

# Annual Report 2023–24

---

Encouraging confidence in  
public institutions and public office



# Acknowledgement of Traditional Owners and Elders

The Integrity Commissioner, Deputy Integrity Commissioner and staff wish to acknowledge Aboriginal and Torres Strait Islander peoples as the Traditional Owners and Custodians of the Country on which we live and work and pay our respects to their 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.

ISSN: 1837-2201

© The State of Queensland (Office of the Queensland Integrity Commissioner) 2024

This annual report can be accessed at:  
<https://www.integrity.qld.gov.au/publications/annual-reports.aspx>

## Contact

Address: Level 13, 53 Albert Street

Postal: PO Box 15290  
City East  
Brisbane Qld 4002

Telephone: +61 7 3003 2888

Email: [office@integrity.qld.gov.au](mailto:office@integrity.qld.gov.au)

Website: [www.integrity.qld.gov.au](http://www.integrity.qld.gov.au)

## Interpreter service statement



The Queensland Government is committed to providing accessible services to Queenslanders from all culturally and linguistically diverse backgrounds.

If you have difficulty understanding this annual report, you can contact us on (07) 3003 2888 and we will arrange an interpreter to effectively communicate the report to you.

## Licence

This annual report is licensed by the State of Queensland (Office of the Queensland Integrity Commissioner) under a Creative Commons Attribution (CC BY) 4.0 International licence.

## CC BY Licence Summary Statement



You can copy, communicate and adapt this annual report if you attribute this work.

Content from this annual report should be attributed as: Office of the Queensland Integrity Commissioner, Annual Report 2023-24.

To view a copy of this licence, visit:  
[creativecommons.org/licenses/by/4.0/](https://creativecommons.org/licenses/by/4.0/)

## Feedback

The Office of the Queensland Integrity Commissioner is committed to continuous improvement and open and accountable governance. Readers are invited to provide feedback on this report at <https://www.getinvolved.qld.gov.au/gi/>

23 October 2024

The Honourable Curtis Pitt MP  
Speaker of the Legislative Assembly  
Parliament House  
George Street  
BRISBANE Qld 4000

Dear Mr Speaker

I am pleased to submit for presentation to the Parliament, the Annual Report 2023–24 and Financial Statement for the Office of the Queensland Integrity Commissioner.

This is the 15th report provided pursuant to section 85K of the *Integrity Act 2009* (Qld), and it complies with the provisions of that section.

In accordance with s 50 and 59A of the *Parliament of Queensland Act 2001* (Qld) and Standing Order 31, I request that this document be tabled during the period that the Legislative Assembly is dissolved.

Yours sincerely



Linda Waugh  
Queensland Integrity Commissioner

## About this Report

This annual report has been prepared for the Speaker and the Cost of Living and Economics Committee for tabling in the Legislative Assembly.

The report provides information about the performance of the Queensland Integrity Commissioner's functions for 2023–24 and has been prepared in accordance with section 85K of the *Integrity Act 2009* (Qld).

This is not an annual report under the *Financial Accountability Act 2009* (Qld). For the purposes of that Act, the financial results for the Office of the Queensland Integrity Commissioner (OQIC) are reported and included in the Department of the Premier and Cabinet Annual Report 2023–24.

# Contents

Message from the Queensland Integrity Commissioner	2
About us	4
What we do	4
Oversight of the Office of the Queensland Integrity Commissioner	4
Our vision, purpose and values	4
2023-24 at a glance	5
Advice on ethics, integrity and interests issues	6
Regulation of lobbying activity	11
Stakeholder engagement, presentations and training	17
Projects and activities	20
Governance, staffing and administrative support	23
Appendix 1 – Financial Statement	25

# Message from the Queensland Integrity Commissioner

I am pleased to present the Office of the Queensland Integrity Commissioner (OQIC) Annual Report 2023–24.

A watershed year for the OQIC, 2023–24 was marked by increased operational demands and significant additional work to implement changes to the *Integrity Act 2009* (Qld) (Integrity Act). These changes are the continuation of integrity reforms to our legislation that commenced in 2022. They have broadened the remit of the Integrity Commissioner and reformed the OQIC's operation. These welcomed amendments have delivered greater independence to the OQIC, expanded the Integrity Commissioner's functions, responsibilities and regulatory powers, and changed lobbyist registration requirements.

Our workload in performing our statutory functions (advising, regulating and raising awareness) grew significantly in 2023–24. We experienced:

- a 56 percent increase in requests for integrity and ethics advice (122 this year compared to 78 last year)
- a 20 percent increase in meetings with key stakeholders (152 this year compared to 127 last year)
- a 108 percent increase in lobbying enquiries (108 this year compared to 52 last year).

In addition, our focus on communication, education and training saw a significant increase in related activities, including:

- new stakeholder publications and resources (25 this year compared to 5 last year)
- delivery of education, training and awareness sessions (33 this year compared to 4 last year).

These are positive results for this year and demonstrate strong performance in discharging our statutory functions. The OQIC exists to promote trust and confidence in Queensland Public Service and in public office through our work, and to contribute to the ongoing development of institutional integrity. To achieve these important objectives, our stakeholders must utilise the ethics and integrity advice available to them, we must do more work to better regulate and support the operation of the lobbying regulatory scheme, and we must actively and continuously undertake presentations and other activities to raise awareness about integrity, ethics, accountability and transparency. I think the increased work and output across all our statutory functions suggests we are working effectively to meet those objectives.

In addition to statutory work, we have a large ongoing program of projects and activities relating to legislative changes and new initiatives. Due to the significant work associated with implementing changes to the Integrity Act, our sole focus this year was on successfully executing the amendments alongside our functional activities. This meant other projects and activities were delayed and will be progressed next year.

Impacting key stakeholder groups as well as our internal operations, the implemented legislative amendments included:

- changes to the definition of designated person (December 2023 and May 2024)
- new provisions for making a position or class of positions a designated person (December 2023 and May 2024)
- new dual hatting laws (April 2024)
- new requirements for applying to be a registered lobbyist (May 2024)
- new categories of information to be published in the Queensland Lobbying Register (May 2024)
- changes to key terms relating to lobbying regulation (May 2024)
- new regulatory powers to issue notices and directives, and the ability to specify conditions on a lobbyist registration (May 2024)
- a new statutory function to provide education and training on the lobbying regulatory scheme (May 2024)
- a new requirement for registered lobbyists to complete annual mandatory training provided by the OQIC (May 2024)
- a new provision, commencing 1 July 2024, to establish the OQIC as a statutory body.

With a budgeted full-time equivalent of 8 for 2023–24, managing this substantial volume of work was challenging. The Department of the Premier and Cabinet (DPC), the then Department of State Development, Infrastructure, Local Government and Planning, and the Department of Justice and Attorney-General all assisted the OQIC by providing additional staff to meet demand. I thank these Directors-General for their assistance.

The legislative changes during the year had the greatest impact on the lobbying regulatory scheme. There were changes which required fresh registration and substantive changes to business processes and systems affecting a number of stakeholders. A significant project was undertaken to ensure every registered lobbying entity and person was registered under the new requirements which commenced on 28 May 2024.

In addition to major changes to the Queensland Lobbying Register to reflect the new application process, we received and assessed hundreds of applications in a condensed timeframe. This was achieved through engaging additional resources, developing a specific assessment procedure and implementing a communications campaign to assist our registrants in meeting the critical timeframes. I thank the staff who worked tirelessly to deliver a successful transition to the new requirements on 28 May 2024.

Another focus for us during the year was preparing for our establishment as a statutory body on 1 July 2024. This milestone provides important financial independence for the OQIC, but brings with it new governance, systems and reporting requirements under the *Financial Accountability Act 2009* (Qld) and the *Statutory Bodies Financial Arrangements Act 1982* (Qld). This will continue to be priority work for us during 2024-25 as all these requirements will need to be met by year end.

As a small independent office we adopt an operating model where corporate services are outsourced. Those services are currently provided by the DPC but during the year we explored alternative delivery options. We will continue this important piece of work with a view to changing providers during 2024-25.

It has been a challenging and rewarding year. The changes to the Integrity Act and the operation of the OQIC consolidate our independence and strengthen the lobbying regulatory scheme in Queensland. Our many achievements of this year – effectively discharging our statutory functions with an increased workload and delivering a significant change management program – would not have been possible were it not for the commitment and professionalism of my staff, including those who joined us temporarily during the year. I recognise the dedication and professionalism of the team and thank them for their role in enabling us to achieve so much this year.



