Queensland Integrity Commissioner

Annual Report 2012-13

The Integrity Commissioner is an independent officer of the Parliament who advises senior Queensland public officials on ethics or integrity issues

About this report

This annual report provides information about the Integrity Commissioner's financial and non-financial performance for 2012-13. It has been prepared in accordance with the *Financial Accountability Act 2009* and the *Financial and Performance Management Standard 2009*.

This report has been prepared for the Speaker and the Finance and Administration Committee for tabling in the Legislative Assembly.

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Copies of this publication can be obtained from www.integrity.qld.gov.au or by contacting 07 3003 2888.

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Integrity Commissioner Annual Report 2012-13

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The Honourable Fiona Simpson MP
Speaker of the Legislative Assembly
Parliament House
George Street
BRISBANE QLD 4000

Mr Steve Davies MP
Chair
Finance and Administration Committee
Parliament House
George Street
BRISBANE QLD 4000

Dear Madam Speaker

Dear Mr Davies

This is the Annual Report of the Integrity Commissioner for the 12 months ending 30 June 2013.

It is the fourth report under the provisions of s. 85 of the *Integrity Act 2009* and complies with the provisions of that section. It is, in accordance with that section, provided to the Speaker and the Parliamentary Committee for Finance and Administration. Previous Annual Reports were provided to the Premier as required by the provisions of the *Public Sector Ethics Act 1994*. Since 1 January 2010 when the Integrity Act came into force, the Integrity Commissioner has been an officer of the Parliament.

Yours sincerely

Dr David Solomon AM
Queensland Integrity Commissioner

19 September 2013

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Who is the Queensland Integrity Commissioner?

Dr David Solomon AM became Queensland's third Integrity Commissioner on 1 July 2009.

The position of Queensland Integrity Commissioner was established in 1999 by amendments to the *Public Sector Ethics Act 1994*. The Honourable Alan Demack AO, a former judge of the Supreme Court of Queensland, took office as the first Integrity Commissioner in August 2000, and retired on 30 June 2004.

He was succeeded by Mr Gary Crooke QC, who served a five year term until 30 June 2009. Mr Crooke had a distinguished legal career that included serving as Senior Counsel assisting the Fitzgerald Inquiry, 1987-89 and Chairman of the National Crime Authority, 1999-2002.

Dr David Solomon was appointed to a five year term as Integrity Commissioner on 25 June 2009, and took office on 1 July 2009.

Dr Solomon was Chair of the Independent Panel appointed by the Bligh Government to review Queensland's Freedom of Information laws in 2007-08.

He spent most of his working life in Canberra, writing about politics and the law, for such newspapers as *The Australian*, *The Australian Financial Review* and *The Canberra Times*. He moved to Brisbane in 1992 to chair the Electoral and Administrative Review Commission, and, when that Commission was wound up, began writing for the *Courier-Mail* as a Contributing Editor. He retired from full-time journalism at the end of 2005.

He has degrees from the Australian National University in Arts and Law (with honours), and a Doctorate of Letters. He has written almost a dozen books on parliament, politics, constitutional law and the High Court.

He received the Centenary Medal in 2001, and was appointed a Member of the Order of Australia in 2006.

The roles and functions of the Integrity Commissioner

The responsibilities and duties of the Queensland Integrity Commissioner are detailed in the *Integrity Act 2009*. They were originally contained in the *Public Sector Ethics Act 1994*.

The functions of the Integrity Commissioner are set out in section 7 of the *Integrity Act*. They are:

(a) to give written advice to a designated person on ethics or integrity issues;

(b) to meet with, and give written or oral advice to, members of the Legislative Assembly;

(c) to keep the lobbyists register and have responsibility for the registration of lobbyists;

(d) to raise public awareness of ethics or integrity issues by contributing to public discussion of these issues relevant to the integrity commissioner's functions.

The integrity function

The Integrity Commissioner's role in providing advice on ethics or integrity matters, including conflict of interest issues, is limited. Advice may only be given when it is sought by a "designated person". The Act specifies who are or may be the "designated persons" that the Integrity Commissioner may assist. Essentially they are Ministers, Members of Parliament (though Opposition MPs were only added by an amendment that came into effect in September 2009), statutory office holders, Chief Executives of government agencies, senior executive officers and senior officers, staffers of Ministers and Assistant Ministers and other people who may be nominated by a Minister or Assistant Minister.

There are more than 5,000 people who fit the description of a designated person. However senior executives, senior officers and senior officer equivalents, who together constitute the overwhelming majority of the designated persons, may only seek advice if they have the signed authority of their chief executive.

The term "conflict of interest" is defined in the Integrity Act.

> Conflict of interest issue, involving a person, is an issue about a conflict or possible conflict between a personal interest of the person and the person's official responsibilities.

The underlined words were added to the definition originally in the Public Sector Ethics Act to bring in the notion of a possible conflict, and to extend what were first described as "official duties" to "official responsibilities".

Requests for advice on ethics or integrity issues must be in writing. The Integrity Commissioner must base the advice provided on relevant approved codes of conduct or approved ethical standards and such other standards as the Integrity Commissioner considers appropriate. The advice must be in writing. The Integrity Commissioner may only decline to provide advice if the Integrity Commissioner reasonably believes that not enough information has been provided in relation to the issue or that giving the advice would not be in keeping with the purpose of the Act. Requests for advice, and the advice given, are confidential, and are not subject to disclosure under the *Right to Information Act 2009*. However a person who receives advice may disclose it.

The Premier may ask for the Integrity Commissioner's advice involving any person who is or has been a designated person, other than a non-government MP. The Premier may also ask for advice on standard setting for ethics or integrity issues.

Others in leadership positions – the Leader of the Opposition, Ministers, Assistant Ministers and Chief Executives – may ask for the Integrity Commissioner's advice on an ethics or integrity issue involving a designated person for whom they have responsibility, as set out in sections 17 –20 of the Act.

Members of the Legislative Assembly may request a meeting with the Integrity Commissioner to discuss ethics or integrity issues arising from their declaration of interests in the Parliamentary register of members' interests or the register of related persons' interests. The Integrity Commissioner may give such advice either orally or in writing.

The lobbyists function

Since 2010 the Integrity Commissioner has been responsible for administering the regulation of lobbying activities under the Integrity Act. This involves the maintenance of the Lobbyists Register and approval of a Code of Conduct for lobbyists. The regulatory system is based on the requirement, in s. 71 of the Act, that "government representatives" must not knowingly permit an entity that is not a registered lobbyist to carry out a lobbying activity for a third party client with the government representative.

