



OFFICE OF
THE QUEENSLAND

Integrity
Commissioner

Invitation to make
a written submission

**Review of the
Queensland Registered Lobbyists
Code of Conduct and other
lobbying matters**

May 2025

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Part 1: About this review

Introduction

Chapter 4 of the *Integrity Act 2009* (Integrity Act) sets out the regulatory scheme for lobbying in Queensland. The scheme requires entities that lobby Queensland government or Opposition representatives on behalf of a third party client to be registered.¹ Registered lobbyists must comply with the Integrity Act and the Queensland Registered Lobbyists Code of Conduct (Code), and record all lobbying activity in the Queensland Lobbying Register.

The Queensland Integrity Commissioner (Integrity Commissioner) is responsible for the regulatory scheme, including the registration of lobbyists, maintaining the Queensland Lobbying Register, and developing and approving the Code. The current Code, which can be found on the Office of the Queensland Integrity Commissioner (OQIC) website,² was last substantively amended on 12 September 2013.

The Integrity Act was amended in April and May 2024, including a new Chapter 4 (Lobbying activity) that made significant changes to lobbying regulation and the powers of the Integrity Commissioner.³ Changes include:

- It is a condition of registration that registered lobbyists must undertake mandatory annual training.⁴
- The Code must include a conflicts of interest policy for registered lobbyists.⁵
- The Integrity Commissioner can issue directives that registered lobbyists must comply with.⁶
- The Integrity Commissioner can issue compliance notices and there are a range of sanctions that can be imposed on registered lobbyists for non-compliance with their obligations (e.g. imposing a condition on registration or suspending or cancelling registration).⁷

Given the passage of time and recent legislative amendments, it is necessary to review the Code to ensure it:

- is fit for purpose and reflects contemporary practice
- is consistent with the purpose of the Code as set out in the Integrity Act
- works in conjunction with the Integrity Act and any directives issued by the Integrity Commissioner in regulating lobbying and setting standards
- promotes transparency and integrity and reflects community expectations around regulated lobbying
- includes a conflicts of interest policy as required by the Integrity Act.

In Part 2 of this paper, we outline the issues and questions that need to be considered in reviewing and updating the Code, and we are seeking your views on these matters.

There are also some other lobbying-related issues on which the Integrity Commissioner would like to consult with stakeholders. These are covered in Part 3 of this paper, and concern mandatory annual training for registered lobbyists, the Integrity Commissioner's function to provide education and training about the operation of Chapter 4, the definition of lobbying activity, and the Queensland Lobbying Register.

1. Section 41 of the Integrity Act defines a third party client as 'an entity that engages another entity to provide services constituting, or including, a lobbying activity for a commission, payment or other reward, whether pecuniary or otherwise, that is agreed to before the other entity provides the services'.

2. <https://www.integrity.qld.gov.au/assets/document/catalogue/general/Lobbyists%20Code%20of%20Conduct.pdf>.

3. See the *Integrity and Other Legislation Amendment Act 2024* (Qld).

4. Integrity Act, section 53(1).

5. Integrity Act, section 55(4).

6. Integrity Act, section 57.

7. Integrity Act, sections 66F to 66J.

The purpose of the Code

In reviewing and updating the Code, it is important to note that its purpose is set out in section 55 of the Integrity Act:

55 Code of conduct

- (1) The integrity commissioner may, after consultation with the parliamentary committee, approve a code of conduct for registered lobbyists (the registered lobbyists code of conduct).
- (2) The integrity commissioner must publish the registered lobbyists code of conduct on the integrity commissioner's website.
- (3) The purpose of the registered lobbyists code of conduct is to provide standards of conduct for registered lobbyists designed to ensure that communication between registered lobbyists and representatives is carried out in accordance with public expectations of transparency and integrity.**
- (4) The registered lobbyists code of conduct must include a policy relating to conflicts of interest for registered lobbyists.
- (5) The registered lobbyists code of conduct may impose obligations on registered lobbyists to give the integrity commissioner information about lobbying activities carried out by them.
- (6) Registered lobbyists must comply with the registered lobbyists code of conduct.

