.g. with former colleagues, business partners) – current or previous employment (e.g. where a lobbyist acts or has acted as both a lobbyist and a consultant to government; where a lobbyist is also employed as an in-house government relations advisor for a company; where a lobbyist has recently held a role in the Queensland public sector) – current or previous political activity, political affiliations or roles within political parties (e.g. where a lobbyist worked on a previous election campaign of a representative). Business interests refer to the specific goals, activities or areas of focus of an entity for which a lobbyist works. Examples include an entity's profit-making activities, operating environment and costs, customer relationships, strategic partnerships and regulatory environment.
political work	Paid or unpaid work of a political or partisan nature during or between election periods done directly for a representative. This includes roles, functions or tasks performed for a representative when they were an election candidate. It **does not include** any of the following: • general membership of a political party • making a political donation in accordance with any State or Commonwealth electoral laws, for example the *Electoral Act 1992* (Qld) • handing out how to vote material • attending a fundraising or campaign event • personally displaying election signs or posting digital campaign material • expressing personal political opinions.
post-separation obligations	Responsibilities and requirements (including under legislation, an employment contract, a directive, a policy or a code of conduct) that apply to a person after they leave public office that are designed to prevent conflicts of interest and protect the integrity of their former position. **Note:** More information about the post-separation obligations of specific groups of representatives (e.g. Ministers, Assistant Ministers, chief executives and SES officers) can be found on the Office of the Queensland Integrity Commissioner website.

Appendix 1 *(continued)*

Term	Definition
registered lobbyist	An entity recorded in the Queensland Lobbying Register as a registered lobbyist. (see section 41 of the Integrity Act)
related person (of a lobbyist)	A person is a related person of a lobbyist if: • for individuals — they are members of the same family • for an individual and a corporation — the person or a member of the person's family is a majority shareholder, director or secretary of the corporation or a related body corporate of the corporation, or has an interest of 50% or more in it • for an individual and a trustee — the person, or a related person under another provision of section 61 of the *Duties Act 2001* (Qld), is a beneficiary of the trust • for corporations — they are related bodies corporate • for a corporation and a trustee — the corporation, or a related person under another provision of section 61 of the Duties Act, is a beneficiary of the trust • for trustees — either: – there is a person who is a beneficiary of both trusts; or – a person is a beneficiary of 1 trust and a related person under another provision of section 61 of the Duties Act is a beneficiary of the other trust. (see section 66P(5) of the Integrity Act and section 61 of the Duties Act)
representative	A government representative or an Opposition representative, as defined separately above. (see section 41 of the Integrity Act)
substantial role in the election campaign of a political party	In relation to Queensland general elections only, 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. It **does not include** any of the following: • general membership of the 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. (see section 41 of the Integrity Act)
success fee	In relation to a lobbying activity, an amount of money or other award, the giving or receiving of all or part of which is contingent on the outcome of the lobbying activity. (see section 66P of the Integrity Act)

Appendix 2:
Summary of obligations and prohibitions for registered lobbyists under the *Integrity Act 2009* (Qld)

The table below summarises obligations and prohibitions in the *Integrity Act 2009* (Qld) (Integrity Act) that registered lobbyists must comply with. This is provided for ease of reference only. Readers should refer to the Integrity Act for the complete wording of relevant provisions and for definitions of key terms.

Heading/topic	Section	Summary of obligation or prohibition
General obligations		
Code of Conduct	55(6)	Registered lobbyists must comply with the Queensland Registered Lobbyists Code of Conduct.
Directives	57(2)	Registered lobbyists must comply with a directive made by the Integrity Commissioner under section 57(1) of the Integrity Act.
Disclosure obligations		
Registered lobbyist must give notice of change in recorded particulars	65	If a registered lobbyist's recorded particulars change, the registered lobbyist must give the Integrity Commissioner a notice stating the details of the change within 10 business days after the registered lobbyist becomes aware of it. **Note:** If the registered lobbyist is a listed person for an entity, the obligation applies to the entity, and the listed person must make sure the entity is notified of the change.
Registered lobbyist must give annual return of recorded particulars	66	A registered lobbyist must, within 1 month after the end of each financial year, give the Integrity Commissioner a notice stating the recorded particulars of the registered lobbyist remain correct. **Note:** If the registered lobbyist is a listed person for an entity, the obligation applies to the entity, and the listed person must make sure the entity is notified of any changes in their recorded particulars that happen in the financial year (see discussion of section 65 above).
Individual who is registered lobbyist must give notice of intention to perform substantial role in election campaign	66A	If a registered lobbyist intends to perform a substantial role in the election campaign of a political party, the registered lobbyist must give the Integrity Commissioner a notice stating this intention immediately after forming it.