"Government representative" is broadly defined. It includes the Premier, Ministers, Assistant Ministers and their respective staff members, Chief Executives and the staff of their departments, local government councillors and Chief Executives and staff of councils, the parliamentary staff, and the chief executives and staff of government owned corporations.

Since December 2012 the Act has also covered lobbying of the Leader and Deputy Leader of the Opposition and the Leader's staff.

"Lobbyist" is narrowly defined. While "lobbying" has a meaning that would be accepted in many jurisdictions – "contact with a government representative in an effort to influence State or local government decision making" (s. 42(1)) – an entity that lobbies is defined in a very restrictive way that excludes many of those who do in fact lobby government. According to section 41(1),

> A ***lobbyist*** is an entity that carries out a lobbying activity for a third party client or whose employees or contractors carry out a lobbying activity for a third party client.

A ***third party client*** is an entity that engages another entity to provide services constituting, or including, a lobbying activity for a fee or other reward that is agreed to before the other entity provides the service (s. 41(2)).

The section goes on to provide a series of exceptions. Those who are declared not to be lobbyists for the purposes of the Act include:

- non-profit entities
- entities constituted to represent the interests of their members
- entities lobbying on their own behalf
- entities that carry out lobbying that is "occasional only and incidental to the provision of professional or technical services".

The Integrity Commissioner maintains a register of lobbyists. To register, a lobbyist must provide:

(a) the lobbyist's name and business registration particulars;

(b) for each person (***listed person***) employed, contracted or otherwise engaged by the lobbyist to carry out a lobbying activity—

(i) the person's name and role; and

(ii) if the person is a former senior government representative, the date the person became a former senior government representative;

(c) the name of each current client of the lobbyist;

(d) the name of each client for which the lobbyist has carried out a lobbying activity within the 12 month period before the lobbyist most recently gave the integrity commissioner the particulars under this division or section 53;

These details are published in the register on the Integrity Commissioner's website.

Proposed "listed persons" (that is, lobbyists employed by lobbying entities) must provide a statutory declaration with details of any relevant criminal history, including any dishonesty offence with a conviction in the previous 10 years.

The requirement that "former senior government representatives" have to be identified on the register flows from the fact that the Act prohibits such people, for two years after they become "former" senior government representatives, from any lobbying activity relating to their official dealings as a government representative in the two years before becoming a former senior government representative.

"Former senior government representative" is defined in a very broad manner to include, for example, anyone who had worked in the office of a Minister or Assistant Minister, as well as Ministers and Assistant Ministers, and senior public servants, down to senior executive level or equivalent.

Lobbyists are also prohibited by the Act (in section 69) from receiving a success fee for their efforts in lobbying government. If a lobbyist offended this prohibition, they would be liable not only to be fined but also to surrender the fee to the government.

Lobbyists are required to comply with a Lobbyists Code of Conduct, approved by the Integrity Commissioner, that is published on the website. The Lobbyists Code of Conduct was introduced in March 2010 and was largely based on an administrative code that was in force in 2009. The range of ethical requirements lobbyists are now required to meet was increased in the new code.

Significantly the Lobbyists Code of Conduct includes two important prerequisites to any lobbying activity, designed to make it easier for government and local government representatives to appreciate the nature of the lobbying activity to which they are being asked to respond.

First, when making an initial contact lobbyists have to make clear that they are on the lobbyist register, and the person conducting the lobbying is listed, who they are representing, the nature of the issue they wish to raise and the reasons for the approach.

Second, if the listed lobbyist is a former government representative, they must indicate when they became a former government representative and that the matter they wish to lobby about is not banned by the Act as a "related lobbying activity".

The Lobbyists Code of Conduct was amended in 2013, with effect from 1 May 2013, to require registered lobbyists to report details of their lobbying contacts with government and Opposition representatives. The reports may be accessed by anyone on the Integrity Commissioner's website. The way in which the amendments were made is explained in detail below in the section headed "The 2012-13 year in review".

The public awareness function

The Integrity Commissioner is required:

> to raise public awareness of ethics or integrity issues by contributing to public discussion of these issues relevant to the integrity commissioner's functions.

In performing this function, however, the Integrity Commissioner must not disclose information likely to identify a specific request for advice that has been received or information that could result in the identification of any person who sought advice or about whom advice was sought.

The 2012-13 year in review

Changes to the *Integrity Act 2009* and the Lobbyists Code of Conduct

In November 2012 the Legislative Assembly approved an amendment to s. 68 of the *Integrity Act 2009*, renumbering the existing subsection (4) as (5) and inserting a new subsection (4) in these terms:

> The lobbyists code of conduct may impose obligations on lobbyists to give the integrity commissioner information about the lobbying activities carried out by them.

In introducing the legislation the Attorney-General said in relation to this matter:

> …(T)hese amendments will clarify that the Lobbyists Code of Conduct can include requirements for lobbyists to give information about their lobbying activities to the Integrity Commissioner. This is an additional requirement to the current Lobbyists Code of Conduct which sets out the standards of conduct that lobbyists must comply with. The amendments to the current code will be developed and approved by the Integrity Commissioner following consultation with the parliamentary committee. It is only fair and reasonable that lobbyists should be recording their contact with government or opposition representatives as part of their day-to-day business activities.
>
> … To ensure the most effective system of supervision, registered lobbyists, not ministers or opposition members, should be required to maintain records of their contacts with government and opposition. It is proposed to make recommendations to the Integrity Commissioner that such a system be implemented as soon as possible. The government's intention is to now put the full onus on registered lobbyists to record their contact with government and opposition representatives and to move away from the current internal ad hoc systems that were put in place by the former government. The provision of this information will be an extra source of information for the Integrity Commissioner to ensure that lobbying activity is being carried out with transparency and integrity in Queensland.
>
> The government will work with the Integrity Commissioner to implement the necessary administrative systems to ensure that the Integrity Commissioner is able to monitor compliance by lobbyists with these new requirements and to ensure that the registers are maintained by lobbyists at a consistent standard.

In early December I emailed all registered lobbyists to inform them of the changes to the Act and of my intention to implement a range of measures including amending the Code of Conduct to require lobbyists to provide details of their lobbying contacts with government and Opposition representatives, the way this would be implemented and my intention to make public the information provided by lobbyists. This was also notified on the Integrity Commissioner's website. I invited anyone interested to make submissions.

