

Annual Report 2025–26

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Copies of this report are available on the Commission's website:
www.integrity.act.gov.au/about-us/corporate-documents.

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This publication should be attributed as the ACT Integrity Commission 2025–26 Annual Report, ACT Integrity Commission, Canberra ACT.

Acknowledgement of Country

The ACT Integrity Commission acknowledges the Ngunnawal people as Traditional Custodians of the ACT and recognises any other people or families with connection to the lands of the ACT and region. We acknowledge and respect their continuing culture and the contribution they make to the life of this city and the surrounding region.

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PART **A**

Transmittal certificate

Dear Mr Speaker

This report has been prepared in accordance with section 7A of the *Annual Reports (Government Agencies) Act 2004* and in conformity with other legislation applicable to the preparation of the annual report by the ACT Integrity Commission (the Commission), including the *Integrity Commission Act 2018* and the *Public Interest Disclosure Act 2012*.

I certify that information in this annual report provided for whole of government reporting constitutes an honest and accurate account of the Commission's activities, and that this report includes all material information on the operations of the Commission for the period 1 July 2025 to 30 June 2026.

I hereby certify that fraud prevention has been managed in accordance with the Public Sector Management Standards 2006 (repealed), Part 2.3 (see section 113, Public Sector Management Standards 2016).

Section 15 of the *Annual Reports (Government Agencies) Act 2004* requires that you present the report to the Legislative Assembly within 15 weeks after the end of the reporting year.

Yours sincerely



The Hon Michael F Adams KC
Integrity Commissioner

October 2026

Commissioner's foreword

The Commission presented one major investigation report during this reporting period, Operation Luna Part 2, and was finalising the Operation Kingfisher report, which both required substantial resources and effort, with findings of egregious conduct and serious failures in decision-making, governance and integrity.

The significance of the investigations extends beyond the individuals directly involved. They raise important questions for the ACT public sector and the broader community. In both investigations, conduct and practices that should have been challenged appeared to have become accepted; key communications that directly influenced doubtful outcomes were not adequately disclosed and, in several instances, dishonestly misstated; and decisions were made without accurately recording the process of decision-making or the path to the conclusions. The outcomes resulted in bad decisions at a significant cost to the Territory. These findings highlight the need to strengthen public sector integrity and reinforce the principles that underpin public confidence: honesty, fairness, transparency and accountability. Preventing similar conduct in the future requires strengthening processes to embody integrity in decision-making and ongoing vigilance through all levels of the public service.

Throughout the reporting period, the Commission continued to contribute to legislative reform, development protocols and memoranda of understanding to support its effective operation. A particular focus has been ensuring that information providers meet their obligations of disclosure while appropriately managing issues such as legal professional privilege and the scale of required production. The Commission will also continue its involvement in Australian Government and Territory working groups seeking powers under the *Telecommunications (Interception and Access) Act 1979* (Cth). The Commission currently retains limited temporary declared powers while legislative changes are progressed.

Across operational areas of the Commission – assessments, legal services, investigations and corporate services – the Commission continued to strengthen capability, streamline processes and build organisational maturity. Following the successful implementation of an independent information technology environment, the Commission has also begun realising efficiencies that enhance operational effectiveness and support its growing workload.

In the reporting period, the Commission received 261 corruption reports of which 80 progressed from initial review at the triage stage through to full assessment to determine if the information met the threshold of corrupt conduct. Eight preliminary inquiries and 14 investigations were in progress at the end of the reporting period. Handling litigation against the Commission has been a constant focus for the legal team, along with supporting the investigations and 32 private examinations.

The Commission remains mindful of the impact that inquiries and investigations can have on witnesses and others involved in its work. Timeliness, regular communication and consideration of individual circumstances are important aspects of the Commission's approach. The touchpoints throughout an inquiry or an investigation's life cycle, and the ongoing consideration of the vulnerability of witnesses, which may change over time, all factor into the case-by-case approach taken and support offered. To further strengthen support services, the Commission introduced a dedicated Witness Liaison Officer role during the year. This role provides tailored and independent support to witnesses throughout the life cycle of an inquiry or investigation.

I would like to acknowledge and thank the Commission's staff for their professionalism, dedication and commitment throughout the year. Their efforts have been central to the significant achievements and progress made across the organisation and continue to strengthen the Commission's ability to fulfil its important role in protecting and promoting integrity in the ACT.

Outlook

Managing relationships, influence and lobbying activities will be a major focus of the Commission's prevention and education work in the coming year. This program will draw on lessons from recent investigations and the ongoing inquiry into the ACT's lobbying framework.

The inquiry is examining whether current practices and frameworks remain fit for purpose, as well as testing the assumptions that inform the ACT's lobbying framework. The objective is to identify practical lobbying arrangements that can support both public participation and government integrity, within the limited resources available in a small jurisdiction. This might suggest that education rather than systems should be the policy focus. The starting point is the importance of encouraging, rather than restricting, participation by the community and the various community interests in government decisions and policy development. However, the vigorous exercise of democratic rights by particular interests raises risks of undue influence and unfair access, which must be acknowledged and appropriately managed. In this process, it needs to be understood that lobbying regulation, though essential, can provide only a relatively small part of integrity governance. Transparency within government, exposure in the Legislative Assembly, freedom of information, a fearless media and, as well, formal investigative agencies such as the Integrity Commission, the Public Service Standards Commission and the Auditor-General together provide a wide-ranging and effective scaffold mediating the relations between government and the community.

The Hon Michael F Adams KC
Integrity Commissioner

Through education and outreach, the Commission will continue to provide practical guidance and real-world examples to help public officials identify and manage risks of unfair access and undue influence and help to build confidence in good government.

Reporting corruption

How to report potential corrupt conduct

It is important that all allegations of serious or systemic corrupt conduct in the ACT are reported to the Commission. This is essential for identifying and exposing any corruption occurring in the ACT and stopping it from continuing or occurring again.

The Commission can investigate allegations of corrupt conduct relating to or involving any current or former ACT public official. A public official is a person who performs an official function for the ACT or who acts in an official capacity for the ACT Government.

The Commission can also investigate allegations of corruption relating to any ACT public sector entity, including:

- the ACT Legislative Assembly and its entities – including Members of the Legislative Assembly (MLAs) and their staff
- ACT Government Directorates and their staff
- statutory bodies
- ACT authorities and instrumentalities
- Territory-owned corporations and their subsidiaries
- public health services, including hospitals
- public transport authorities
- emergency services organisations (excluding ACT Policing)
- public education bodies
- public utilities, including gas, electricity and water suppliers
- ACT correctional centres and places of detention.

The Commission cannot investigate matters relating to public sector entities from the Commonwealth or other state or territory jurisdictions unless there is a connection to the ACT. This includes reports about ACT Policing, which operates as a community policing branch of the Australian Federal Police.

Assessing corruption allegations

The Commission assesses all reports of corrupt conduct it receives. It then decides whether to dismiss, refer or investigate the alleged conduct.

Those reporting conduct do not need to provide the Commission with their name. However, information given anonymously may be more difficult to investigate. The Commission strongly suggests that individuals making a report provide their contact details.

The Commission undertakes corruption investigations. It does not have a complaint-handling role and cannot help individuals to achieve personal remedies or resolve disputes.

The Commission prioritises the investigation of allegations of serious or systemic corrupt conduct. If a report is not investigated, the Commission may keep the report on file to inform future decisions.

All information provided to the Commission is handled in accordance with relevant privacy laws and the *Integrity Commission Act 2018*.

How to report

Online: report.integrity.act.gov.au

Email: complaints@integrity.act.gov.au

Phone: (02) 5132 9300

Reporting disclosable conduct

How to report suspected disclosable conduct

A Public Interest Disclosure (PID) is a report about disclosable conduct which has been accepted as such by the Commissioner. 'Disclosable conduct' means an action, policy, practice or procedure of a public sector entity, or public official, that is maladministration, or results in a substantial and specific danger to public health or safety, or the environment.

For a report to qualify as a PID, it must be made to a person responsible for receiving reports. These people are called 'disclosure officers' and include:

- the Auditor-General
- the Ombudsman
- the Commissioner
- the Public Sector Standards Commissioner
- the Head of Service
- the Head of an ACT Public Service (ACTPS) entity
- a person nominated to be a disclosure officer for an ACTPS entity
- the Clerk of the Legislative Assembly
- a person nominated to be a disclosure officer for a Legislative Assembly entity.

To help people identify the appropriate person to contact, public sector entities are required to publish the contact details of their nominated disclosure officers on their websites. The Commission also maintains a publicly available list of nominated disclosure officers across the ACT public sector.

The legislation recognises that people may not always know who a disclosure officer is or feel comfortable approaching one directly. As a result, disclosures can also be made to a Minister. Public sector employees may report concerns to their supervisor or manager, a member of their entity's governing board (where one exists), or another person within the organisation who is responsible for dealing with the issues being raised.

Importantly, the process for making a disclosure is intended to be accessible and flexible. A disclosure does not need to be made in a particular format. It may be communicated by email, letter, fax, telephone, or through any other means of communication. In some circumstances, a disclosure may arise through informal communication. Individuals also have the option of making a disclosure anonymously if they do not wish to reveal their identity.

How to report

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Phone: (02) 5132 9300

PART **B**

Organisational overview
and key achievements

This annual report covers the seventh year of operations for the Commission, which commenced operation on 1 December 2019.

The Commission and the role of the Integrity Commissioner are established under the *Integrity Commission Act 2018* (Integrity Commission Act). The Commission consists of the Commissioner who is an independent officer of the Legislative Assembly. Subject to the Integrity Commission Act and to other Territory laws, the Commissioner has complete discretion in the exercise of the Commission's functions under section 23 of the Integrity Commission Act. The Commissioner is assisted by staff employed under the *Public Sector Management Act 1994* and the Integrity Commission Act. The staff of the Commission are not subject to direction from anyone other than the Commissioner or another member of staff of the Commission authorised by the Commissioner to give directions. The Commission is also responsible for administering the *Public Interest Disclosure Act 2012* (Public Interest Disclosure Act). The Public Interest Disclosure Act provides a way for people to disclose wrongdoing in the public sector and protect whistleblowers who do so.

The Commission's vision, purpose, values and functions

Our vision

A trusted Commission whose work is valued and influential in enhancing the integrity of public administration and government.

Our purpose

To strengthen public confidence in the integrity of the ACT Government by investigating, exposing, and preventing corrupt conduct and overseeing investigations into disclosable conduct.

Our values

The following values guide and underpin the Commission's day-to-day work:

Independence

Our actions are lawful, ethical, evidence-based and free from political direction, influence or bias.

Professionalism

We demonstrate excellence, respect, courtesy and dedication in everything we do.

Accountability

We accept responsibility for our actions and decisions; transparency and consistency are fundamental to our business.

Fairness

We exercise the Commission's powers fairly, paying due respect to civil and human rights.

Integrity

We act with honesty, sound moral character and adherence to ethical principles in discharging our duties while encouraging the same behaviour across the ACTPS.

Our functions

The Commission's role is to assess reports of alleged corrupt conduct in the ACT Government, the ACTPS, and services utilising public revenue, and to investigate and report on allegations where warranted.

The Commission is also responsible for raising awareness in the public sector and the community about the risks of corruption and how to combat it.