**Linda Waugh**  
Queensland Integrity Commissioner

# About us

---

The Queensland Integrity Commissioner (Integrity Commissioner) is an independent statutory officer and officer of the Queensland Parliament established under the *Integrity Act 2009* (Qld) (Integrity Act).

The Office of the Queensland Integrity Commissioner (OQIC) is also established under the Integrity Act and consists of the Integrity Commissioner, the Deputy Integrity Commissioner and Integrity Officers. OQIC staff are employed under the *Public Sector Act 2022* (Qld).

## What we do

Our statutory functions are set out in section 7 of the Integrity Act and are to:

- give written advice about ethics or integrity issues to designated persons, former designated persons and former ministerial advisors
- meet with and advise members of the Legislative Assembly, orally or in writing about interests issues
- register lobbyists and keep the Queensland Lobbying Register
- provide education and training to government representatives, Opposition representatives and registered lobbyists about the operation of Chapter 4 (Lobbying activity) of the Integrity Act
- raise public awareness of ethics and integrity issues.

## Oversight of the Office of the Queensland Integrity Commissioner

The OQIC is overseen by the Legislative Assembly's Cost of Living and Economics Committee. The committee has a range of functions, including monitoring and reviewing the Integrity Commissioner's performance in fulfilling their functions under the Integrity Act and examining each annual report tabled in the Legislative Assembly.

## Our vision, purpose and values

Our Strategic Plan 2022–2025, which sets out the OQIC's vision, purpose, values and objectives, is available at <https://www.integrity.qld.gov.au/publications/strategic-plans.aspx>.

A revised plan was published in April 2024.

### Our vision

Encouraging confidence in public institutions and public office.

### Our purpose

The Integrity Commissioner's purpose is to:

- advise designated persons on ethics or integrity issues and, in the case of Members of the Legislative Assembly, also provide advice on interests issues
- raise public awareness of ethics and integrity matters, and deliver training about the operation of Chapter 4 (Lobbying activity) of the Integrity Act
- on request of the Premier, provide advice on standard setting for ethics or integrity issues
- set conduct standards for registered lobbyists
- regulate lobbying activity and maintain the Queensland Lobbying Register.

### Our values

**Challenge** misconceptions and myths around ethics and integrity.

**Engage** the public and public officials to raise awareness about ethics and integrity.

**Lead** by developing and promoting good practice standards for ethics and integrity.

**Resolve** ethics and integrity issues in the public interest.

# 2023–24 at a glance

## Advice on ethics, integrity and interests issues

We provide advice on ethics, integrity or interests issues to 'designated persons' under the Integrity Act. Designated persons include ministers, members of the Legislative Assembly, senior public sector leaders, statutory officers and others.

 **122**

**formal requests** from a designated person for advice on ethics, integrity or interests issues<sup>1</sup>

 **115**

formal written **advice requests finalised**<sup>2</sup>

 **8**

formal written advice requests finalised **within one business day** of request (urgent matters)

 **89**

formal written advice requests finalised **within 2 weeks** of requests

## Lobbying regulation

We maintain the Queensland Lobbying Register, which includes particulars about registered lobbyist entities and individual registered lobbyists, and records all lobbying activity between registered lobbyists and government and Opposition representatives.

 **104\***

registered **entities**

 **254\***

registered **listed persons**

 **108**

**enquiries** about lobbying

 **928**

**recorded lobbying activities/contacts** with government and Opposition representatives

## Stakeholder engagement and awareness raising

We meet regularly with our key stakeholders and deliver education and awareness sessions on our statutory functions and related matters.

 **21**

**requests** for education and awareness presentations

 **33**

education and awareness presentations **delivered**


 **61**

**meetings** with designated persons (for requested advice or services)

 **91**

**other** stakeholder meetings

### Enquiries

 **62**

**general enquiries received**

 **6**

**media enquiries received**

### Staff

 **10.3\***

**Commissioner** 1  
**Permanent** 6.2  
**Temporary** 3.1

### Budget

 **2.01M**

**Actual expenditure** \$2.169M  
**Revised budget** \$2.5M\*\*

\* As at 30 June 2024

\*\* Revised budget includes deferrals and enterprise bargaining increases.

1 Ten of the advice requests received were out of jurisdiction, one was withdrawn and one was not finalised in the reporting period.

2 In 5 instances, advice issued this year was in response to a request received in the previous financial year.



# Advice on ethics, integrity and interests issues

The Integrity Commissioner's role is to provide advice on ethics, integrity or interests issues to designated persons, former designated persons and former ministerial advisors.

## About the advice function

Under section 15 of the Integrity Act, a designated person may, in writing, ask for the Integrity Commissioner's advice on an ethics or integrity issue. The Integrity Commissioner must have regard to the following in preparing advice:

- approved codes of conduct and approved standards of practice under the *Public Sector Ethics Act 1994* (Qld)
- ethical standards or codes of conduct adopted by the Legislative Assembly by resolution
- ethical standards or codes of conduct approved by the Premier for Ministers.

The Integrity Commissioner may also have regard to other ethical standards considered appropriate for the matter under consideration.

A former designated person and a former ministerial advisor can, for 2 years after leaving their role, request advice on an ethics or integrity issue that arises from a post-separation obligation they have.

Records relating to any advice request (including the advice provided) are not subject to the *Right to Information Act 2009* (Qld). However, there are provisions in the Integrity Act that permit the disclosure of advice under very limited circumstances. As these are nuanced to the classification of the designated person, these disclosure provisions are included in each advice.

## Who is a designated person?

Section 12(1) of the Integrity Act defines a designated person as:

- a member of the Legislative Assembly;
- a statutory office holder;
- a chief executive of a public service entity;
- a senior executive;
- a chief executive of, or senior executive equivalent employed in, a government entity who is nominated by the Minister responsible for administering the entity;

- a ministerial staff member who performs the role of chief of staff (however called) in the office of a Minister;
- a person, or a person within a class of persons, nominated by the Premier;
- a person, or a person within a class of persons, prescribed by regulation.

## What is an ethics or integrity issue?

The definition in section 9 of the Integrity Act states that an ethics or integrity issue is 'an issue concerning ethics or integrity and includes a conflict of interest issue'. Additionally, and only for a request made by the Premier, the definition includes 'standard setting for ethics or integrity issues'.

A conflict of interest issue is defined as involving 'a conflict or possible conflict between a personal interest of the person and the person's official responsibilities'.

## What is an interests issue?

An interests issue is a particular type of ethics or integrity issue that applies only to a member of the Legislative Assembly. It means an ethics or integrity issue relevant to the member for, or in, the register of members' interests, or the register of related persons' interests, kept under section 69C of the *Parliament of Queensland Act 2001* (Qld).

## Meetings with members of the Legislative Assembly about interests issues

Unlike other ethics and integrity advice requests – where the request must be made in writing and the Integrity Commissioner must provide advice in writing – Part 3 of the Integrity Act allows an advice request relating to interests issues to be made in writing or orally at a meeting with the Integrity Commissioner.

The Integrity Commissioner must give the member advice on the interests issues raised, and this advice may be provided orally or in writing.



Meetings about advice requests

While advice requests must be made in writing, it is not uncommon for the Integrity Commissioner to meet with a designated person about their advice request. This may be before, during or after written advice has been issued.

In some cases, a designated person will seek a meeting to discuss their request before they submit it in writing. They may be unsure whether it is a matter on which they should seek advice, or they may have questions about how the advice function works. In other cases, a request for a meeting will form part of the written advice request. This is often to set out relevant context to the issue being raised or to make themselves available to answer questions after the Integrity Commissioner has considered the written request.

Where an advice request is complex or nuanced, the Integrity Commissioner may request a meeting with the designated person to:

- discuss the issues, confirm facts and ensure context is correctly understood
- discuss whether there are any obstacles or challenges with any options being considered for the management of an ethics or integrity issue
- review the management actions contained in the advice and how to implement those effectively.