By the end of January I had received 10 submissions, two of which were required by their authors to be confidential, though they were able to be made available to the Finance and Administration Committee of the Parliament. Under the Integrity Act, the Integrity Commissioner can only approve or make change to the Code of Conduct after consultation with the committee – see s. 68(1). In early February I received another two submissions, and a supplementary submission.

I forwarded my first draft of the proposed amendments to the Code to the Committee early in February 2013, along with the dozen submissions received from lobbyists. The Committee considered the draft changes at a meeting with me on 13 February 2013, questioning me about the objections and other material provided by the lobbyists.

Are changes necessary/desirable?

The Parliament did not make it mandatory for the Integrity Commissioner to change the Code of Conduct to oblige lobbyists to give the Integrity Commissioner information about their activities. The Integrity Commissioner, as an officer of the Parliament, was not required to give effect to the policy enunciated by the Attorney-General in his second reading speech, though that speech explained the reasons why the Government wanted the changes to the Integrity Act. In my view, however, the policy the Attorney wished to have implemented was an appropriate one, given the purpose of the lobbyists provisions of the Integrity Act as set out in s. 4 (b), namely, "to encourage confidence in public institutions by regulating contact between lobbyists and State or local government representatives, and contact between lobbyists and key representatives for the Opposition, so that lobbying is conducted in accordance with public expectations of transparency and integrity". The reference to "transparency" alone was sufficient, in my view, to justify seeking relevant information from lobbyists about their lobbying activities with a view to making that information public.

What information is relevant?

The Government's policy of requiring lobbyists to disclose information about their activities was developed following a political row over the contents (and/or lack of them) of the "contact with lobbyists registers" of several Ministers who made the registers public by tabling them in Parliament. Ministers, their offices, Departments and most agencies had kept those registers (a) because it is a requirement of the Public Records Act that records should be kept of such matters and (b) because the Crime and Misconduct Commission (CMC) advised authorities that they should keep particular records relating to lobbyists and in a form recommended by the CMC.

In late 2012 there were claims that some Ministers had not kept proper records because not every phone call or message from a lobbyist had been recorded (though in my view it was not necessary for Ministers to record all contacts with lobbyists, only lobbying contacts – that is, it was unnecessary, for example, to record the fact that a lobbyist had contacted the office or a Minister to arrange, change or cancel a meeting at which lobbying was going to occur.)

The CMC wanted the following data recorded: name of registered lobbyist, including all lobbyists present; client of lobbyist; method of contact; purpose of contact; issue; outcome from contact. There were drop-down menus for method of contact and outcome, and issue was to be described in no more than 10 words.

In my letter to lobbyists I suggested a slightly longer list, though I excluded "outcome", as that is a matter that could be beyond the knowledge of the lobbyist – only the government representative might know how they are going to proceed after having been lobbied, and they may not decide that for some time. Strangely, quite a few of the lobbyists made submissions based on the belief that I had proposed that "outcome" be included.

After considering the submissions of lobbyists I reduced the list of matters they should be required to provide. The draft Code that I provided to the FAC specified just the following:

- name of registered lobbyist
- date of lobbying contact
- listed persons of the lobbyist entity that were present
- the client of the lobbyist
- the title and/or name of the government or Opposition representatives
- the purpose of contact.

The last would be selected from a drop-down menu that lists the items in s. 42(1)(a) of the Act, which defines lobbying activity as contact with a government representative in an effort to influence State or local government decision-making including: the making or amendment of legislation; the development or amendment of a government policy or program; the awarding of a government contract or grant; the allocation of funding; and the making of a decision about planning or giving a development approval under the *Sustainable Planning Act 2009*. To this I added two more choices: "commercial in confidence", and "other". There would be space for an explanation of "other".

There was one further item: lobbyists would have to indicate whether, in arranging the contact, the lobbyist complied with the requirements of 3.2 of the Lobbyists Code of Conduct and, if relevant, 3.3. These set out the obligations of lobbyists to inform the person they are contacting that they are on the register, who they represent, the purpose of contact and so on. This was included because I had been told that not all lobbyists do comply with this requirement of the Code, though to date, I have not received a formal complaint. I hoped that including this question would prompt proper compliance with the Code.

I believed the list as developed avoided any real privacy issues and required only information that could be sought and obtained under the Right to Information Act and the Information Privacy Act. This was the draft I provided to the Parliamentary Committee for its meeting on 13 February 2013.

Publication of the information

As mentioned earlier, the Integrity Act's purpose in regulating lobbying is so that lobbying is conducted in accordance with public expectations of transparency and integrity. Publishing the information provided by lobbyists will contribute to achieving that aim. There are several other reasons for making the information public.

First, some of it will be made public in any event, when (from 1 January 2013) the Premier and other Ministers began publishing extracts from their diaries, detailing their meetings with people outside government, including with lobbyists. The information will include meetings with people who lobby government but are not required to register under the Integrity Act, such as in-house lobbyists and lawyers and accountants (some of whom I believe are required to register, but do not do so).

Second, the events of late 2012 drew attention to the fact that Ministers, their offices, Departments and other public bodies such as local councils, keep records of meetings with lobbyists. The fact that some Ministerial contact registers were tabled in Parliament makes it likely that there will be very many more requests made under the Right to Information Act by the media, interest groups and others, for continuing disclosure of the details of those meetings by those who make such records. It is certain that the Integrity Commissioner would be required to disclose such information as will be collected under the Code, subject to the restrictions that might possibly emerge under the Right to Information Act. However, assuming that lobbyists choose to record matters that really are "commercial in confidence" under that heading, I believe that it is in the public interest that all the information they provide be made public.

Third, the primary object of the Right to Information Act "is to give a right of access to information in the government's possession or under the government's control unless, on balance, it is contrary to the public interest to give the access." The Act encourages those holding information to make it public without resort to the access arrangements detailed in the Act where that can be done. I consulted with the acting Information Commissioner and the acting Privacy Commissioner about the proposed changes to the Code and they had no objection to them.

Fourth, the explanatory notes to the amendments to the Integrity Act that permit these changes to the Code say that costs associated with compliance are expected to be minimal "and will be met from within existing budget allocations". This scheme will make that possible. That would not be the case if the Integrity Commissioner had to cope with innumerable RTI applications for the information provided by lobbyists.

The administrative scheme

In the past 12 months, a significant upgrade was made to the website of the Integrity Commissioner, allowing lobbyists, using unique passwords, to access the system to update their details on the lobbyists register. My office monitors these changes. For a relatively small additional expenditure, the system was further changed to allow lobbyists to enter onto a contact register the information that these proposed changes to the Code would require of them.