[emphasis added]

Section 55(3) emphasises the Code should set standards of conduct and those standards should align with public expectations of transparency and integrity around lobbying activities.

How to make a written submission

We invite Queensland Registered Lobbyists, public sector departments and agencies, and other interested parties and stakeholders to make written submissions to the review of the Code and related matters, addressing the issues and questions outlined in Parts 2 and 3 of this paper.

Using the submission template or online form

Written submissions should be made using either the [submission template](#) or [online form](#) available on the [webpage](#).

Submissions made using the template should be emailed to codereview@integrity.qld.gov.au. Submissions made using the [online form](#) will be sent automatically to the OQIC once the form is completed.

If you have any difficulty using the template or completing the form, please email us at codereview@integrity.qld.gov.au or call us on (07) 3003 2888.

Submissions on some but not all issues

If you only want to make submissions on some issues, leave blank those sections in the template or form you do not wish to comment on.

Closing date for submissions

The closing date for submissions is **5pm on Friday, 6 June 2025**.

How submissions will be considered

All submissions will be carefully considered and used to:

- inform the review and update of the Code
- develop directives to be issued by the Integrity Commissioner, which will complement the Code
- develop our policies and factsheets related to lobbying regulation
- inform the development of our training and education strategy and, in particular, help us in designing and delivering presentations and training.

In relation to the Code, the Integrity Commissioner is required to consult with the Parliamentary Committee⁸ before approving a Code for registered lobbyists.⁹ The Integrity Commissioner will consult with the Parliamentary Committee as part of the review process and on the final draft of the Code before it is approved.

When the Code is updated and approved, it will be published on our website and we will inform all those who made submissions, all Queensland Registered Lobbyists, and other stakeholders.

Confidentiality of submissions and privacy issues

Personal information in your submission will be collected by the OQIC for the purpose of informing changes to the Code, the development of training and education about lobbying, and other improvements to lobbying regulation in Queensland as outlined above. We may contact you for further information on the issues you raise.

We will not publish your submission or share it externally (subject to the exemptions listed below), but we may refer to it anonymously in any subsequent public report or communication (e.g. a report about the review process or our annual report). This means we may refer to or quote directly from your submission but we will not identify its source.

Please also note that while we do not intend to publish your submission, we may disclose it if required to do so by law, including as follows:

- All submissions may be subject to disclosure to the Queensland Parliament's Justice, Integrity and Community Safety Committee (the oversight committee for the Integrity Commissioner) under sections 25 and 33 of the *Parliament of Queensland Act 2001* (Qld).
- All submissions may be subject to disclosure under the *Right to Information Act 2009* (Qld), and applications to access submissions will be determined in accordance with that Act.

Contact details for questions and further information

If you have a question about the review, need further information, or are unable to make a written submission, please email us at codereview@integrity.qld.gov.au or call us on (07) 3003 2888.

8. The Queensland Parliament's Justice, Integrity and Community Safety Committee is responsible for monitoring the performance of the OQIC.

9. Integrity Act, section 55(1).

Part 2:

Submissions on changes to the Code

Issue 1:

Are there any conduct standards or topics missing from the Code?

The current Code has 5 sections:

1. Application
2. The Act
3. Standards of Conduct for Lobbyists
4. Information about lobbying activities
5. Definitions.

Section 3.1 sets out the 13 principles lobbyists must observe when engaging in lobbying activity.

We are interested in your views as to whether the Code is missing conduct standards or topics that ought to be addressed. For example:

- The Code could include considerations for registered lobbying entities when employing former Queensland senior government or Opposition representatives who are within their prohibition period under the Integrity Act.
- The Code could include specific additional disclosure requirements for when a registered lobbyist is communicating under the credentials of their third party client (e.g. if using a client email address).

Question 1 (Conduct standards and topics to be addressed in the Code)

- (a) Are there conduct standards or topics currently missing from the Code that ought to be covered?
- (b) Are there conduct standards or topics currently in the Code that are not clear or should be expanded on?

Issue 2:

What should be contained in the Code versus a directive?

