



QUEENSLAND PARLIAMENT **COMMITTEES**

Oversight of the Office of the Queensland Integrity Commissioner

Justice, Integrity and Community Safety Committee



Report No. 17

58th Parliament, July 2025

Justice, Integrity and Community Safety Committee

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All references and webpages are current at the time of publishing.

Acknowledgements

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Chair's Foreword

The Justice, Integrity and Community Safety Committee (committee) has oversight responsibilities for the Queensland Integrity Commissioner. This report presents a summary of the committee's oversight of the Office of the Queensland Integrity Commissioner (OQIC) for the 2023-24 financial year.

As part of its oversight function, the committee reviewed the *Office of the Queensland Integrity Commissioner Annual Report 2023-24*, which was tabled on 24 September 2024, and held a public hearing with the Queensland Integrity Commissioner, the Deputy Integrity Commissioner and the Manager of Corporate Services on 21 May 2025.

During 2023-24, the volume and scope of OQIC's work increased. The OQIC transitioned to a statutory body, managed and implemented changes to the *Integrity Act 2009*, and developed a large volume of new training materials and website resources.

I congratulate the Integrity Commissioner and the OQIC for their work during this busy time, and for their assistance with the committee's oversight for the reporting period. I also extend my thanks to Parliamentary Service staff for their work on this report.

I commend this report to the House.



Marty Hunt

Chair

Recommendations

Recommendation 1	16
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That the House notes the contents of this report.

Glossary

Annual Report	Office of the Queensland Integrity Commissioner Annual Report 2023-24
Committee	Justice, Integrity and Community Safety Committee
DPC	Department of the Premier and Cabinet
FTE	Full time equivalent
Integrity Act	<i>Integrity Act 2009</i>
Integrity Commissioner	Queensland Integrity Commissioner
OQIC	Office of the Queensland Integrity Commissioner
Public hearing	Public hearing held on 21 May 2025

1. Introduction

The Justice, Integrity and Community Safety Committee (committee) has oversight responsibilities for the Queensland Integrity Commissioner (Integrity Commissioner). This includes monitoring and reviewing the performance, and examining reports of the Integrity Commissioner, and reporting to the Legislative Assembly where required.¹

This report presents the committee's examination of the *Office of the Queensland Integrity Commissioner Annual Report 2023-24* as part of its oversight function.

1.1. Purpose and functions of the Integrity Commissioner

The Integrity Commissioner is an independent statutory officer established under the *Integrity Act 2009* (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.

The role of the Integrity Commissioner is 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 of the Integrity Act (Lobbying activity)
- raise public awareness of ethics and integrity issues.

1.2. Committee's functions regarding the Integrity Commissioner

The committee's functions with respect to the Integrity Commissioner include:

- monitoring and reviewing the Integrity Commissioner's performance of its functions under the Integrity Act²
- reporting to the Legislative Assembly on any matter concerning the Integrity Commissioner, their functions and/or their performance that the committee considers should be drawn to the Legislative Assembly's attention³
- examining the Integrity Commissioner's annual reports (or other reports) and, if appropriate, commenting on any aspect of the report⁴

¹ *Integrity Act 2009* (Integrity Act), sch 2; Assembly, Standing Orders, sch 6.

² Integrity Act, s 89(a).

³ Integrity Act, s 89(b).

⁴ Integrity Act, ss 89(c) and (d).

- reporting to the Legislative Assembly on any changes to the functions and procedures of the Integrity Commissioner that the committee considers desirable for the more effective operation of the Integrity Commissioner or the Integrity Act⁵
- being consulted on the code of conduct for registered lobbyists⁶
- being consulted on, and approving, the selection process, appointment⁷ and matters relating to the appointment of the Integrity Commissioner⁸
- being consulted on, and agreeing to, a motion for an address to the Governor to suspend or remove the Integrity Commissioner⁹
- tabling the reports of the Integrity Commissioner (including the annual report and strategic review report)¹⁰
- approving the appointment of a person as the reviewer for strategic reviews of the Integrity Commissioner or the terms of reference for a strategic review¹¹
- considering funding proposals from the Integrity Commissioner, preparing a report in respect of such a proposal with Treasury and providing the Minister with a report regarding the approval of a proposal.¹²

1.3. Integrity Commissioner

Linda Waugh was appointed Queensland Integrity Commissioner on 5 December 2022 for a 5-year term. Under section 75 of the Integrity Act, the Integrity Commissioner can hold office for a term of not more than 5 years (unless the Integrity Commissioner resigns or is removed from office). They can be reappointed for additional terms but cannot hold office for more than 10 years continuously.¹³

To appoint a person as the Integrity Commissioner, the Minister is required to:

- advertise nationally for applications from suitably qualified persons
- obtain approval from the committee about the selection process and the person's appointment.¹⁴

⁵ Integrity Act, s 89(e).