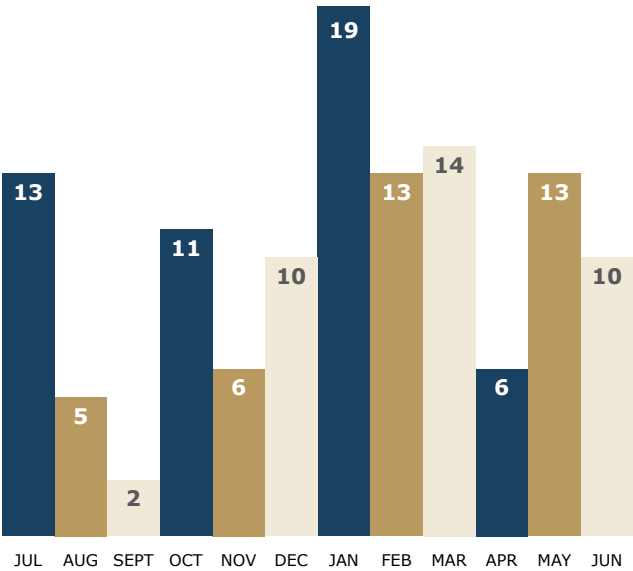
While the time taken to schedule and conduct one or more meetings increases the timeframe to provide the advice, it is often as important as the provision of the final advice itself. In more complex matters where there are multiple issues to deal with, it is important to ensure a designated person is given the opportunity to discuss and work through their understanding of the issues and the associated legislative and policy requirements applying to them.

Thank you for giving me your time and feedback through this period of time, I have appreciated it.

Advice requests received

During the year, we received 122 requests for advice. The peak of advice requests was in Q3 (January to March 2024), where 46 (38 percent) were received. January 2024 recorded the highest number of advice requests for the year, due in large part to changes in the Queensland Cabinet in December 2023. Each new minister and assistant minister, and each minister and assistant minister with changed portfolios and responsibilities, must review their private interests and identify whether any give rise to a potential, perceived or actual conflict of interest. The Queensland Ministerial Handbook (March 2024) requires ministers and assistant ministers to seek Integrity Commissioner advice on any actions proposed to manage a conflict of interest, so it is always anticipated that there will be an increase in advice requests following a Queensland State General Election or a Queensland Cabinet reshuffle.

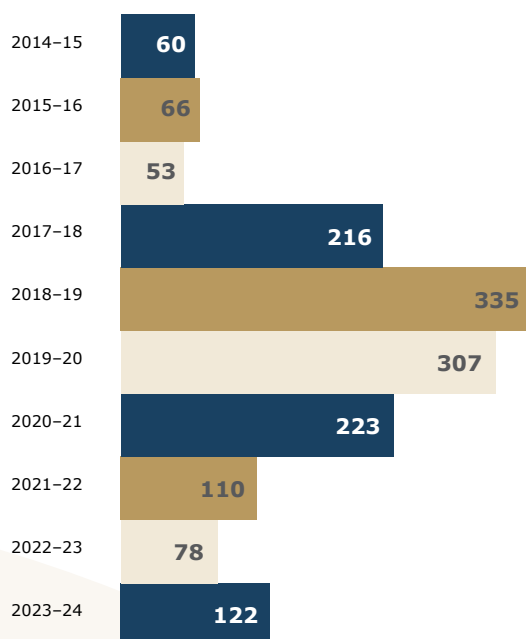
Figure 1: Advice requests by month received – financial year 2023–24



## Advice request trends over time

The OQIC saw an increase in advice requests during the 2023–24 financial year compared to the previous 2 years and to the years preceding the period when councillors and mayors were also able to seek advice from the Integrity Commissioner. Overall, demand for advice continues to increase.

**Figure 2: Number of formal advice requests received – financial years 2014–15 to 2023–24.**



*Note: The increase in advice requests between 2017–18 and 2020–21 was exceptional, and resulted from mayors and councillors being eligible to seek advice during that period. Mayors and councillors are no longer eligible to seek advice.*

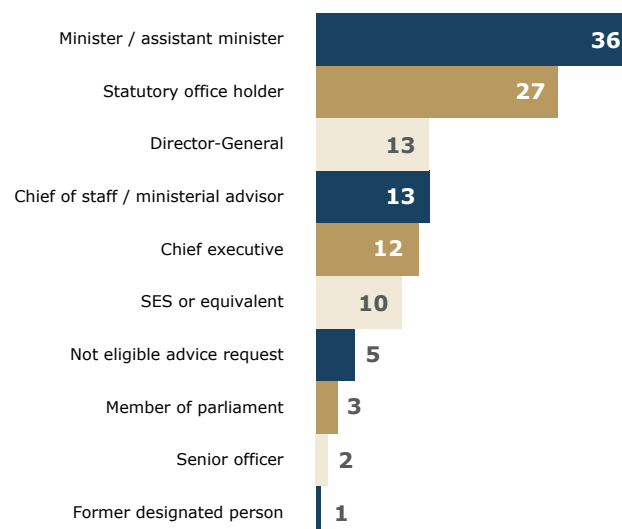
## Advice requests by class of designated person

As shown in Figure 3, ministers and assistant ministers were the largest category of designated persons, with 36 requests for advice.

The next highest group was statutory office holders, with 27 requests for advice. Statutory office holders are those in any position established under statute and appointed by a minister or Governor in Council. This group includes board members (e.g. on a government-owned corporation board or a hospital and health service board). Board members sought advice on 25 occasions.

The next 2 largest cohorts were directors-general and ministerial advisors, each making 13 advice requests.

**Figure 3: Advice requests – designated persons: financial year 2023–24**



*Note: In the 'Chief of staff/ministerial advisor' category, most requests (11) were from ministerial advisors.*

Thank you for your insightful advice. I very much appreciate it and will action accordingly.

As a result of legislative amendments that commenced on 13 December 2023, ministerial advisors (except a minister's chief of staff) and senior officers are no longer designated persons for the purposes of the Integrity Act. A chief of staff in the office of a minister was added as a new category of designated person (new section 12(1)(f)). Ministers, assistant ministers and chiefs of staff are authorised to ask the Integrity Commissioner for advice on an ethics or integrity issue involving a ministerial advisor.

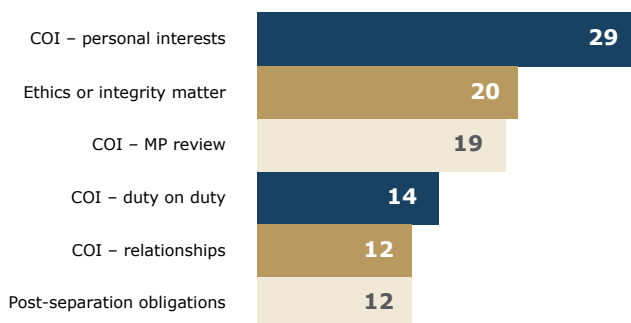
Although no longer designated persons, ministerial advisors – current and for 2 years after leaving their advisor role – can seek advice directly from the Integrity Commissioner on an ethics or integrity issue that arises because of a post-separation obligation.

Another amendment was the removal of the power (then section 12(1)(h)) for ministers and assistant ministers to nominate any person as a designated person. A person, or a person within a class of persons, can now be prescribed a designated person through a regulation (new section 12(1)(g)) and the Premier has the power to nominate, for a 28-day period, a person or a person within a class of persons, as a designated person (new section 12(1)(fa)).

## What advice requests concerned

As shown in Figure 4, the main issue on which ethics or integrity advice was sought was conflicts of interest. In total, 85 percent of advice requests concerned a conflict of interest.

**Figure 4: Advice requests 2023–24 by topic (top 6)**



*Note: COI is conflict of interest.*

Conflict of interest is a broad category encompassing advice requests about:

- duty-on-duty conflicts (conflicts between 2 or more roles held)<sup>3</sup>
- the adequacy of a proposed conflict of interest management plan
- memberships of sporting clubs, unions, professional associations or community organisations
- pecuniary interests (e.g. shareholdings or other business interests)
- recruitment processes (e.g. where a candidate is known to the designated person)
- relationships (e.g. where a person known to a decision-maker will be impacted by the decision they make).

Please extend my sincere thanks to the Commissioner for her support and advice with respect to these matters.

Other ethics or integrity matters (20) concerned a variety of issues such as ethical considerations in recruitment or procurement processes, managing sensitive information or about internal policy and practice for better managing ethics or integrity issues. It also included 2 requests from Members of the Legislative Assembly for advice on an ethics or integrity matter relating to the register of members' interests or the register of related persons' interests (interests issues).

On 12 occasions, advice was sought about an ethics or integrity issue arising from post-separation obligations for a current or former designated person. Post-separation obligations exist to promote transparency and accountability, and to prevent former senior government representatives from taking personal advantage of special relationships or confidential information acquired through their position, for the 2 years prior to their separation.