The current Code is a mixture of principles and rules. Rules-based elements provide specific and detailed requirements (e.g. section 3.2), while principles-based elements provide broader statements that give guidelines on how a lobbyist should behave (e.g. section 3.1).

A new section of the Integrity Act, section 57, provides that the Integrity Commissioner may make a directive about the operation of a provision of Chapter 4 of the Integrity Act or the Code, including, for example, a procedural or technical requirement. Registered lobbyists must comply with a directive as well as the Code.¹⁰

The Integrity Commissioner is considering moving some procedural and technical obligations contained in the Code into a directive, for example:

- section 3.2, regarding information that a lobbyist must provide when first communicating with a government or Opposition representative
- section 3.3, regarding information that must be provided by a lobbyist who is a former Queensland senior government or Opposition representative (less than 2 years earlier) when first communicating with a government or Opposition representative
- section 4, regarding the specific information that must be provided to the Integrity Commissioner (and entered into the public register) about each lobbying activity.

The advantage of moving technical and procedural requirements into a directive is that it allows the Code to be principles-based, less cluttered, shorter and easier to read.

The disadvantage is that information about mandatory requirements and obligations is housed in multiple documents rather than just one.

Question 2 (Requirements in the Code or a directive)

Which provisions in the current Code (if any) should be removed and implemented by way of a directive under section 57 of the Integrity Act?

Question 3 (Other matters subject of a directive)

Are there any additional matters or topics concerning conduct and behaviour standards that should be dealt with through a directive under section 57 of the Integrity Act?

10. Integrity Act, sections 55(6) and 57(2).

Issue 3: Addressing the revolving door problem

The Collins Dictionary defines “the revolving door” as ‘a situation in politics in which someone moves from an important position in government to a position in a private company, especially where this may give them an unfair advantage’.¹¹

In 2008, the Crime and Misconduct Commission (CMC) identified misconduct risks in the pre- and post-separation employment of public officials.¹² The CMC report noted that if those risks were left untreated, public confidence in the integrity of government could be adversely affected. The CMC report also examined lobbying as a subset of post-separation employment and discussed the need for clear rules about how lobbyists interact with government representatives.

More recently, the Crime and Corruption Commission (CCC) discussed concerns about revolving door risks in its report on influence and transparency in Queensland’s public sector and identified 2 themes:

- Theme 5 — There is a perception that former government representatives have an unfair advantage.
- Theme 6 — There are concerns that there is no oversight of post-separation obligations.¹³

Under Theme 5, the CCC report highlighted concerns that:

... individuals who moved between the public and private sectors, including into registered lobbying roles, might leverage their existing associations or knowledge obtained through their former employment to further their own interests or that of a client ...

and further, that:

... former government representatives who moved to the private sector might be in a position to exert improper influence on government decisions due to the access and information they were privy to during their former employment. The risk may be further heightened when those individuals are engaged by government as consultants, contractors or appointed to government boards or bodies.¹⁴

To address the integrity risks posed by the revolving door in so far as becoming a third party lobbyist, section 62 of the Integrity Act prohibits a former Queensland senior government or Opposition representative,¹⁵ for 2 years after they leave their government or Opposition role, from carrying out lobbying activity for a third party, if the activity relates to official dealings in which they engaged in their official capacity in the 2 years before leaving. It also imposes obligations on government and Opposition representatives to not knowingly permit a former representative to carry out a lobbying activity with them in contravention of section 62.¹⁶

The Integrity Act also includes restrictions on “dual hatting” in relation to election campaigns. It disqualifies a person from being a registered lobbyist if they are performing a substantial role in the state election campaign of a political party in Queensland. It also prohibits a former lobbyist who played a substantial role in the election campaign of the political party who won the last Queensland state election from being registered as a lobbyist in the current term of government.¹⁷

Question 4 (Provisions in the Code for revolving door risks)

Should there be any additional provisions in the Code to further address the revolving door risks where lobbyists are recent former Queensland senior government or Opposition representatives? If so, please outline what you think those provisions should be.