⁶ Integrity Act, s 55(1).

⁷ That is, remuneration, allowances, and terms and conditions of office; Integrity Act, s 76.

⁸ Integrity Act, s 74.

⁹ Integrity Act, s 82(4).

¹⁰ Integrity Act, ss 85K, 85L, 88(6).

¹¹ Integrity Act, s 86. The committee has 20 business days to give or not give its approval after receiving the request from the Minister. If not given within 20 days, it is taken to have approved the appointment of the reviewer or terms of reference for the strategic review; Integrity Act, s 86(7).

¹² Integrity Act, ss 85E-85J. The committee has 20 business days to give or not give its approval after receiving the request from the Minister. If not given within 20 days, it is taken to have approved the funding proposal; Integrity Act, s 85G(3).

¹³ Integrity Act, s 75.

¹⁴ Integrity Act, s 74. The committee has 20 business days to give or not give its approval after receiving the request from the Minister. If not given within 20 days, it is taken to have approved the appointment of the person as the Integrity Commissioner; Integrity Act, s 74(3).

The Minister is also required to obtain the approval of the committee on the reappointment of a person as the Integrity Commissioner.¹⁵

1.4. The committee's oversight process

In conducting its oversight of the OQIC for the 2023-24 period, the committee adopted the following process:

Examined the Office of the Queensland Integrity Commissioner Annual Report 2023-24 (see section 2 of this report)	Held a public hearing on 21 May 2025 (see section 3 of this report)
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The following representatives participated in the public hearing on 21 May 2025 (public hearing):

Linda Waugh Queensland Integrity Commissioner	Paxton Booth Deputy Commissioner	Krystal Petersen Manager, Corporate Services
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The transcript of the public hearing is available on the committee's webpage.¹⁶

¹⁵ Integrity Act, s 74.

¹⁶ Queensland Parliament, Justice, Integrity and Community Safety Committee, Oversight of the Queensland Integrity Commissioner.

2. Examination of Annual Report 2023-24

The *Office of the Queensland Integrity Commissioner Annual Report 2023-24* was tabled on 24 September 2024 (Annual Report) pursuant to section 85K of the *Integrity Act 2009*.

The Annual Report provides information about the Integrity Commissioner's performance in relation to its strategic objectives and priorities, its financial position and its compliance with legislative requirements. It is not an annual report for the purposes of the *Financial Accountability Act 2009*; the OQIC fulfils its financial obligations under this Act by reporting in the annual report of the Department of Premier and Cabinet.

2.1. Advice requests

In 2023-24, the OQIC:

- received 122 formal requests from a designated person for advice on ethics, integrity or interests issues (an increase of 56 from the previous year)¹⁷
- finalised 115 formal written advice requests
- finalised 8 urgent formal advice requests within one business day
- finalised 89 formal written advice requests within 2 weeks of request.¹⁸

Ministers and assistant ministers were the largest category of designated persons requesting advice from the OQIC, followed by statutory office holders, directors-general and ministerial advisers.¹⁹

About 85% of advice requests concerned a conflict of interest. Of those requests, the majority related to personal interests. Also in demand was advice concerning ethics or integrity matters, including recruitment or procurement processes, sensitive information and internal policy, among other issues.²⁰

The Annual Report states that 77% of the advice requests were finalised within 10 business days. Those that took longer were reported as being more complex and requiring more detailed research.

Response times were impacted by resource constraints. In May 2024 all OQIC resources were dedicated to implementing changes to lobbying regulations. The Annual Report contends that OQIC sought to address the concurrency issue by creating efficiencies in internal processes which are expected to improve performance in the future.²¹

¹⁷ OQIC, Annual Report 2023-24 (Annual Report), p 2.

¹⁸ Annual Report, p 4.