How often?

Beginning in 2013, Ministers' diaries are to be made public every month. I considered that lobbyists should also be required to file details of their contacts with government and Opposition representatives once a month. (This is the period set for Canadian lobbyists to make similar – though much more detailed – disclosures.)

Some lobbyists suggested the period should be extended and that it would be sufficient, and less demanding of their resources, if they filed every three months. In fact, given the way in which they will enter data on the Integrity Commissioner's website, the work-load of lobbyists will be the same, whatever the interval that is chosen. The amount of data is the same, and would be even if lobbyists had to report their contacts on a daily basis.

Lobbying contact

"Lobbying activity" is defined in s. 42 of the Act, and that definition is repeated in the definitions section of the Code. In addition I included a definition of "lobbying contact", expressed in negative terms. "Lobbying contact," it says, "does not include contact solely for the purpose of arranging, changing or cancelling a meeting, or meetings where no lobbying occurred."

Defects?

Virtually all the lobbyists expressed their concern that the Code will only impact on registered lobbyists. They point out (as I have on many occasions) that perhaps 80 per cent of all lobbying is done by people who are not required by the Integrity Act to register as lobbyists. That, however, is a policy issue for government that would require changes to the Integrity Act. The Parliamentary Committee agreed that changes were necessary and made a number of recommendations that would have this effect.

Commencement

I proposed that the new Code would come into effect on 1 April 2013. The Parliamentary Committee met in private session on 6 March to consider the proposed changes. The Committee wrote to me on 7 March 2013 listing its recommendations. I replied on 14 March 2013 in a letter mainly responding to the Committee's suggestion that the published version of the report by lobbyists on their lobbying contacts with government representatives should not include the name of the client (see below). The Committee published its response in its report No 26 to the Parliament, on 27 March 2013, "Oversight of the Queensland Integrity Commissioner 2012 and Review of the Lobbyists Code of Conduct". I decided that to properly consider that response, and to give lobbyists appropriate notice of the details of the new system, I should delay its implementation. I determined that the new Code would come into effect on 1 May 2013, and informed lobbyists accordingly. Early in April, I made the details of the Code available to lobbyists and published the amended Code on the website on 11 April 2013.

The amended requirements of the Code

As noted above, the Parliamentary Committee proposed several amendments to the proposed Code. These were to delete the requirement for lobbyists to notify (a) the listed persons of the lobbyist entity that were present and (b) the client of the lobbyist. After consideration I agreed with (a), but not (b). The Committee's objection to (b) was not to me obtaining the information, but to it being published on the website. I replied to the Committee arguing that it was desirable both the I obtain the information about the client, and that it should be publicly available. In that letter I said:

First. Unfortunately the Committee appears not to have taken fully into account how the RTI system now operates. The Committee argued that the RTI process should be used "in order to ensure that the release of this information is both in the public interest and records are kept of those who have accessed the information (emphasis added). The Committee appears to accept that disclosure of the name of the client would occur under RTI, it being in the public interest. However while the name of the person who used RTI to access the name of the client would be made public under recent changes to the RTI Act, the identity of the client would also be posted on the Integrity Commissioner's website in its disclosure log, at the same time the information was provided to the RTI applicant. The disclosure log can be accessed by anyone. It would be impossible to discover who, other than the original requester, had accessed the information. It is published to the world.

Second. I accept and agree with the Committee's view that disclosing the identity of the lobbyist's client is in the public interest. That being so there are two reasons, endorsed by the Parliament in legislation, why that information should be made public without recourse to the procedures in the RTI Act. The first is in the purpose clause of the Integrity Act which says "the Act is to encourage confidence in the public institutions by … regulating contact between lobbyists and … government representatives ... so that lobbying is conducted in accordance with public expectations of transparency and integrity" (emphasis added). The second is contained in the RTI Act. Its primary purpose "is to give a right of access to information in the Government's possession or under the Government's control unless, on balance, it is contrary to the public interest to give the access". The Act encourages those holding government information to make it public without resort to the access arrangements detailed in the Act.

Third. The philosophy of the RTI Act was explained by the Attorney-General and Minister for Justice in answer to a question from you, Mr Crandon, on 7 March 2013, about Ministerial diaries. The Attorney said in part:

> "We believe as a government in the push model. We want to push information out of government and not have people in Queensland trying to extract it from government and not have people in Queensland not get the information they desire. So we believe in the push model."
> (On a personal note, this answer resonates with me as a co-author of the report on which the new RTI Act was based.)

Fourth. The Ministerial diaries, mentioned above, reveal details of contacts between Ministers and organisations lobbying them directly, without the use of registered lobbyists as intermediaries. For example, the diary of the Premier for January 2013 shows that he had meetings with, among others, representatives of Mount Isa Mines, BHP, Rio Tinto, Xstrata Coal, Anglo American Coal and Virgin Australia. It would be extraordinary if the names of clients could be concealed from general view through the device of hiring a lobbyist.

Fifth. The Committee's proposal would discriminate between those registered lobbyists with many clients and those with few. While the average number of clients for each registered lobbyist on the Queensland Register is about 14, there are 33 (out of 163 registered lobbyists, i.e. about 20 per cent) who list only one client. This means if one of those 33 lobbyists records a lobbying meeting the identity of the client is immediately

apparent. Another 12 lobbyists have only two clients. It may be easy to establish, from the identity of the government representative they have met, the name of the client they were representing. The Committee's proposal would therefore be very damaging, potentially, to the smallest (in terms of numbers of clients) lobbyists.

Sixth. The Committee's proposal would generate unnecessary red-tape and expense, both for those seeking information and for my office. While the Committee has suggested I might negotiate with the Attorney-General about additional resources (actually the Minister responsible for the Integrity Commissioner's budget is the Premier) I would find it difficult to argue for what would probably be a doubling of my staff (currently three) plus additional accommodation and on-costs to meet a need that can be satisfied simply by following the Government's preferred "push model" of dealing with the release of this information.

Seventh. On the subject of red-tape and expense I draw attention to the statement in the explanatory notes accompanying last November's amendments to the Integrity Act that the costs associated with compliance were expected to be minimal "and will be met from within existing budget allocations". To achieve this end I had some changes made to the Integrity Commissioner's website to allow lobbyists to enter directly on that website the details required by the changes in the new s. 4 of the Lobbyists Code of Conduct of their lobbying activities. Staff in my office would oversee this and take regular "snapshots" from the website of the activities of lobbyists, but there would be a relatively small demand on their time.