The Integrity Commissioner provides advice to assist designated persons leaving government to ensure they are aware of their obligations, what actions they can take in preparation for their separation, and relevant constraints on any future interactions they may have with government representatives for the duration of the obligations. A small number of requests were about an offer of employment and whether the offer gave rise to ethics or integrity issues the person should contemplate before making a decision.

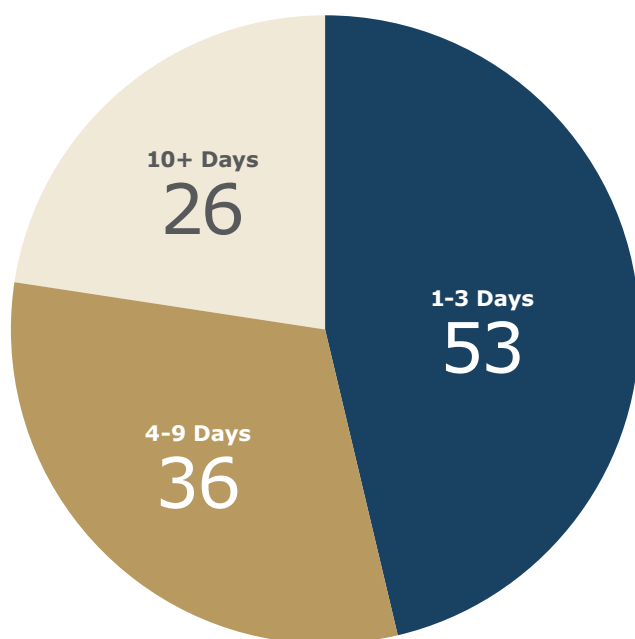
The advice you have kindly provided has clarified and supported [my views], enabling me to determine an outcome which is in the best interest of the [organisation], [individual] and the Queensland Community.

<sup>3</sup> Duty-on-duty conflicts most commonly arise for people who hold part-time government roles, such as board members.

## Timeliness of advice provided

In the 2023–24 financial year, 89 advice requests (77 percent) were finalised within 10 business days. The remaining 26 requests (23 percent) took longer to finalise.

**Figure 5:** Timeframes for responses to requests for advice – financial year 2023–24



Advice requests with longer finalisation timeframes are more complex and often require more detailed research, the collection of further particulars from the designated person, or both. The issue may be intricate or there may be multiple issues to address.

At different points of the year, the timeliness of advice requests was also impacted by resourcing constraints, multiple concurrent advice requests or other office priorities. For example, as outlined later in this report, in May 2024, all the OQIC resources were dedicated to managing the implementation of changes to lobbying regulation. In response to the increasing number of occurrences where delays were due to shortages in staffing or the capacity of staff or the Integrity Commissioner, we reviewed our triage process for new advice requests. The resulting change in approach means each advice request is now immediately assessed in terms of urgency and complexity, and to establish whether further information is required from the person to properly consider their request. During periods of delay, it means that where further information is required, this is progressed during the delay period, so that all information is available when the detailed advice work starts.

Can you also pass on my appreciation to [the Integrity Commissioner] for getting back to me on this so promptly!

# Regulation of lobbying activity

The Integrity Commissioner is responsible for regulating lobbying activity in Queensland. Chapter 4 (Lobbying activity) of the Integrity Act sets out how the scheme works and the Integrity Commissioner's role and powers.

## How the regulatory scheme works

Lobbying is an important part of our system of government and democratic representation. It has a role in informing good policy development but should also be ethical, equitable and transparent. Importantly, lobbying should not result in decisions being made because of undue influence or preferential access.

Lobbying has always been present and forms part of our political process. It is undertaken by citizens, clubs and associations, corporations, not-for-profit entities and other community stakeholders. More recent decades have seen the emergence of consultants who are paid by third parties to advocate on their behalf (often called 'professional lobbyists'). Professional lobbyists have often previously been involved in politics and/or government, so they are familiar with government systems, processes and decision-makers.

The regulatory scheme requires:

- certain entities and persons who engage in 'lobbying activity' with Queensland government representatives or Opposition representatives to be registered with the OQIC
- each registered lobbyist to record their clients and contacts with Queensland government representatives and Opposition representatives in the Queensland Lobbying Register, which is publicly accessible on the our website
- each registered lobbyist to comply with the requirements under the Integrity Act and with the Queensland Registered Lobbyists Code of Conduct (the Code).

In addition to obligations relating to lobbyists, the Integrity Act also imposes some requirements on Queensland Government and Opposition representatives (e.g. to report unregistered lobbying activity), former Queensland senior government and former Opposition representatives (e.g. the prohibition against carrying out lobbying activity relating to official dealings of the previous 2 years), and other entities (which are prohibited from paying success fees to lobbyists).

## Which lobbyists must be registered?

In Queensland, an entity (including a business or an individual) that lobbies Queensland Government representatives and Opposition representatives on behalf of a third-party client for a fee or other reward is required to be registered with the OQIC. However, the following entities are exempt from the requirement to register:

- a non-profit entity, but only if the purpose of the lobbying activity is to represent the entity's interests
- an entity constituted to represent the interests of its members (e.g. a trade union or professional group), but only if the purpose of the lobbying activity is to represent its members' interests
- an entity carrying out lobbying activities only for the purpose of representing its own interests.

There are several different activities that are not included as a 'lobbying activity'. The most common among these are:

- communicating with a representative in the ordinary course of making an application, or seeking a review or appeal about a decision, under an Act
- communicating with a representative in the ordinary course of providing professional or technical services to a person.

For each registered lobbyist, the Lobbying Register must include the lobbyist's name and business registration particulars. It must also include the details of each registered lobbyist (person) employed, contracted or otherwise engaged by the lobbyists to carry out lobbying (called a 'listed person') and the names of its current and previous third-party clients.

The Lobbying Register must also contain details of the officers and employees of lobbying entities, except employees who work exclusively outside Queensland or in administration roles. Former senior government representatives and former Opposition representatives who apply to be registered as a lobbyist must also provide a statement about their official dealings in the 2 years immediately before they ceased to be a representative. This statement is published on the Lobbying Register.

## What is lobbying activity and how is it recorded?

Lobbying activity is:

- communicating with a government representative to influence state or local government decision-making, or
- communicating with the Leader of the Opposition (or their staff) or the Deputy Leader of the Opposition to influence the Opposition's decision-making on legislation, policy, programs or position or view in relation to state or local government decision-making.

A registered lobbyist must record every lobbying activity in the Lobbying Register. This register is publicly accessible and can be accessed via our website. It provides transparency to the community about whom registered lobbyists are having contact with, about what, and whom they are representing when they do have contact.

## Changes to Queensland lobbying laws

This year Chapter 4 of the Integrity Act was significantly amended by the *Integrity and Other Legislation Amendment Act 2024* (Qld). The key changes are outlined below. The implementation of these changes impacted multiple stakeholders and occurred over a relatively short period. It was a significant undertaking for the OQIC to implement the suite of changes, and this is discussed further in the section of this report covering projects and activities.

### Introduction of dual hatting laws

New dual hatting laws commenced on 19 April 2024. Section 49 of the Integrity Act now prohibits registered lobbyists from performing a substantial role in the election campaign of a political party. If a registered lobbyist intends to perform a substantial role in the election campaign of a political party, they must provide the Integrity Commissioner with a notice, are prohibited from operating as a registered lobbyist and are removed from the Lobbyist Register. Section 49 also prohibits a person who performs a substantial role in the election campaign of a political party from being registered as a lobbyist if that political party wins the general election for the duration of that term (4 years). This section implements part of recommendation 3 from Professor Peter Coaldrake's report<sup>4</sup>.

## Changes to the definition of registered lobbyist

Previously, only a lobbying entity (e.g. a sole trader, a company or a partnership) could be registered as a lobbyist in Queensland (then called a 'registrant'). Officers and employees who carried out lobbying activity were on the Lobbying Register as listed persons, but did not carry the title of 'registered lobbyist'. The regulatory powers of the Integrity Commissioner applied only to registrants, meaning action for noncompliance could only be taken against the entity (the registrant) and not the individual.

