

LEGAL SERVICES
COMMISSION

Annual Report 2024–25



Acknowledgement of the traditional owners

The Legal Services Commission would like to acknowledge Aboriginal peoples and Torres Strait Islander peoples as the Traditional Owners and Custodians of this Country. We recognise their connection to land, sea and community. We pay our respects to them, their cultures, and to their Elders, past, present and emerging.

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Letter of compliance



28 October 2025

The Honourable Deb Frecklington MP
Attorney-General and Minister for Justice
Minister for Integrity
1 William Street
BRISBANE QLD 4000

Dear Attorney-General

In accordance with section 490(1) of the *Legal Profession Act 2007*, I am pleased to submit for presentation to the Parliament the Annual Report 2024–2025 and the financial statements for the Legal Services Commission.

I certify that the report complies with:

- the prescribed requirements of the *Financial Accountability Act 2009* and the *Financial and Performance Management Standards 2019*, and
- the detailed requirements set out in the *Annual report requirements for Queensland Government agencies*.

A checklist outlining the annual reporting requirements is provided at page 52 of this annual report.

Yours sincerely

ML Mahon

Megan Mahon
Commissioner

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Overview

Message from the Commissioner

The Commission's Coming of age

We began this reporting year marking the 20th anniversary of the Legal Services Commission, an important milestone for the legal profession in Queensland and an opportunity to reflect on all that has been achieved since the Commission opened its doors in 2004. The Commission of 20 years ago stands in stark contrast to the organisation's operations of present, and in the last reporting year, we have eagerly embraced new technology to improve the ease of engaging with the Commission for members of the profession and public. This has come in the form of new forms that are entirely digitised, removing barriers of access for our consumers.

Digitising our enquiry and complaint forms enables those wishing to make an enquiry or complaint with the Commission to do so entirely from their mobile phone or other device, without the need to print and upload a paper form. While we still happily assist individuals wishing to use a paper form—or those phoning, emailing or attending our Brisbane office—by and large our consumers have welcomed the online forms, with a rapid and receptive uptake of this new method of engagement.

The advent of these new forms came out of the considered and progressive work undertaken as part of Project Agility. This body of work, completed by a cohort of staff within the Commission, was determined to improve the experience of those engaging with the Commission. Like all process-driven work, improving the experience for consumers also required invaluable insights from staff about how their processes could be optimised—after all, it is the symbiosis of two sides of the same coin. Therefore, by setting this ambitious goal of mutual benefit, Project Agility was able to uncover a source of delay and tension for both consumers and officers of the Commission.

Early triaging

The existing methodology usually meant that an individual's first engagement with the Commission was through the submission of a complaint form. This resulted in a large volume of received complaints falling outside the scope of the Commission's responsibilities, and the only means to dismiss such complaints was by completing the processes for summary dismissal, outlined under section 432 of the *Legal Profession Act 2007* (the Act). This naturally caused needless and time-consuming work to appropriately dismiss these complaints, causing frustrations for complainants, who would learn after a period of time had elapsed that their complaint was never able to be dealt with by the Commission due to its irrelevance to the scope of our functions or our jurisdictional constraints.

It was from this pain point that the enquiry-first approach emerged. By engaging with stakeholders and understanding the needs of complainants, and through this process, ascertaining how the Commission could assist these individuals in a timely and efficient manner, we discovered that we could best attend to both members of the profession and public through an enquiry-first process that predicated a complaint. Therefore, the digitisation of the complaint form also heralded the new enquiry-first approach, where individuals first complete an online enquiry form to initiate their engagement with the Commission. When an enquiry is received by the Commission, a member of the Enquiry and Complaints team contacts the enquirer through their preferred

method, whether that be by phone or email, to gather the necessary information to provide targeted information and correctly triage their matter, for the benefit of all concerned.

The Commission has responded to 95% of enquiries within 14 days. It is a very proud achievement for our Enquiries and Complaints team, against the backdrop of this significant change, and has led to more positive engagements with our consumers who appreciate this early and consistent contact and guidance.

The enquiry-first approach has seen this initial contact by the Commission with the enquirer to be prompt and detail-oriented. In cases where the enquiry cannot be dealt with by the Commission, the officer may provide information about other potential avenues that the enquirer may wish to explore, such as other regulators or consumer protection agencies, like the Office of Fair Trading. In some instances, where an enquirer has a minor issue with a legal practitioner that is not a conduct concern, such as a delay in responding or providing documents, the Commission will try to assist a resolution by making contact with the legal practitioner in question. Often these minor interventions can resolve the issue, without the need to escalate it to a complaint, providing the enquirer with a quick and satisfactory outcome, while allowing us to allocate these otherwise expended resources elsewhere. In instances where the enquiry requires escalation to a complaint, or the individual would like to continue with a complaint, the individual is sent a link to progress their enquiry to a formal complaint. This process automatically includes the information they provided in their enquiry, so there is no need to reproduce it or repeat themselves.

The results in this annual report illustrate the success of the first year of the enquiry-first approach. The early review of enquiries has resulted in a reduction in the number of formal complaints received by the Commission, and as such, a reduction in the number of summary dismissals that would otherwise have been the outcome of those out-of-jurisdiction complaints. This innovation has been a vital component in building organisational resilience in the face of the many challenges of the modern workplace, characterised by high demand, growing complexities and constrained resources. The Commission's commitment to continual improvement means that we are always looking for ways of adapting and optimising to manage rising costs and increasing consumer demands.

Increasing complexity

At the Commission, we are observing growing complexity in the matters we have been dealing with over the last couple of years. This incremental but persistent increase in the complexity of many matters includes technical and intricate histories and detailed proceedings, emotionally charged situations and grievances, and voluminous data and materials relating to each matter. All the while, we have observed trends, across the board, of respondents becoming unnecessarily recalcitrant and unprofessionally combative. In too many instances, respondents are uncontactable or not responding to communications within the required timeframes, often exacerbating an otherwise manageable complaint and leading to further conduct concerns.

Additionally, our workload at the Commission, especially within the unlawful operator space, has not been immune to wider societal changes brought about by technological advancements. Platforms like Airtasker, or even Facebook, continue to enable both qualified legal practitioners and unlawful operators to access new markets of clients. The occurrence of individuals who are not lawfully entitled to provide legal advice or otherwise, engaging in legal practice through these platforms, raises the alarm about how the legal profession, and legal system at large, grapples with technological advancements and the shift to legal work taking place through an entirely online exchange.

Unlawful operators

There has been an increase in allegations about unlawful operators over the reporting year, which have not been limited to online platforms. The Commission successfully prosecuted two unlawful operators who undertook unqualified 'legal work' for clients they had first engaged with on one of the platforms mentioned above. The fact that there are consumers seeking legal advice through online platforms reflects the vulnerability of such persons, who are often completely unaware of the potential risks. While Airtasker has been responsive and prompt in assisting our investigations, more must be done by these sites to warn users of the risks they are assuming and curtail the use of their platforms by unlawful operators. Likewise, the legal profession must be proactive in reporting suspected offenders to the Commission. If we don't know about it—we can't do anything about it.

There has been an increase in reports of alleged unlawful operators to the Commission. During the reporting year, the Commission received 34 enquiries and 2 complaints about potential unlawful operators and opened 39 investigation matters. These numbers have been steadily growing over the last few years, and as with our other complaint and investigation files, there is increased complexity associated with the investigation of these matters. This is in part driven by the increasingly sophisticated methods used by these individuals to avoid detection while providing unlawful legal services. Investigations of unlawful operators ordinarily involve the commitment of significant resources and the discharge of compulsory powers throughout the state.

Personal injury services advertising

Similarly, in the personal injuries space, we are also seeing relevant legislation struggle to keep up with the changes that have occurred in advertising over the past two decades. With widespread advancements in online advertising since the personal injuries advertising restrictions were introduced in 2002, we have observed the way digital methods and other creative advertising look to circumvent the intended outcomes of the legislation. The Commission is also regularly dealing with breaches of the advertising restrictions, including prohibited images and statements in advertisements for personal injury services on online formats, such as websites and social media platforms, as well as other digital advertising. It presents a great issue for lawyers who are following the spirit of the legislation, who find themselves competing against the unscrupulous marketing tactics of those who are not.

To address these concerns, the Commission has been exploring how we can best maintain the good standing of the legal profession in Queensland and safeguard consumers, while ensuring legal practitioners can adequately advertise their services. We are engaging with key stakeholders and seeking advice, as we appreciate the complexity of the issue and the potential impacts to businesses and livelihoods. We are currently undertaking a review of our personal injury services advertising regulatory guide and are committed to providing the profession with contemporary guidance about how to advertise personal injury services in the digital age. Nevertheless, compliance with all relevant laws is ultimately the responsibility of each and every lawyer. The important objective of protecting Queenslanders from prohibited advertising—or unscrupulous activities like age-old, proverbial ambulance chasing—remains a key priority for the Commission. There has been an apparent need to shift from the Commission's educative approach in this area, to investigating and commencing disciplinary proceedings for ongoing breaches.

Seeking better regulation

An obstacle in achieving positive outcomes for consumers has been the delays in finalising disciplinary proceedings due to the numerous and competing demands of the Queensland Civil and Administrative Tribunal

(the Tribunal), as highlighted in last year's annual report. Given the only regulatory response under the Act is to commence a disciplinary proceeding, or dismiss a complaint or investigation matter, the increased number in proceedings has been the only regulatory power available to maintain the standards of the legal profession (and hopefully even improve them over time). In other Australian jurisdictions, regulatory authorities have powers to make early regulatory determinations on less serious conduct matters, allowing for the timely resolution of cases, without the need to refer every matter to a disciplinary body. Such legislative amendment could support more efficient handling of complaints and identified conduct concerns.

The Commission has been working with the Queensland Department of Justice (the Department) for some time in an effort to seek changes to the relevant laws and provide improved regulation of the legal profession in Queensland. Many of the changes sought will deliver improved outcomes for respondents and consumers.

Technological improvements

Given the competing challenges of the modern workplace already mentioned, it would be remiss not to mention the opportunities and advancements also presented by this everchanging landscape. The Commission is now entering the delivery phase of replacing our 25-plus-year-old legacy case management system (CMS) and implementing a new, fit-for-purpose CMS. By modernising the way we work, we build resilience, improve efficiencies and ensure agility. We are committed to maturing as an organisation and embracing innovation to deliver our regulatory functions more efficiently, effectively and responsively to best support Queenslanders.

Given the completion of the scoping phase this reporting year, it is expected that the new CMS will be built over the coming reporting year. The project has required the diversion of resources, with the expectation that the improved efficiencies and better processes will reward that investment.

By improving our service delivery through more efficient workflows and handling of matters, we will endeavour to address the challenges presented by increasingly complex matters and a year-on-year increase in the number of enquiries and complaints being dealt with by the Commission.

Sincere appreciation

It has been another busy year at the Commission, and I wish to thank our co-regulators, the Queensland Law Society and Bar Association of Queensland, for their invaluable collaboration. The Queensland model of regulation of the legal profession depends on the concerted effort of each regulator in discharging their respective functions, as well as committing to consistent and improved regulation.