11. See <https://www.collinsdictionary.com/dictionary/english/the-revolving-door>.

12. Crime and Misconduct Commission, *Public duty, private interests: issues in pre-separation conduct and post-separation employment for the Queensland public sector*, December 2008.

13. Crime and Corruption Commission, *Influence and transparency in Queensland’s public sector: minimising the corruption risks associated with improper influence on government decisions*, January 2023.

14. CCC, pp. 14–15.

15. Integrity Act, sections 59 to 61.

16. Integrity Act, section 64.

17. Integrity Act, section 49.

Issue 4: Code to include a conflicts of interest policy

Under section 55(4) of the Integrity Act, the Code 'must include a policy relating to conflicts of interest for registered lobbyists'.

This requirement was part of the legislative changes that occurred in May 2024, and implements a recommendation made by Mr Kevin Yearbury PSM in his strategic review of the Integrity Commissioner's functions:

Recommendation 17

In relation to lobbyists working in an advisory capacity to political parties, the Integrity Commissioner update the Lobbyists Code of Conduct to include a specific Conflict of Interest Policy that could be referenced as part of the Ministerial Code of Conduct to which Ministers commit, and lobbyists as part of their registration.¹⁸

Mr Yearbury noted the potential for conflicts to arise where a registered lobbyist is working for a political party in the period leading up to an election where policies are being developed that might impact one or more of their clients, and that, at the time of the review, there were no legislative 'constraints around lobbyists working for a political party within the office of a Minister'.¹⁹

The following year, Professor Peter Coaldrake AO also considered the issue of "dual hatting" in his review of culture and accountability in the Queensland public sector.²⁰ He stated:

The appearance of guiding a political party to office one week and then advocating a client's case for a government or council decision a few weeks later naturally raises suspicion which cannot be remedied by promises to impose 'Chinese walls'. Suspicions about 'dual hats' may be heightened if subsequent government decisions favour clients of the firms engaged to run election campaigns.²¹

Professor Coaldrake recommended 'an explicit prohibition on the "dual hatting" of professional lobbyists during election campaigns. They can either lobby or provide professional political advice but cannot do both'.²²

In April 2024, the Integrity Act was amended to include "dual hatting laws" that prohibit a registered lobbyist from performing a substantial role in an election campaign.²³ These new laws go some way to dealing with the concerns identified by Mr Yearbury.

The current Code addresses lobbyists' obligations concerning general conflicts of interest in sections 3.1(j) to (l) as follows:

- (j) Lobbyists shall not represent conflicting or competing interests without the informed consent of those whose interests are involved.
- (k) Lobbyists shall advise government representatives and Opposition representatives that they have informed their clients of any actual, potential or apparent conflict of interest, and obtained the informed consent of each client concerned before proceeding or continuing with the undertaking.
- (l) Lobbyists shall not place government representatives or Opposition representatives in a conflict of interest by proposing or undertaking any action that would constitute an improper influence on them.

These obligations will be incorporated into the conflicts of interest policy that will form part of the new Code.

18. Kevin Yearbury, [Strategic review of the Integrity Commissioner's functions](#), September 2021, p. 56.

19. Yearbury, p. 55.

20. Peter Coaldrake, [Let the sunshine in: review of culture and accountability in the Queensland public sector: final report](#), June 2022.

21. Coaldrake, p. 56.

22. Coaldrake, p. 58.

23. Integrity Act, section 58.

Question 5 (Content of a conflicts of interest policy)

- (a) What content should be included in a conflicts of interest policy for registered lobbyists (to be contained within the Code)?
- (b) Should there be any mandatory requirements under a conflicts of interest policy for registered lobbyists?

Question 6 (Other resources in relation to conflicts of interest)

Are there other resources the Integrity Commissioner should consider developing for registered lobbyists in relation to conflicts of interest?

Issue 5: Other submissions on the Code

The Integrity Commissioner is interested in hearing from stakeholders about other suggestions or issues of concern relating to the content or operation of the Code that have not been raised in this paper.

Question 7 (Other issues concerning the Code)

What other issues and improvements would you like the Integrity Commissioner to consider in reviewing the Queensland Registered Lobbyists Code of Conduct?