However if the Committee's proposal were to be adopted this would require (a) that lobbyists, as well as filling out the proforma on the website, would also have to send a written (or emailed) version of their monthly returns that included the additional requirement to name the client they represented at each of their meetings with government representatives, and (b) that my staff would have to process this material and get it ready for the inevitable RTI requests, which, as noted above, could result in a doubling of the size of my staff, if they were to be handled appropriately and in a timely manner as required by the RTI Act.

Finally I am aware of (and sympathetic with) the concerns of the Committee about the apparent unfairness of the fact that these measures will impact only on registered lobbyists who constitute "only a small proportion of those who lobby government". As noted above, the publication of Ministerial diaries will mean that the names of large companies and organisations that lobby Ministers directly will now be made public. It would be highly desirable, and a major contribution to "public expectations of transparency and integrity" (to quote the Integrity Act again) if government departments also published on their websites records of lobbying contact with such companies and organisations.

As the Committee is aware I have made a number of submissions to government urging that the scope of the lobbying provisions of the Act be extended, in part to overcome the "unfairness" issue that concerns the Committee. For the moment, however, I am required by the Act to develop and put into effect proposals that advance the objects of the Act and I consider that my proposed amendments to the Lobbyists Code of Conduct will do this.

The Committee responded to this reasoning in its report to Parliament by advancing a quite new proposal: that the name of the client could be published only if the purpose of the meeting was not disclosed. It said:

> The Committee considered the Integrity Commissioner's response and respectfully disagrees with some aspects of his response. The Committee considers that the publication of client information will impact on registered lobbyists and their clients and may lead to clients seeking to influence government in other ways. The Committee was also concerned that additional pressures may be placed on clients as a result of the publication of this material. The Committee noted that the Integrity Commissioner acknowledged that it is possible that other lobbyist firms may go through the list and put a proposal to a firm that they could do a better job. He advised the Committee that he has been told that a bit of poaching goes on as a result of the clients being listed. The purpose of the lobbyists' code of conduct is to ensure that any lobbying is done in an open and transparent manner. If those 'lobbying' are not required to abide by the code of conduct then this purpose is negated.
>
> The Committee acknowledges the Integrity Commissioner's argument that the publication of minister's diaries may lead to this disclosure anyway. The Committee offers the suggestion that the material published by the Integrity Commissioner, for registered lobbyists only, should not require disclosures beyond that required of other types of lobbyists. It suggests that if the client's name is to be published, then the information should mirror that required in Ministerial diaries and not include the purpose for the contact.
>
> Having given further consideration to the matter, the Committee is of the view that the purpose of the meetings should remain confidential if the client name is to be published.

However, this proposal was based on a misconception. Ministerial diaries may reveal both the name of the client, or the principal if there is no lobbyist, and the purpose of the meeting, the latter being a requirement of the new system. Having considered the Committee's contentions, I decided that it was desirable that both the client's name and the purpose of the meeting should be disclosed on the website, not least because both would be accessible under RTI, and because publication would contribute to ensuring that, to again quote the purpose clause in the Integrity Act, "lobbying is conducted in accordance with public expectations of transparency and integrity".

The amended Code came into effect on 1 May 2013.

It requires lobbyists to provide the following information about their contacts with government representatives:

(a) the name of the registered lobbyist

(b) whether in arranging the contact, the lobbyist complied with the requirements of 3.2 of the Lobbyists Code of Conduct and, if relevant, 3.3

(c) the date of the lobbying contact

(d) the client of the lobbyist

(e) the title and/or name of the government or Opposition representatives present

(f) the purpose of contact [from a drop-down menu]: making or amendment of legislation; development or amendment of a government policy or program, awarding of government contract or grant; allocation of funding; making a decision about planning or giving of a development approval under the *Sustainable Planning Act 2009*, commercial-in-confidence; other.

My office will be analysing the material provided and comparing it with ministerial diary extracts and agency records of contact with lobbyists.

I conclude this section by mentioning recent developments in Britain concerning lobbying, including a quotation from the conclusion of the House of Commons Public Administration Select Committee's 2009 report on "Lobbying: Access and influence in Whitehall" (at p. 60, emphasis added):

> The key, in this area as in others, is transparency. **There is a public interest in knowing who is lobbying whom about what**.

In June 2013, following the latest spate of allegations about Members of the House of Lords and the Commons selling their services as lobbyists, the British Government announced it planned to introduce in July, legislation to create a statutory register of lobbyists and have it put into law by the end of the parliamentary session in May next year. Unlike the Queensland law, it will contain penalties for lobbyists who do not register, and thus be enforceable.

Other legislative changes

The amendments to the Integrity Act in 2012 made two other significant changes affecting the lobbying provisions of the Act. First, the amendments extended the operation of the Act to provide that the Leader and Deputy Leader of the Opposition, and the Leader's staff, were bound by the same standards in relation to lobbying as the government and provide that "lobbying activity" applied to efforts to influence Opposition decision-making. Second, a new definition of "third party client" of a lobbyist was inserted. This somewhat narrows the former definition and makes it clear that, in order to conduct a lobbying activity, a lobbyist must be delivering lobbying services for a client for a fee or other reward that is agreed before the services are provided. As a result of this change, one lobbyist informed me he no longer needed to remain on the register, and subsequently withdrew from it.

Reviewing the Integrity Act

The Parliamentary Committee's report mentioned above also made recommendations for possible changes to the Integrity Act, particularly in relation to lobbyists. In previous annual reports I have noted that I have made a number of submissions to the Department of the Premier and Cabinet recommending that the registration of lobbyists should be extended to cover many of the other people who lobby (in the normal meaning of the word, not the definition in the Act) government. Based on a comparison with the registration scheme in Canada, I have estimated that the current Queensland scheme only covers about 20 per cent of the people who actually lobby government.

The Parliamentary Committee agreed that the definition of lobbyists should be extended to cover many of those other lobbyists. It recommended:

> **Recommendation 2**
>
> The Committee recommends that the *Integrity Act 2009* be amended to include paid in-house lobbyists of both corporations and associations.
>
> **Recommendation 3**
>
> The Committee recommends that a review of the *Integrity Act 2009* be completed and include examination of the following topics:
>
> - sanctions for section 71 and code of conduct breaches
> - investigative powers for the Integrity Commissioner
> - definition of lobbyist
> - definition of lobbying activity
> - post-separation and employment restrictions
> - definition of designated persons
> - sanctions for non-provision of information under the Public Records Act.