There are of course many other people and entities involved in effective regulation in Queensland, not the least of which are the many people involved in the disciplinary process, including judicial members, practitioner members and lay members, who are all committed to ensuring there is confidence in Queensland's legal profession and the administration of justice, through deterrent disciplinary outcomes, all of which and protects consumers of legal services in Queensland.

I remain grateful for the support and commitment of the staff of the Commission, who collectively are the creators of the Commission's achievements. I thank each of them for their commitment to continuous improvement, their passion for better regulation, their cooperation and patience through significant changes, and their dedication to their respective roles in discharging the Commission's functions and responsibilities.

I also wish to thank the legal profession for their overall commitment to a strong and ethical profession in Queensland. While the Commission deals with conduct issues on a daily basis, we are very aware that those issues represent a very small fraction of the interactions, services and advocacy provided by you all, in all walks of life, all around our great state. The justice system, and the public generally, are reliant on the profession's unwavering commitment to the rule of law. The communities you all serve are the benefactors of your professionalism and dedication to the administration of justice.

ML Mahon

Megan Mahon

Commissioner

1. About the Commission

The Commission is an independent statutory body which was established in 2004 and continues its existence pursuant to the Act.

The Act provides for the appointment of the Commissioner who is conferred with statutory powers and the responsibility for the functions to regulate the legal profession, and to receive, manage and investigate complaints about the conduct of legal practitioners, their employees and unlawful operators in relation to the provision of legal services in Queensland.

The Commissioner is supported by the staff of the Commission to discharge these obligations to ensure effective regulation of legal practice in Queensland in the interest of the administration of justice and for the protection of consumers of the legal profession and the public more generally. This includes monitoring lawyers and legal practitioners while also safeguarding the public and the profession from those purporting to practise law when not entitled to do so. The Commission also has a proactive function within the regulation of the profession, by identifying emerging issues and assisting and educating the profession on their ethical and legal obligations.

The Commission plays an integral role in the regulation of the legal profession in Queensland along with the Legal Practitioners Admission Board (LPAB), Bar Association of Queensland (BAQ), Queensland Law Society (QLS), the disciplinary bodies, including QCAT and the Legal Practice Committee (LPC) and the Courts of Appeal.

The Commission ensures complaints are dealt with by a statutory body that is independent from the legal profession. The Commission's approach as an effective regulator protects consumers and supports lawyers in their obligations to provide competent legal services, improved professionalism and ethical decision making.

1.1 Protecting the public from unsuitable legal practitioners

The Commission ensures professional standards of behaviour are maintained, including the obligation that barristers and solicitors conduct their matters fairly and competently. This is essential work that contributes to keeping communities safe through the prevention, detection and deterrence of unsatisfactory professional conduct and professional misconduct within the legal profession.

While every matter is unique, the Commission aims to always be fair and consistent with disciplinary and enforcement activities, and the prosecution of unlawful operators. The Commission monitors the wider professional environment to identify conduct within our jurisdiction that warrants the commencement of an investigation matter (IM), which is an investigation commenced by the Commissioner without a complaint.

Complainants are assisted through the complaints process as far as our resources and statutory limitations permit. They are provided with relevant, accessible information, including step-by-step guides to the complaint process.

The Commission also supports consumer redress for complainants where appropriate, by giving them guidance on how to achieve satisfactory outcomes in relation to disputes with their legal services provider. Redress may include adjustment of legal costs charged, release of documents and other important information belonging to them, or a full account of trust monies.

1.2 Protecting consumers from unqualified legal service providers

As an independent statutory body, the Commission acts in the public interest and plays an important role protecting the community. By ensuring members of the public can be confident in receiving sound legal advice from competent, qualified legal practitioners, the Commission safeguards the public from those practising law who are not qualified or entitled to do so.

Members of the public must be protected from people or corporations who offer to provide legal services or undertake work that amount to engaging in legal practice without the proper qualifications and authorisations. Under the Act, the Commission has the power to take action to stop unlawful operators and prosecute them.

This power is particularly important given the complexities of the law and the legal system, and the potentially severe and far-reaching consequences a legal outcome may have for an individual, their business or their family. Practising law without the proper qualifications and authorisations is a criminal offence.

1.3 Assisting and contributing to the profession

The work of the Commission ensures legal practitioners in Queensland uphold the highest professional standards, understand their obligations to their clients and when engaging with members of the public. This is achieved in two ways: by monitoring and regulating the legal profession within Queensland in accordance with the Act, and through direct engagement with and education of the profession, including delivering presentations, providing educative news and alerts throughout the year, and attending events and other functions.

Major challenges facing the legal profession are addressed by working collaboratively with members of the profession and their representative bodies to provide education, guidance and feedback on current and emerging issues.

The Commission constructively engages with the profession across a range of public and private sectors throughout Queensland and Australia to ensure that services provided are continuously improving and integrate current best practices.

1.4 Engagement with emerging professionals

It is also important to engage with future members of the profession at both the undergraduate and graduate levels. The Commission is committed to ensuring that lawyers of the future enter the profession with a strong understanding of their ethical and professional obligations and the role of regulators, including the Commission.

The Commission looks to regularly engage with providers of legal education throughout the state, and the Commissioner aims to connect personally with universities, often presenting to their law students annually.

2. Regulatory framework

Queensland operates a co-regulatory model of the legal profession. The Commission, the BAQ and QLS, LPAB and the Supreme Court each perform certain functions under the Act.

Together, all authorities are responsible, in varying ways, for the promotion and enforcement of professional standards, competency and honesty of the legal profession. In carrying out the regulatory functions outlined below, each authority contributes to ensuring confidence in the administration of justice and the protection of consumers of legal services.

2.1 Regulatory authorities and their key functions

Legal Services Commission	BAQ	QLS
• Peak regulatory body of the legal profession (lawyers, barristers and solicitors). • Receives complaints about the conduct of lawyers, legal practitioners and law practice employees. • Undertakes investigations and commences disciplinary proceedings where necessary. • Investigates and prosecutes individuals and corporations who are unlawfully operating. • Audits of incorporated legal practices.	• Peak representative body of barristers in Queensland. • Responsible for the issuing and regulation of practising certificates for barristers. • Undertakes investigations into the conduct of barristers when a matter is referred from the Commissioner. • Responsible for making the barristers' rules.	• Peak representative body of solicitors in Queensland. • Responsible for the issuing and regulation of practising certificates for solicitors. • Regulates solicitors' trust accounts, undertakes part 3.3 investigations, and enforcement action against solicitors when required. • Responsible for making the solicitors' rules. • Provides support for the LPAB, which supports the Supreme Court in the admission of persons to the legal profession.

2.2 Disciplinary bodies and other proceedings

Once the Commissioner has made the decision to commence a disciplinary proceeding, the matter must be brought before the relevant disciplinary body. For discipline applications relating to conduct of lawyers and legal practitioners, the matter goes before either QCAT or the LPC (the latter being limited to allegations of unsatisfactory professional conduct and not professional misconduct). Conduct matters involving non-qualified law practice employees are only able to be heard by the LPC.

For the prosecution of offences under the Act or *Personal Injuries and Proceedings Act 2002* (PIPA), charges are brought and heard before the Magistrates Court of Queensland.

Applications for injunctions and other restrictive orders are made to the Supreme Court of Queensland. The Supreme Court also retains its inherent jurisdiction in relation to the legal profession as officers of that Court.

QCAT	Legal Practice Committee	Magistrates Court
The Commissioner may make a disciplinary application to QCAT for the hearing of conduct matters. These applications relate to allegations of unsatisfactory professional misconduct and professional misconduct. An appeal of a QCAT decision may be made to the Queensland Court of Appeal.	The Commissioner may make an application to the LPC for the hearing of conduct matters. These are limited to less serious allegations of unsatisfactory professional conduct (as opposed to the more serious professional misconduct) of Australian lawyers and Australian legal practitioners, as well as alleged misconduct of law practice employees. The Act requires the Commissioner to provide secretariat support to the LPC. An appeal of a LPC decision may be made to QCAT.	Complaint and summons are filed in the Magistrates Court for offences under the Act, including unlawful operators, either unlawfully providing legal services, representing that they will or are entitled to provide legal services, and other summary offences. Decisions of the Magistrates Court can be appealed in the ordinary way.

3. The Queensland legal profession

3.1 Profession Overview

Legal Practitioners

At 30 June 2025, there were 17,402 legal practitioners who held practising certificates in Queensland, including 23 registered foreign lawyers. This overall number is an increase of 5.78% on the previous year. Of this total, 16,188 were solicitors, including foreign registered lawyers, and 1,214 were barristers.

Of the combined total of solicitors and barristers, 9,570 legal practitioners identify as female (54.99%) and 7,803 legal practitioners identify as male (44.84%). Within the separate branches of the profession, female legal practitioners make up 57.01% of solicitors and 28.17% of barristers, and male legal practitioners make up 42.82% of solicitors and 71.83% of barristers. 29 solicitors do not specify their gender, which is 0.17% of all legal practitioners.

There are 136 King's or Senior Counsel at the Queensland Bar, comprising 13 women (9.56%) and 123 men (90.44%).

Law Practices

There were 2,897 solicitor law practices, a 12.42% increase from the last reporting period.

918 were sole practitioners or partnerships, a 7.5% increase from the last reporting period, and represents 31.69% of all solicitor law practices.

1,964 were incorporated legal practices (ILPs), a 14.79% increase from the last reporting period, and represent 67.79% of all solicitor law practices. 15 were multi-disciplinary practices, which represents 0.52% of all solicitor law practices.

All data on solicitors and barristers in Queensland is provided to the Commission by the QLS and BAQ respectively.

This data does not include those government legal officers who do not hold a practising certificate. Government legal officers are defined in the Act to include any legal officer (whether or not they hold a practising certificate) who performs legal work in the jurisdiction for the Queensland Government. Government legal officers are not required to hold a practising certificate to provide legal services to the Government.

The Commission is not currently provided with any data in relation to government lawyers who do not hold a practising certificate. Therefore, the number of certificate holders does not reflect the total number of lawyers lawfully practising in Queensland.

3.2 Barristers

At 30 June 2025, there were 1,214 barristers with practising certificates in Queensland. This is a 1.8% increase on the previous reporting period.

Breakdown of barristers	Count
Private	1056
Employed	158

Breakdown of barristers by seniority	Count
King's Counsel or Senior Counsel	136
Junior Counsel	1078

Breakdown of barristers by practising certificate type	Count
Nil conditions	987
Readership	68
Special – reporting	1
Other	0
Employed	158
Total	1214

Breakdown of barristers' chambers	No. of chambers	No. of barristers
Individual chambers	158	158
Group chambers	92	1056
Total	250	1214

3.3 Solicitors

At 30 June 2025, there were 16,188 practising solicitors in Queensland, including 23 registered foreign lawyers. This is an increase of 6.09% on the previous reporting period.

Solicitors by practising certificate type	Count
Foreign lawyers*	23
Limited principal	49
Restricted employee	3,242

Solicitors by practising certificate type	Count
Restricted principal	4
Restricted volunteer	65
Unrestricted employee	8,897
Unrestricted principal	3,853
Unrestricted volunteer	55
Total	16,188

*Refers to Australian Registered Foreign Lawyers registered to practice foreign law in Queensland, but who cannot practise Australian law in Queensland. These lawyers do not hold a practising certificate but are registered with the QLS. For more information see <https://www.qls.com.au/practising-law-in-qld/working-as-a-solicitor/compliance/australian-registered-foreign-lawyers>.