¹⁹ Annual Report, p 8.

²⁰ Annual Report, p 9.

²¹ Annual Report, p 10.

2.2. 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.

In 2023-24, the OQIC:

- recorded 104 entities and 254 individuals on the lobbying register
- responded to 108 enquiries about lobbying, representing an uptick from the previous financial years (due to changes in legislation requiring lobbyists to re-register in May 2024)²²
- recorded 928 lobbying activities and contacts with Government and Opposition representatives.²³

During the reporting period, Chapter 4 of the Integrity Act was significantly amended by the *Integrity and Other Legislation Amendment Act 2024*. Key amendments included:

- changes to the definition of registered lobbyist
- the introduction of mandatory training for registered lobbyists
- modifications to the functions of the Integrity Commissioner, including a new requirement to provide training on Chapter 4 of the Act, and impose conditions on the registration of lobbyists
- changes to the annual reporting requirements of registered lobbyists.²⁴

The Integrity Commissioner will commence consultation to update the Lobbying Code of Conduct (last approved in 2013) during 2024-25.²⁵

The Annual Report notes that during 2023-24, the OQIC:

- recorded 66 instances of lobbyist non-compliance
- received 5 reports of unregistered lobbying (none reached the threshold for referral to the Queensland Police Service)
- issued one notice to show cause.²⁶

2.3. Stakeholder engagement, presentations and training

During 2023-24 the OQIC conducted:

- 152 meetings with stakeholders (a 20 per cent increase on the previous year)
- 48 meetings with ministers and assistant ministers, directors-general and chief executives about integrity and ethics advice and/or services

²² Annual Report, p 15.

²³ Annual Report, p 14.

²⁴ Annual Report, pp 12-13.

²⁵ Annual Report, p 14.

²⁶ Annual Report, pp 15-16.

- 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).²⁷

The Annual Report explains that the Deputy Integrity Commissioner also conducts stakeholder engagement; however, data has not been recorded historically. The OQIC intends to report on these metrics for the next financial year.²⁸

The OQIC delivered 33 presentations and training sessions to various public and private entities regarding:

- ethics and integrity advising
- assessing and managing conflicts of interest
- regulating lobbying
- public sector integrity.²⁹

The OQIC also developed and published a webinar series for registered lobbyists and government representatives regarding the recent changes to lobbying regulation in Queensland. The feedback received regarding the webinars was positive. For example:

- 95 per cent of participants stated that the presentation skills of the presenters were good or excellent
- 95 per cent of participants stated that the learning outcomes and relevance of the webinars were good or excellent
- 100 per cent of participants stated that the presentation materials were good or excellent.³⁰

2.4. Projects and activity

Corporate and operational projects arising from changes to the Integrity Act include:

- *Transitioning to a statutory body and new corporate services provider.* Amendments to the Integrity Act established the OQIC as a statutory body as of 1 July 2024. The transition will continue in 2024-25 with corporate services—currently provided by DPC—transferred to an external provider.³¹

²⁷ Annual Report, p 17.

²⁸ Annual Report, p 17.

²⁹ Annual Report, p 18.

³⁰ Annual Report, p 19.

³¹ Annual Report, p 20.

- *Management and implementation of changes to the Act.* New dual hatting laws and lobbying regulation measures commenced on 28 May 2024, for which an education and awareness campaign was undertaken.³²
- *Development of training materials and website resources.* The OQIC developed a suite of presentations and 25 new publications, resources and artefacts on the OQIC's website. Training initiatives for government, Oppositions and registered lobbyists will be further considered during 2024-25.³³

2.5. Staffing

During 2023-24, the OQIC finalised recruitment of key appointments, including the Deputy Integrity Commissioner. In March 2024, DPC seconded 3.8 (equivalent) staff to the OQIC on a temporary basis to assist with increased demands resulting from the changes to the Integrity Act; in particular, the changes to the lobbying regulation and preparing the OQIC for transition.³⁴

As of 30 June 2024, the OQIC comprised 10.3 full-time equivalent staff; the Integrity Commissioner, 6.2 permanent staff and 3.1. temporary staff.³⁵

2.6. Financial performance

The OQIC's financial performance is summarised in the Financial Statement (Appendix 1 to the Annual Report). The Financial Statement shows that the Integrity Commissioner's budget increased significantly compared to the last financial year. In 2023-24, it received \$2.08 million in appropriation revenue, an increase of \$580,000 (or more than one third) compared to the previous year.³⁶