The Parliament took note of the Committee's report.

Registration of lobbyists

The Integrity Commissioner became responsible for the Lobbyists Register on 1 January 2010, when the Integrity Act came into force. At that point, there were 65 registered lobbyists, with 188 listed persons having 695 clients. As at 30 June 2013, the Register contained the names of 139 registered lobbyists, 379 listed persons and 2,835 clients.

This table shows the way the registration figures have changed.

Date	Registered Entities	Registered Lobbyists	Clients (Current and previous combined)
01/01/2010	65	188	695
30/06/2010	97	225	1,332
30/06/2011	134	350	2,815
30/06/2012	154	374	2,700
30/06/2013	159	379	2,835

Discipline (Division 4)

During the period under review a government representative complained about the behaviour of a lobbyist in relation to his agency and related matters. I decided that the matter, if proved, would not warrant removal from the Lobbyists Register, or suspension However I decided to issue a show cause notice (s. 63) as to whether a warning should be issued. Following a submission by the lobbyist's solicitor responding in detail to the complaints that had been made, I decided to take no further action.

At the Premier's request (s. 16 of the Act)

I draw attention to s. 16 of the Integrity Act. It provides that the Premier may ask for the Integrity Commissioner's advice (a) on an ethics or integrity issue concerning any designated person other than a non-government MP and (b) on standard setting for ethics or integrity issues. The secrecy provisions of the Act would normally prevent me from mentioning that the Premier has sought advice under this section. However on at least two occasions in the past year, the Premier has made public the fact that he has done so. These illustrate some of the uses to which the section may be put.

Relying on the first part of the section, the Ministerial Code of Conduct now contains a requirement for an annual audit by the Integrity Commissioner of the compliance by Ministers and Assistant Ministers with the Ministerial Code. The Code provides:

> In accordance with Section 16 of the *Integrity Act 2009*, the Integrity Commissioner will undertake random checks of Minister/Assistant Minister compliance with this Code.
>
> The Integrity Commissioner will meet with each Minister and Assistant Minister once a year, at a time determined by the Integrity Commissioner, to discuss their compliance. Ministers and Assistant Ministers are expected to provide the Integrity Commissioner with such relevant materials as are requested, and answer any relevant questions in order for the Integrity Commissioner to carry out the random checks.

> The Integrity Commissioner will advise the Premier of any unresolved issues concerning Ministers or Assistant Ministers' interests.

As to the second part of the section, the Premier sought my advice on rewriting the Ministerial Code of Ethics (as it was then called) following the election in March 2012. The new Ministerial Code of Conduct came into force in October 2012, and was largely based on the advice provided.

The Ministerial Code contains important statements about Ministerial responsibility, under the heading "accountability". The material concerning individual ministerial responsibility is new. It says:

> Ministers are also responsible individually to Parliament. Ministers have a duty to Parliament to account, and be held to account, for the policies, decisions and actions of themselves and their departments and agencies. Ministers must give accurate and truthful information to Parliament, and correct any inadvertent error at the earliest opportunity. Ministers must not knowingly mislead Parliament.

Requests from designated persons

The number of requests for advice from designated persons continues at a very high level. A record number of 68 such requests were received in 2012-13, one more than in the previous year, which had itself been a record. In my four years as Integrity Commissioner the number of requests in each year has been 57, 40, 67 and now 68. The number of requests received by my two predecessors over the previous 10 years averaged about 28. A detailed breakdown is provided in a later section of this report.

Most requests for advice were answered in about 24 hours. Some took longer because I needed further information from the person making the request, or because a designated person needed to obtain permission from their chief executive to make the request.

These comments on my performance of this function are necessarily expressed in a generalised and unspecific manner. This is dictated by the requirement in the *Integrity Act* that the annual report "must not disclose information likely to identify a specific request for the Integrity Commissioner's advice on an ethics or integrity issue, including information likely to identify" anyone requesting advice or about who advice was requested – s. 85 (3).

Additionally I received 23 requests for advice about lobbying issues. These requests are not necessarily "advice on ethics or integrity issues" of the kind specified in chapter 3 of the Integrity Act, though a few were. Some requests were not from designated persons, but from people concerned with lobbying. As noted later, the Integrity Commissioner is also asked to provide advice about other matters, such as proposed amendments to legislation. Again, this is mostly not "advice" of the kind specified in the Act, but an opinion.

Meetings with MPs

Part 3 of the Integrity Act provides that Members of the Legislative assembly may request a meeting with the Integrity Commissioner relating to their declarations of interest, and particularly as to whether any conflicts of interest might arise. Although the Act provides that advice may be given orally in these meetings, it has been my practice to inform MPs that I would only provide them with formal advice in writing (see the section below, "Providing advice"). In fact it is rare for MPs to seek formal advice about matters arising from their declarations of interest. These meetings normally only last five to ten minutes.

The Premier, Campbell Newman, followed the precedent set by his predecessor, Anna Bligh, in telling MPs who are members of his government, that they should all make an appointment to see the Integrity Commissioner to discuss their declarations of interest. Since the March 2012 election I have had such meetings with 64 government MPs. There were 13 LNP MPs who did not respond to the Premier's direction or to the two reminders I sent to them. In one case a Minister indicated he did not wish to have such a meeting.

This financial year I also had meetings with four Opposition MPs.

Requests and meetings concerning lobbying

I received and responded to 23 requests for advice about lobbying. Some of these requests were from designated persons, and some of these requests actually raised integrity issues.
As noted earlier, I consulted with the Parliamentary Committee about changes to the Lobbyists Code of Conduct. I also had meetings with some individual lobbyists and with representatives of two of the organisations that represent lobbyists, the Government Relations Professionals Association (GRPA) and the Public Relations Institute of Australia (PRIA) about the development and implementation of the Code. The GRPA arranged a workshop in late May that was attended by 17 of its members and other lobbyists to discuss the reporting requirements under the Code. Deborah Clark-Dickson, Principal Policy Officer (Lobbying), Craig Hunter (Research Support Officer (Lobbying) and I all attended to answer questions raised by the lobbyists.

Other presentations and meetings

I had meetings with a variety of organisations in relation to both integrity and lobbying matters. Following the passage of legislation establishing Hospital and Health Boards throughout Queensland, I provided a briefing at a meeting of the newly appointed Chairs of those Boards, mainly on lobbying and conflict of interest issues. By invitation I later met with the West Moreton Hospital and Health Service Board to discuss various integrity and lobbying issues.