Under section 23 of the Integrity Commission Act, the Commission's functions are to:

- investigate conduct that is alleged to be corrupt conduct
- refer suspected instances of criminality or wrongdoing to the appropriate authority for further investigation and action
- prevent corruption, including by:
 - researching corrupt practices
 - mitigating the risks of corruption
- publish information about investigations conducted by the Commission, including lessons learned
- provide education programs about the operation of this Act and the Commission, including providing advice, training and education services to:
 - the Legislative Assembly and the public sector to increase capacity to prevent corrupt conduct
 - people who are required to report corrupt conduct under this Act
 - the community about the detrimental effects of corruption on public administration and ways in which to assist in preventing corrupt conduct
- foster public confidence in the Legislative Assembly and public sector.

Under sections 17A and 19 of the Public Interest Disclosure Act, the Commission's functions are to:

- assess disclosures of disclosable conduct (section 17(A))
- investigate or refer the public interest disclosures for investigation to an investigating entity (section 19).

In undertaking these functions, the Commission assesses reports of wrongdoing in the ACT Government and public sector. After receiving an allegation, it decides whether there could be corrupt conduct as per the definition given under section 9 of the Integrity Commission Act. Corrupt conduct, in substance, comprises criminal offences or actions that could have serious disciplinary or employment consequences for a public official. It also constitutes a significant breach of public trust or the abuse or misuse of an official position.

If the Commission decides an allegation merits further action, it either initiates an investigation or refers the matter to another agency for investigation.

It also has the power to initiate an investigation without having received a report of wrongdoing.

In exercising its functions, the Commission must prioritise the investigation and exposure of corrupt conduct that it considers may be serious or systemic.

Public Interest Disclosure Act

The Public Interest Disclosure Act is intended to encourage people to disclose wrongdoing in the public sector and to protect whistleblowers who do so.

The Commission has the power to receive and assess disclosures made under the Public Interest Disclosure Act, decide whether disclosures amount to PIDs, investigate PIDs or refer PIDs to other public entities for investigation, and monitor and review how other public entities deal with such disclosures.

Detailed guidelines about the Public Interest Disclosure Act and the Commission's role are available on the Commission website at integrity.act.gov.au.

The Public Interest Disclosure Act also prescribes the Commission's annual reporting requirements, which are included in this report (see **Part G**).

Organisational structure

Section 20 of the Integrity Commission Act provides that the Commission consists of the Commissioner. The Commissioner is an independent officer of the ACT Legislative Assembly and has complete discretion in exercising the Commission's functions, subject to the Act and other ACT laws.

Section 41 of the Integrity Commission Act requires the Commissioner to appoint a Chief Executive Officer (CEO) and specifies the conditions of the appointment.

The CEO's functions, outlined in section 44 of the Integrity Commission Act, are to:

- manage the day-to-day operations of the Commission
- advise the Commission on its operations and financial performance.

As at 30 June 2026, the Commission's senior structure consisted of the Commissioner, the CEO, General Counsel, the Chief Financial Officer (CFO), and 3 senior directors who lead the Assessments, Investigations, and Corporate, Prevention and Communication functions, respectively. Figure 1 outlines the Commission's organisational structure as at 30 June 2026 and Table 1 shows the full-time equivalent (FTE) and headcount figures for each team.

Figure 1. The ACT Integrity Commission's organisational structure as at 30 June 2026

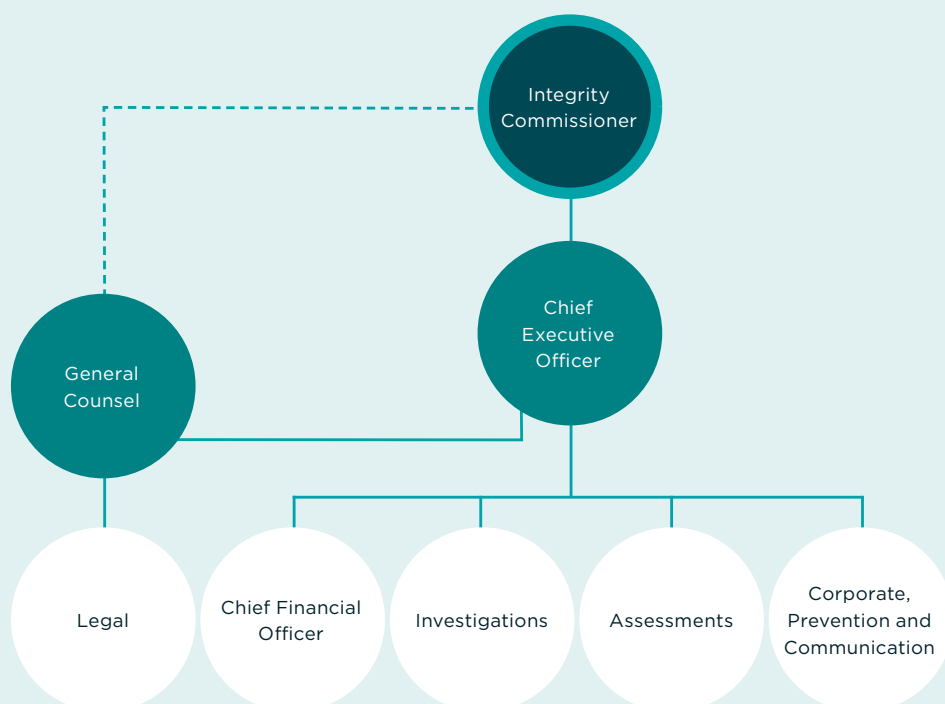


Table 1. Commission full-time equivalent staff and headcount by team as at 30 June 2026

	FTE	Headcount
Executive (including the Commissioner and CEO)	2	2
Assessments	8.7	9
Investigations	6.8	7
Legal (including General Counsel)	5	5
Corporate, Prevention and Communication	6.9	7
Total	29.4	30

Under this organisational structure, the Senior Director of Assessments manages the Assessments team. The Commission's Assessments team is the first point of contact for members of the public and ACT Government staff who wish to make a corruption report or disclosure. The role of the Assessments team is to record, triage and assess corruption reports and disclosures received by the Commission, undertake preliminary inquiries and propose appropriate recommendations on how the Commission should deal with these reports. The team also provides advice, guidance and information on the Commission's jurisdiction and processes to the public, external agencies and ACT Government staff.

The Senior Director of Investigations manages the investigative function into alleged corrupt conduct and exercises the Commission's information-gathering powers. This includes engaging with witnesses and persons who have made corruption complaints. The Senior Director of Investigations also oversees the use of specialist digital forensic capabilities and the exercise of search and seizure powers by investigators authorised under the Integrity Commission Act.

The General Counsel is a member of the Commission's Senior Executive Service (SES) and provides legal advice to the Commission. The General Counsel ensures the Commission's Legal team provides high-quality, accurate and timely advice and services to support the Commission's operations. The General Counsel ensures the Commission's statutory powers are exercised in a lawful, effective, ethical and accountable manner. Another core function of the team is to act as Counsel Assisting the Commissioner in examinations of witnesses.

The Senior Director of Corporate, Prevention and Communication manages the corporate obligations of the Commission, alongside the prevention, education and media functions. This includes researching and analysing corruption risks and trends, and providing best-fit anti-corruption advice, products and education to the ACT public sector and community. It also promotes the Commission's work within the ACT and nationally, and acts as the face of the Commission through serving as media liaison, publishing media releases and maintaining the public-facing resources of the Commission.



2025-26 year at a glance

Reports received



67

Voluntary corruption complaints



11

Mandatory notifications



155

Information reports



26

Disclosures of disclosable conduct



2

Own initiative

* Information reports are communications received by the Commission which relate to existing investigations or assessments, do not raise allegations of corrupt conduct, or relate to entities outside of the Commission's jurisdiction. These matters are not considered to be corruption reports and not subject to a formal assessment.



14

Investigations worked on



17

Preliminary inquiries
worked on



32

Examinations held



71

Summonses issued



1

Finalised investigation report



1

Discontinued investigation



21

Education sessions
delivered



852

Attendees at education sessions

Achievements

During the year, the Commission received 261 reports including PIDs and worked on 14 investigations. The reporting period was characterised by substantial progress in advancing complex and high priority investigation matters along with efficiencies in the Assessment process.

Operational achievements

The Commission achieved a significant organisational milestone with the first referral of a matter to the Director of Public Prosecutions (DPP) for consideration of criminal charges following an investigation. This matter was managed meticulously and was the first brief of evidence prepared for external prosecutorial referral.

Significant progress was achieved on Operation Kingfisher, with the procedural fairness process nearing completion and the investigation advancing into the final report-writing stage. This represents a major milestone in a highly complex and high-priority investigation that required the analysis and integration of an extraordinary volume of evidence to support robust findings. The achievement is particularly notable given it was delivered while concurrently managing multiple other investigations and competing operational priorities. By the end of the reporting period, the final investigation report was nearing completion and presentation to the Legislative Assembly.

All other investigations continued to progress resulting in one investigation (Operation Agni) being discontinued and 12 investigations being actively progressed, representing a range of entities, decisions, and actions by public officials. See Figure 6.

The Commission has continued to strengthen operational effectiveness and assessment functions. Enhancements to assessment processes, which included maturing rapid triage and information report processes, resulted in a record low number of outstanding matters awaiting assessment. The increased capability in the Assessments team to conduct preliminary inquiries has also resulted in stronger assessment outcomes up-front with greater clarity and confidence on matters that are recommended to the Commissioner for investigation.

Operational metrics between financial years is shown at Figure 3.

Corporate achievements

The Commission achieved a significant advancement in information security by establishing a PROTECTED-rated network and outsourced information and communication technology (ICT) services. This transformation required separation from ACT Government Shared Services arrangements and establishing a stand-alone network. The new ICT environment is designed to meet the requirements of the Commonwealth's Protective Security Policy Framework (PSPF) and Information Security Manual (ISM), enabling secure handling and storage of protected information. Limited connectivity back to ACT Digital Services remains through a secure link for staff to stay connected for essential human resource functions and ACT Government employment functions.