The Financial Statement indicates some variations between budgeted and actual expenditure in 2023-24. Most notably the OQIC spent \$1.76 million on employee expenses, which was \$485,000 more than budgeted, and an increase of approximately \$600,000 on 2023. Both the increase and variation appear due to the hiring of additional temporary staff, and the secondment of staff from other government agencies.³⁷

The Financial Statement also indicates that the OQIC spent \$337,000 on supplies and services, which was only about half of the total budgeted for this area (\$667,000). This variation was attributed to a delay in accommodation fit-out.³⁸

The Annual Report's Financial Statement records a cost-neutral operating result for Financial Year 2023-24.³⁹

³² Annual Report, p 21.

³³ Annual Report, p 22.

³⁴ Annual Report, p 23.

³⁵ Annual Report, p 5.

³⁶ Annual Report, p 25.

³⁷ Annual Report, p 25.

³⁸ Annual Report, p 25.

³⁹ Annual Report, p 25.

3. Oversight hearing

The committee held an oversight hearing with the OQIC in Brisbane on 21 May 2025 and examined a range of issues, including:

- common issues that arise regarding compliance with lobbying requirements
- the recently commenced review of the Lobbying Code of Conduct
- the Integrity Commissioner's approach to education and enforcement
- the workload and resourcing of the Office of the Integrity Commissioner
- how the role of the Integrity Commissioner compares to other jurisdictions
- confidentiality requirements and the disclosure of advice provided by the Integrity Commissioner.

Each of these issues is discussed further below.

3.1. Compliance with lobbying requirements

The Integrity Commissioner described some of the main reasons for noncompliance with the requirements that apply to professional lobbyists. These include failing to enter a lobbying activity onto the public register, and confusion around when an entity is engaging in a lobbying activity or not.⁴⁰

The Integrity Commissioner explained that it is relatively common for alleged instances of non-compliance to be found to be unsubstantiated. Most often this is because the specific activity turns out not to fall within the relevant definition of lobbying (e.g. because a lobbyist was doing work pro-bono, or because lobbying was not the sole purpose of the engagement).⁴¹

3.2. Review of the Code of Conduct

The Integrity Commissioner commented on the current review of the Lobbying Code of Conduct and advised the committee that her office has prepared a consultation paper to guide engagement with and feedback from stakeholders.⁴² As part of the review, the Integrity Commissioner proposed removing some procedural details from the Lobbying Code of Conduct (to be placed in directives) to 'leave the code to do the work of the code, which is about values and behavioural expectations.'⁴³

The Integrity Commissioner also stated that the definition of lobbying activity will be considered in the review. This is because the application of this definition to concrete cases is often a source of confusion. For example, stakeholders have reported confusion about whether merely requesting a meeting constitutes lobbying activity.⁴⁴

⁴⁰ Public hearing transcript, Brisbane, 21 May 2025, p 4.

⁴¹ Public hearing transcript, Brisbane, 21 May 2025, p 4.

⁴² Public hearing transcript, Brisbane, 21 May 2025, p 3.

⁴³ Public hearing transcript, Brisbane, 21 May 2025, p 3.

⁴⁴ Public hearing transcript, Brisbane, 21 May 2025, p 5.

3.3. Education and enforcement

The Integrity Commissioner provided information about her use of enforcement powers, in particular, the one show cause notice issued to date. The Integrity Commissioner stated that this resulted in a decision to issue a warning, however, she was unable to provide further details about the matter.⁴⁵

The Integrity Commissioner advised the committee that her approach so far has been to emphasise education as a means of ensuring compliance with lobbying regulations. While the training offered to date has focussed on fundamental issues, future training is expected to address key issues, trends and themes as they emerge.⁴⁶

The Integrity Commissioner noted that once her office has delivered more training for relevant stakeholders, she may reassess how she approaches cases of non compliance:

*These are relatively new powers that I have had for just on a year. I really was very committed to delivering that mandatory training before we started, looking at how we approach in particular these instances of noncompliance but also proactive regulatory work which we are not doing at the moment.*⁴⁷