Changes to the Integrity Act, effective from 28 May 2024, mean that officers or employees who conduct lobbying activity must now register as lobbyists (in addition to the registered lobbying entity). The application to register an officer or employee must be made by the entity on behalf of the officer or employee. If approved, the individual will be listed on the Lobbying Register and will be subject to the obligations imposed on registered lobbyists under the Integrity Act, for example, to undertake an approved training course, to comply with the Code and any directives issued by the Integrity Commissioner, and to give notice if they intend to perform a substantial role in the election campaign of a political party. The Integrity Commissioner can now take regulatory action against an individual registered lobbyist and the registered lobbying entity, if appropriate.

### New requirement for mandatory training for registered lobbyists

It is now a condition of registration to undertake an approved training course within a period specified by the Integrity Commissioner. Registered lobbyists must undertake this training every 12 months. The Integrity Commissioner is currently developing the training course and will engage with stakeholders before finalising the training requirements.

### New function to provide training on the operation of Chapter 4 (Lobbying activity)

The amendments to the Integrity Act also include a modified section 7(c) (Functions of Integrity Commissioner), which includes a new responsibility for the Integrity Commissioner 'to provide education and training to government representatives, Opposition representatives and registered lobbyists about the operation of Chapter 4'.

<sup>4</sup> [Let the sunshine in – Review of culture and accountability in the Queensland public sector](#) (28 June 2022)



This new function is axiomatic to delivering effective lobbying regulation – the legislation places obligations not only on registered lobbyists but also on government and Opposition representatives. Providing education and training ensures these stakeholder groups understand how lobbying regulation operates, what their respective responsibilities and obligations are, and how best to comply with those obligations. Education and training, in conjunction with the publication of resources and the provision of an enquiry service, will ensure that key stakeholders are informed about the operation of Chapter 4.

## Powers of the Integrity Commissioner

The scheme has always provided the Integrity Commissioner with several powers in relation to lobbying regulation, including the power to:

- refuse registration of an applicant (e.g. if the application includes materially false or misleading information or due to previous compliance failures with requirements under the Integrity Act or the Code)
- issue a warning to a registered lobbyist, or
- suspend or cancel the registration of a lobbyist.

The changes to the Integrity Act give the Integrity Commissioner additional powers to issue:

- a directive (registered lobbyists must comply with any directive issued)
- a notice, to a registered lobbyist or another person, to produce information or documents (where noncompliance by a registered lobbyist is suspected), or
- a compliance notice (where it is appropriate to give a registered lobbyist an opportunity to rectify noncompliance).

The Integrity Commissioner can also now impose a condition upon the registration of a lobbyist and add, vary or remove a condition on the registration of a lobbyist at any time.

Prior to taking action to impose, vary or remove a condition, or to suspend or cancel registration, the Integrity Commissioner is required to first issue a 'show cause notice' stating:

- the Integrity Commissioner intends to take action
- the proposed action
- the grounds for taking the proposed action
- an outline of the facts and circumstances forming the basis for taking the proposed action
- the time allowed to respond (the lobbyist will have 14 days, or longer if agreed by the Integrity Commissioner, to respond to the notice in writing).

## Changes to the annual return requirements of recorded particulars

The Integrity Act requires registered lobbyists each year to confirm their recorded particulars in the Lobbying Register are updated and correct. To do this, each year in July, the registrant or registered lobbying entity must:

- confirm that the particulars previously provided to the Integrity Commissioner in relation to their registration remain correct
- submit a new statutory declaration for each person listed by the entity as undertaking lobbying activities.

'Recorded particulars' is information given to the Integrity Commissioner and recorded on the Lobbying Register, including:

- the information provided in the initial registration application (e.g. business name, individuals being registered to undertake lobbying activities and the names of owners)
- other information the Integrity Commissioner may have requested during the registration process
- any changes to any entity's recorded particulars throughout the year.

Recorded particulars does not include the details of individual lobbying activities undertaken and recorded in the Lobbying Register.

The amendments to the Integrity Act included the removal of the obligation requiring each individual registered as a lobbyist to sign a new statutory declaration. The entity must still confirm their recorded particulars are correct, and this includes information about each employee registered as a lobbyist. This means the annual return process can be undertaken more efficiently, with new statutory declarations only required if the information provided by the individual upon registration has changed.

## Registered Lobbyists Code of Conduct

The Integrity Act gives the Integrity Commissioner the power to approve a code of conduct for registered lobbyists after consultation with the Legislative Assembly's Cost of Living and Economics Committee.

The Code was previously approved in 2013 and will be amended in 2024-25 to reflect changes to Chapter 4 of the Integrity Act.

The Code is published on our website. It sets out the ethical obligations and requirements for registered lobbyists, including:

- standards of conduct
- what information must be provided when contacting a government or Opposition representative (e.g. the purpose of contact)
- the consequences of failing to comply with the Code (e.g. cancellation or suspension of registration)
- what information about lobbying activities must be included in the Lobbying Register (date, purpose of contact, who the contact was with, and which client was being represented)
- the requirement to update the Lobbying Register within 15 days of the close of the month, with details of all contacts made during that month.

The *Integrity and Other Legislation Amendment Act 2024* (Qld) amended the lobbying regulation scheme to require the Code to include a policy on managing conflicts of interest.<sup>5</sup> The Integrity Commissioner will commence a consultation process as part of our work to review and update the Code, including the content of the conflict of interest policy, in 2024-25.

## Lobbying activities

At the close of 2023-24, the Lobbying Register recorded:

- 104 active registered entities
- 254 active listed persons
- 928 lobbying activities/communications (contacts), which took place over the course of 2023-24.

Table 1 shows the trends in key lobbying activities over the past 4 years.

**Table 1: Lobbying activities – financial years 2020-21 to 2023-24**

Year	Registered entities*	Registered individuals*	Lobbying contacts with government/ Opposition representatives
<b>2023-24</b>	104	254	928
<b>2022-23</b>	110	300	665
<b>2021-22</b>	129	305	1,518
<b>2020-21</b>	123	227	989

\* Figures as at 30 June of each year.

While the number of registered entities has slightly decreased, the number of individual registered lobbyists has remained relatively stable over the past 2 financial years, with an increase between 2020-21 and 2021-22. The total number of contacts has varied considerably over time. The reason for the spike in contacts during 2021-22 is unclear.

The reduction in the number of contacts in 2022-23 coincided with a change announced in June 2022<sup>6</sup> to the way lobbyists can contact a minister. The change required registered lobbyists to request all meetings in writing via an online form and to make any other contact only via a chief of staff. Anecdotal evidence suggests that ministers take fewer or no meetings with registered lobbyists.

<sup>5</sup> This part of the Act commenced on 28 May 2024.

<sup>6</sup> Media statement, 'New rules for lobbyists', Premier and Minister for the Olympics, the Honourable Annastacia Palaszczuk MP, 27 June 2022.

## Outcome of annual return requirements

Section 66 of the Integrity Act requires registered lobbyists to update their particulars by 31 July each year for continued registration. In particular:

- registered lobbying entities must confirm with the Integrity Commissioner that the particulars they provided in relation to their registration remain correct
- individual registered lobbyists must ensure the registered entity is notified of any changes in their recorded particulars.

In June 2023, registrants were notified of the annual renewal process, which was due between 1 and 31 July 2023. After 31 July 2023, a reminder was sent to a small number of registered lobbying entities that failed to update their particulars by the due date. All either submitted their annual return or requested to be removed from the Lobbying Register.

## Lobbying enquiries

The OQIC receives email and telephone enquiries about the lobbying regulation scheme throughout the year. For instance, the OQIC receives many enquiries as to whether an activity is a 'lobbying activity' or whether an entity is required to be registered.

During 2023–24, the OQIC responded to 108 enquiries about lobbying. This was higher than in 2022–23 and 2021–22, when the OQIC received 52 and 31 enquiries, respectively. The significant increase in the number of enquiries was largely due to the changes in legislation requiring all lobbyists to re-register in May.

Thank you enormously for your diligent (and enormously helpful) response. I appreciate that the detailed responses you provide are likely to take some time and resources in drafting, and it's not unnoticed.

## Show cause and other actions

During 2023–24, the Integrity Commissioner issued one show cause notice for failure to comply with the Integrity Act and the Registered Lobbyists Code of Conduct.

During 2023–24, the Integrity Commissioner received 10 reports from ministers and chief executives of departments regarding lobbyists' noncompliance. The OQIC recorded 66 instances of noncompliance. All instances were rectified by the lobbyist and captured in the Lobbying Register. No show cause notices were required for failures to update particulars, and no registered lobbying entities or individuals had their registration suspended.