Figure 2. Summary of achievements

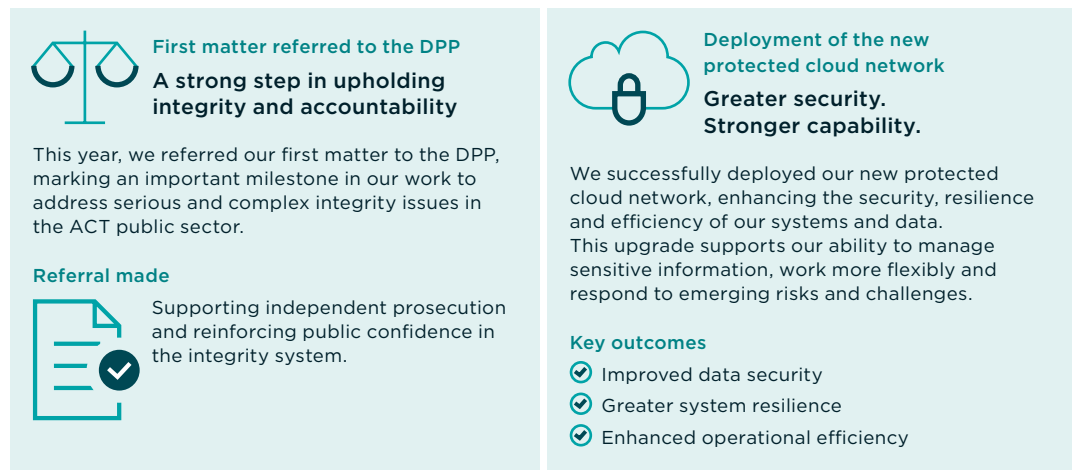
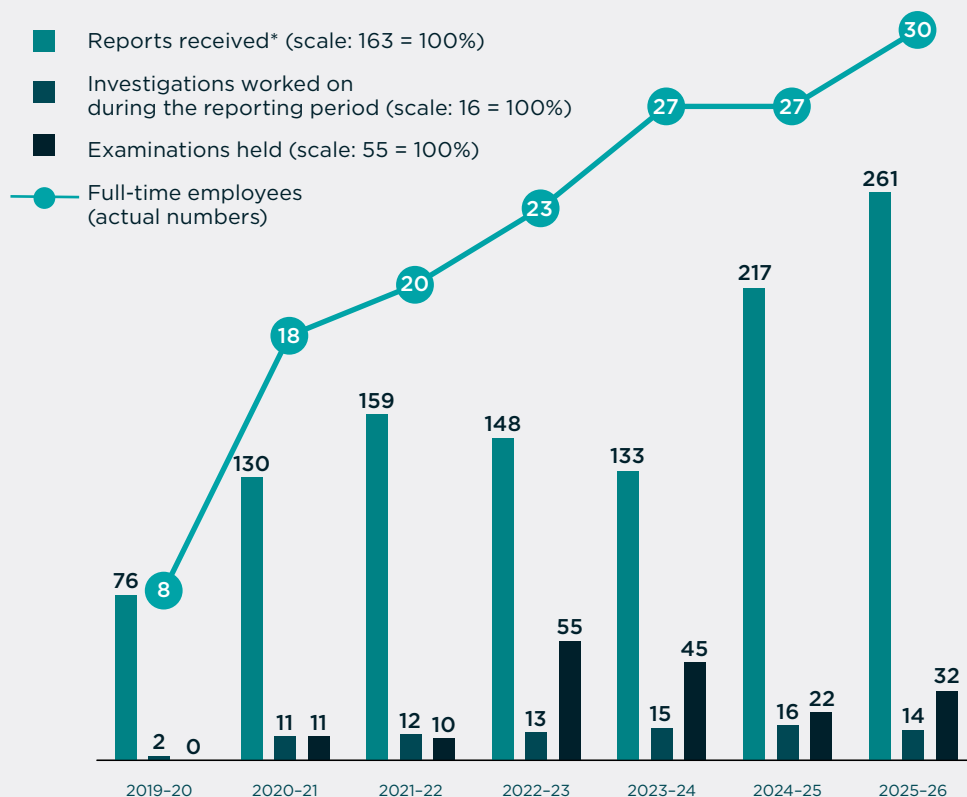


Figure 3. Key metrics comparison 2019-20 to 2025-26



* In Figure 3, 'reports received' refers to the sum of corruption reports received under the Integrity Commission Act, disclosures received under the Public Interest Disclosure Act and information reports.



The PROTECTED Network and ICT Services Project

June 2026 marked a major milestone for the Commission with the successful transition from ACT Government ICT services provided by Digital Canberra (DCBR) to a dedicated stand-alone protected network delivered by Centorrino Technologies. This achievement represents the culmination of almost 3 years of planning, procurement, design and implementation involving Commission staff, external advisors, DCBR and Centorrino Technologies.

Following an extensive procurement process and contract negotiations, transition activities commenced in December 2025 and were delivered over an intensive 7-month period. The project included establishing a new Microsoft Azure and Microsoft 365 environment, integrating key business systems and services, developing the policies and controls required for compliance with the ISM and PSPF, undertaking comprehensive testing, and completing the migration of the Commission's data into the new environment.

One of the project's most significant challenges was the migration of data from the DCBR environment to the new Microsoft 365 Azure tenancy. Identified as the highest project risk, the migration was carefully planned and executed over a single weekend. Thanks to the coordinated efforts of the project team, all staff had access to their data and critical systems on the first day of operating in the new environment, ensuring a seamless transition for the Commission.

The Commission now benefits from a modern, secure and resilient ICT platform that supports both its operational needs and security obligations. Key capabilities include a dedicated protected network hosted in Microsoft Azure cloud, accredited secure facilities, protected hardware, including secure printers and integrated access to critical business applications. Cyber security has also been significantly strengthened through the implementation of a Cyber Security Management System, ongoing security monitoring and a Security Operations Centre.

With the transition now complete and business-as-usual services established, the final stage of the project focuses on completing an independent Infosec Registered Assessors Program (IRAP) assessment and formal accreditation of the environment's protected-level compliance. Once accreditation is achieved, connectivity to the GovLINK network will be implemented, bringing the project to completion.

The successful delivery of this project provides the Commission with a secure, contemporary and scalable technology platform that will support its operations and regulatory responsibilities well into the future.

Table 2 lists the Commission's original business objectives and outcomes achieved by the project.

Table 2. Business objectives and outcomes for the protected network and ICT services project

Business objective	Outcome
The Commission's jurisdiction is the ACT public sector and government. The Commission's role involves the investigation of allegations of corrupt conduct against ACT public officials. These investigations involve the gathering of sensitive information and evidence from relevant parties, including public officials. The Commission's data and information holdings therefore contain sensitive information about its operations, that under existing arrangements, can expose the Commission's work unnecessarily.	Separation from DCBR achieved and information appropriately isolated.
As a matter of principle, the Commission requires its information and ICT environment to be separated from anyone that falls under its jurisdiction. Access to the Commission's data by ACT Government employees is a risk to the Commission's operational integrity. This is a matter both of substance and perception.	Achieved.
The Commission requires a stand-alone ICT environment capable of being certified at the protected level under the Australian Government PSPF. A protected ICT environment will provide additional security measures not currently available on a platform rated to the official level and facilitate operational activity with other Commonwealth and state agencies.	In progress pending conclusion of the IRAP assessment.
The engagement of a third-party provider for protected network and IT services will enhance the customer's efficiency and effectiveness through the development of partnering arrangements with relevant Commonwealth and state agencies; receiving increased flows of intelligence from agencies that require protected-level arrangements.	In progress pending conclusion of the IRAP assessment.

Important themes exposed in investigations

Operations Kingfisher and Luna Part 2

Operations Kingfisher and Luna Part 2 reveal serious and deeply concerning failures of integrity, governance and accountability within public administration. The investigations exposed conduct that eroded fundamental safeguards designed to protect public resources and maintain public trust. Rather than isolated administrative shortcomings, the findings point to failures of oversight, deficient record keeping, disregard for established processes and decision-making practices that fell well short of the standards expected of public officials.

Operation Kingfisher examined the procurement of the Campbell Primary School Modernisation Project. The investigation identified conduct that compromised the integrity of the procurement process, including inappropriate external influence, undocumented communications, departures from approved evaluation methodologies and failures to maintain procurement independence. These shortcomings undermined the transparency, fairness and probity of a process that should have been beyond reproach.

Operation Luna Part 2 also uncovered troubling conduct. The investigation exposed serious corruption involving the use of false and misleading information to justify extraordinary and highly irregular contractual arrangements. Public money was committed through processes that lacked transparency, proper scrutiny and credible justification. The conduct identified reflected a profound failure of honesty and accountability and represented a serious betrayal of the obligations owed by public officials to the community they serve.

Taken together, these investigations demonstrate how vulnerable public institutions become when individuals choose to disregard established controls, evade scrutiny and withhold critical information. They reveal how poor governance creates opportunities for misconduct and how failures of leadership and accountability can allow questionable conduct to proceed unchecked. Public trust is not damaged by honest mistakes; it is damaged when those entrusted with responsibility fail to uphold the standards required of their office.

Integrity lessons

Integrity is the foundation upon which public administration depends. Without it, public confidence, accountability and effective governance quickly deteriorate.

Both investigations illustrate the consequences that occur when integrity is treated as an option or a 'grey area' rather than a fundamental obligation. Decision-making processes were circumvented, scrutiny was diminished and key decision-makers were deprived of accurate, reliable and complete information. In some instances, the absence of proper records appears not merely careless but fundamentally incompatible with transparent and accountable administration.

Record keeping is not an administrative formality. It is one of the principal safeguards against misconduct. When records are incomplete, absent or deliberately avoided, accountability is weakened, scrutiny is frustrated and public confidence is inevitably undermined.

Equally important is the obligation of candour. Public officials must do more than avoid making false statements – they must ensure that information provided to colleagues, decision-makers and oversight bodies is complete, accurate and not misleading by omission. Integrity requires frankness and transparency, particularly where information may influence a decision or alter the understanding of a matter. The ACT *Public Sector Management Act 1994* and the ACTPS Code of Conduct require officials to act honestly, with integrity and in a manner that supports accountability. This obligation cannot be satisfied by a narrow approach of answering only the precise question asked while withholding relevant information.

Procurement lessons

Public procurement frameworks exist to prevent favouritism, improper influence and misuse of public funds. They are designed to ensure that decisions are fair, transparent and capable of independent scrutiny.

Operation Kingfisher demonstrated how quickly procurement integrity can be compromised when established safeguards are disregarded. Evaluation processes were undermined by undocumented interactions, departures from approved methodologies and inappropriate influence. Such conduct strikes at the heart of public confidence in government procurement and creates a perception that outcomes may have been shaped by factors other than merit.

Operation Luna Part 2 revealed an even more alarming disregard for procurement discipline. False and misleading information was used to facilitate contractual arrangements that should have attracted immediate concern and rigorous examination, had updates provided to the Board on the procurement been candid. Significant advance payments and exceptional contractual terms proceeded despite obvious warning signs. The failures identified highlight the dangers that arise when scrutiny is unable to be undertaken due to active concealment of the facts and governance processes are treated as obstacles to be overcome rather than safeguards to be respected.

Governance lessons

The investigations expose governance failures that should concern every public sector leader.

Operation Kingfisher identified weaknesses in accountability arrangements that allowed inappropriate influence to be exerted over important procurement decisions. Individuals charged with protecting the integrity of the process failed to exercise the degree of independence, rigour and scrutiny that the circumstances demanded.

Operation Luna Part 2 demonstrated the serious consequences that follow when governance systems are fed false or misleading information. Effective oversight is impossible when decision-makers cannot rely on the accuracy and completeness of the information placed before them.

The findings illustrate a broader truth: governance frameworks are only as effective as the people responsible for applying them. Controls, policies and procedures provide little protection when they are ignored, circumvented or treated with indifference.

Risk management lessons

Both investigations revealed warning signs that should have prompted immediate intervention and heightened scrutiny.

These included:

- undocumented communications
- decisions unsupported by credible evidence
- unexplained departures from procurement outcomes
- rushed approvals and compressed decision-making
- external pressure exerted to bypass ordinary processes
- highly unusual contractual and payment arrangements
- deficient record keeping
- inconsistent, implausible or shifting justifications
- potential conflicts of interest
- external influence over procurement activities.

These are not minor procedural irregularities. They are recognised indicators of integrity risk. When such indicators emerge, leaders have a responsibility to act decisively. Failure to do so increases the likelihood that corruption will flourish unchecked.

Leadership and organisational culture

At the centre of both investigations lies a failure of decision-makers to achieve the outcomes they were seeking with ethical leadership.

Leaders establish the ethical standards by which organisations operate. When accountability is weak, scrutiny is discouraged or compliance with obligations are treated as obstacles, a culture emerges in which poor decisions and questionable conduct and improper relationships become increasingly normalised.