Part 3:

Submissions on related issues

Issue 6: Content and format of mandatory training for registered lobbyists

It is a standard feature of professions that, for members to maintain their registration, they must undertake regular professional education and training. In May 2024, the Integrity Act was amended to introduce a new requirement for mandatory training for registered lobbyists.

Section 56 of the Integrity Act requires the Integrity Commissioner to approve a training course for the purpose of enabling individuals to be, or continue to be, registered lobbyists, and to publish a description of the approved training course on the OQIC website. Section 53(1) makes it a condition of registration for a registered lobbyist to undertake the approved training course.

We are currently designing the inaugural training course for registered lobbyists, which will be delivered in May 2025. Given this is the first mandatory training course to be delivered to all registered lobbyists, it will cover the fundamentals of the regulatory scheme with a focus on obligations and compliance requirements under the Integrity Act and the Code.

We are seeking views about the content and delivery of the approved training course, including initial training requirements and ongoing training requirements in future years.

Question 8 (Mandatory training for registered lobbyists)

- (a) What content or topics should be covered in the initial mandatory training for a newly registered lobbyist?
- (b) What content or topics should be covered in subsequent ongoing annual mandatory training?
- (c) How should the mandatory training for registered lobbyists be delivered?
- (d) What format/formats should be used to deliver mandatory training — in person, online, self-paced online (video or written)?
- (e) How frequently should mandatory training be required?
- (f) How long should mandatory training be? That is, how many training hours should be required per year to retain registration?

Issue 7: General training and education about lobbying regulation

In addition to providing mandatory training for registered lobbyists as outlined above, the Integrity Commissioner has been given an additional statutory function 'to provide education and training to government representatives, Opposition representatives and registered lobbyists about the operation of Chapter 4' of the Integrity Act.²⁴ Chapter 4 (Lobbying activity) is solely concerned with lobbying regulation in Queensland.

The definition of a government representative in particular is broad and includes most, if not all, individuals working within Queensland Government, as well as all Queensland local government councillors and employees.²⁵

We have several factsheets published on our website that relate to lobbying regulation and we also incorporate information about lobbying regulation into particular presentations and training we deliver (e.g. presentations to Executive Leadership Teams within government and to new ministerial staff).

The OQIC is currently developing its program of work to deliver training and education about the operation of Chapter 4. This will include training to reach a diverse stakeholder group (e.g. virtual and/or self-paced training and/or train-the-trainer modules) complemented by educational resources such as factsheets, guides and video-explainers.

We would like to hear from government representatives, Opposition representatives and registered lobbyists about what training and education will be most effective in improving understanding of lobbying regulation in Queensland.

Question 9 (Training and education about lobbying regulation)

- (a) What training should the OQIC provide to raise awareness and understanding of lobbying regulation for government representatives, Opposition representatives and registered lobbyists?
- (b) How should training be delivered?
- (c) What educational materials and resources should the OQIC provide about lobbying regulation?
- (d) What topics should be covered in training and education about lobbying regulation?
- (e) What other suggestions do you have for training and education about lobbying regulation?

24. Integrity Act, section 7(1)(c).

25. Integrity Act, section 44.

Issue 8: Is asking for a meeting a lobbying activity?

Section 42(1) of the Integrity Act defines a lobbying activity as:

- (a) communicating with a government representative in an effort to influence decision-making of the State government or a local government ...; or
- (b) communicating with an Opposition representative in an effort to influence decision-making of the Opposition ...

The OQIC is often asked whether a registered lobbyist's request for a meeting with a government or Opposition representative, including for an introductory meeting with their client, is a "lobbying activity" under section 42(1). Different Integrity Commissioners have taken different positions on this question — in the past, for example, one position has been that communication solely for the purpose of arranging, changing or cancelling a meeting is not a lobbying activity.

The current position, which has been held for several years, is that communication to request or arrange a meeting is a lobbying activity only if it is successful (that is, if a meeting is granted or agreed to). If communication is unsuccessful and a meeting is not granted or agreed to, then it is not a lobbying activity. This position is published in *Lobbying: Common questions & answers* on the OQIC website as follows:

If I arrange a 'meet and greet' for a client with a Minister, is that lobbying?