4. Compliance and engagement

The Commissioner has powers under the Act to regulate and audit ILPs.

The Act places obligations on ILPs and their legal practitioner directors (LPDs) to implement and maintain an appropriate management system. These systems need to be designed to ensure that legal practitioners at the ILPs can maintain their professional and ethical obligations. The Act also obliges LPDs to take reasonable steps to prevent or remedy any breach of these standards where it is apparent that a breach has occurred or may occur.

The Commission continues to work with ILPs to ensure that they are aware of their obligations to have appropriate management systems (as should every law practice).

An appropriate management system simply means a law practice's formal and informal management policies, procedures and controls, work culture, and habits of interaction and practice that support and encourage ethical behaviour by all employees. Importantly, there is no one best way to proceed with the implementation and maintenance of a management system and there is no single system that is applicable to all law practices. A management system that is appropriate for one law practice may not be appropriate for another, and these systems will vary from law practice to law practice.

The Commission may conduct an audit of:

- the compliance of an ILP, its officers, and employees with the requirements of the Act, the *Legal Profession Regulation 2017* and the *Australian Solicitors Conduct Rules 2023*; and
- the management of the provision of legal services by the ILP, including the supervision of the officers and employees providing the services.

The Commission's audit programme focus is to help ILPs implement appropriate management systems to promote the delivery of competent legal services to consumers and reduce the likelihood of complaints being made against the law practice. These audits are a collaborative and educative approach for the Commission to work with ILPs to identify opportunities for improvement.

While the statutory power to audit appropriate management systems is currently limited to ILPs, the Commission encourages all law practices to ensure that their systems are effective and supportive of good practice that enables the delivery of competent legal services, while providing a safe workplace for their staff and clients.

Self-assessment and compliance audits

There are two types of audits that the Commission conducts: self-assessment audits and compliance audits.

Self-assessment audits require LPDs to review their management systems and supervisory arrangements at least six months after they have given notice to the QLS of the intention to engage in legal practice as an ILP. The Commission provides the LPDs with a self-assessment audit questionnaire asking them to review the effectiveness of their management systems and address three key objectives of sound law practice management.

LPDs use a self-assessment audit questionnaire to describe the status of their practice management systems against the three key objectives. It is designed to help the Commission understand the systems currently in place

at the law practice. The questionnaire is also designed to provide an opportunity for the law practice to identify further improvements that could be implemented.

Identified deficiencies and areas for improvement are noted by the Commission and revisited in a follow-up questionnaire 12 months after the initial self-assessment audit. This provides LPDs an opportunity to update the Commission on the progress made, and can flag where further action may be required by the Commission to ensure that there are appropriate measures in place.

Compliance audits comprehensively review the management systems or review discrete aspects of the management systems (e.g. the supervisory arrangements or their billing practices) against the professional obligations of the practice and/or its staff.

Compliance audits are a resource intensive exercise. The Commission conducts these audits on an 'as needs' basis, often identified through the complaints or other information received by the Commission. This may include, for example, where the Commission has received information or determined by a risk-assessment that there is reasonable suspicion that the practice, or some aspects of its practice, fall short of the expected standards or requirements.

During the reporting year, the Commission commenced 4 new compliance audits. Due to the high service demand and need to address a backlog of matters, as well as a key member of the Commission's Compliance team being on extended leave, remaining team members were required to pivot into other core business areas. This staff movement meant that further progress was not able to be made on these audits.

As of 30 June 2025, the Commission had 8 open compliance audits.

4.1 PIPA

The Commission has responsibility for the monitoring and enforcement of the advertising and touting restrictions for personal injuries services and the prohibitions on claim farming contained within the PIPA.

Advertising and touting restrictions

The PIPA restricts the advertising of personal injury services by legal practitioners and others. Personal injury services can only be advertised or published in accordance with sections 64, 65 and 66 of the PIPA.

The legislation also contains anti-touting provisions which prevent a person from inducing or attempting to induce another person into making a claim for personal injuries at the scene of an incident or at a hospital after the incident.

Breaches of the PIPA advertising restrictions or anti-touting provisions are summary offences and significant penalties can apply, including fines. In addition to possible prosecution of these offences, the same conduct can also result in disciplinary proceedings for legal practitioners.

The Commissioner is responsible for dealing with enquiries related to these provisions and monitoring and enforcing these offences under the PIPA. The Commission has published a regulatory guideline on the application of the provisions, the Commission's interpretation and the approach taken for alleged breaches.

During the reporting period the Commission received and finalised 16 PIPA advertising and touting related enquiries. This number continues to be lower than previous reporting years, however of these, 9 matters were referred for further action. The Commission has continued to see increased numbers of complaints and investigations related to suspected breaches of the advertising restrictions, with 13 complaints and IMs finalised this reporting period. 2 matters were referred to the Commission’s Litigation team.

In the past, the Commission has taken an educative approach toward remedying breaches of the PIPA. However, due to developments in recent years, there has been an increase in complaints and investigations related to PIPA non-compliance, and subsequently, an increase in decisions to commence disciplinary proceedings on these matters.

This increase in complaints and investigations can in part be attributed to deficiencies in the legislation, which was drafted prior to social media and the proliferation of other online formats. As such, enforcement of the advertising restrictions under PIPA has been problematic and the provisions are arguably no longer addressing contemporary compliance challenges. The Commission strongly supports a fulsome review of the relevant PIPA provisions, with a view to amending the restrictions to be more effective and provide more clarity, so that these particular provisions can be strengthened and ensure the relevant objects of PIPA are met.

In the interim, the Commission has commenced work to review its regulatory guide in order to provide a clearer position on the issues currently presented and better guidance to the profession.

Enquiries	2024-25	2023-24	2022-23
PIPA advertising and touting	16	16	49

Claim farming

The prohibition of claim farming provisions in the *Personal Injuries Proceedings and Other Legislation Amendment Act 2022* (PIPOLA) replicates the provisions contained in the *Motor Accident Insurance Act 1994*. These amendments expanded the regulatory remit of the Commission to include oversight and enforcement of provisions designed to stop the practice of claim farming in Queensland.

The laws:

- prohibit cold calling or personally approaching another person and soliciting or inducing them to make a claim;
- make it an offence for any person to pay claim farmers for the details of potential claimants or to receive payment for a claim referral or potential claim referral;
- impose obligations on the supervising principal of a law practice who represent the injured claimants to certify during the claims process that neither they nor their associates have paid a claim farmer for the claim. These certificates are called Law Practice Certificates and will be required at different stages of the claims process;
- require law practices to refund, or not recover, fees and disbursements paid in connection with a claim that has been claim farmed;

- provide the Commission with additional powers to oversee and enforce the new claim farming provisions; and
- expand the Workers' Compensation Regulator's enforcement and investigation powers so it can effectively prosecute claim farming.

Importantly, there are new offences prohibiting claim farming practices including:

- prohibiting a person from giving or receiving consideration for referring a claimant or potential claimant. This offence aims to prevent a person from paying a claim farmer for the details of potential claimants or receiving payment for a claim referral or potential claim referral; and
- prohibiting a person from personally approaching or contacting another person to solicit or induce them to make a claim. Personal approach or contact includes contact by mail, telephone, email or other forms of electronic communication. This offence aims to prohibit the act of cold calling or personally approaching another person without their consent to solicit or induce them to make a personal injury claim.

In the last reporting year, the Commission received a total of 10 claim farming related enquiries and closed 8 of those enquiries over the reporting year. This includes reports of suspected claim farming activity and notifications about non-compliance with the Law Practice Certificate requirements. The Commission referred one matter to our co-regulators and commenced 2 investigations during the year.

The low level of reporting of potential claim farming activity represents a continuous downward trend since the introduction of the claim farming prohibitions. The Commission considers that, in part, the low reporting is indicative of the effectiveness of the legislation.

Claim farming legislation has now been introduced in other jurisdictions, most recently in New South Wales. The Commission and our co-regulators at the Motor Accident Insurance Commission (MAIC) and Workers' Compensation Regulator (WCR) will continue to monitor these developments to identify if the shifting landscape in other jurisdictions begins to drive claim farmers back to Queensland.

The Commission is also committed to ensuring that legal practitioners are aware of their reporting obligations under the claim farming provisions and that low reporting is not reflective of a lack of education or awareness among the profession about their obligations. The Commission will engage in further education and awareness campaigns with the profession in the next reporting year.

During the reporting year, the Commission commenced work with MAIC and the WCR to update the Law Practice Certificate form. The changes will align the Law Practice Certificate with the Department's new Statutory Declaration Forms, which reflect the amendments made to the *Oaths Act 1867* as part of the *Justice and Other Legislation Amendment Act 2023*.

The new forms are applicable in the next reporting period.

Claim farming enquiries by outcome	2024-25	2023-24	2022-23
Referred for investigation	2	7	5
No further action	5	21	50

Claim farming enquiries by outcome	2024-25	2023-24	2022-23
Compliant	0	2	0
Referred to other agency	1	3	0
Total	8	33	55

4.2 Engagement

The Commission continues to engage and communicate with stakeholders to increase awareness of its regulatory, education and public interest functions.

This is achieved through proactive and regular engagement with members of the profession, through the professional representative bodies, such as the BAQ and the QLS, local and district law associations, and with emerging lawyers and law students by engagement with Queensland universities and legal training providers.

These engagements usually involve presentations or participation in panel discussions and attendance at events, ceremonies or conferences by the Commissioner or other senior staff at the Commission. In the case of universities, it also involves guest lectures and presentations. The Commissioner and other staff presented on a range of topics, including professional responsibilities, current and emerging ethical challenges and cross-jurisdictional advising. These engagements continue to drive awareness, and in turn, improvements within the profession.

The Commission also disseminated media releases and received mentions in the media for successful prosecution of unlawful operators. Additionally, the Commissioner has raised awareness in the media on issues, such as the emerging use of artificial intelligence in legal work.

The Commission continues to engage with our co-regulators, the BAQ and QLS, the Department and other relevant agencies around the regulation of professional standards within the legal profession and on key areas of reform.

In October 2024, the Commission's senior leadership team attended the national Conference of Regulatory Officers in Melbourne, which brings together the legal regulators from Australia and New Zealand and provides an opportunity for inter-jurisdictional cooperation and collaboration.

The Commission continues to engage with the profession through newsletters and alerts, as well as attendance and presentations at conferences and professional gatherings throughout the state.

5. Professional conduct

The Commission receives and manages enquiries and complaints from consumers of legal services, legal practitioners and other persons who engage or interact with the legal profession. The Commission aims to deal with all parties in a fair and efficient manner, and to assist enquirers and complainants through the enquiry and complaint processes as far as resources and statutory limitations permit.