These investigations demonstrate the damage that can occur when leaders fail to foster an environment of transparency and integrity. Organisational cultures that tolerate secrecy, discourage questioning and reward expediency over accountability create fertile ground for misconduct and corruption. Organisations need to allow public servants to make mistakes and reward candour, even when it may be embarrassing.

Public sector leadership demands more than achieving outcomes. It requires a steadfast commitment to integrity, transparency and responsible stewardship of public resources to achieve those outcomes.

Conclusion

Operations Kingfisher and Luna Part 2 expose a form of corrupt conduct that demands far greater recognition and scrutiny. While lacking the hallmarks of traditional corruption for personal financial gain, the conduct identified was no less damaging. It involved the subversion of established processes, the manipulation of decision-making, the use of false and misleading information, and the erosion of accountability mechanisms intended to safeguard public resources and public trust.

The investigations revealed serious failures of integrity and governance, together with an unacceptable disregard for proper probity and professional boundaries in dealings with Ministers, ministerial offices and external actors. The conduct exposed was not merely poor administration; it represented a failure to uphold the fundamental obligations of public office.

These investigations demonstrate that when those obligations are disregarded, the consequences are significant: public funds are placed at risk or wasted, governance systems are compromised and confidence in public institutions is diminished.

These investigations also reinforce the importance of actively identifying, declaring and managing actual, potential and perceived conflicts of interest. Public officials and ministerial staff cannot assume that personal relationships, political affiliations, professional associations or competing loyalties are irrelevant simply because they do not directly influence a decision. The test is often whether a reasonable person could perceive that independence, impartiality or probity may be compromised. Where such circumstances arise, there is a positive obligation to recognise the risk, disclose it appropriately and ensure it is managed transparently. Failing to do so can create opportunities for undue influence, undermine confidence in decision-making and call into question the integrity of government processes. Integrity requires more than avoiding misconduct – it requires taking active steps to safeguard public confidence by ensuring that personal interests, relationships and associations are never allowed to interfere, or appear to interfere, with the impartial discharge of official duties.

Evolving the Commission

The Commission acknowledges the broad expectation from government and the community to produce more work more quickly. As an organisation, its focus continues to be on maturing its operations and systems to deliver on its priorities in a timely manner and to further build confidence and trust with key stakeholders and the Canberra community, acknowledging that fighting corruption is not a battle fought alone.

Supporting the development of protocols to streamline the provision of documents or things requested by the Commission under a summons has also been a high priority. The Commission's ability to perform its functions depends on the timely production of information and documents requested by the Commissioner, under various provisions of the Integrity Commission Act, including formal summonses that require the production of information. Throughout the reporting period, delays in producing summonsed documents continued. A principal cause of these delays is a perceived need for public officials subject to summonses to review documents captured by a summons before they are produced to the Commission, to determine whether claims of legal professional privilege, public interest immunity, or Assembly information may apply to documents. While the Commission has sought, where appropriate, to accommodate these challenges by extending compliance periods, refining the scope of material sought, or making specialised alternate arrangements for evidence discovery, significant delays persist.

The Commission is progressing conversations with the Solicitor General, Head of Service, the Office of the Speaker and the Legislative Assembly Standing Committee on the Integrity Commission to outline the challenges faced and develop short-term solutions that operates within the legislative requirements, while achieving long-term legislative change.

The Commission is seeking to streamline the processes under the current legislation using agreed protocols, to address the significant delays these circumstances cause to investigations. Work on establishing a clear way forward will continue in the new reporting period.

The Commission was successful in securing funding for an additional 7 FTE staff to provide additional operational capability to investigate corruption allegations and to commence work on a review of the regulation of lobbying in the ACT as part of the 2025-26 ACT Government Budget process. The granting of additional resources at this time recognised the complexity and time needed to conduct thorough and fair investigations into allegations of corrupt conduct, respond to litigation arising from corruption findings, and acknowledged assumptions about the expected level of growth in the volume of corruption reports.

The business case recognised the important impact of the Commission's work as a driver to uplift the standard of public administration and governance and the prevention of losses of government appropriations through poor practice and/or practices lacking honesty and probity.

The Commission has utilised the allocated funding to grow capacity and capability to deliver the important work of the teams of the Commission.

Organisational priorities

The Commission continues to mature through its focus on 5 main organisational priorities, in addition to the budget priorities set out in **Part C**.



Focus area 1: People

The Commission continued with recruitment activity throughout 2025-26 to meet its budgeted FTE. In accordance with broader ACT Government policy, the Commission is committed to providing employees with permanent employment. Temporary contracts are only used for special projects and/or to backfill business-as-usual functions. As at 30 June 2026, one employee is non-ongoing and will be eligible to be assessed under the government's Secure Workforce Conversion process in late 2026.

The wellbeing of all Commission staff is also a priority. The wide-ranging services offered by the Employee Assistance Program (EAP) are promoted regularly to staff to ensure they understand how to access support as well as professional development through this valuable service.



Focus area 2: Investigation capabilities

Access to *Telecommunications (Interception and Access) Act 1979* (Cth) powers

On 4 June 2024, the Commission was temporarily declared a criminal law enforcement agency under the *Telecommunications (Interception and Access) Act 1979* (Cth) (TIA Act). This declaration meant the Commission could exercise powers to access stored communications (Chapter 3) and telecommunications data (Chapter 4), as defined under the TIA Act. The declaration does not enable the Commission to use interception powers (Chapter 2).

The Commission was re-declared as such an agency on 23 December 2024, and again on 19 January 2026. The third declaration took effect from 21 January 2026 and remains in effect until August 2026 when a further temporary declaration will be requested while permanent powers are being sought. The acquisition of these powers increases the Commission's capabilities where it is investigating conduct that could constitute a criminal offence.

The Commission has developed internal processes and procedures to enable it to use these powers appropriately and in accordance with legislative requirements.

The Commission is working with the Integrity Policy Branch in the Chief Minister, Treasury and Economic Development Directorate (CMTEDD) to enable the Commission to have ongoing access to these interception powers. See **Part D** for more information.

The Commission continues to evolve its investigative practices, including the implementation of an Operations Group as part of ongoing internal governance arrangements. See **Part D** for more details on the Operations Group.



Focus area 3: Corporate-enabling capabilities

The Commission completed the key enabling project for the Commission in June 2026 to separate the Commission's ICT services from a Shared Services arrangement with the ACTPS. The completion of this project was a major achievement, requiring all Commission staff to transition to a new operating environment, stand up new hardware and networks across the Commission, and introduce new ways of working to allow them to carry on with, and in some areas mature, their day-to-day functions. The achievement of this project is a credit to the project team and all staff at the Commission in managing a major transformation while continuing the operations of the Commission. Further detail can be found earlier this Part.



Focus area 4: Statutory review of the Integrity Commission Act

The Commission is committed to progressing the implementation of recommendations of the Govey Review of the Integrity Commission Act.

The review of the Integrity Commission Act, undertaken under section 303 by Mr Ian Govey AM, was tabled in the Legislative Assembly on 30 November 2023.

The government response outlined adopting a staged approach to implementing the recommendations due to the Legislative Assembly election in October 2024.

The first tranche of recommendations has been implemented, incorporating 18 of the 66 review recommendations. Most of the changes took effect from 29 September 2024, with the witness wellbeing provisions operative from 21 March 2025.

Implementing the recommended administrative efficiency measures necessitated significant effort by the Commission to update standard operating procedures and processes. Addressing the recommendation to improve the wellbeing of those involved in Commission activities required a comprehensive, independent review of the existing Witness Welfare Policy. Further information is provided in **Part D**.

The Commission welcomes the next tranche of recommendations for implementation of legislative change, as well as further discussion on outstanding recommendations for government consideration.



Focus area 5: Maturing internal processes and practices

The Commission is committed to the ongoing maturation of its processes and practices. Progress made across key projects and activities during 2025-26 is documented in **Part D**.



Figure 4. The Commission's journey and significant events

2023-24

- August 2023:** The Commission holds its first public examinations into Operation Kingfisher.

- 1 September 2023:** Litigation arising from Operation Kingfisher, the matter of *Haire v ACT Integrity Commission*, brought proceedings in the Supreme Court against the Commission seeking judicial review relating to an allegation of apprehended bias against the Commissioner.

- 30 November 2023:** Completion of the reviews of the Integrity Commission Act and Public Interest Disclosure Act, statutory reviewer's report tabled in the ACT Legislative Assembly.

- December 2023:** Operation Kingfisher public examinations continue.

- 4 June 2024:** Attorney-General signs the instrument to declare the Commission a criminal law enforcement agency under the TIA Act.

- 27 June 2024:** The Commission makes its first finding of serious and systemic corruption in the 'Operation Luna Part 1' Special Report.

2024-25

- July 2024:** Additional public examinations take place over 5 days into Operation Kingfisher.

- 1 July 2024:** In Operation Kingfisher, a witness in the investigation sets down proceedings for judicial review and an injunction concerning the public hearings submission stage of the investigation, and an application for an urgent interim injunction to stop the public hearings.

- July 2024:** His Honour Justice Elkaim rejected the application and the public oral submissions proceeded as planned on 9-11 July 2024.

- 5 August 2024:** Confidential Investigation Report – Operation Kite submitted to the Standing Committee on Justice and Community Safety.

- 24 October 2024:** In *Haire v ACT Integrity Commission*, the proceedings were resolved by consent, plaintiff was granted leave to cross-examine a witness and that cross-examination ultimately occurred on 6 and 7 December 2024.

- 17 January 2025:** Investigation Report – Operation Falcon released.

- 13 March 2025:** In Operation Luna an injunction was sought to restrain the Special Investigation Report from being released, which was dismissed.

- 24 March 2025:** In Operation Juno, proceedings were initiated seeking judicial review of the Commission's investigation report, which made a finding of serious corrupt conduct.

- 29 April 2025:** In *Cover v ACT Integrity Commission*, issue raised as to whether the Commission's Operation Luna Part 1 report findings of serious corrupt conduct could be challenged if parliamentary privilege was attached to the report.

2025-26

- 2 July 2025:** In *Sofronoff v ACT Integrity Commission*, in relation to the Operation Juno report, her Honour Justice Abraham in the NSW Federal Court decided that parliamentary privilege did not apply to the report published on the Integrity Commission's website.

- 21-22 July 2025:** In *Sofronoff v ACT Integrity Commission*, the substantive application concerning the Commission's findings of corrupt conduct was heard by her Honour.

- 23 July 2025:** In Operation Kingfisher, litigation was commenced by a witness concerning the Commission's summons to produce his mobile phone when appearing as a witness at a private hearing.

- 25 July 2025:** Operation Luna Special Report Part 2 released making findings of serious corrupt conduct.

- 18 September 2025:** In the Cover litigation (see 29 April 2025), his Honour Justice Mossop held that parliamentary privilege did not apply to Operation Luna Part 1 report but otherwise dismissed Ms Cover's application for judicial review. ([2025] ACTSC 424)

- 26 August 2025:** His Honour dismissed an application for an interlocutory injunction (see 23 July 2025) preventing the Commission from reviewing the data on the summonsed mobile phone. ([2025] ACTSC 380)

- 19 November 2025:** A memorandum of understanding (MOU) with the Inspector of Custodial Services and the Commission was finalised and signed by all parties.

- 9 December 2025:** Anti-corruption day weeklong engagement activities took place across ACT Government sites.

- 11 December 2025:** Justice Abraham dismissed the application in relation to *Sofronoff v ACT Integrity Commission*. ([2025] FCA 1565; [2026] FCA 47)

- 19 January 2026:** The Commission was re-declared a criminal law enforcement agency under the TIA Act.