At the invitation of the President of the International Ombudsman Institute, the New Zealand Chief Ombudsman, Dame Beverley Wakem, I prepared and presented a paper to the IOI's 10th world conference, in New Zealand in November 2012, on Queensland's integrity network. The Institute paid my fares and accommodation.

This year I had no meetings with local government in relation to lobbying.

In July 2012, while on holidays, I had separate meetings in London with Sir Alex Allan, the UK Prime Minister's independent advisor on ministerial standards, and Sir Christopher Kelly, who was then the Chairman of the Committee on Standards in Public Life, known as the Nolan Committee after its first Chair. These meetings explored matters of common interest, there being matters falling within their responsibilities in Britain, that were relevant to my role. The meetings were arranged for me by the Queensland Agent-General, Mr Ken Smith.

Advice/responses to the Premier and others

I have been consulted by the Premier and several Ministers and Departments in relation to a number of integrity issues. I was also consulted by the Parliamentary State Development, Infrastructure and Industry Committee concerning legislation it was reviewing to establish the Gasfields Commission, and I later provided advice to that Commission. I was also consulted by the Leader of the Opposition about changes that had been made by the Premier to the Opposition Handbook requiring the Leader and Deputy Leader of the Opposition to table in the Parliament extracts from their diaries.

Other matters

I was informed confidentially by an agency in February 2013 that it had made a submission to the review into the Crime and Misconduct Act then being conducted by former High Court judge Ian Callinan QC and Professor Nicholas Aroney, in which submission it recommended that my function of providing advice on ethics or integrity matters should be transferred to the Crime and Misconduct Commission. I wrote to the inquiry and briefly explained why I thought this change to (in effect, abolition of) my core function as Integrity Commissioner should not occur. The inquiry's report included in its summary of conclusions and recommendations (at p. 206) the following two sentences.

> We have made no recommendations to make about the roles of the Integrity Commissioner and, subject to one matter, the Parliamentary Commissioner. We think that what they do is <u>useful</u> and <u>should continue to be done</u>. (emphasis added)

The Integrity Act

(a) Providing advice

Section 15 of the Act requires that all requests for advice by designated persons must be in writing, and s. 21 stipulates that the Integrity Commissioner must provide such advice in writing. Section 23 provides an exception to this system. It provides that when a Member of the Legislative Assembly has a meeting with the Integrity Commissioner to discuss ethics or integrity issues arising from the declaration of interests they have made to the Parliament on behalf of themselves or a related person, they may seek advice orally or in writing and that advice may be given orally or in writing. It has been my invariable practice, however, that when

a Member of the Legislative Assembly does request such advice, I ask that it be put in writing, and I provide my advice in writing. This is to ensure there can be no doubt about the facts upon which the advice is provided, or the nature of the advice that is given. Very few interviews with Members of the Legislative Assembly have resulted in the need for a request for advice being put in writing.

I occasionally have discussions, directly or over the telephone, with non-parliamentary designated persons about matters they wish to raise that may or may not involve an ethics or integrity matter. If it appears to me that an issue does arise, I always tell them that I can only give them advice in writing in response to a request for such advice in writing. I am not permitted by the Act to give them oral advice, and nothing that I may say to them can be taken to be formal advice. Nevertheless there have been several occasions when a designated person has not followed up our discussions with a formal written request, and has suggested to others that they have had formal advice from the Integrity Commissioner. I must stress, however, that the only formal advice I provide to designated persons under part 3 of the Act is advice that is in writing, in response to a request that is in writing.

(b) Requests and meetings concerning lobbying

As indicated above, I received and responded to 14 written requests for advice about various aspects of the lobbying provisions of the *Integrity Act*, mainly from local government councils.

I gave evidence to a Senate Committee on possible changes to the Commonwealth's lobbyists register and code of conduct. I had made a submission along the lines of the submissions I had earlier made to the Department of the Premier and Cabinet in its review of the Integrity Act. The Commonwealth's lobbying scheme is a an administrative scheme, not based on a statute, but otherwise similar to that in force in Queensland. The Senate Committee recommended no changes to the Commonwealth scheme.

(c) The Integrity Commissioner's work-load

For the whole of the 2012-13 year I have been employed on the basis that I would carry a workload that was 80 per cent of full-time. That is a reasonably accurate reflection of what has occurred. In the early part of the year integrity issues occupied the vast majority of my time. Then, between October and April, lobbying issues were predominant. For the last two or three months there was a reasonably even split between the two. It was during this last period that I interviewed Ministers and Assistant Ministers in relation to Code of Conduct compliance.

(d) Relations with Parliamentary Committee

I have had two meetings with the Parliament's Finance and Administration Committee, which has oversight jurisdiction of the Integrity Commissioner. The Hansard record of these meetings has been tabled in the Parliament along with the Report mentioned earlier.

(e) Declarations of interest by statutory office holders and chief executives

Section 85(2) of the Integrity Act requires the Integrity Commissioner to provide details of compliance by statutory office holders and chief executives of departments with the respective requirements of s. 72C of the Act and s. 101 of the *Public Service Act 2008* to give the Integrity Commissioner statements and written advice. These sections deal with declarations of interest by statutory office holders and chief executives to a Minister and to the Integrity Commissioner. I can report that, as at 30 June 2013, all statutory office holders and chief executives had complied with the requirements of the Act.

(f) The Integrity Commissioner's declarations

In accordance with s. 80 of the Act I have provided the Speaker with my own declaration of interests and with a declaration covering a related person (my wife) along with several amendments.

(g) The Integrity Committee

Since 2001, an informal meeting has been convened three or four times a year of what is known as the Integrity Committee. Those invited to attend are the Chair of the Crime and Misconduct Commission, the Auditor-General, the Ombudsman and the Integrity Commissioner. Since 2005 the Information Commissioner has also attended. Following changes to the governance and responsibilities of the Public Service Commission its chief executive ceased to attend meetings in 2013. The group discusses a wide range of ethical and integrity issues, and shares information about their activities. There were three meetings of the group in 2012-2013.

(h) Office location

The office of the Integrity Commissioner is on the 13th floor of 53 Albert Street, Brisbane. The Public Service Commission is on the same floor and provides accounting and some technical services to my office. Computer services are provided by the Department of the Premier and Cabinet.