From 1 July 2024, the Commission implemented an enquiry-first approach to improve how it handles its interactions with the public. This change, stemming from Project Agility, addresses challenges such as delays and the high volume of complaints outside the Commission's jurisdiction (due to their nature, timeframe or location). Under the new process, all initial contact is treated as an enquiry, whether submitted by the preferred online enquiry form, email, phone, letter or in-person at the Brisbane CBD office. This approach enables the Commission to provide individuals with information about its role and complaint process before escalating matters to formal complaints. This process does not preclude anyone from making a complaint if they wish to do so, and if an individual decides to proceed, they are directed to a complaint form, with online enquirers receiving a pre-populated form for convenience. The Enquiries and Complaints team, comprising assessment officers and lawyers, continues to act as the first point of contact, ensuring timely and informed responses.

5.1 Enquiries

All matters brought to the Commission, by either members of the profession or public, begin as enquiries. By streamlining the initial contact with the enquirer, the Enquiries and Complaints team can ascertain whether the individual's concerns can be addressed within the limits of the Commission's jurisdiction, as well as provide information about how the enquiry and/or complaint process works.

During the reporting year, 4,123 enquiries were received, which is a 70% increase on the previous year. The Commission responded to and finalised 4,061 enquiries, a 68.5% increase. This increase is reflective of the Commission's new enquiry-first process that enables us to better serve enquirers and complainants with the early triage of enquiries. This change in methodology was also expected to impact the number of new complaints opened for the reporting year, which is discussed in [section 5.2](#) of this report.

Enquiries received	2024-25	2023-24	2022-23
Total	4,123	2,428	2,196

Enquiries closed	2024-25	2023-24	2022-23
Total	4,061	2,426	2,285

The Commission continued to see an overall increase in the number of interactions with members of the profession and public. This includes an increase in the number of administrative and other actions on matters, such as emails and other documents produced and received, including for ongoing complaints and IMs.

The level of activity required on matters, whether enquiries or complaints and IMs, has increased significantly alongside the complexity and sophistication of matters, and continues to impact output. This increasingly upward trend has continued for the past five reporting years.

	2024-25	2023-24	2022-23	2021-22	2020-21
Calls	9,657	5,128	4,788	4,420	5,272
Documents internally generated and externally provided	19,043	19,845	20,558	13,535	7,660
Emails received	26,563	25,744	22,574	22,440	20,727
Emails sent	37,162	34,408	32,196	27,592	17,519
Total	92,434	85,125	80,116	67,787	51,178

5.2 Complaints and IMs

As an independent statutory body, the Commission has the responsibility of regulating the legal profession, including receiving and, where appropriate, investigating complaints about the conduct of lawyers, legal practitioners, law practice employees and unlawful operators. All complaints are dealt with as efficiently and expeditiously as practicable, and balanced with competing priorities.

The Commissioner has the discretion to refer professional conduct investigations involving barristers to the BAQ; all other investigations are undertaken by the Commission. Once completed, any investigation findings are reported to the Commissioner, who then makes the decision as to the initiation of any disciplinary proceeding, prosecution or dismissal of the matter.

The Act also gives the Commissioner power to pursue an IM without the need for a formal complaint being made. Under the Act, these matters are referred to as ‘investigation matters.’

Information may be received by the Commissioner from a variety of sources, including anonymous tip-offs, media reports and commentary, referrals from the courts, individuals or other agencies, or information that may come to light during other investigations.

Following an initial assessment of the information available, if the Commissioner believes it is reasonable to commence an investigation, a decision is made to commence an IM. IMs may relate to any of the conduct covered by the Act, including investigating contraventions of PIPA, suspected unlawful operators and other summary offences.

In total, there were 831 complaints and IMs on hand at the start of the reporting year. 1,024 new matters were received or initiated during the reporting year. Including summary dismissals, there were 779 complaints and investigations matters finalised. Following a review of the Commission’s open matters to accommodate administrative and operational changes, a number of files were re-categorised or closed. As a result, at 30 June 2025, there were 1061 matters on hand. These numbers are broken down in the following pages.

5.2.1 Complaints

The year commenced with 613 open complaints on hand. The Commission received 873 complaints in the reporting year and finalised 661 matters, including 509 summary dismissals. The Commission investigated and finalised 152 complaints, which is a 55% decrease in number on the previous year. Of the investigations finalised by the Commission, 33 were referred to the Commission's Litigation team to commence disciplinary proceedings, and 2 matters were referred to commence a prosecution in the Magistrates Court. The Commissioner also issued 9 letters of caution and was given an undertaking by 10 legal practitioners. As noted earlier, following a review of the Commission's open matters, a number of files were closed on the basis of duplication or error. At 30 June 2025, there were 833 open complaints on hand at various stages of progress.

The decrease in complaints received and finalised during the reporting period reflects the change in process brought about by Project Agility. Previously, members of the public and profession could make a complaint simply by accessing the complaint form on the website or by requesting a form be sent to them. This in turn meant that a higher portion of these complaints would later be deemed to fall outside the Commission's jurisdiction as set out in the Act or result in summary dismissal. By implementing the enquiries-first approach, the Commission has been able to advise members of the public sooner if their matter cannot be dealt with by the Commission, and where possible, refer them to a relevant regulator for matters not within the Commission's jurisdiction.

By engaging with the individual before a complaint is made, it has enabled the Enquiries and Complaints team to inform enquirers and prospective complainants about the functions of the Commission upon their early engagement with us, enabling these individuals to gain a more detailed picture of the role the Commission plays within the Queensland legal system. Additionally, by engaging with enquirers early on, the Commission has been able to provide more targeted assistance, including referrals to other appropriate agencies. In some cases, by a limited intervention, the Commission's staff have been able to assist in resolving minor issues for consumers, such as a delay in the release of documents or provision of an itemised invoice. These issues have been resolved through contact with the legal practitioner in question, enabling the matter to be resolved before it is escalated to a complaint. This can result in a quick and favourable outcome for the enquirer and legal practitioner, as well as a more efficient use of the Commission's resources. The enquiry-first approach has enabled the Commission to better triage matters that do result in a complaint, as the early contact with the enquirer can help target the matters that the Commission may be able to deal with, and the information obtained during the initial enquiry process helps expedite the assessment of any subsequent complaint made.

Despite these improved efficiencies brought about by the enquiry-first approach and engaging with members of the public and profession sooner, the Commission is still experiencing delays in finalising complaints. Year-on-year the Commission has observed the nature of matters becoming increasingly complex, with the associated materials related to each matter growing in volume. There has also been an increase in respondents disputing their complaints or failing to respond to the Commission, which is a trend we have observed regardless of the type or nature of the matter. In addition, the reduction in number of finalised complaint investigations, is in part attributable to a focus on older and more complex files (primarily those over 2 years old). Approximately 40% of complaint matters finalised this year fell within this category. Despite this, the average number of days to finalise a complaint investigation fell by 21 days to 695 days.

These compounding trends, along with the prioritisation of older files, have significantly increased workloads for staff. A jurisdictional scan has identified that the staff of the Commission handling complaints and investigations carry a significantly higher file load than their interstate counterparts. This heightened workload has had flow-on impacts throughout the workplace, including greater pressure on staff to meet the rising expectations of enquirers

and complainants. Additionally, we have observed that enquirers and complainants have greater expectations for the expeditious handling of their matters and the reach of the Commission's powers, causing staff to also receive a greater number of engagements as individuals continually follow-up by phone and email on the progress of their matters.

Complaints investigated

Complaints by outcome	2024-25	2023-24	2022-23
s.433 – withdrawn	1	6	4
s.446(2)(a) – commence in Magistrates court	2	2	1
s.446(2)(b) – refer to police	0	0	1
s.446(2)(d) – no further action	10	14	0
s.447 – decision to refer to LPC	2	3	1
s.447 – decision to refer to QCAT	31	45	34
s.448(1)(a) – dismissed - no reasonable likelihood	70	202	132
s.448(1)(b) – dismissed - no public interest	36	73	29
Total	152	345	202

Complaints by area of law	2024-25	2023-24	2022-23
Administrative Law		6	2
Bankruptcy and Insolvency	1	3	0
Building /Construction Law	5	7	3
Commercial /Company Law	10	21	11
Conduct not in the practice of law	3	7	2
Conveyancing	21	23	15
Criminal Law	13	22	14
Deceased Estates or Trusts	24	58	25
Family Law	26	66	66
Immigration	2	13	3
Industrial Law	1	6	2
Law Practice Management	1	-	-

Complaints by area of law	2024-25	2023-24	2022-23
Leases /Mortgages	3	3	1
Litigation	15	45	16
Personal Injuries /Workcover Litigation	10	15	8
Property Law	9	23	12
Trust Account Breaches	0	0	3
Unknown	0	1	1
Other	8	26	18
Total	152	345	202

Complaints by matter nature	2024-25	2023-24	2022-23
Communication	11	36	28
Compliance	17	20	5
Costs	19	38	19
Documents	2	9	5
Ethical Matters – Communication	5	22	10
Ethical Matters – Disclosure	17	31	11
Ethical Matters – Dishonesty	10	19	7
Ethical Matters – Pressure/threatening	1	4	0
Ethical Matters – General	13	52	44
Personal Conduct	3	12	9
PIPA	1	0	1
Quality of Service	39	70	45
Trust Funds	6	17	10
Other	8	15	8
Total	152	345	202

Complaints by complainant type	2024-25	2023-24	2022-23
Barrister	0	0	2
Beneficiary	4	4	2
Client/former client	79	208	125
Executor	0	2	0
Government	1	1	0
Judge	0	0	0
Legal Aid Commission	0	0	1
LSC	0	0	1
Member of Parliament	0	0	0
Non-client	31	52	29
Other Queensland regulatory body	0	1	0
Solicitor	15	20	13
Solicitor for client	11	19	11
Third Party	11	38	18
Total	152	345	202

Summary dismissals

Summary dismissals by outcome	2024-25	2023-24	2022-23
s.430(2)(b) – conduct was more than 3 years ago	4	4	22
s.432(1)(a) – failed to comply with s.431 notice	44	95	81
s.432(1)(b)(i) – not chapter 4 conduct	20	30	32
s.432(1)(b)(ii) – does not disclose Unsatisfactory professional conduct or Professional Misconduct	398	546	452
s.432(1)(c) – lacking in substance, vexatious, etc.	1	8	29
s.432(1)(d) – subject of previous complaint	4	6	7
s.432(1)(e) – already struck off	0	8	1
s.432(2) – no further investigation required	17	32	20
s.433 – withdrawn	21	34	45
Total	509	763	689

Summary dismissals by area of law	2024-25	2023-24	2022-23
Administrative Law	3	10	10
Bankruptcy and Insolvency	5	7	1
Building /Construction Law	5	25	11
Commercial /Company Law	22	32	31
Conduct not in the practice of law	2	4	2
Conveyancing	30	41	46
Criminal Law	34	59	54
Deceased Estates or Trusts	50	88	73
Family Law	165	202	190
Immigration	1	11	8
Industrial Law	15	18	14
Law Practice Management	1	-	-
Leases / Mortgages	1	2	3
Litigation	95	97	87
Personal Injuries / Workcover Litigation	36	66	53
Property Law	19	41	37
Trust Account Breaches	0	0	0
Unknown	8	16	8
Other	17	44	61
Total	509	763	689

Summary dismissals by matter nature	2024-25	2023-24	2022-23
Communication	55	85	89
Compliance	7	16	4
Costs	91	67	45
Documents	9	15	13

Summary dismissals by matter nature	2024-25	2023-24	2022-23
Ethical Matters – Communication	12	34	13
Ethical Matters – Disclosure	32	51	25
Ethical Matters – Dishonesty	89	106	56
Ethical Matters – Pressure / threatening	8	8	10
Ethical Matters – General	1	10	137
Personal Conduct	7	52	75
PIPA	2	11	1
Quality of Service	169	215	174
Trust Funds	15	17	13
Other	12	76	31
Total	509	763	689

Summary dismissals by complainant type	2024-25	2023-24	2022-23
Anonymous	1	0	0
Barrister	0	2	1
Beneficiary	8	11	8
Client/former client	316	444	371
Executor	1	4	1
Government	2	2	2
Lay Observer	0	1	0
Legal Aid Commission	0	0	1
Member of Parliament	1	0	0
Non-client	136	197	166
Solicitor	13	28	27
Solicitor for client	2	5	6
Third Party	29	69	106
Total	509	763	689

5.2.2 Investigation matters (IMs)

An IM is commenced when the Commissioner believes that an investigation about a matter should be started into the conduct of an Australian legal practitioner, law practice employee or unlawful operator. Once investigated, the matter can be dismissed or proceed further. Regulatory responses may include proceeding with a disciplinary application, or if the conduct related to an unlawful operator, by complaint and summons to prosecute in the Magistrates Court, or other statutory protection measures, such as an injunction or banning order from the Supreme Court.