For 'lobbying activity' to have occurred, it would need to be done with the intention of influencing government decision making.

However, even the mere introduction of a third party client, which successfully leads to further contact with the aim of influencing government decision making, is part of the overall 'lobbying activity'.

Is it 'lobbying activity' if I merely telephone a Minister's office to arrange a meeting between my client and the Minister, that will not include me participating in the meeting?

The contact to arrange a meeting is 'lobbying activity' if it results in the successful arrangement of a meeting.

If the contact was unsuccessful in arranging a meeting or further relevant contact, the [Integrity Commissioner] would not consider it to have amounted to 'lobbying activity'.²⁶

Over the last 2 years, the Integrity Commissioner has been asked on several occasions to reconsider the above position and to provide more nuanced guidance on this issue (e.g. to clarify whether, once a meeting has been agreed to after initial contact, subsequent communications about meeting logistics such as time, location and who will attend are lobbying activities).

It has also been argued that the current position is confusing because it is the outcome of the communication that determines whether it is a lobbying activity, rather than the activity itself, and it would be administratively easier to manage if it was a clear cut position (i.e. it is either a lobbying activity or not, irrespective of whether the request resulted in a meeting).

Relevant to considering this issue is section 3.2 of the Code, which requires a registered lobbyist, when making an initial communication with a government representative or Opposition representative about a particular issue on behalf of a third party client, to inform the representative all of the following:

- that they are a lobbyist currently listed on the register of registered lobbyists
- that they are making the communication on behalf of a third party
- the name of the third party
- the nature of that third party's issue
- the reasons for the approach.

26. OQIC, [Lobbying: Common questions & answers](#), May 2024, pp. 2–3.

Stakeholders have expressed differing views about whether requesting a meeting (irrespective of whether the request is met) is a lobbying activity as defined in section 42 of the Integrity Act. The 2 major views are as follows:

- A request for a meeting that does not specify what outcome is being sought (e.g. a change to policy) should not be considered a lobbying activity. It is argued that if the communication does not include the intended outcome, it is not an attempt to influence decision-making.
- Lobbying activity should include all communications related to the lobbying matter. It is argued that it is irrelevant whether the desired outcome is expressed in a particular communication, because all communications by a registered lobbyist on behalf of a client are part of the broader objective of obtaining an outcome for the client and influencing decision-making.

Question 10 (Definition of lobbying activity regarding requests for meetings)

In your view, is initial communication by a registered lobbyist with a government or Opposition representative for the purpose of setting up a meeting or arranging an introduction for a client a "lobbying activity"? Please include your arguments and reasoning as to why you believe it is or is not a lobbying activity as defined in section 42 of the Integrity Act.

Issue 9: Improvements to the Queensland Lobbying Register

The main purpose of the Queensland Lobbying Register (Lobbying Register) is to increase transparency of lobbying in Queensland. The Lobbying Register also:

- provides an easy way for individuals and entities to register as lobbyists in Queensland and provide information about their lobbying activity
- helps government and Opposition representatives to comply with their obligations in relation to lobbyists, including ensuring representatives who are approached by or meet with lobbyists know whose interests the lobbyists are representing
- enables the Integrity Commissioner to monitor compliance with Queensland's regulatory scheme for lobbying.

Users outside of the OQIC interact with 2 components of the Lobbying Register:

- a public register of all past and current registered lobbyists and their lobbying activity²⁷
- an online portal for registered lobbying entities to update their information and record lobbying activities (the lobbyists' portal).

We are currently exploring ways to enhance both components of the Lobbying Register to provide a more user-friendly experience for registered lobbyists, government and Opposition representatives, and members of the public. We would like to hear how well the register currently works for you and any ways you think it could be improved. We are also interested in any feedback or suggestions as to how the register can better achieve the objective of providing transparency of lobbying.