- February 2026:** Whole of government corruption prevention poster campaign launched.

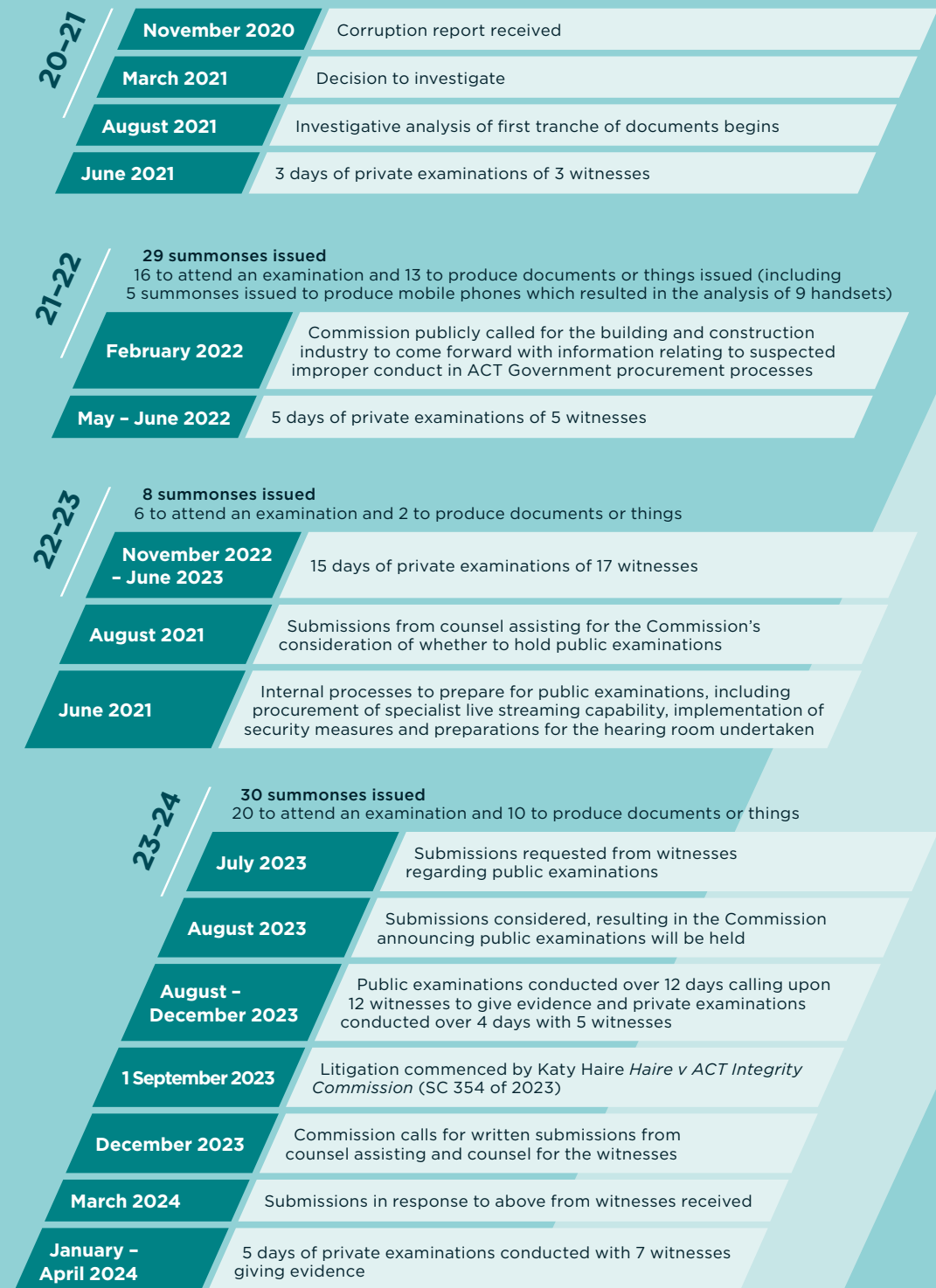
- 27 February 2026:** The Operation Kingfisher Proposed Investigation Report was sent to interested parties for procedural fairness.

- February 2026:** In the matter of *Sofronoff v ACT Integrity Commission*, Mr Sofronoff set down an appeal to the Full Court of the NSW Federal Court to review the decision of findings against himself in the Operation Juno Investigation Report.

- May 2026:** The Commission used its powers under Chapter 4 of the TIA Act.

- 22 June 2026:** ICT project to separate the Commission from DCBR goes live.

Figure 5. ACT Integrity Commission – Operation Kingfisher



24-25

4 summonses issued

1 to attend an examination, 3 to produce documents or things

July 2024

A witness, Mr Ceramidas brought an urgent interlocutory application requesting the upcoming oral submissions be held in private and sought a suppression order over his name - suppression order was initially issued, but the application was ultimately rejected and costs awarded to the Commission

July 2024

5 days of public oral closing submissions conducted

March 2025

Final judgement delivered in *Haire v ACT Integrity Commission* (SC 354 of 2023) - with no findings against the Commission, and no order as to costs

June 2025

Preparation of Proposed Investigation Report (PIR) commences (ongoing process until 27 February 2026)

June 2025

2 days of private examinations and production of documents and a mobile phone conducted with 2 witnesses giving evidence

25-26

July - Sept 2025 - 5 summonses issued

1 to attend an examination, 3 to produce documents or things

July 2025

Civil proceedings filed in ACT Supreme Court by a witness, Mr Ferguson

August 2025

Mr Ferguson filed an application for an interim injunction to prevent the Commission reviewing data on his phone

21 February 2026

Mr Ferguson withdrew his claim and was ordered to pay costs

27 February 2026

Proposed Investigation Report sent to relevant parties as required under the Act

Since Operation Kingfisher commenced:



Over
1.8M
digital
evidence items
downloaded



Over
6,500
files of
documents,
policies and
correspondence
obtained



Over
3,800
pages compiled
as a brief of
evidence



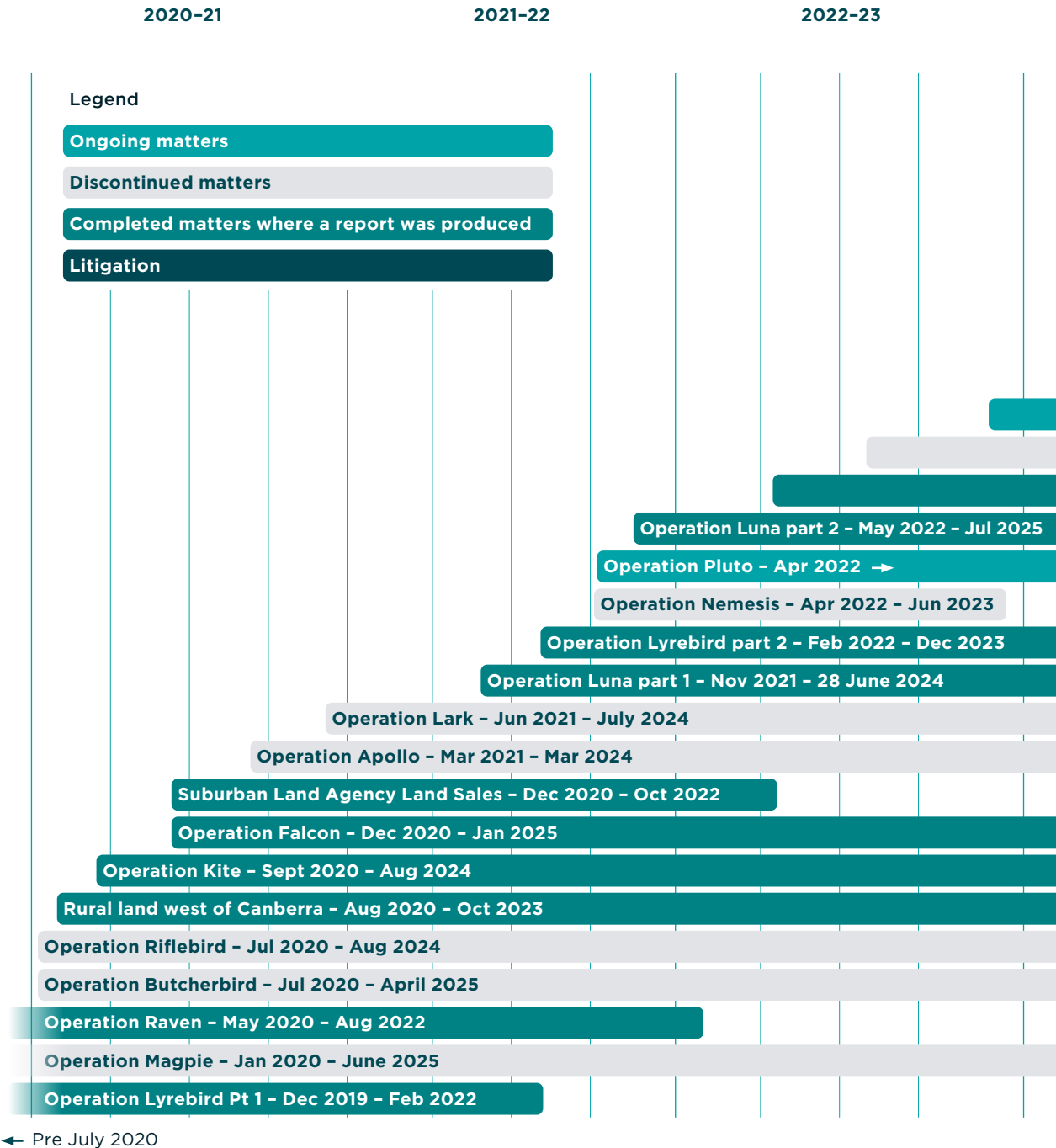
30
witnesses
examined

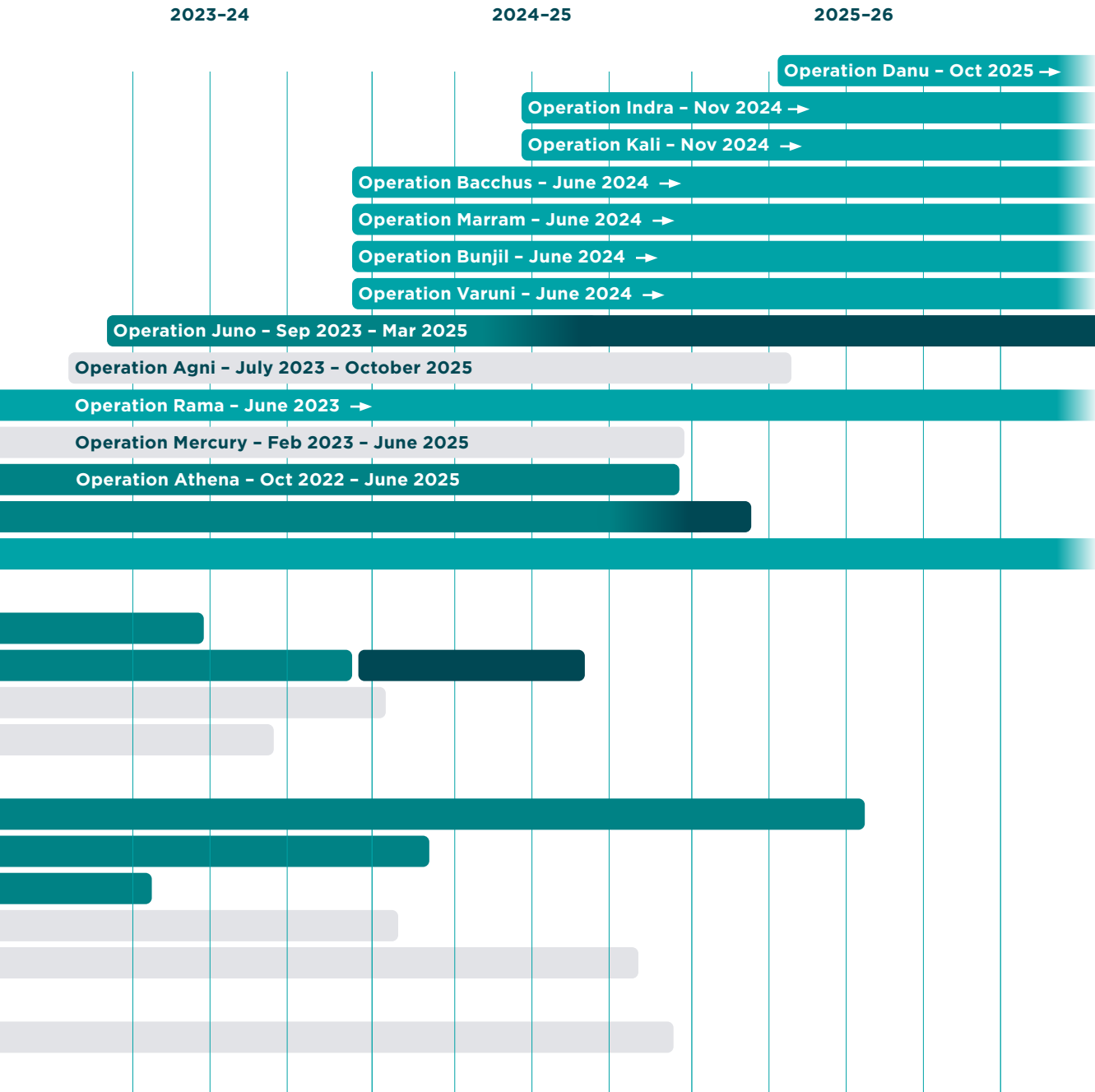


199
hours of
examinations

Figure 6 outlines significant *operational matters* undertaken by the Commission since July 2020, excepting the routine assessment of corruption reports and related preliminary inquiries, which form a continuous part of the Commission's work. Over the period represented, the Commission received in excess of 910 matters for assessment requiring decisions by the Commissioner.

Figure 6. Significant operational matters undertaken by the Commission since July 2020





PART C

Performance

The Commission's reporting framework

The Commission's performance reporting framework is underpinned by the functions and objectives specified in the Integrity Commission Act and the Public Interest Disclosure Act. The framework also aligns with the annual reporting requirements that are specified in these Acts.

The Integrity Commission Act establishes the Commission's functions and the role of the Commissioner. It defines the Commission's jurisdiction, including who and what matters it can investigate and how it will conduct investigations.

The Integrity Commission Act also defines 'corrupt conduct'. It mandates that the Commission must prioritise the investigation of, and expose, serious and systemic corrupt conduct.

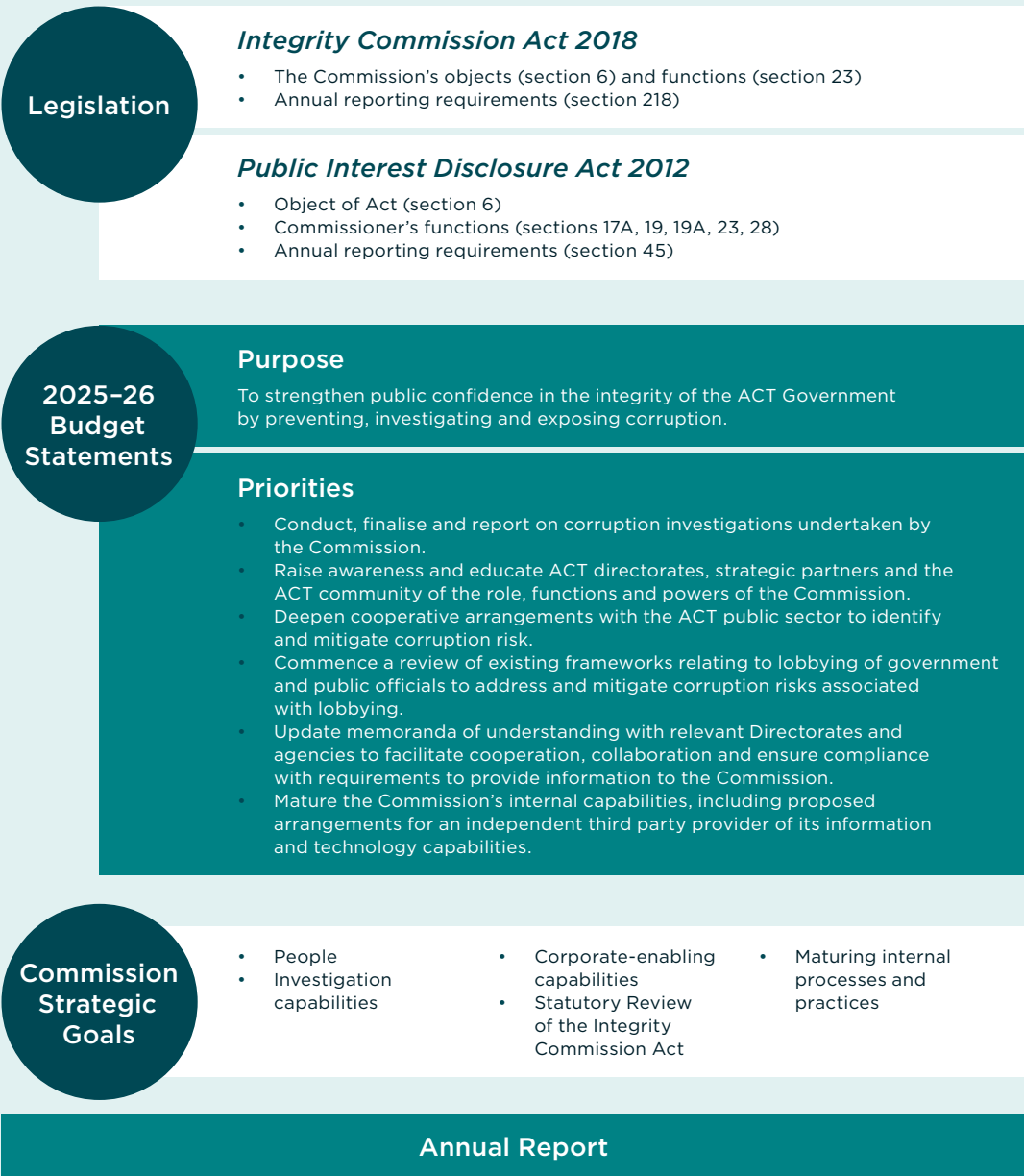
The Public Interest Disclosure Act assigns several functions to the Commissioner. These relate to assessing, investigating and overseeing reports of disclosable conduct within the ACT. It also sets out a range of annual reporting requirements for the Commission.

2025–26 Budget Statements

The Commission's 2025–26 Budget Statements describe the organisation's priorities for the reporting period, and the actions it will take to fulfil its purpose. The Commission's functional priorities are described in Figure 7.



Figure 7. The Commission’s functional priorities



Performance measures for 2025-26

Table 3 outlines the measures against which the Commission assessed its performance in achieving its 2025-26 Budget priorities.

Table 3. Commission performance measures for 2025-26

2025-26 budget priority	Measure	Statement against measure/achievement
Priority 1 Conduct, finalise and report on corruption investigations undertaken by the Commission.	1.1 The Commission assessed 85% of all reports within 90 days.	1.1 Achieved 87% of all reports assessed were assessed within 90 days of receipt.
	1.2 The Commission assessed all declared PIDs within 90 days.	1.2 Partially achieved 57% of declared disclosures received under the Public Interest Disclosure Act were assessed within 90 days of receipt.
	1.3 The Commission efficiently and effectively manages its caseload.	1.3 Achieved The Commission worked on 14 investigations throughout the year. Five investigations were new and 9 were carried forward from previous years. Of these investigations, one resulted in a brief of evidence being compiled and referred to the ACT Director of Public Prosecutions for possible criminal charges (Operation Bunjil), a proposed investigation report was released to impacted parties for procedural fairness (Operation Kingfisher), a special report was tabled in the Legislative Assembly (Operation Luna Part 2), and one investigation was discontinued (Operation Agni). The Commission also commenced one own-initiative investigation.
Priority 2 Raise awareness and educate ACT directorates, strategic partners and the ACT community of the role, functions and powers of the Commission.	2.1 The Prevention, Engagement and Communications Strategy outcomes were achieved.	2.1 Achieved The Prevention, Engagement and Communication Strategy was updated following achievement of the 2025-26 priorities. It provides guidance for staff on Commission priorities and long-term direction of prevention and engagement activities.
	2.2 The Education program achieved or exceeded the previous year's participation.	2.2 Achieved In 2025-26, 852 ACTPS staff attended a Commission education session, an increase from 749 in 2024-25.

2025-26 budget priority	Measure	Statement against measure/achievement
Priority 3 Deepen cooperative arrangements with the ACT public sector to identify and mitigate corruption risk.	3.1 The Commission has systems in place that enable cooperation and collaboration with the ACT public sector to identify and mitigate corruption risk.	3.1 Achieved Online training continued to be a major method for supporting members of the ACTPS to identify and mitigate corruption risk. Pop-up stands were set up in ACT Government offices and hospital foyers for Anti-Corruption Week to increase awareness of the Commission. A series of physical and digital posters were provided to each ACT Government Directorate and entity for display in common areas identifying common corruption risks and options for reporting suspected corrupt conduct. The Commission engages with various networks to deepen collective understanding of risks and issues relevant to the jurisdiction while leveraging innovation to address them.
Priority 4 Commence a review of existing frameworks relating to lobbying of government and public officials to address and mitigate corruption risks associated with lobbying.	4.1 Commence the Commission's inquiry into lobbying arrangements in the ACT to improve understanding of and mitigate risks associated with lobbying.	4.1 Achieved Following a consultation process in October 2025 on the Inquiry Terms of Reference, a public consultation was undertaken from March to May 2026. Submissions received during this process will be incorporated into the inquiry report, scheduled for release in late 2026.
Priority 5 Update memoranda of understanding with relevant directorates and agencies to facilitate cooperation, collaboration and ensure compliance with requirements to provide information to the Commission.	5.1 Priority MOUs are established with relevant entities.	5.1 Achieved MOUs are being established or updated. (Director of Public Prosecutions, ACT Corrective Services, Inspector of Custodial Services, Public Sector Standards Commissioner, Inspector of the ACT Integrity Commission, Speaker of the Legislative Assembly). A register has been developed to manage the implementation and review of MOUs on an ongoing basis.