The Commission had 215 IMs on hand at the start of the reporting period and 155 new referrals for investigation were made. 117 matters were finalised during the reporting period, including 32 files where the decision was made not to commence an investigation, following a detailed assessment. This is a 27% decrease in finalisations from the previous year. The Commissioner also issued 2 letters of caution and was given 1 undertaking by a legal practitioner. Following a review of the Commission's open matters to accommodate administrative and operational changes, a number of files were re-categorised. Following the review, at 30 June 2025, there were 220 IM files open for assessment or investigation.

The decrease in the number of IMs finalised this reporting period can be understood by looking at a two-year range. The number of total IMs finalised in 2022-23 is similar to this reporting period's total, indicating how at times work on an IM may be undertaken during a particular period but finalised in the following period. Work undertaken for matters in 2022-23 was captured in the totals for 2023-24, and likely work undertaken this reporting period will be reflected in next year's result. However, as noted above, the Commission has also observed an increase in complexity and volume of materials related to each matter. There has also been an increase in the number of referrals to the Commission, which are dealt with as IMs, from a variety of sources, including the various courts, from state and federal jurisdictions, other regulators outside of the legal profession, and other interested parties.

Despite the lower volume of files finalised, progress was made on finalising a number of 'aged' files, being files over 2 years old, comprising 20% of the finalised IMs. There was also a reduction in the average number of days to finalise an IM, dropping to 534.7 days.

IM by outcome	2024-25	2023-24	2022-23
IM not commenced	32	32	17
s.24AA AIA – repeal of decision	0	1	5
s.446(2)(a) – commence in Magistrates court	5	4	2
s.446(2)(b) – refer to police	0	1	2
s.446(2)(d) – no further action	10	10	0
s.447 – decision to refer to LPC	0	1	1
s.447 – decision to refer to QCAT	31	36	25
s.448(1)(a) – dismissed - no reasonable likelihood	12	37	36

IM by outcome	2024-25	2023-24	2022-23
s.448(1)(b) – dismissed - no public interest	22	31	22
No proceedings commenced	5	-	-
Total	117	153	110

IM by area of law	2024-25	2023-24	2022-23
Administrative Law	6	1	2
Bankruptcy and Insolvency	1	2	0
Building / Construction Law	1	1	1
Commercial / Company Law	4	1	0
Conduct not in the practice of law	13	20	17
Conveyancing	5	10	2
Criminal Law	9	11	9
Deceased Estates or Trusts	7	14	6
Family Law	3	6	4
Immigration	1	1	3
Industrial Law	4	1	1
Law Practice Management	10	3	0
Litigation	11	15	4
Personal Injuries / Workcover Litigation	19	14	6
Property Law	1	7	0
Trust Account Breaches	2	4	3
Unknown	3	1	3
Other	17	41	49
Total	117	153	110

IM by matter nature	2024-25	2023-24	2022-23
Communication	7	2	2

IM by matter nature	2024-25	2023-24	2022-23
Compliance	60	62	38
Costs	4	10	3
Documents	0	0	1
Ethical Matters – Communication	0	0	1
Ethical Matters – Disclosure	2	6	1
Ethical Matters – Dishonesty	9	4	7
Ethical Matters – General	7	21	19
Personal Conduct	3	20	17
PIPA	11	10	4
Quality of Service	4	8	4
Trust Funds	6	4	7
Other	4	6	5
Total	117	153	110

5.3 Internal reviews (reconsiderations)

While there is no obligation under the Act to conduct an internal review of a matter, it is considered to be good decision-making practice and in the public interest to reconsider a statutory decision when an appropriate request is made. Requests for an internal review may be accepted where there are sufficient and appropriate grounds for a review of the decision made. Relevant considerations when determining whether to accept a request include, but are not limited to, the time elapsed between the decision and request, whether there is fresh or compelling evidence provided that was not available at the time the original decision was made, or whether there are substantial grounds for review, including on the basis of administrative law.

During the reporting year, the Commission finalised a review and documentation of its existing internal review practices as part of the development of a formal internal review policy. This process has assisted in streamlining the review process, providing greater certainty for staff and those requesting a review, and aligning the process with other government departments.

The Commission's revised Internal Review Policy that formalises these changes is available on the Commission's website.

During the reporting year, there were 46 requests for an internal review made and 44 requests were resolved. Of the 44 matters resolved, 30 requests were accepted and the original decision affirmed following review, 11 requests were not accepted as there were insufficient grounds for review, and 3 matters were withdrawn by the requester.

6. Litigation

The Commissioner has the sole authority to bring disciplinary proceedings against lawyers, legal practitioners and law practice employees in relation to conduct matters under the Act. These proceedings can be before one of the two disciplinary bodies in Queensland, which are QCAT and LPC. Unlike other jurisdictions, the Commissioner has no ability to make determinations in relation to conduct, and under the current legislation, the only disciplinary course to deal with inappropriate conduct is by commencing a disciplinary proceeding.

The Commissioner also seeks to protect the public and the profession from those purporting to practise law without the necessary qualifications, including a valid certificate (unlawful operators). Practising law, or representing an entitlement to do so, without the necessary qualifications is a criminal offence. The Commissioner can commence proceedings in the Magistrates Court for these and other offences within the Commission's jurisdiction.

In addition to these actions, the Commissioner also commences other litigation and proceedings, such as seeking injunctions. This regulatory activity requires significant resourcing and time. However, these functions are critical to the protection of all Queenslanders and consumers of legal services. There are instances where the potential impact of harm to individuals, as well as the reputation of the profession and confidence in the administration of justice, will warrant such matters taking priority over disciplinary matters.

In all matters relating to litigation, the Commissioner is supported by our in-house Litigation team and by external legal service providers.

There were 116 litigation matters on hand at the start of the reporting year. Throughout the year, 44 new matters were commenced and 36 matters were finalised with varying outcomes as set out below, including decisions handed down for matters heard in previous reporting years. Following a review of the Commission's open matters to accommodate administrative and operational changes, a number of files were re-categorised. Following those changes, there were 110 active litigation files on-hand at 30 June 2025. These numbers are broken down below.

Litigation by outcome	2024-25	2023-24	2022-23
Dismissed	0	1	1
No proceeding commenced	2	2	1
One or more charges proven	20	17	6
Withdrawn (after DA filed)	8	0	1
Reconsidered (no DA filed)	6	5	0
Total	36	25	9

Litigation by area of law	2024-25	2023-24	2022-23
Commercial /Company Law	0	0	0
Conduct not in the practice of law	5	4	0
Conveyancing	1	2	0
Criminal Law	2	0	1
Deceased Estates or Trusts	1	3	0
Family Law	7	4	1
Industrial Law	0	1	0
Litigation	2	2	2
Personal Injuries /Workcover Litigation	1	0	0
Property Law	2	0	1
Trust Account Breaches	1	0	0
Other	14	8	4
Total	36	25	9

Litigation by matter nature	2024-25	2023-24	2022-23
Communication	3	4	0
Compliance	8	4	2
Costs	1	1	0
Ethical Matters – Disclosure	0	1	0
Ethical Matters – Dishonesty	9	3	2
Ethical Matters – General	3	3	3
Personal Conduct	2	3	1
PIPA	1	0	0
Quality of Service	1	4	0
Trust Funds	2	0	0
Other	6	0	1
Total	36	25	9

Litigation by respondent type	2024-25	2023-24	2022-23
Barrister	0	0	1
Other	2	2	0
Solicitor	28	22	7
Unlawful operator	6	1	1
Total	36	25	9

6.1 Disciplinary proceedings

The year commenced with 100 disciplinary application files on-hand. 36 new matters were opened during the reporting period and 33 discipline applications were filed with QCAT. 31 matters were finalised (through various outcomes), including 17 decisions being handed down by QCAT, which is similar to the previous year.

The number of matters filed in QCAT this reporting year, while reflective of the growing number of conduct issues in the profession, also continues to demonstrate the results of continuous improvements within the Commission, effected by improved workflow processes, early involvement in investigations, improved allocation of resources and proactive case management.

The Commission has continued its work from the 2023-24 reporting year, developing a more streamlined approach to QCAT proceedings. At 30 June 2025, there were 36 matters where a decision to commence disciplinary proceedings has been made, that are to be filed. Filing of these matters is being managed in the overall context of ensuring that the Commission is able to adequately resource all matters at various stages that are already filed with the disciplinary bodies.

As at 30 June 2025, 105 discipline application files were on-hand at varying stages of progression. 72 applications are presently filed with QCAT and are at various stages, including awaiting hearing or decision.

6.2 QCAT decisions

QCAT handed down 17 decisions during the reporting year, including 16 involving matters filed by the Commissioner and 1 matter heard on appeal from the LPC. This included decisions handed down for matters commenced and heard in previous reporting years. These decisions are available to download from the Queensland Judgments' website at <https://www.queenslandjudgments.com.au/caselaw/qcat/>.

While there has been continued improvement in the number of decisions handed down by QCAT each year, there continues to be growth in the backlog of matters that will need to be heard in the coming reporting years.

The growing concern is that while professional conduct matters are not able to be addressed by QCAT in a timely way due to competing demands on resources, there is less deterrence achieved, both personal and general. This

in turn appears to be resulting in increased conduct challenges, with greater risks to members of the public and consumers of legal services.

16 decisions found that the legal practitioner had engaged in professional misconduct or unsatisfactory professional conduct. Sanctions imposed in these decisions included:

- 3 legal practitioners receiving a reprimand
- 5 legal practitioners being removed from the local roll
- 4 legal practitioners being disqualified from applying for registration for a specified period
- 4 legal practitioners being required to pay a pecuniary penalty.

In 1 matter heard on appeal from the LPC, the discipline application was dismissed.

Of the 5 legal practitioners removed from the roll, 3 were as a result of convictions for serious criminal offences, including for serious dishonesty, robbery and drug offences. The remaining 2 involved a variety of conduct, including failing to respond to notices issued by the Commission, dishonesty and trust account breaches.