As noted above, the Lobbying Register also supports the Integrity Commissioner's compliance monitoring responsibilities. These include dealing with reports of alleged non-compliance with requirements of the Integrity Act and the Code and implementing regulatory activities like audits and quality assurance processes to identify instances of non-compliance and ensure the accuracy and completeness of data in the register.

27. Available at <https://lobbyists.integrity.qld.gov.au/Lobbying-Register/>.

We are therefore seeking views on a number of other topics relating to the Lobbying Register, including 3 specific issues that are currently being considered by the Integrity Commissioner:

1. To assist in discharging statutory responsibilities, the Integrity Commissioner is proposing that registered lobbyists who record the purpose of a lobbying activity as “commercial in-confidence” be required to include further information about the matter in a free-text field that would not be published on the public register. The further information would be accessible only to OQIC staff for compliance monitoring purposes. We are seeking stakeholders’ views about this proposal, and about the information provided regarding the purpose of lobbying activities generally.
2. The Lobbying Register includes information about the purpose of a lobbying activity, which lobbyists are required to provide under section 4 of the current Code. Currently when entering a lobbying activity into the register, the registered lobbyist must choose the purpose of the activity from a drop down menu, with options including “allocation of funding”, “making or amending legislation”, “introduction” and so on. Only if the option of “other” is selected is the registered lobbyist required to enter a free-text description of the purpose of the activity. We are interested in views on whether the options in the drop down menu are sufficient to describe the purpose of a lobbying activity, or whether a short free-text description should also be required for all menu options.
3. The OQIC is considering developing an online form that people could use to report potential non-compliance with the lobbying regulatory scheme to the Integrity Commissioner. This could be similar to the form available via the federal register of lobbyists kept by the Australian Government Attorney-General’s Department.²⁸ We would welcome feedback about this idea.

Question 11 (Content and functionality of the public register)

- (a) Is the type and amount of information about lobbyists/lobbying entities, clients and lobbying activities available on the public register useful/sufficient? If not, please outline what other information you think should be included.
- (b) How easy or difficult is it to search the public register and find relevant information?
- (c) What changes do you think would improve the functionality of the public register?

Question 12 (Functionality of the lobbyists’ portal)

- (a) If you use the lobbyists’ portal, how well does it work for you?
- (b) Do you have any suggestions for how the lobbyists’ portal could be improved?

28. See <https://lobbyists.ag.gov.au/report-a-breach>.

Question 13 (Information about the purpose of lobbying activities)

- (a) Should lobbyists be required to provide further information about lobbying activities that have a purpose of “commercial-in-confidence”? This information would be accessible only to OQIC staff for compliance monitoring purposes and would not be published on the public register. Please include your arguments and reasoning as to why lobbyists should or should not be required to provide further information about lobbying activities that are commercial-in-confidence.
- (b) Should lobbyists be required to provide a short, free-text description of the purpose and intended outcome of all lobbying activities?
- (c) Are the current drop down options in the Lobbying Register useful/sufficient when reporting on the purpose of a communication with a government or Opposition representative?

Question 14 (Reporting potential non-compliance)

Would you use an online form to report potential non-compliance with requirements of the Integrity Act or the Code to the Integrity Commissioner? Please share any ideas about what such a form should include and how it should work.

Question 15 (Other improvements to the Lobbying Register)

Are there any other improvements that could be made to the Queensland Lobbying Register to better provide transparency of lobbying or enhance the register’s operation?

Issue 10: Other improvements to the regulation of lobbying in Queensland

It is too early to comment on the effectiveness of the most recent amendments to the Integrity Act. Their impact will be closely monitored by the Integrity Commissioner over time. This is not to say, however, that improvements to the regulation of lobbying cannot be made within the current statutory framework. To that end, stakeholders are invited to make submissions on any issue they think may enhance the Integrity Commissioner’s lobbying regulation function. Without limiting submissions, stakeholders may wish to consider the following questions.

Question 16 (Other improvements to lobbying regulation)

- (a) Are there any other improvements you consider would improve transparency of lobbying or the administration of lobbying regulation in Queensland?
- (b) Are there any other lobbying-related issues you would like to raise with the Integrity Commissioner?