Appendix 2 *(continued)*

Heading/topic	Section	Summary of obligation or prohibition
Integrity Commissioner may require information from registered lobbyist or another person	66D	Unless they have a reasonable excuse, a registered lobbyist who receives a notice from the Integrity Commissioner requiring them to give the Integrity Commissioner information or a document must comply with the notice within the period of at least 15 business days stated in the notice, or within the longer period agreed in writing between the Integrity Commissioner and the lobbyist. **Note:** The circumstances in which the Integrity Commissioner may give such a notice to a registered lobbyist are described in sections 66D(1) and (2) of the Integrity Act.
Prohibited conduct		
Former representative must not carry out lobbying activity relating to official dealings of previous 2 years	62	Within 2 years after becoming a former representative, a person must not carry out lobbying activity for a third party client if the activity relates to official dealings in which the person engaged in their official capacity in the 2 years immediately before becoming a former representative.
Registered lobbyist must not perform substantial role in election campaign of political party	58	A registered lobbyist must not perform a substantial role in the election campaign of a political party.
Criminal offences		
Success fee prohibited	66P(2)	A lobbyist, or a related person of the lobbyist, must not receive or agree to receive a success fee in relation to a lobbying activity carried out by or for the lobbyist. **Note:** The maximum penalty is 200 penalty units. It is also an offence for a person to give or agree to give a lobbyist, or a related person of the lobbyist, a success fee in relation to a lobbying activity carried out by or for the lobbyist.

Note: The following are also offences for people who are not registered lobbyists.

- Unregistered lobbying (section 46): An unregistered person must not carry out lobbying activity for a third party client.
- Holding out as a registered lobbyist (section 66O): A person who is not a registered lobbyist must not: a) carry on or purport to carry on a business of providing services constituting or including a lobbying activity for another person; b) hold out that they are a registered lobbyist; or c) take or use a title, name or description that indicates or could be reasonably understood to indicate the person is a registered lobbyist.

Appendix 3:
Web addresses for key resources

Full web addresses for key resources referred to in this Code are provided below.

Essential lobbying resources

Integrity Act 2009 **(Qld)**

https://www.legislation.qld.gov.au/view/whole/html/inforce/current/act-2009-052

Integrity Commissioner directives

https://www.integrity.qld.gov.au/lobbying/lobbyists-obligations-and-queensland-registered-lobbyists-code-of-conduct

Queensland Lobbying Register

https://lobbyists.integrity.qld.gov.au/Lobbying-Register/

Other resources

Gifts and Benefits Directive for the Queensland public service

https://www.forgov.qld.gov.au/pay-benefits-and-policy/directives-policies-circulars-and-guidelines/gifts-and-benefits-directive-2209

Gifts and Benefits Guideline for the Queensland public service

https://www.forgov.qld.gov.au/pay-benefits-and-policy/directives-policies-circulars-and-guidelines/gifts-and-benefits-guideline

Information from the Office of the Queensland Integrity Commissioner about post separation obligations

https://www.integrity.qld.gov.au/publications/education-resources

Queensland Government Post separation employment provisions

https://www.forgov.qld.gov.au/pay-benefits-and-policy/directives-policies-circulars-and-guidelines/post-separation-employment-provisions

Queensland Ministerial Handbook

https://www.premiers.qld.gov.au/publications/categories/policies-and-codes/handbooks/ministerial-handbook.aspx

Queensland Parliament Code of Ethical Standards

https://documents.parliament.qld.gov.au/assembly/procedures/CodeOfEthicalStandards.pdf

Other legislation

Duties Act 2001 **(Qld)**

https://www.legislation.qld.gov.au/view/whole/html/inforce/current/act-2001-071

Electoral Act 1992 **(Qld)**

https://www.legislation.qld.gov.au/view/whole/html/inforce/current/act-1992-028

Local Government Electoral Act 2011 **(Qld)**

https://www.legislation.qld.gov.au/view/whole/html/inforce/current/act-2011-027

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