3.4. Workload and resourcing

The Integrity Commissioner advised the committee that her office experienced a significant increase in the volume and scope of its work in 2023-24. This was due to a number of factors, including legislative changes, increased community expectations of transparency and accountability, and greater awareness of her role.⁴⁸

The Integrity Commissioner noted that the workload associated with providing advice can vary greatly. While some matters are simple and can be dealt with quickly, more complex matters require her to gather more information before providing advice. The process was described as follows:

*Usually you have to gather some more information to properly understand the circumstances. If it is a conflict of interest the test I am going to apply is a reasonable person test, but I need to really understand what the private interest is in detail and I need to really understand what their official duties are so that I can identify the nexus and then apply the reasonable person test on where this conflict of interest sits on the scale—is it actual, perceived, is it significant, is it minor—and then from there what will be an appropriate management strategy.*⁴⁹

Committee members were interested in the workload of the Integrity Commissioner and her office, and the adequacy of the resources available. The Integrity Commissioner advised the committee that the OQIC has a current budget allocation of 15 full time equivalent (FTE) staff, with the actual number of staff sitting around 16.8 FTE.⁵⁰

⁴⁵ Public hearing transcript, Brisbane, 21 May 2025, p 4.

⁴⁶ Public hearing transcript, Brisbane, 21 May 2025, p 2.

⁴⁷ Public hearing transcript, Brisbane, 21 May 2025, p 8.

⁴⁸ Public hearing transcript, Brisbane, 21 May 2025, p 1.

⁴⁹ Public hearing transcript, Brisbane, 21 May 2025, p 7.

⁵⁰ Public hearing transcript, Brisbane, 21 May 2025, p 6.

The Integrity Commissioner also stated that the ability of her office to undertake outreach and communication activities is currently limited by staff numbers. A modest increase in resourcing has been requested to ensure staff numbers are adequate to complete this work.⁵¹

3.5. Jurisdictional comparisons

The committee explored how Queensland's integrity scheme compares to that of other jurisdictions. The Integrity Commissioner advised the committee that her position is unique to Queensland—as far as she is aware, other jurisdictions do not have an equivalent position. Integrity schemes in place in other states operate differently and tend to be more fragmented in comparison to Queensland's more comprehensive scheme. The Integrity Commissioner commented that, in her view, her role is a valuable one as it ensures that people in senior roles can access independent advice on integrity issues.⁵²

3.6. Confidentiality and disclosure of advice

The Integrity Commissioner gave evidence about the importance of confidentiality with respect to the advice she provides, and the circumstances in which it might be disclosed. The confidentiality provisions of the Integrity Act apply to the Integrity Commissioner and her staff, not a designated person seeking advice. As such, that person is free to share any advice provided to them. However, the Integrity Commissioner noted that as a matter of practice, she would ask a person who does so to disclose her advice in full.⁵³

The Integrity Commissioner stated that the confidentiality requirements that apply to her office are important, as they encourage people to seek advice:

*I would not seek the authority or power to choose to disclose advice documents myself. The reason behind that is it is a confidential service. If you give the commissioner the ability to disclose on public interest grounds, that will make advisees nervous. Commissioners change and they may interpret that differently and decide to do that. I am not unhappy with the system.*⁵⁴

Committee comment



The committee commends the Integrity Commissioner and her staff on their work during the 2023-24 financial year. That period included significant changes to the Integrity Act, many of which had substantial flow-on effects for the OQIC.

The Integrity Commissioner's statements about the importance of education as a tool for fostering compliance are supported. The committee takes particular note of the Integrity Commissioner's comments regarding the importance of outreach and communication activities, and the capacity of

⁵¹ Public hearing transcript, Brisbane, 21 May 2025, p 7.

⁵² Public hearing transcript, Brisbane, 21 May 2025, p 7-8.

⁵³ Public hearing transcript, Brisbane, 21 May 2025, p 6.

⁵⁴ Public hearing transcript, Brisbane, 21 May 2025, p 6.

her office to undertake them. Evidence before the committee suggests that the increased workload did affect the performance of the OQIC. The committee notes the OQIC's request for additional resources to support its ongoing work.



Recommendation 1

That the House notes the contents of this report.

Appendix A – Public Briefing, 21 May 2025

Office of the Queensland Integrity Commissioner

Linda Waugh	Integrity Commissioner
Paxton Booth	Deputy Integrity Commissioner
Krystal Petersen	Manager, Corporate Services