Summary of requests

Premier and other Ministers	18
Assistant Ministers	7
Other MPs	12
Directors-General	8
Other designated persons	23
DESIGNATED PERSONS	68
Lobbying – formal advice	23
FORMAL ADVICE 2012-13	**91**

Issues considered

The preceding table lists the source of the requests for advice received in the 2012-2013 year. The Integrity Act states that my report must not disclose information likely to identify a specific request for my advice on an ethics or integrity issue, including information likely to identify an individual who requested advice, or about whom advice was sought. The statistics this year once again combine any requests that the Premier may have made with requests from other Ministers.

Notwithstanding the secrecy provisions in the Act concerning the requesting of advice and the advice itself it is possible to indicate the general nature of the issues that have been raised by most requests during the year.

Most requests for advice concerned conflicts of interest of various kind, some of which are detailed below. There were also a significant number of requests for advice about restrictions that apply when people cease to hold their current positions and move to other, private, employment.

The conflicts issues included:

- conflicts of interest about post separation employment
- conflicts of interest arising from the interests of relatives
- conflicts of interest arising from share holdings
- conflicts of interest of staff
- conflicts of interest arising from MP's constituency interests.

Contribution to public awareness and understanding of ethics or integrity issues

One of the functions of the Integrity Commissioner is "to raise public awareness of ethics or integrity issues by contributing to public discussion of these issues relevant to the Integrity Commissioner's functions" – s. 7(1)(d) of the Integrity Act. As my immediate predecessor, Gary Crooke QC, noted in his final annual report, this is not a mandate to comment at large on any matter of public interest. What the Integrity Commissioner is required to do is discuss "issues relevant to the Integrity Commissioner's functions". That said, the mandate is reasonably broad. Ethics or integrity issues are involved in a wide range of matters concerning government structures, practices and policies. As noted earlier, I made a submission to a Senate Committee about the regulation of lobbying.

There are a number of ways in which the Integrity Commissioner may contribute to the relevant public discussion. Perhaps the most basic is by making information available to anyone who is interested through the website, www.integrity.qld.gov.au. This site was opened on 6 April 2001. It was updated in the first half of 2011 and given a fresh look. Much of the material that was on the site was rewritten, to reflect changes that were brought about in part by the enactment of the

Integrity Act. It also acquired a complete new section, dealing with lobbyists. The Lobbyists Register in now published on the site and is searchable for registered entities, employed lobbyists and organisations that employ lobbyists to lobby for them. An upgrade for this part of the website has been made, allowing lobbyists to alter their own entries on the register.

The website includes papers and presentations by Integrity Commissioners past and present, and the most recent annual reports of the Integrity Commissioner. In the past year there have been more than 8,100 visits to the website, and almost 24,000 page views, some 18,000 fewer than in the previous year.

Date range	No. Visits to website (year)	No. visits to website (monthly average)	No. page views (year)	No. page views (monthly average)
01/07/2012 – 30/06/2013	8,109	675.75	23,983	1,998.53

As indicated earlier, I have given a large number of papers at conferences, in Queensland and interstate.

Staffing for the Integrity Commissioner

Throughout the 2012-2013 financial year, I have been employed on a part-time basis, the equivalent of four days a week, though I am generally in the office (or travelling on official business) on most working days.

The Integrity Commissioner has the support of a full-time Executive Coordinator. The position has been filled for the past nine years by Mrs Mattea Slinger. I am grateful for her extremely capable support.

In January 2010, two additional positions were created within the office to maintain the Lobbyists Register and other matters concerning lobbying. Deborah Clark-Dickson is the Principal Policy Officer (Lobbying). Craig Hunter is the Research Support Officer (Lobbying) and was responsible for developing the new inter-active website that enables lobbyists to directly change their details on the register and for the new part of the site where lobbyists report the lobbying activities. The competence and dedication of Deborah and Craig has ensured that the Lobbyists Register is kept accurate and up-to-date. Most requests for registration are dealt with within two days.

Compliance disclosures

The Code of Conduct for the Queensland Public Service, approved by the Premier for adoption, if appropriate, by public service agencies, is the Code to which the Integrity Commissioner and staff adhere.

A copy of the Records Retention and Disposal Schedule (QDAN 629 v.2) developed for the Queensland Integrity Commissioner and approved by the Queensland State Archivist on 29 November 2010 is available on the Queensland State Archives website, www.archives.qld.gov.au.

No consultants were used.

As noted earlier, I attended a conference in New Zealand as a guest of the 10th World Conference of the International Ombudsman Institute.

No public interest disclosures under the *Whistleblowers Protection Act 1994* or the *Public Interest Disclosure Act 2010* were received by the office.

Right to Information

One request was received concerning a lobbying matter. The decision was appealed by the requestor to the Information Commissioner.

No information may be provided about the Integrity Commissioner's activities under chapter 3 of the Act – see schedule 1 – "Documents to which this Act does not apply" - of the *Right to Information Act 2009*. Section 6 of that schedule says –

> **6 Documents received or created by integrity commissioner for *Integrity Act 2009*, ch 3**
>
> A document created, or received, by the Queensland Integrity Commissioner for the *Integrity Act 2009*, chapter 3.

This Annual Report, the Privacy Plan and Statement of Affairs of the Integrity Commissioner are available on the website, www.integrity.qld.gov.au.

Financial statement

Office of the Integrity Commissioner
Revenue and Expenditure
for the year ended 30 June 2013

	2012/13	2011/12
Revenue from ordinary activities		
Output revenue	726,473	678,273
Total revenue from ordinary activities	**726,473**	**678,273**
Expenses from ordinary activities		
Employee Expenses		
Salaries and wages and related costs	402,028	389,820
Salary-related taxes	24,748	23,923
Superannuation	49,187	46,437
Other employee expenses	2,616	1,686
Total employee expenses	**478,578**	**461,866**
Supplies and services		
Building Services	66,732	62,384
Consumables	1,464	1,217
Corporate Technical Services SSP	88,920	88,920
Consultancy and Contractors	46,403	-
Depreciation	973	973
External computer charge	11,263	834
Marketing and public relations	132	1,509
Minor plant and equipment	364	433
Other Administrative Expenses	78	458
Other Supplies and Services *	1,839	16,014
Parking	9,049	9,091
Professional Services	-	4,356
Telecommunications costs	4,598	5,012
Travel costs	16,080	25,207
Total supplies and services	**247,894**	**216,407**
Total expenses from ordinary activities	**726,473**	**678,273**
Net Operating Result	-	-

The Office of the Integrity Commissioner is an independent entity created by Statute.

For reasons of economy and efficiency, funding and administrative support is received through the Public Service Commission. Corporate services and asset replacement have been provided through the Public Service Commission.