## Lobbying-related offences

The Integrity Act contains 4 offences that relate to lobbying activity:

**Table 2:** Offence provisions under Chapter 4 of the Integrity Act (Lobbying activity)

Section	Offence category	Offence provision	Maximum penalty
66P(1)	Success fees	A person must not give, or agree to give, to a Queensland registered lobbyist, or a related person* of the lobbyist, a success fee in relation to a lobbying activity carried out by or for the lobbyist.	200 penalty units
66P(2)	Success fees	A Queensland registered lobbyist, or related person* of the lobbyist, must not receive, or agree to receive, from another person a success fee in relation to a lobbying activity carried out by or for the lobbyist.	200 penalty units
66O	Holding out	<p>A person who is not a registered lobbyist must not:</p> <ul style="list-style-type: none"> <li>- carry on or purport to carry on, a business or providing services constituting, or including, a lobbying activity for another person, or</li> <li>- hold out that the person is a registered lobbyist, or</li> <li>- take or use a title, name or description that, having regard to the circumstances in which it is taken or used, indicates or could be reasonably understood to indicate the person is a registered lobbyist.</li> </ul>	200 penalty units
46	Unregistered lobbying	An unregistered person** must not carry out a lobbying activity for a third party client.	200 penalty units

\* A related person of a lobbyist is a related person of the lobbyist within the meaning of the Duties Act 2001 (Qld), section 61(1).

\*\* An unregistered person is an entity that is not a registered lobbyist and is not one of the particular entities listed under section 47 of the Integrity Act that are not required to be registered.

During the year we did not receive any reports of alleged conduct that might constitute success fees offence or a holding out offence. We did receive 5 reports about unregistered lobbying however no referrals were made to the Queensland Police Service (QPS).

Reports about unregistered lobbying generally contain personal information. In order to lawfully communicate that information to the QPS, the Integrity

Commissioner needs to be satisfied on reasonable grounds that it is necessary for the investigation, prosecution or punishment for an offence. To meet that threshold, the Integrity Commissioner must be satisfied the complaint is credible and have evidence or information to support the allegations. If there is insufficient evidence, a referral to the QPS is not appropriate. None of the 5 reports reached that threshold.

# Stakeholder engagement, presentations and training

The Integrity Commissioner raises public awareness of ethics or integrity issues by contributing to public discussion of these issues relevant to the Integrity Commissioner's functions and provides education and training to government representatives, Opposition representatives and registered lobbyists about lobbying regulation in Queensland. The Integrity Commissioner is also responsible for delivering annual mandatory training for registered lobbyists.

Ethics and integrity issues and lobbying regulation are entwined in a broad range of matters concerning government structure, practices and policies, and the OQIC's contributions to increasing awareness of these issues are important. The OQIC achieves these objectives by providing information on our website, meeting with key stakeholders, and delivering education and awareness sessions.

## Stakeholder meetings

Our commitment to fostering a culture of integrity and ethics across Queensland's public institutions remained a core focus throughout the year. In line with the Integrity Act, we enhanced our engagement with stakeholders to promote transparency, accountability and good governance.

This year has seen an increase in the number of stakeholder meetings with the Integrity Commissioner, reflecting our continued focus on transparency and ethical governance, raising awareness about ethics and integrity issues and lobbying regulation, and ensuring the role and services of the Integrity Commissioner are understood. These meetings also focus on compliance with public sector standards and requirements.

This year, the Integrity Commissioner held 152 meetings with stakeholders, a 20 percent increase from the 127 meetings conducted last year. The Deputy Integrity Commissioner and other OQIC staff also met with stakeholders throughout the year, but we have not previously maintained an exact count of these meetings. Data capturing systems have been modified to capture meetings between stakeholders and the Deputy Integrity Commissioner and other OQIC staff, and this will be reported next year.

During the year, the Integrity Commissioner conducted:

- 48 meetings with ministers and assistant ministers, directors-general and chief executives about integrity and ethics advice and/or services
- 18 meetings with Department of the Premier and Cabinet (DPC) corporate service providers
- 86 meetings with other stakeholders (e.g. chief executives and senior executives of government-owned corporations, Queensland integrity agencies, taskforces and committees).

## Meetings with ministers and assistant ministers

Meetings with ministers and assistant ministers require separate mention because the Ministerial Code of Conduct (March 2024, p. 11–12) sets out ministers' and assistant ministers' requirements and obligations in regard to meeting with the Integrity Commissioner:<sup>7</sup>

- The Integrity Commissioner will meet at least annually with Ministers to discuss requirements and obligations relating to conflicts of interest and broader ethics and integrity issues, and to follow up on any advice provided in the preceding 12 months. The Integrity Commissioner will advise the Premier when all annual meetings have been completed.

I am writing to express my sincere gratitude for your presentation at the recent [agency] orientation workshop ... Your insightful presentation clearly made a significant impact and this was reiterated in the evaluation feedback ... We are very grateful for your valuable contribution and thank you again for sharing your knowledge and making this event such a success.

<sup>7</sup> [www.premiers.qld.gov.au/publications/categories/policies-and-codes/handbooks/ministerial-handbook.aspx](http://www.premiers.qld.gov.au/publications/categories/policies-and-codes/handbooks/ministerial-handbook.aspx)

- Additional meetings may also occur where there is a change in Ministerial duties and responsibilities or personal circumstances.
- A member who has become a Minister for the first time, will meet with the Integrity Commissioner within one month of being sworn in. The purpose of the meeting is to identify and discuss potential conflict issues, as well as requirements and obligations applying to Ministers in relation to ethics and integrity issues including conflicts of interest.
- The Integrity Commissioner will present at least annually to Cabinet – the focus of the presentation will be on integrity and ethics issues as well as requirements and obligations under the *Integrity Act 2009* in relation to conflicts of interest, advice and lobbying regulation.

In addition to annual meetings, the Ministerial Code of Conduct also requires ministers and assistant ministers to seek the advice of the Integrity Commissioner:

- whenever there is ambiguity or uncertainty as to whether a private interest gives rise to a conflict of interest (p. 7),
- on any actions proposed to manage an identified conflict of interest – ‘where required, the Minister may need to settle the actions required to respond to the conflict in consultation with the Integrity Commissioner’ (p. 8).

In December 2023, there was a change in government leadership and a Cabinet reshuffle. Consequently, the Integrity Commissioner met with new ministers and assistant ministers as well as continuing ministers and assistant ministers who had portfolio changes. Additionally, the Integrity Commissioner met with directors-general who also had changes in their responsibilities.

These meetings were important for providing updated advice on ethics and integrity issues to officials with new or changing responsibilities. The Integrity Commissioner ensured the advisees understood their obligations under the Integrity Act and related governance frameworks.

On behalf of [our agency]  
I would like to thank you for coming out and speaking to our leadership yesterday. Your presentation was very insightful and it received a lot of positive feedback from our leaders. In fact, the word ‘fabulous’ was used.

## Supporting the Corruption Prevention Network Queensland

The Integrity Commissioner is the Patron for the Corruption Prevention Network Queensland (CPNQ), a not-for-profit community of professionals drawn from both public and private sectors. The Integrity Commissioner works with the CPNQ to promote awareness of ethics and integrity, and better practice in accountability and transparency.

In August 2023, the Integrity Commissioner and Deputy Integrity Commissioner gave a presentation to the CPNQ covering the role and functions of the Integrity Commissioner and managing risks around lobbying.

The Integrity Commissioner also participated as a panel member in an event supported by the CPNQ, the TJ Ryan Foundation and the QUT Centre for Justice about the future of public service in Queensland.

The Integrity Commissioner or OQIC staff (or both) attend each CPNQ event, and the Integrity Commissioner provides minor in-kind support to the CPNQ.

## Presentations and training

The Integrity Commissioner has an important statutory function to raise public awareness about ethics and integrity issues. In discharging this function, the focus is principally on those key stakeholders who are within the remit of the Integrity Commissioner (e.g. designated persons or in-house advisors to designated persons, government representatives who have obligations in relation to lobbying or registered lobbyists).

The Integrity Commissioner delivered 33 presentations and training sessions about:

- ethics and integrity advising
- assessing and managing conflicts of interest
- regulating lobbying
- public sector integrity.

Training was delivered to:

- the Norfolk Island Governance Committee
- all new hospital and health service board members
- the Independent review of the homelessness response in Queensland.



