# Submission to the Review of the Queensland Registered Lobbyists Code of Conduct and other lobbying matters

The Office of the Queensland Integrity Commissioner (OQIC) is seeking written submissions to its review of the Queensland Registered Lobbyists Code of Conduct (Code) and other lobbying matters. Please use this template to make your submission in response to the questions in the OQIC’s consultation paper, available at [https://www.integrity.qld.gov.au/lobbyists/queensland-registered-lobbyists-code-of-conduct.aspx](https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.integrity.qld.gov.au%2Flobbyists%2Fqueensland-registered-lobbyists-code-of-conduct.aspx&data=05%7C02%7Clauren.hancock%40integrity.qld.gov.au%7C95bcf98c4f504859da9708dd91e54af3%7C51778d2aa6ab4c7697dc782782d65046%7C0%7C0%7C638827136214631917%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=hV1gJ%2BertM7maiOoj99EH6Hct%2B4HW8fxkdHPAdsd63I%3D&reserved=0).

## How to make a submission

The consultation paper discusses key issues with the Code and other aspects of lobbying regulation in Queensland. It also poses some related questions. Your submission should clearly address at least one of the issues in the consultation paper, but you do not need to answer every question.

Please email your completed submission to codereview@integrity.qld.gov.au **by 5pm on Friday, 6 June 2025**.

### Using this template

### Your input is extremely valuable, and we encourage you to provide as much detail as needed. The response boxes will expand as you type.

If you do not wish to answer a particular question, you can leave the box empty.

### Privacy

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

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

Please also note that while the OQIC does not intend to publish your submission, the OQIC 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.

## Submitter details

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| Name |  |
| I am making this submission…  | [ ]  as an individualOR[ ]  on behalf of an organisation / agency |
| Position (if applicable)  |  |
| Organisation / agency (if applicable) |   |
| Email address |  |
| Phone number |  |

## Submission

### Part 2: Submissions on changes to the Code

#### **Issue 1: Are there any conduct standards or topics missing from the Code? (p. 5)**

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

1. Are there conduct standards or topics currently missing from the Code that ought to be covered?

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1. Are there conduct standards or topics currently in the Code that are not clear or should be expanded on?

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**Issue 2: What should be contained in the Code versus a directive? (p. 6)**

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?

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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?

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**Issue 3: Addressing the revolving door problem (p. 7)**

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.

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**Issue 4: Code to include a conflicts of interest policy (pp. 8–9)**

Question 5 (Content of a conflicts of interest policy)

1. What content should be included in a conflicts of interest policy for registered lobbyists (to be contained within the Code)?

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1. Should there be any mandatory requirements under a conflicts of interest policy for registered lobbyists?

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**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?

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**Issue 5: Other submissions on the Code (p. 9)**

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?

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### Part 3: Submissions on related issues

**Issue 6: Content and format of mandatory training for registered lobbyists (p. 10)**

Question 8 (Mandatory training for registered lobbyists)

1. What content or topics should be covered in the initial mandatory training for a newly registered lobbyist?

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1. What content or topics should be covered in subsequent ongoing annual mandatory training?

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1. How should the mandatory training for registered lobbyists be delivered?

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1. What format/formats should be used to deliver mandatory training — in person, online, self-paced online (video or written)?

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1. How frequently should mandatory training be required?

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1. How long should mandatory training be? That is, how many training hours should be required per year to retain registration?

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**Issue 7: General training and education about lobbying regulation (p. 11)**

Question 9 (Training and education about lobbying regulation)

1. What training should the OQIC provide to raise awareness and understanding of lobbying regulation for government representatives, Opposition representatives and registered lobbyists?

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1. How should training be delivered?

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1. What educational materials and resources should the OQIC provide about lobbying regulation?

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1. What topics should be covered in training and education about lobbying regulation?

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1. What other suggestions do you have for training and education about lobbying regulation?

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**Issue 8: Is asking for a meeting a lobbying activity? (pp. 12–13)**

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.

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**Issue 9: Improvements to the Queensland Lobbying Register (pp. 13–15)**

Question 11 (Content and functionality of the public register)

1. 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.

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1. How easy or difficult is it to search the public register and find relevant information?

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1. What changes do you think would improve the functionality of the public register?

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Question 12 (Functionality of the lobbyists’ portal)

1. If you use the lobbyists’ portal, how well does it work for you?

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1. Do you have any suggestions for how the lobbyists’ portal could be improved?

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Question 13 (Information about the purpose of lobbying activities)

1. 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.

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1. Should lobbyists be required to provide a short, free-text description of the purpose and intended outcome of all lobbying activities?

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1. 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?

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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.

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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?

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**Issue 10: Other improvements to the regulation of lobbying in Queensland (p. 15)**

Question 16 (Other improvements to lobbying regulation)

1. Are there any other improvements you consider would improve transparency of lobbying or the administration of lobbying regulation in Queensland?

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1. Are there any other lobbying-related issues you would like to raise with the Integrity Commissioner?

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Thank you for making your submission. We appreciate you taking the time to share your valuable insights with us.