6.3 Discipline register

The Commission maintains a public register of disciplinary action against lawyers as required by the Act. The purpose of the register is to provide public access to the names of legal practitioners whose conduct has been found to be a more serious level of conduct, being professional misconduct. Disciplinary actions of this kind are required to be reported on the register and the relevant party identified by law, regardless of any non-publication order.

In accordance with the Act, disciplinary findings of the lesser categorisation of unsatisfactory professional conduct are currently not entered in the register, unless they attract a practising certificate related consequence (such as suspension, cancellation, refusal to grant or strike off). However, as all orders of QCAT and LPC are required by the Act to be filed with the Supreme Court, the outcome of all disciplinary proceedings become a matter of public record and are freely searchable, unless subject to a non-publication order.

The register can be viewed on the Commission's website at: <https://www.lsc.qld.gov.au/queensland-discipline-register>.

During the reporting year, the Commission identified that a limited number of entries on the Discipline Register were no longer available and took steps to rectify this issue. The Commission has now implemented better governance processes to ensure updates to the register are more frequent. Work has also commenced on a project to review current entries and ensure that information contained on the register is accurate, useful and in line with minimum statutory requirements.

It has also been raised with the Commission that once on the register, a discipline action is recorded 'for life.' As even convictions for some criminal offences end up being 'spent', there is no equivalent for a disciplinary action that is recorded on the register. While it is accepted that a lifelong blemish on a practitioner's record could be considered harsh, particularly for conduct of lesser seriousness, the obligation under the Act to record all disciplinary action does not have any power to remove or review the entries over time. It is for this reason that the Commission has sought a review of the relevant provisions of the Act, along with many others, to provide a

more equitable approach to the listings on the register. It is the Commission's view that, at the very least, the Commissioner should have a discretion to amend or remove entries after a certain period of time. The Commission has also sought to amend the regulation that requires a respondent's date of birth to be included in an entry on the register, which in this day and age of identity theft is considered to no longer be appropriate.

6.4 Unlawful operator and summary offences

The Act makes it an offence for a person to engage in legal practice or hold themselves out as entitled to do so if they do not hold a valid practising certificate. These summary offences are investigated and prosecuted by the Commission on behalf of the Commissioner.

The Commissioner relies on reports from members of the public, legal practitioners and the courts to identify these activities for potential investigation. Investigation of these matters involves gathering sufficient evidence to meet the higher burden of proof required to successfully prosecute alleged offenders.

Prosecutions of offences are actively pursued to ensure that consumers are protected from the serious harms that can result from engaging unlawful operators (often without knowing that they are not qualified), and so that the legal profession's reputation and standards are upheld. Such harms can be exacerbated by an unlawful operator not being insured and unwilling 'clients' then having little to no recourse against them when things do go wrong. Unlawful operators are not only unlicensed to practise, but they very often also have no formal legal qualifications at all.

The Commission successfully prosecuted 3 individuals, discontinued 2 matters and filed a further 7 summary offence prosecution complaints for prosecution for unlawful operation.

Overall, the Commission has observed an upward trend in the number of matters involving unlawful operators. These matters vary in gravity, with the offence in some instances involving a letter being written on behalf of a supposed lawyer, or in other instances, taking on a much more serious nature as unlawful operators operate sophisticated businesses through which they unlawfully engage in legal practice and hold themselves out as entitled to do so. Another notable trend has been the use of platforms, such as Airtasker, by unlawful operators, who complete all types of legal work for users of these platforms in exchange for sums of money.

6.5 Injunctions and warrants

6.5.1 Injunctions

Injunctions can be sought under section 703 of the Act. They are another tool available under the Act to take swift action against persons who are, or may be, engaging in unlawful conduct and may be harmful to the consumers of legal services in Queensland. Injunctions are only sought where it is in the public interest to do so and provide a means to prevent harmful action from continuing while an investigation or disciplinary action is undertaken.

The Commission finalised 2 Supreme Court injunctions and filed 1 new injunction application. In relation to the new application, an interim order was made, and an appeal subsequently lodged. The appeal was not finalised during this reporting year and the hearing of the application for a final injunction has been deferred pending the appeal.

6.5.2 Search warrants and rights of entry

The Commission respects the rights of individuals and understands that the use of search warrants and other coercive powers under the Act can impact on, and limit, the rights of individuals. In particular, a person's right to privacy and reputation, and property rights may be limited by the exercise of these powers. As a result, these decisions are made where any limitation is reasonable and justified.

While such powers may at times impact the rights of individuals, the exercise of the powers are nevertheless an important mechanism available to the Commissioner in the discharge of her statutory functions to regulate the legal profession, particularly in relation to alleged offences.

This reporting period, the Commission executed one search warrant, which was obtained at the end of the last reporting period. The Commission also performed one entry of a law practice where the legal practitioner in question was not cooperating with the Commission's investigation. Under section 545 of the Act, an investigator of the Commission has the power to enter such business premises. The Act also provides the investigator with powers of search and seizure in relation to that business premises.

7. Operations, policy and strategy

Part of the Commission's role includes the publication of information and guidance to the profession and the public in compliance with the Act, the Commission's approach to regulation and its regulatory remit. This may include the publication of information sheets to aid the public's understanding of Act, as well as policies and regulatory guidelines to assist the profession.

As the peak regulatory body for the legal profession, the Commission also has a role in pursuing and assisting in legislative reform that relates to the profession. This includes participating in the development and consultation processes surrounding proposed legislation or amendments, and where changes impact the Commission's regulatory remit, implementing those amendments and changes.

7.1 Policy and strategy

This reporting year, the Commission commenced a review of its PIPA regulatory guide that provides legal practitioners with guidance on the restrictions that apply to advertising personal injury services. This policy project will require extensive engagement with stakeholders but aims to provide clearer guidance about compliance with these regulations and the Commission's position. This work is still in progress and will be a priority for the next reporting year.

The Commission completed its review of its service delivery complaints handling policy, which will be published on the Commission's website soon. It is the result of an extensive review process that sought to identify and address any gaps or shortcomings, providing staff and consumers with comprehensive details about how the process works and what they could expect from it.

7.1.1 Project Agility

Last reporting year, the Commission undertook a range of work aimed at modernising operations at the Commission, raising awareness of our role in the regulation of the profession, and improving the quality of services provided, both to the public and the legal profession alike. This series of interlinked pieces of work was coined 'Project Agility,' to reflect the Commission's commitment to being an agile regulator and adapting to meet new challenges in an ever-changing profession and regulatory environment.

The culmination of the work from Project Agility went live from 1 July 2024. Outlined below are the key pieces of work and outcomes from the conclusion of Project Agility.

New enquiry-first process and digital form

At the beginning of this reporting year, the Commission implemented the enquiry-first approach. Initial contact with the Commission by members of the profession or public is treated as an enquiry, allowing for better triaging and management of matters. This process change does not prevent individuals from lodging a formal complaint if they wish to do so, instead it aims to improve operational efficiencies and consumer experiences. Further information and results can be found above in [5.1 Enquiries](#).

The development and implementation of the digital enquiry and complaint forms was not without challenges. Thorough consideration went into exploring the best provider to ensure the forms would integrate with the Commission's new CMS, which is scheduled for implementation in the next reporting year. The digital forms have proven to be a valuable tool in supporting the enquiry-first process and improving the overall experience for both consumers and staff.

Sexual harassment reporting tool

The previous reporting period saw the Commission launch an online sexual harassment reporting tool to enable people to report instances of sexual harassment in the legal profession, and to do so anonymously if they wished. The first month following the launch of the tool recorded the highest number of reports made. This initial uptake showed signs of promise and that the tool was a much needed measure to help mitigate unlawful sexual behaviour within the profession. However, since the launch, the majority of reports received through the tool have concerned incidents outside the legal profession. In these cases, officers at the Commission provide the reporter with information about the appropriate organisations to report the sexual harassment to, and where appropriate, refer them to support services, such as Lifeline.

A notable trend has been the prevalence of instances in which reporters submit a report about the occurrence of sexual harassment, but do not engage further with the Commission. In the portal, the team can see if reporters have viewed response messages, and it has been observed that most do not return to the portal after submitting their report to read the response from the Commission. Despite this, the Commission notes the informal feedback received by the legal profession, particularly women, who have expressed appreciation for the recognition of sexual harassment as an issue and the availability of the reporting tool.

The Commission remains committed to addressing sexual harassment within the legal profession and ensuring that all individuals, including clients and legal support staff, have access to a safe and supportive reporting mechanism. Specially trained staff provide trauma-informed responses to reporters and ensure a single point of contact throughout the reporting process. The tool's safety features, including secure login, quick exit options, and a two-way chat function, also recognise the need to put measures in place so that individuals feel supported and protected to be able to report sexual harassment.

Although the number of relevant reports received through the tool has been limited, the Commission receives complaints where sexual harassment by a member of the profession is part of broader conduct issues. This suggests complainants are utilising the existing complaints mechanism to alert the Commission of unlawful conduct, including sexual harassment. The Commission will continue to raise awareness about the online sexual harassment reporting tool, and the unacceptability of such behaviour in the profession, and at large.

Commission rebrand and new website

The Commission successfully launched its new website this reporting year. The new website improved the user experience across this vital touchpoint, creating an easy-to-use hub for members of the public and the profession to access information. The rebrand of the Commission's visual identity, which was completed in the previous reporting year, provided the design fundamentals that informed the new website's look and feel.

The Commission's new brand and website have received positive feedback both from members of the profession and the public, promoting the Commission as a future-focused organisation. Through internal reviews and data analysis, the Commission will continue to update and optimise its website to improve accessibility and user experience. By continuing to modernise the means by which people engage with the Commission, such as through digital forms and a streamlined website, the Commission shows initiative to innovate for the improvement of the consumer experience.

7.1.2 LSC CMS Project

The Commission's strategic initiative to replace its legacy CMS progressed significantly during the reporting period. The current CMS underpins all core regulatory functions, including complaints management, disciplinary and enforcement activities, and statutory reporting. However, the legacy platform is increasingly constrained by outdated technology, inefficient workflows, limited interoperability with co-regulators and limited capability to track matters required by the anti-claim farming offences introduced in the PIPOLA.

Aligned with the Commission's strategic objectives for timely, effective regulation of the legal profession and the Department's [ICT Strategy 2021–26](#), the Project aims to deliver a contemporary, fit-for-purpose CMS that enhances operational efficiency, workforce capability, data sharing and service continuity.

During this reporting period, the Project successfully completed the feasibility phase and progressed through detailed planning. A delivery partner was engaged to lead a discovery process to define system requirements and implementation readiness. The Project is now positioned to commence the delivery phase, which will include the design, build, testing and deployment of the new system, with implementation targeted for completion within the 2025-26 reporting year.

The Queensland Government's investment in the Commission's core technology is essential for the continuity of current services, meeting future requirements, and adapting to evolving service delivery models and client demands. It will also address the critical deficiencies and risks associated with the current legacy system, aligning with evolving business needs.

Significant resources of the Commission have also been redirected to the project, ensuring that it is viable and fit for purpose, with key staff of the Commission involved in its design, informing technical experts of the processes and needs of the Commission to better discharge its statutory obligations and other functions.