Presentations were delivered to:

- Queensland Cabinet, Queensland assistant ministers and ministerial staff
- department Executive Leadership Teams (ELTs)
- other leadership groups, including department leadership teams who were not ELT, a council leadership team, and an executive leadership educational program
- a government-owned corporation
- a hospital and health service board
- government representatives and government staff
- registered lobbyists
- the CPNQ
- university events.

We have several training and education projects and activities underway. These are discussed in the next section of this report.

### Webinars on changes to lobbying regulation

Significant changes were made to the operation of Chapter 4 (Lobbying activity) as part of the Integrity Act amendments in May.

As part of this new responsibility, in June we delivered webinars about the changes to the operation of Chapter 4 to the stakeholders most impacted by the changes:

- 3 webinar sessions designed for registered lobbyists
- 3 webinar sessions designed for government representatives.

We also sought feedback from webinar attendees:

- 95 percent said the presentation skills of the presenters were good or excellent
- 95 percent said the learning outcomes and relevance of the webinars were good or excellent
- 100 percent said the presentation materials were good or excellent.

The next section outlines further work we carried out under this new responsibility.

We wanted to drop a quick note to thank you each [OQIC staff members] for taking the time to come out and speak with us today, sharing your insights. It was helpful to learn about your areas of focus for this year, common issues for us to be on the lookout for, and how [our internal integrity unit] can ensure requests for advice are fulsome and well-considered. The team really benefited from your input and there was plenty of discussion afterwards about incorporating education on lobbying across the department into each of our roles.

# Projects and activities

---

This year we undertook several significant corporate and operational projects and activities, most of which were the result of, or related to, changes to the Integrity Act. We required some additional temporary staffing and funding to assist with the workload associated with these projects and activities.

## Transitioning to a statutory body and a new corporate services provider

As part of the Integrity reforms arising from the [\*Strategic Review of the Integrity Commissioner's Functions\*](#)<sup>8</sup> and [\*Let the sunshine in – Review of culture and accountability in the Queensland public sector\*](#)<sup>9</sup>, amendments to the Integrity Act will establish the OQIC as a statutory body on 1 July 2024. This will realise the financial independence of the OQIC, complementing the earlier changes to establish operational independence.<sup>10</sup> In conjunction with this significant change, the OQIC has been provided funding to transition the delivery of corporate services from the DPC to another external provider.

Late this financial year, the DPC assisted the OQIC by providing a Project Director for 3 months to lead the planning for the transition, which is expected to take between 12–18 months. A project was established in March 2024 to plan for the transition and to ensure the legal entity was established for commencement of the OQIC as a statutory office on 1 July 2024. A road map was developed to outline a staged approach to transitioning to a statutory body over this period.

A Transition Project Board comprising the Integrity Commissioner, Deputy Integrity Commissioner, Project Director and Manager, Corporate Services was established to oversee the early planning and activities for the transition. The transition project will continue during 2024–25, overseeing the effective changeover of corporate services, implementing a governance framework and aligning business operations with the new business structure.

## Developing a strategic information technology plan and roadmap

We have started work to develop a Strategic Information Technology (IT) Plan and road map. As we look to transition to a new provider for IT services, it is important to consider how best to leverage technology, digital assets and technical expertise to create value and support the achievement of our longer-term organisational objectives. The strategic road map will provide a forward-looking view of the IT strategy, aligning it with the OQIC's overarching goals.

By developing this road map, the OQIC aims to outline a clear sequence of investment requirements, including time and cost impacts, for the future state of our technology environment. This will ensure that all technology investments are aligned with identified information management and technology themes, providing a strategic approach to IT that supports the OQIC's operational goals.

## New branding

In the second half of the year, we started work on refreshing the branding for the OQIC. This new branding initiative is aligned with our evolving role and responsibilities as we prepare to become a statutory body. The updated brand will reflect our ongoing commitment to innovation and agility, ensuring that we remain at the forefront of efforts to improve ethics and integrity across Queensland. This branding refresh is an essential step in aligning our public image with the changing expectations of our stakeholders and the community.

As we move forward, the new brand will support our efforts to create a stronger, more recognisable presence. It will serve as a cornerstone for communication, helping us better engage with our key stakeholders. By embodying our values of transparency, accountability and continuous improvement, the brand will reinforce our contribution to strengthening the ethical landscape in Queensland while respecting the legacy and history of our office.

---

<sup>8</sup> Mr Kevin Yearbury PSM, 30 September 2021.

<sup>9</sup> Professor Peter Coaldrake AO, 28 June 2022.

<sup>10</sup> On 1 March 2023, the 'Office of the Queensland Integrity Commissioner' was established by an amendment to the Integrity Act; other amendments included new provisions establishing that the Integrity Commissioner controls the OQIC and is not subject to direction.

## Management and implementation of changes to the Integrity Act

### New dual hatting laws

The new dual hatting laws commenced on 19 April 2024, some weeks before the replacement of Chapter 4 (outlined below), which commenced on 28 May 2024. We undertook a small project to ensure these changes were communicated to our key stakeholders and to develop a fact sheet that sets out, in plain English, how these new laws operate.

We wrote to all registered lobbyists, published the fact sheet about the dual hatting laws and responded to queries about the new provisions. We communicated with stakeholders via email, social media and our website.

### New lobbying regulation (replacement of Chapter 4)

Changes to the Integrity Act that commenced on 28 May 2024 replaced the entire Chapter 4. The new Chapter 4 introduced significant changes to further clarify and strengthen the regulation of lobbying in Queensland. These included:

- introducing a new term, 'registered lobbyist', meaning entities and individuals who are registered and permitted to lobby in Queensland
- expanding the information required to apply for registration
- expanding the type of information to be published on the Lobbying Register
- broadening the powers of the Integrity Commissioner (e.g. to issue a compliance notice, issue a notice to provide information or a directive, and impose a condition on registration)
- requiring former senior government representatives and former Opposition representatives to provide a statement of official dealings as part of their application for registration (and publication of the statement in the Lobbying Register, once approved)
- mandating annual training for registered lobbyists
- giving the Integrity Commissioner a function to deliver training and education about lobbying regulation.

A large project was established to coordinate the various activities required to implement the changes successfully. These activities included:

- drafting and publishing various communications, fact sheets and other artefacts
- making changes to the Lobbying Register
- modifying internal procedures and business rules.

All these activities required immediate action. Other aspects of the legislative changes are planned for delivery in 2024–25, including the delivery of mandatory training. These will be discussed in next year's annual report.

As the requirements for registration changed, it was necessary for all lobbyists who registered before 28 May 2024 to re-apply for registration under the new requirements and definitions. These changes also required major modifications to the Lobbying Register, all of which had to be built and tested before the commencement date of 28 May 2024. Changes were made to:

- online and hard copy registration forms
- online and hard copy forms for changing particulars
- the public view of recorded particulars fields
- the process for initial login for a registered lobbying entity and their contact officers
- administrator views
- historical audit trails and stamped timelines in the back end of the system.

A significant education and awareness campaign was required to guide registrants and listed persons through this new process. As the changes meant the OQIC would have to do a bulk assessment of registration applications quickly, we needed to train all OQIC staff in the assessment process and bring in additional resources. During the same period, we also developed new resources, artefacts and publications for our various stakeholder groups, and we used multiple communication modes (including email, correspondence, website carousel and LinkedIn) to convey important information.

The Integrity Commissioner also wrote to heads of departments and agencies, all members of the Legislative Assembly, and other stakeholders about the amendments to the Integrity Act and the key changes in the regulation of lobbying. This correspondence incorporated information about the changes, and it

included the opportunity to take part in a webinar and a communications package to share within agencies to assist in informing all public sector employees about the changes. The Integrity Commissioner also offered to present the changes to executive teams and the Opposition. Following this correspondence, the Integrity Commissioner received a few requests to speak to executives and boards. This will be undertaken in 2024–25.

## Development of training and presentation materials

In late 2023, we recruited a Principal Training and Engagement Officer to lead our training and education strategy and projects, including developing new training and awareness materials and presentations.

The OQIC has developed a suite of presentations on various topics targeted at key audiences. The continuous development and delivery of this educational training material aligns with the OQIC's Strategic Plan objectives for areas of focus in 2024–25.

Mandatory training for lobbyists is under development and will commence following the review of the Registered Lobbyists Code of Conduct. In 2024–25, we will also consider what other training and education will fulfil our function to train government and Opposition representatives and registered lobbyists about lobbying regulation.