2025-26 budget priority	Measure	Statement against measure/achievement
Priority 6 Mature the Commission's internal capabilities, including proposed arrangements for an independent third-party provider of its information and technology capabilities.	6.1 The Commission participated in law reform processes and identified new areas of reform for further consideration.	6.1 Achieved The Commission engaged with the Solicitor-General of the ACT, the head of the ACTPS, the Public Sector Standards Commissioner and other stakeholders to progress statutory reform related to outstanding Govey Review recommendations. The Commission also engaged with the Australian Government Department of Home Affairs to achieve a renewal of temporary powers under Chapters 3 and 4 of the TIA Act as well as participating in the Commonwealth-led project on Electronic Surveillance Reform, in support of the Commission being permanently recognised as a law enforcement agency for the purpose of being granted permanent TIA Act powers under Chapters 2, 3 and 4.
	6.2 Operational efficiencies are achieved following implementation of a protected IT network.	6.2 Achieved The Commission went live on the new IT infrastructure, providing a protected network independent of the ACT Government's IT services provided by DCBR in late June 2026. The network and IT platform are expected to deliver further operational efficiencies throughout the next year.

Assessment of Integrity Commission Act corruption reports

A core function of the Commission is to assess reports of corruption it receives. Section 70 of the Integrity Commission Act requires the Commission to dismiss, refer or investigate a corruption complaint or a mandatory corruption notification.

Corruption reports can be dismissed when they contain allegations that are outside the jurisdiction of the Commission and/or otherwise do not raise a reasonable suspicion of corrupt conduct, as defined under the Integrity Commission Act. Reasonable grounds for dismissing a corruption report are identified in section 71(3) of the Integrity Commission Act.

Corruption reports that are assessed as meeting the threshold of a reasonable suspicion of corrupt conduct can either be investigated by the Commission or referred to another entity to investigate.

The Commission prioritises matters for investigation which give rise to a reasonable suspicion that serious and/or systemic corrupt conduct may have occurred. Even where a matter may rise to that level, the Commissioner has discretion as to whether to commence an investigation under section 100 of the Integrity Commission Act. Among the factors considered when deciding whether to investigate a corruption report are the likelihood of being able to determine the truth of the allegations, the public interest in exposing the reported conduct, the availability of other avenues to effectively investigate the allegations raised and the Commission's available resources.

The Commission may refer matters to other entities for investigation where it is assessed that the referral entity has the power to investigate the subject matter of the report, and the Commission considers it would be more appropriate for the corruption report to be investigated by the referral entity.

The assessment process is shown at Figure 8.

Internal changes to the assessment process

The Commission has matured its rapid triage process to facilitate the review and prioritisation of reports received. Under this process, all reports are reviewed by the Commission's senior managers, usually within one week of receipt, and a preliminary recommendation is made on whether the report requires assessment as a corruption report under the Integrity Commission Act, as a possible disclosure of disclosable conduct for assessment under the Public Interest Disclosure Act, or the subject matter is considered to be outside the Commission's jurisdiction and the report is taken to be an information report with no further assessment required.

The adoption of the rapid triage process along with ongoing refinements to assessment procedures have contributed to a reduction in the backlog of corruption reports to be assessed and improved timelines for completing assessments of reports received by the Commission.

Figure 8. Assessment life cycle



1. Matter received

A complainant or mandatory reporter submits a report to the Commission.



2. Triage

The report is reviewed by senior management. A preliminary recommendation is made. Those matters which are not considered to be corruption reports are classified within the Commission as 'information reports'. Information reports are not further assessed, however may be shared with other relevant entities.



3. Allocation and assessment

The report is allocated to an assessment officer for preparation of an assessment report.



4. Recommendation

The assessment officer creates a report with a recommendation to dismiss, refer or investigate the report. The assessment report is provided to the Commission's assessment panel for consideration and discussion.



5. Decision

The Integrity Commissioner or their delegate considers the recommendation in the assessment report and makes a decision. Under the Integrity Commission Act, a matter will be dismissed, referred to another entity or investigated by the Commission.



6. Implementation

The Commissioner's decision is given effect to, including communicating the outcome to the complainant. If the matter is to be referred or investigated, relevant information is shared with the referral entity or the Commission's Investigations team.

Reports received

In this section, the term ‘reports’ indicates, where relevant, the combined total of all types of corruption reports received and processed by the Commission under the Integrity Commission Act.

The total number of reports received by the Commission in 2025–26 was a record number of 233, plus 2 own-initiative reports. The split of report types indicating the relevant sections of the Integrity Commission Act that the reports were received under, and actions taken in response to those reports, are outlined below.

Figure 9. Total number of reports received



There are several different types of reports (see Table 4):

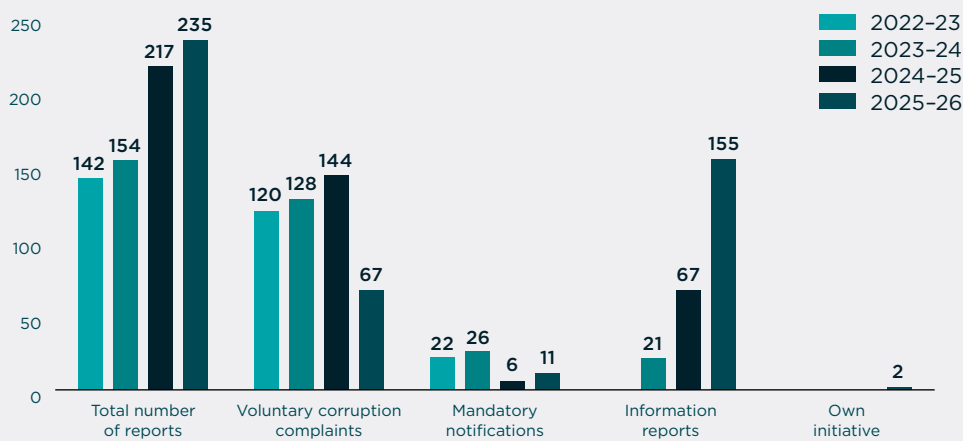
- Corruption complaints are made under section 57 of the Integrity Commission Act. Anyone may make a complaint to the Commission about conduct that might be corrupt.
- Corruption complaints may be referred to the Commission by other relevant entities under section 59 of the Integrity Commission Act.
- Mandatory corruption notifications are made under sections 62 and 63 of the Integrity Commission Act.
 - Section 62 requires the head of a public sector entity or an SES member to notify the Commission about any matter they reasonably suspect involves serious or systemic corrupt conduct.
 - Section 63 requires an MLA, a chief of staff of a Minister, or the Leader of the Opposition to notify the Commission about any matter they reasonably suspect involves serious or systemic corrupt conduct by another MLA or a member of their staff.
- The Commission may commence assessment of matters on its own initiative under section 87 of the Integrity Commission Act.

Table 4. Types and number of reports received in 2025-26

Reporting mechanism	Number of reports received
	2025-26
Section 57	67
Section 59	0
Section 62	10
Section 63	1
Section 87	2
Total reports received	80
Information reports	155
Total matters received and triaged	235

The number of reports received in this reporting period, compared to the previous reporting period, is outlined in Figure 10.

Figure 10. Comparison of reports received by type and reporting period



Information reports

The Commission receives complaints, reports and other information via its website form, submissions or phone. For the purposes of the efficient conduct of the Commission's workflows, communications received by the Commission which do not contain cogent allegations of corrupt conduct are classified as information reports. This is determined on review during the triage process. Information reports are not subject to further detailed formal assessment by the Assessment team. The complainant, if known, is notified of this outcome. Information reports may also be shared with other relevant entities.

Factors that may be considered when determining whether to treat a matter to be an information report include:

- The information provided does not contain specific allegations of wrongdoing or corrupt conduct.
- The information provided is about matters clearly outside of the Commission's remit and was likely misdirected to the Commission.
- The report was sent to multiple entities with the Commission 'carbon copied' and another recipient has the appropriate jurisdiction for the matter reported.
- The report was intended to express dissatisfaction with government services or disagreement about government decisions or policies and does not include specific allegations of wrongdoing or corrupt conduct by ACT public officials or entities.
- The report contains only general allegations of corruption based on speculation, conjecture or opinion and lacks specific details.
- The content of the report is nonsensical or incoherent.
- The reporter has a history of making frivolous and baseless claims and the report lacks merit or credibility.
- The information provided relates to an existing investigation or corruption report. In such instances, the information received is recorded under the existing investigation or assessment reference number and provided to the responsible officer who has carriage of the matter.
- The report is provided by another entity as an information or intelligence report (for example, intelligence reports provided by law enforcement agencies such as the Australian Federal Police and other integrity agencies).

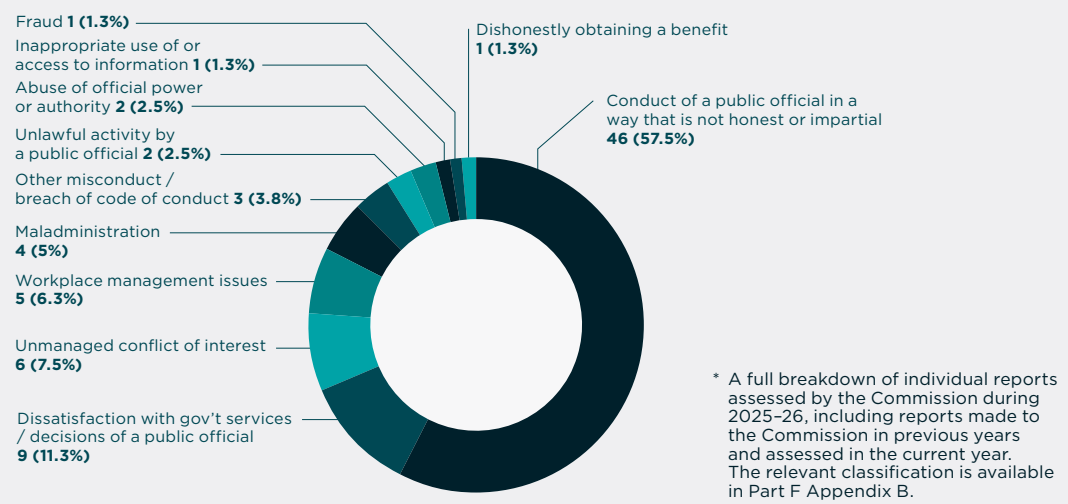
These factors are intended as general guidelines for consideration during the triage process.

The decision to record a matter as an information report, as well as the reasoning for that decision, will be reflected in the triage notes, which are retained in the Commission's matter management system.

When practicable and reasonable, the Assessments team will advise the reporter that the matter reported has been classified as an information report with no further action taken by the Commission.

There were 155 reports received during the year which were classified as information reports.

Figure 11. Reports received in 2025-26 by allegation type*



Categorisation of corruption reports

All corruption reports received by the Commission that are assessed as meeting the criteria of a corruption complaint (excluding information reports) are classified according to the nature of the alleged conduct. Classification is based on the information available to the Commission at the time the report is received. As additional information becomes available through further assessment and analysis, reports may be reclassified to more accurately reflect the nature of the alleged conduct. A breakdown of these classifications is provided in Figure 11, noting the numbers presented exclude information reports.

During the reporting period, the most common allegation received involved conduct of a public official in a way that is not honest or impartial, which made up 58% of all corruption reports received.

Reports assessed

During 2025-26, the Commission completed assessments of 84 corruption complaints and mandatory corruption notifications under the Integrity Commission Act. Eleven matters were progressed to preliminary inquiry so that additional information could be obtained by the Commission to facilitate a decision under section 70.

Table 5. 'Stock on hand' of corruption reports

Corruption reports on hand at 1 July 2025	28
Corruption reports received	78
Own initiative matters commenced	2
Total reports requiring assessment	108
Assessments completed	84
Progressed to preliminary inquiry	11
Total reports addressed	95
Assessments pending at 30 June 2026	13

There were no corruption complaints withdrawn under section 60 during 2025-26.