The Commission acknowledges the ongoing and vital support of the Department's Information Technology Services and procurement teams and thanks them for their support and guidance.

7.2 Governance and organisational structure

A copy of the Commission's Organisation Chart can be found at [Appendix B](#).

7.2.1 Commissioner

The Commissioner is an independent statutory officer appointed under the Act by the Governor-in-Council. The Commissioner reports to the Attorney-General and Minister for Justice and Minister for Integrity (the Attorney-General).

Being responsible for the Commission in the discharge of its statutory duties, the Commissioner ensures complaints made to the Commission are dealt with as efficiently and expeditiously as resources and service demands permit.

Commissioner Mahon was appointed as Commissioner on 16 October 2019 and holds a Bachelor of Laws with Honours and, on completion of five-year articles, was admitted as a Solicitor of the Supreme Court of Queensland.

In 2011, Commissioner Mahon was appointed a Notary Public, and the following year became a Fellow of the Australian Academy of Law. On announcing Commissioner Mahon's appointment, the Attorney-General acknowledged the Commissioner's distinguished career in private practice for more than 20 years (at that time) and her Women Lawyers Association of Queensland 2009 'Woman Lawyer of the Year' award. Commissioner Mahon was also the 2017 recipient of the QLS President's Medal.

In October 2023, Commissioner Mahon was re-appointed as Commissioner for a further five-year term.

7.2.2 The Commission's senior leadership team

In addition to the Commissioner, the Commission's Senior Leadership Team comprises the Deputy Commissioner (currently vacant) and the following senior leaders.

Kellie Grainger – Director, Professional Conduct

The Director, Professional Conduct leads the Commission's teams responsible for the intake and assessment of enquiries and complaints, the investigation of complaints and IMs, as well as investigations about possible offences under the Act (e.g. unlawful operators) and under PIPA (e.g. claim farming and PIPA advertising breaches).

Kellie joined the Commission in August 2020, having previously worked at the regulator for the legal profession in the Northern Territory, the Law Society Northern Territory, for eight years. She holds a Bachelor of Laws and a Bachelor of Commerce. Following her admission in 1996, she worked in private practice in regional Queensland for over 16 years.

Scott McLean – General Counsel

The General Counsel leads the Commission's in-house Litigation team, responsible for conducting disciplinary proceedings, offence prosecutions and other enforcement action, and general litigation on behalf of the Commissioner.

Scott returned to the Commission in March 2024, having previously worked with the Office of the Health Ombudsman as Executive Director, Legal Services and Director of Proceedings. Scott is a lawyer with over 30 years' experience in private and government practice, focusing on criminal prosecutions, professional regulation and discipline.

Terri Dennent – Director, Operations, Policy and Strategy (from 10 October 2024)

The Director, Operations, Policy, and Strategy is responsible for overseeing the Commission's business operations, statutory obligations and service deliverables. This role also manages the development and implementation of policies and procedures for people management, governance and risk, finance, and systems.

Terri joined the Commission in October 2024, following an extensive career in leadership roles within leading law firms. She holds a Bachelor of Business, a Master of Business Administration (Corporate Governance and Strategy), is a graduate and member of the Australian Institute of Company Directors, and a fellow of the Governance Institute of Australia.

7.2.3 Staff of the Commission

The Commission comprises the Commissioner and a full-time equivalent (FTE) team of 31.4 staff as at 30 June 2025. This includes permanent and temporary staff. This reporting year, staffing levels included 4 staff seconded from other departmental agencies, 4 staff appointed to higher duties, 1 staff member on extended leave and 2 staff on reduced working hours.

The Commission was granted limited life funding to continue 8 temporary appointments for the next reporting year. These ongoing FTEs are included in the above Commission staff numbers.

7.2.4 Organisation change and workforce planning

The Commission's commitment to continuous improvement has resulted in further enhancements to its structure and operations, including embedding an organisational restructure, continuing to apply improvements to business processes, and broadening the scope of its operation to include both proactive and reactive regulatory functions. The Commission's strategy, spanning across 2022–27, continues a focus on improvements aimed at ensuring the Commission is an efficient and effective regulator, fulfilling all of its statutory functions and obligations.

While these previous changes continue to streamline improvements to operations, the Commission remains focused on strategies to respond to the growing service demand and the increased complexity and sophistication of matters. This has included people initiatives, which have provided opportunities for staff within the Commission, entailing higher duty opportunities and job enrichment, contributing to a focus on retention while also broadening internal capabilities across teams.

As part of the Commission's CMS Project, the Commission's strategic initiative to replace its legacy CMS, comprehensive change management services will be delivered by the implementation partner, which have been planned and will be delivered over the next reporting period. These services will support the Commission through the transition by assessing structural impacts and workforce needs, ensuring staff are equipped and engaged

throughout the change process. The new system will also enhance workforce planning capabilities and employee experience through improved analytics and reporting functionality.

7.2.5 Code of conduct

As an independent statutory body, the Commission currently employs legal officers and other staff who remain officers of the Department. In addition to the Commission's professional, legal and ethical obligations, all staff adhere to the Code of Conduct for the Queensland Public Service and the Department's Charter. The lawyers employed at the Commission are also subject to the professional obligations of all lawyers, including professional rules of conduct. All staff of the Commission are provided ethics and code of conduct training through the Department when onboarded and undertake refresher courses at intervals determined by the Department.

7.3 Performance reporting

As part of the move to our enquiry-first approach, the Commission reviewed its performance metrics for enquiries to accommodate the changed process and the intended likely levels of engagement with members of the public at the enquiry stage of the process. A 14-day metric was deemed appropriate for the first year of this new process, with review and potential revision in the next reporting year as the impacts of this change are better understood and evaluated.

Service	Performance Target	2024-25
Enquiries: informal queries or enquiries that are made by telephone, writing, email or in person.	Respond to all enquiries in a timely manner.	
	Enquiries received:	4,123
	Response times	
	• 100% within 14 working days of receipt:	95.1%
Complaints: new complaints received.	Respond to all complaints received in a timely manner, giving users of legal services an independent, timely, effective, fair and reasonable means of redress for complaints.	873
	Complaints on hand at 30 June 2025:	833
Summary dismissals: number of complaints assessed and finalised by way of summary dismissal	Number of summary dismissals:	509
	Assess and finalise complaints that are deemed summary dismissals:	
	• 70% within four months:	73.08%
	• 100% within six months:	88.21%
IMs: investigation matters commenced by the Commissioner.	Commence own motion investigations where information comes to the attention of the Commissioner and is in the public interest to commence an investigation.	155

Service	Performance Target	2024-25
Investigate and finalise complaints and IMs.	Investigations finalised: number of complaints and IMs investigated and finalised (this figure does not include complaints that are summarily dismissed – set out above).	
	Number of investigations completed:	269
	Finalised	
	• 60% of investigations within 18 months:	51.30%
	• 100% within 24 months:	68.40%
Internal Reviews (Reconsiderations): there is no power or obligation under the Act to reconsider a matter. However, it is considered to be in the public interest to reconsider a statutory decision when requested, if the matter has not previously been reviewed, even though it has a significant resourcing impact.	Number of requests received:	44
	Number of requests accepted and reviewed where appropriate:	30
	• Decision affirmed:	30
	• Request not accepted:	11
	• Withdrawn:	3
Litigation matters: including disciplinary matters, summary offence prosecutions, other enforcement action and other civil proceedings.	Number of new litigation files opened:	46
	Number of matters finalised:	36
Disciplinary proceedings:	Number of decisions to commence a proceeding:	36
	Number of disciplinary proceedings filed:	33
	Number of disciplinary proceedings finalised (either application withdrawn or decision delivered):	25
Summary offence prosecutions (unlawful operators):	Number of new prosecution complaints filed:	7
	Prosecutions finalised:	5
	Successful convictions:	3
	Discontinued:	2
ILP Compliance: ensure all LPDs of an ILP are contacted shortly after commencement of practice.	Number of initial self-assessment letters sent to directors of newly notified ILPs:	173
External Engagement: number of engagements with users of legal services, lawyers and stakeholders to help improve standards of conduct in the provision of legal services.	Complete 6 engagements per year:	42
	Continually review website and publications for both content and accessibility	Ongoing

7.4 Financial reporting

The cost of administering the system for dealing with complaints in 2024-25, compared to the prior reporting year:

Legal Services Commission	2024-25 Original Budget \$	2024-25 Amended Budget ² \$	2024-25 Actual \$	2025-26 Approved Budget ³ \$
Employment Costs	4,734,200.00	5,668,500.00	5,225,688.91	5,878,700.00
Other Costs ¹	3,214,300.00	3,459,000.00	3,210,157.74	4,558,200.00
Total	7,948,500.00	9,127,500.00	8,435,846.65	10,436,900.00

1 This figure includes brief-out budget and actual costs of \$700,000 and \$675,926 respectively.

2 Funding of \$425,000 was deferred from FY 2023–24 to FY 2024–25, while \$966,000 was drawn down for Claim Farming in FY 2024–25. Additionally, \$1.5 million for the Case Management System was deferred to FY 2025–26 in the February 2025 Forward Estimates Update.

3 CBRC approved \$1.8 million in 2025-26 to support the Legal Services Commission to address demand for services.

External legal services costs

2023-24	2024-25
\$573,211	\$675,926

Penalties and costs

The penalties and costs received pursuant to orders of QCAT / LPC / Courts for the relevant periods:

Orders	QCAT \$	LPC \$	Courts \$	2024-25 total \$	2023-24 total \$	2022-23 total \$
Penalties (QCAT/LPC/Courts)						
Ordered	11,000	-	-	11,000	2,500	2,000
Payments received	11,000	-	-	11,000	5,000	2,000
Written Off	-	-	-	-	-	-
Payments pending at 30 June	2,500	-	1,500	4,000	4,000	6,500
Costs (QCAT/LPC/Courts)						
Ordered, agreed or assessed	45,000	-	-	45,000	116,970	6,500

Orders	QCAT \$	LPC \$	Courts \$	2024-25 total \$	2023-24 total \$	2022-23 total \$
Payments	111,650	-	-	111,650	96,790	98,600
Written off	-	-	-	-	-	-
Payments pending at 30 June	104,999		-	104,999	171,649	151,468

*Courts – include matters heard in the Magistrates, District and Court of Appeal

7.5 Legal Practice Committee

The LPC hears and decides discipline applications lodged by the Commissioner that involve the less serious charge of unsatisfactory professional conduct and will not result in the removal of the legal practitioner's name from the local roll or suspension from practice. The Committee also hears matters involving misconduct of law practice employees.

The Act requires that the Commission provides administrative and secretariat support to the Committee.

Legal Practice Committee	
Act or instrument	<i>Legal Profession Act 2007</i>
Functions	The Committee hears and decides discipline applications lodged by the Commissioner that involve the less serious charge of unsatisfactory professional conduct of a legal practitioner and matters involving misconduct of law practice employees. The Committee also has an advisory function to monitor the effectiveness of legal profession rules and make recommendations to the Attorney-General.
Achievements	Did not sit in 2024-25 financial year.
Financial reporting	Transactions of the entity are accounted for in the financial statements for the Commission.