## New OQIC publications and website resources

During the year, we released 25 new publications, resources and artefacts on our website. These included 9 new fact sheets, and new statutory declaration forms for entities and individuals applying for registration as a lobbyist. We also revised our Strategic Plan and published our policy for complaints about the Integrity Commissioner.

## Input and feedback on policy, guides and other documents

Throughout the year, we were asked to comment or provide feedback to stakeholder agencies on internal policies, guides and other documents. This is an important part of our work and allows us to ensure that messaging around the importance of effective ethics and integrity is incorporated into key documents and frameworks guiding behaviour and conduct in the public sector. We provided feedback on several occasions on internal agency policies and procedures, including those about managing contact with registered lobbyists.

The Public Sector Commission (PSC) consulted us, and we provided important feedback on its review of a wide range of integrity-related directives, including the *Declaration of interests – Chief Executives of departments (Directive 05/24)* and *Declaration of interests – public sector employees excluding chief executives (Directive 03/24)*.

The Queensland Government Ministerial Code of Conduct was revised in January 2024, and the DPC sought input from the Integrity Commissioner. The Integrity Commissioner provided feedback on those sections relating to conflicts of interest, about the Integrity Commissioner and on Attachment 2, which included examples of conflicts of interest. Most of our feedback was accepted.

The OQIC does not currently have a central register recording requests to provide input, feedback or comment on policy, documents or projects, but we have modified our data capture systems to report on this next year.

Thank you for taking the time to provide feedback on our [draft document]. The amendments you have suggested enhance the clarity of the material and will help strengthen the prevention value of this [document].

# Governance, staffing and administrative support

This section provides general information about governance, as well as information about staffing, resourcing, risk management and information systems.

## Governance and administrative arrangements

The DPC was responsible for the financial, operational and administrative performance of the OQIC supporting the Integrity Commissioner during 2023–24. The DPC also provides corporate services to the OQIC (e.g. finance, human resources and information technology services).

The *Integrity and Other Legislation Amendment Act 2024* (Qld) will establish the OQIC as a statutory body for the *Financial Accountability Act 2009* (Qld) and the *Statutory Bodies Financial Arrangements Act 1982* (Qld) on 1 July 2024. This means that from 2024–25, the Integrity Commissioner will be the responsible officer for the OQIC.

In 2024–25, the OQIC will commence the process of transitioning corporate services support from the DPC to another provider.

## Acting Integrity Commissioner arrangements

During the year, Mr Forbes Smith was the Acting Integrity Commissioner when Ms Waugh took short periods of leave:

- 11 December 2023 to 5 January 2024
- 27 June to 5 July 2024.

## Staffing and budget

Recruitment of key positions, including the Deputy Integrity Commissioner, was finalised in the first half of the year. Through the then Department of State Development, Infrastructure, Local Government and Planning, a part-time Director Integrity Services was engaged, which provided much needed support for increased advice requests and key activities in the lobbying function.

In March 2024, through the DPC, the OQIC also received a temporary increase of 3.8 full-time equivalent staff to assist with the significant work required to implement changes arising from changes to the Integrity Act – in particular, the changes to lobbying regulation and preparing the OQIC for transition to being a statutory body.

The OQIC's budget increased due to the deferral of surplus funds from 2022–23 and additional funding from the DPC for Lobbying Register enhancements.

Major components of the budget are for employment-related expenditure, supplies and services (such as workplace accommodation, third-party corporate support services and legal advice), and amortisation expenses for the Lobbying Register. Refer to Appendix 1 for the Financial Statement for the 2023–24 financial year.

## Staff induction and training

The DPC continues to provide the OQIC with staff induction and training support services.

New OQIC employees are required to complete the DPC's new starter induction program. The program ensures new starters are aware of expected obligations and workplace behaviours and that their performance and behaviour must comply with the Code of Conduct under the *Public Sector Ethics Act 1994* (Qld). These expectations are incorporated into the ongoing cycle of employees' performance and development.

All new starters must complete a Confidentiality of Information Agreement, which sets out the various confidentiality provisions and obligations that apply, including the confidentiality under the Integrity Act.

All OQIC employees have access to the DPC intranet page, which provides various resources. Employees also have access to the iLearn platform, which allows them to access a wide range of online and face-to-face training courses.

## Risk management

The Director-General of the DPC is the accountable officer for the purposes of deploying an appropriate risk management system in accordance with the *Financial Accountability Act 2009* (Qld).<sup>11</sup> As such, the joint DPC and PSC Audit and Risk Management Committee provided oversight of risk management activities for the OQIC during 2023–24.

Work on reviewing our risk register and management systems continues as we prepare to become a statutory body and transition our corporate services from the DPC to another provider.

## Information systems and recordkeeping

The recordkeeping practices of the OQIC and staff must adhere to the *Public Records Act 2002* (Qld). The DPC provides record management services and support in using the HP Enterprise Content Manager system for managing electronic and physical documents. Policies and processes are in place for recordkeeping, email management, retention and disposal of records, managing information on shared network drives, and information security.

A copy of the Records Retention and Disposal Schedule (QDAN 629 v.3) developed for the Integrity Commissioner and approved by the Queensland State Archivist on 22 November 2013, is available on the Queensland State Archives website at [www.archives.qld.gov.au](http://www.archives.qld.gov.au).

This annual report and previous reports from the Integrity Commissioner are available online at <https://www.integrity.qld.gov.au/publications/annual-reports.aspx>.

## Right to information and information privacy

We received no applications under the *Right to Information Act 2009* (Qld) or the *Information Privacy Act 2009* (Qld) in 2023–24.

The OQIC did not collect any application fees or processing charges.

## Complaints management

During the year, the OQIC developed a complaints management framework and associated procedures.

The Integrity Commissioner did not receive any public interest disclosures under the *Public Interest Disclosure Act 2010* (Qld).

---

<sup>11</sup> Noting that from 1 July 2024, the OQIC becomes a statutory office. From 2024–25 onwards, the responsible officer will be the Integrity Commissioner.



# Appendix 1 – Financial Statement

Office of the Queensland Integrity Commissioner  
Statement of Comprehensive Income  
Year ended 30 June 2024

	2024	2023	2024	Note
	Actual	Actual	Original Budget	Budget Variance
OPERATING RESULT	\$'000	\$'000	\$'000	\$'000
<b>Income from Continuing Operations</b>				
Appropriation revenue	2,080	1,500	2,012	68
User charges and fees	5	-	-	5
Grants and other contributions	-	-	-	-
Other revenue	84	-	-	84
<b>Total Income from Continuing Operations</b>	<b>2,169</b>	<b>1,500</b>	<b>2,012</b>	<b>157</b>
<b>Expenses from Continuing Operations</b>				
Employee expenses	1,762	1,154	1,277	485
Supplies and services	337	284	667	(330)
Grants and subsidies	-	3	-	-
Depreciation and amortisation	70	7	58	12
Other expenses	-	-	10	(10)
<b>Total Expenses from Continuing Operations</b>	<b>2,169</b>	<b>1,447</b>	<b>2,012</b>	<b>157</b>
<b>Operating Result for the Year</b>	<b>0</b>	<b>53</b>	<b>-</b>	<b>0</b>
<b>OTHER COMPREHENSIVE INCOME</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>TOTAL COMPREHENSIVE INCOME</b>	<b>0</b>	<b>53</b>	<b>-</b>	<b>0</b>

The accompanying notes form part of these statements.

Presentation amounts included in the financial statements are rounded to the nearest \$1,000, or where that amount is less than \$500 to zero.

## Explanation of major budget variances

1. The increase in other revenue is primarily due to the receipt of in-kind contributions relating to employee-related expenses met by other government agencies.
2. An increase in the employee expenses is primarily due to the additional temporary full-time equivalent resources provided during the 2023–24 financial year, and the value of employee expenses received in kind from other government agencies.
3. A decrease in supplies and services is primarily due to timing delay for accommodation fit-out.



OFFICE OF  
THE QUEENSLAND

Integrity  
Commissioner

Level 13, 53 Albert Street

PO Box 15290

City East

Brisbane Qld 4002

T: +61 7 3003 2888

E: [office@integrity.qld.gov.au](mailto:office@integrity.qld.gov.au)

[www.integrity.qld.gov.au](http://www.integrity.qld.gov.au)