Remuneration

Position	Name	Meetings/sessions attendance	Approved annual, sessional or daily fee	Approved sub-committee fees if applicable	Actual fees received
Chair	Patricia Schmidt	N/A	N/A	N/A	N/A
Member	John McKenna	N/A	N/A	N/A	N/A
Member	Martin Conroy	N/A	N/A	N/A	N/A
Member	Barbara Houlihan	N/A	N/A	N/A	N/A

Member	Michael Stewart	N/A	N/A	N/A	N/A
Member	Loretta Lynch	N/A	\$250.00 Sessional fee	N/A	\$0.00
Member	Alice Ruhe	N/A	\$250.00 Sessional fee	N/A	\$0.00
No. scheduled meetings	0				
Total out of pocket expenses	<i>Nil expenses</i>				

7.6 Risk management and accountability

In addition to regular risk management and statutory reporting obligations, the Commission continues to review, update where necessary and report on the following matters:

- workplace health and safety matters
- building evacuation procedures
- business continuity planning
- people initiatives including career progression, positive performance management frameworks and engagement strategies
- security standard operating procedures and staff training
- governance and risk management frameworks and procedures.

7.7 External scrutiny

The Commission responded to 9 complaints received by the Queensland Ombudsman, which resulted in no further action. There were no significant findings or reports handed down by the Queensland Ombudsman specifically related to the Commission.

During the reporting year the Commission continued to deal with 1 human rights complaint.

7.8 Service complaints

Feedback is an important tool to assist the Commission to continue to improve the quality of service provided. Constructive feedback, including complaints, helps us to identify areas for organisational improvement, staff development and training, and what we are doing right.

The Commission continued its thorough review of our existing service delivery complaints handling policy, to ensure ongoing compliance with Australian standards and the Queensland Ombudsman's *Guide to Developing Effective Complaints Management Policies and Procedures*. The policy will be published to the Commission's website shortly.

The Commission received 35 service complaints and finalised 27 during the year, including those from previous reporting years. There were 24 matters that required no further action. The number of service complaints about the Commission has more than doubled this reporting period from the 16 complaints that were received in the previous year. This increase reflects the growing volume of enquiries and complaints that the Commission deals with on a year-to-year basis and can also be attributed to the growing demand on the Commission's services, resulting in increasing workloads.

7.9 Information and record keeping

The Commission's regulatory functions rely on robust information and record-keeping practices. Those practices are not only mandated by legislative and state government requirements but are also essential for ensuring the Commission remains informed and equipped to effectively discharge its responsibilities. All records and information are stored, maintained and disposed of in accordance with relevant legislation, state government protocols, and the Commission's Retention and Disposal Schedule.

As the Commission continues to evolve, so do its information and record-keeping needs. A recent review and gap analysis of the Commission's systems identified significant deficiencies within the current CMS, which is over 25 years old and underpins all Commission functions. With this system nearing end-of-life, the Commission commenced the LSC CMS Project to deliver a modern CMS that resolves these critical deficiencies and introduces sustainable, future-ready technology.

Further challenges have arisen due to a major IT upgrade by the QLS, which disrupted data feeds into the Commission's CMS. The Commission, together with the current CMS provider, QLS and the QLS IT team, worked diligently to ensure accurate and reliable data was available for the preparation of this Annual Report. While interim manual processes have ensured data integrity, these are not sustainable long-term. LSC CMS Project will address these challenges by implementing streamlined integrations to enable consistent, accurate and automated data sharing. Collaborative efforts to strengthen data feed integrity will continue to ensure the Commission receives the information it requires to meet its statutory obligations.

The Commission's CMS Project will also enhance record-keeping through the structured use of SharePoint for document storage. The new CMS will be designed to retain essential records and present information and data in an efficient, accessible manner.

7.10 Right to Information

There were 10 compliant applications made under the *Right to Information Act 2009* and 1 compliant application for access under the *Information Privacy Act 2009* in the reporting year.

7.11 Human rights

The Commission treats all people with dignity and respect. The Commission is committed to protecting and promoting the human rights of all people as we help build a culture that encourages and respects human dignity. As a statutory authority, we have an obligation to act and make decisions in a way that is compatible with human rights, and when making a decision, to give proper consideration to human rights.

While the very nature of the regulatory work that we do results in making decisions that may impact individual human rights, all decisions appropriately consider and are compatible with human rights. Where there is any limitation imposed on an individual's human rights, it is done so lawfully and where such limitation is considered reasonable and demonstrably justified. These decisions are consistent with the greater public interest, in seeking to protect consumers of legal services, maintain the standards expected of lawyers, helps to maintain confidence in the legal profession and the administration of justice, and ensures ethical conduct, consistent with the regulatory regime set out in the Act (sections 3 and 416).

The Commission has reviewed, and continuously reviews, all decision-making processes, policies and guidelines to ensure their continued compatibility with human rights and/or compliance with the *Human Rights Act 2019*.

7.12 Open data

Without limiting our powers and obligations under the Act, the Commission aligns with the Department's Open Data Strategy. For more information on the Open Data Strategy, visit the Queensland Government Open Data Portal at <https://www.data.qld.gov.au>.

7.13 Queensland language services policy

The Commission continued to provide access to translator services for people from non-English speaking backgrounds, and relay services for people with hearing and vision impairments.

7.14 Interpreter services

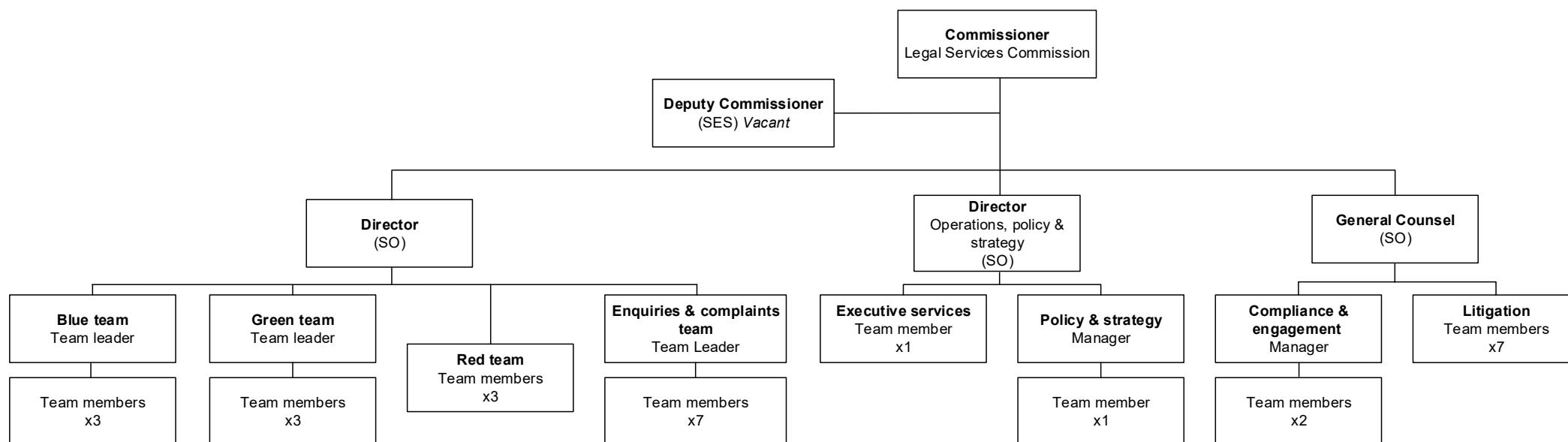
Interpreter services are available for all Commission's publications and online information, and on request for Commission events and for activities undertaken by third parties on the Commission's behalf.

8. Appendices

Appendix A – Glossary

Abbreviations and acronyms	
Act	<i>Legal Profession Act 2007</i>
Attorney-General	Attorney-General and Minister for Justice and Minister for Integrity
BAQ	Bar Association of Queensland
CMS	Case Management System
Commission	Legal Services Commission
Commissioner	Legal Services Commissioner
Department	Department of Justice (Queensland)
Investigation matter (IM)	Pursuant to the Act the Commissioner has power to commence an investigation without a formal complaint being made
ILP	Incorporated legal practice
MAIC	Motor Accident Insurance Commission
LPAB	Legal Practitioners Admissions Board
LPC	Legal Practice Committee
LPD	Legal practitioner director (of an ILP)
PIPA	<i>Personal Injuries Proceedings Act 2002</i>
QCAT	Queensland Civil and Administrative Tribunal
QLS	Queensland Law Society
UPC	Unsatisfactory professional conduct
WCR	Workers' Compensation Regulator

Appendix B – Legal Services Commission organisational chart



Appendix C – Compliance checklist

Summary of requirement		Basis for requirement	Annual report reference
Letter of compliance	A letter of compliance from the accountable officer or statutory body to the relevant Minister/s	ARRs – section 7	3
Accessibility	- Table of contents - Glossary	ARRs – section 9.1	4-5
			52
	Public availability	ARRs – section 9.2	2
	Interpreter service statement	Queensland Government Language Services Policy	2
		ARRs – section 9.3	
	Copyright notice	Copyright Act 1968	2
		ARRs – section 9.4	
	Information Licensing	QGEA – Information Licensing	2
		ARRs – section 9.5	
General information	Introductory Information	ARRs – section 10	11-14
Non-financial performance	Government's objectives for the community and whole-of-government plans/specific initiatives	ARRs – section 11.1	-
	Agency objectives and performance indicators	ARRs – section 11.2	45-46
	Agency service areas and service standards	ARRs – section 11.3	45-46
Financial performance	Summary of financial performance	ARRs – section 12.1	47-48
Governance – management and structure	Organisational structure	ARRs – section 13.1	44-45, 53
	Executive management	ARRs – section 13.2	43-44
	Government bodies (statutory bodies and other entities)	ARRs – section 13.3	48-49
	Public Sector Ethics	Public Sector Ethics Act 1994	45
		ARRs – section 13.4	
	Human Rights	Human Rights Act 2019	50-51
		ARRs – section 13.5	
	Queensland public service values	ARRs – section 13.6	-
Governance – risk management and accountability	Risk management	ARRs – section 14.1	49
	Audit committee	ARRs – section 14.2	-
	Internal audit	ARRs – section 14.3	-

	• External scrutiny	ARRs – section 14.4	49
	• Information systems and recordkeeping	ARRs – section 14.5	50
	• Information Security attestation	ARRs – section 14.6	-
Governance – human resources	• Strategic workforce planning and performance	ARRs – section 15.1	44-45
	• Early retirement, redundancy and retrenchment	Directive No.04/18 <i>Early Retirement, Redundancy and Retrenchment</i> ARRs – section 15.2	-
Open Data	• Statement advising publication of information	ARRs – section 16	51
	• Consultancies	ARRs – section 31.1	https://data.qld.gov.au
	• Overseas travel	ARRs – section 31.2	https://data.qld.gov.au
	• Queensland Language Services Policy	ARRs – section 31.3	https://data.qld.gov.au
Financial statements	• Certification of financial statements	FAA – section 62 FPMS – sections 38, 39 and 46 ARRs – section 17.1	3
	• Independent Auditor's Report	FAA – section 62 FPMS – section 46 ARRs – section 17.2	-

FAA Financial Accountability Act 2009

FPMS Financial and Performance Management Standard 2019

ARRs Annual report requirements for Queensland Government agencies