Outcomes of corruption reports assessed¹

Section 70 of the Integrity Commission Act requires the Commission to dismiss, refer or investigate a corruption report. There are various grounds under which the Commission can dismiss a corruption report. These grounds are outlined in section 71 of the Integrity Commission Act.

The Commission finalised assessment of 84 matters during the reporting period, including 76 voluntary corruption reports made under section 57, and 6 mandatory notifications made under section 62, one mandatory notification under section 63, and one 'own initiative' matter.

Of the 84 corruption reports for which decisions were made, 80 were dismissed under section 71(2). Three matters were determined to justify investigation by the Commission under section 100 of the Integrity Commission Act, and one matter was referred to another entity for investigation under section 107. In addition, 9 preliminary inquiries were completed resulting in 3 matters being accepted for investigation under section 100, 5 matters were dismissed under section 71(2) and one matter referred under section 107. Details are shown at Tables 6a and 6b.

Eleven corruption reports were progressed to a preliminary inquiry to allow the Commission to obtain further information to make a decision under section 70.

The grounds under which the Commission dismissed each matter assessed during the reporting period is included in **Part F** in Appendix B.

Table 6a. Corruption report outcomes 2025–26

Assessments completed	84
Dismissed under s 71(2)	80
Accepted for investigation	3
Referred to another entity for investigation under s 107	1

Table 6b. Assessment and preliminary enquiry outcomes 2025–26

Total assessment outcomes including preliminary inquiries decisions	93
Total matters dismissed	85
Total matters accepted for investigation	6
Total matters referred to other entities under s 107	2

¹ In this section, corruption complaints and mandatory corruption notifications made under the Integrity Commission Act will be referred to as 'matters'.

Assessment timeframes

The average number of working days to make a decision under section 70 of the Integrity Commission Act was 99 workdays (from date of receipt of the report to a determination on whether to dismiss, investigate or refer), down from 115 workdays during the previous year.

Recognising that complex reports require additional time to obtain the required information to make an informed decision, 80% of the reports assessed this financial year were completed in an average of 66 workdays, down from 69 workdays during the previous year.

A decision under section 70 was made in less than 90 workdays for 63% of all corruption reports assessed (Figure 12).

Table 7 shows the number of workdays to assess corruption reports for which the Commissioner decided to commence investigation under section 100.

Table 7. Workdays to assess corruption reports

Reference number	Workdays to assess
R23-0062 (preliminary inquiry INV-20245)	582
R24-0132	252
R24-0136	251
R25-0070	176
R25-0118	37
R26-0039	62

Figure 12. Time taken to complete assessments under the Integrity Commission Act



Average net workdays to finalise assessments (all)
99 workdays



Average workdays to finalise assessment of 80% of reports received
66 workdays



Average workdays to finalise assessments of section 57 reports
95 workdays



Average workdays to finalise assessments of section 62 mandatory notifications and section 63 mandatory notifications
148 workdays
175 workdays

Preliminary inquiries

The Commission can conduct preliminary inquiries to acquire additional information needed to assess a corruption report and decide whether to dismiss, refer or investigate it.

When conducting a preliminary inquiry, the Commission has the power to request information from the head of a public sector entity. It can also issue a notice instructing a person to produce information, documents or other things to the Commission.

The Commission worked on 17 preliminary inquiries during the reporting period. Of these, 11 were new² and 6 were carried forward from previous financial years. Nine preliminary inquiries were completed. Eight were underway as at 30 June 2026. The 'stock on hand' for the Commission's preliminary inquiries is shown in Table 8.

Of the 9 preliminary inquiries concluded, 3 matters resulted in the commencement of an investigation by the Commission under section 100, 5 were dismissed under section 71(2) of the Integrity Commission Act, and one matter was referred to another entity under section 107 for investigation.

Table 8. 'Stock on hand' of Commission preliminary inquiries

Preliminary inquiries pending – 1 July 2025	6
Preliminary inquiries commenced during 2025–26	11
Total requiring assessment during 2025–26	17
Preliminary inquiries completed	9
Accepted for investigation	3
Dismissed	5
Referred to another entity for investigation under s 107	1
Preliminary inquiries pending on 30 June 2026	8

In carrying out preliminary inquiries, the Commission may issue a notice under section 90 of the Integrity Commission Act to a person, requiring the person to attend the Commission at a stated time and place to produce a document or thing. The Commission issued 6 such section 90 notices during 2025–26.

The general nature of allegations of preliminary inquiries and the number of days taken by the Commission to undertake these inquiries (where the preliminary inquiry has been completed) is shown in Tables 9 and 10.

² Includes one preliminary inquiry commenced under section 87 of the Integrity Commission Act – own initiative.

Table 9. Preliminary inquiries completed

Ref number	Nature of allegation	Workdays to complete (from receipt of report to date of s 70 decision)	s 70 decision
R23-0062	Conduct of a public official in a way that is not honest or impartial	582	Investigation
R24-0107	Conduct of a public official in a way that is not honest or impartial	290	Refer
R24-0112	Conduct of a public official in a way that is not honest or impartial	296	Dismissed
R24-0132	Conduct of a public official in a way that is not honest or impartial	252	Investigation
R24-0136	Conduct of a public official in a way that is not honest or impartial	251	Investigation
R24-0143	Conduct of a public official in a way that is not honest or impartial	201	Dismissed
R25-0022	Conduct of a public official in a way that is not honest or impartial	269	Dismissed
R25-0084	Conduct of a public official in a way that is not honest or impartial	206	Dismissed
R25-0074	Conduct of a public official in a way that is not honest or impartial	232	Dismissed

Table 10. Preliminary inquiries ongoing

Ref number	Nature of alleged conduct
R25-0110	Abuse of official power or authority
R25-0087	Conduct of a public official in a way that is not honest or impartial
R25-0111	Conduct of a public official in a way that is not honest or impartial
R25-0134	Conduct of a public official in a way that is not honest or impartial
R25-0138	Conduct of a public official in a way that is not honest or impartial
R26-0026	Conduct of a public official in a way that is not honest or impartial
R26-0089	Conduct of a public official in a way that is not honest or impartial
R26-0005	Conflict of interest

Information provided to other entities

Section 71(4)

Section 71(4) of the Integrity Commission Act enables the Commission to give corruption reports it has dismissed to other entities if those entities have the power to investigate the subject matter.

The Commission gave 28 corruption reports to other entities during the reporting period under section 71(4).

Section 107

Where a report is determined to fall within the Commission's legislative remit and it has the power to investigate the matter, the Commission may decide not to proceed with an investigation but refer it to another entity to investigate pursuant to section 107 of the Integrity Commission Act. The Commission made one referral of corruption reports to other entities during the reporting period.

Section 196

At any time during assessment, the Commission may disclose information it has received to another entity under section 196 of the Integrity Commission Act if the Commission considers the information is relevant to the exercise of the functions of that entity. For example, if the Commission receives a corruption report which indicates a potential risk to personal health or safety, the Commission will disclose that information to a relevant public sector body or law enforcement agency to mitigate the identified risk.

The Commission disclosed information on 49 occasions to 15 different entities (see Part F, Appendix B) during the reporting period.

These provisions help ensure relevant information reaches the right organisations, supports informed decision-making, and promotes a coordinated approach to integrity matters across the ACT public sector.

Public interest disclosures

The Commission's role in administering PIDs commenced in April 2021 with implementation of amendments to the Public Interest Disclosure Act giving the Integrity Commissioner decision, oversight and investigative powers over PIDs.

Under section 17 of the Public Interest Disclosure Act, disclosure officers are required to give the Commissioner disclosures that they have received and determined to be about disclosable conduct and made in good faith. The Commissioner may also receive disclosures directly from reporters and assess corruption reports received under the Integrity Commission Act as potential disclosures of disclosable conduct, depending on the nature of allegations.

On receipt of a disclosure from either a disclosure officer or reporter, the Commissioner must assess the disclosure and decide whether the disclosure is accepted as a PID under the Public Interest Disclosure Act, with the requirements being that the report is about disclosable conduct, was disclosed in the public interest and is not frivolous or vexatious.

Disclosable conduct is defined under section 8 of the Public Interest Disclosure Act to mean an action or a policy, practice or procedure of a public sector entity, or public official for a public sector entity, that is maladministration or results in a substantial and specific danger to public health or safety, or the environment.

A report can be assessed under both the Public Interest Disclosure Act and the Integrity Commission Act (as a corruption complaint or mandatory corruption notification). A report may be assessed under both Acts if an initial assessment shows that the report includes allegations of potential corrupt conduct and potential disclosable conduct, or if the reporter alleges that both corrupt conduct and disclosable conduct have occurred.

Disclosures received in 2025–26

A total of 26 reports were received by the Commission during the financial year that were considered as potential disclosures under the Public Interest Disclosure Act. Eleven of those reports were also assessed under the Integrity Commission Act as corruption reports.

Of the 26 disclosures received, 7 were from disclosure officers under section 17(2) and 19 disclosures were received directly from disclosers or other persons.

In general, the disclosures received were about:

- maladministration/mismanagement/wastage of public funds (9)
- dissatisfaction with government services, treatment or decisions (7)
- danger to public health or safety (3)
- employment or workplace issues (3)
- concerns about hiring and selection processes (2)
- unmanaged conflicts of interest (2).

Disclosures assessed in 2025–26

The Commission assessed 20 disclosures under the Public Interest Disclosure Act. Of these, 3 disclosures were accepted as PIDs and referred for investigation.

For disclosures not accepted as PIDs, the Commissioner was not satisfied on reasonable grounds that the disclosures were about disclosable conduct.

There were no disclosures under the Public Interest Disclosure Act taken to be a corruption report under section 59(A).

The 'stock on hand' for the matters received under the Public Interest Disclosure Act is shown in Table 11.

Table 11. ‘Stock on hand’ of disclosures received under the Public Interest Disclosure Act

Disclosures on hand as at 1 July 2025	4*
Disclosures received in 2025–26	26
2024–25 disclosures assessed in 2025–26	4
2025–26 disclosures assessed in 2025–26	16
Total disclosures assessed in 2025–26	20
Disclosures unassessed as at 30 June 2026	10

* Includes 2 matters received as section 57 reports during 2024–25 which were later considered as possible disclosures under the Public Interest Disclosure Act.

The Commission assesses each disclosure and may provide information to other entities where appropriate, ensuring matters and information can be considered by the organisations with relevant responsibilities and functions. When the disclosure is not accepted as a PID, the Commission may provide the discloser with information about other reporting avenues available to them.

Timeframes for disclosure matters assessed

Figure 13. Working days to assess disclosures under the Public Interest Disclosure Act



72

Average workdays to complete assessment of disclosures under the Public Interest Disclosure Act

Investigation of public interest disclosures

Once the Commission determines that a matter is a PID, it must investigate the disclosure or refer it to a designated entity for investigation.³ The investigating entity must investigate the disclosure consistent with the rules of natural justice and procedural fairness. It may choose to end the investigation for reasons listed in section 20(2) of the Public Interest Disclosure Act.

There were 3 disclosures that were accepted as PIDs by the Commissioner during the year. Two were referred to the relevant entity and one was investigated by the Commission (Table 12).

³ Section 19 of the Public Interest Disclosure Act.

Figure 14. Outcome of disclosures assessed

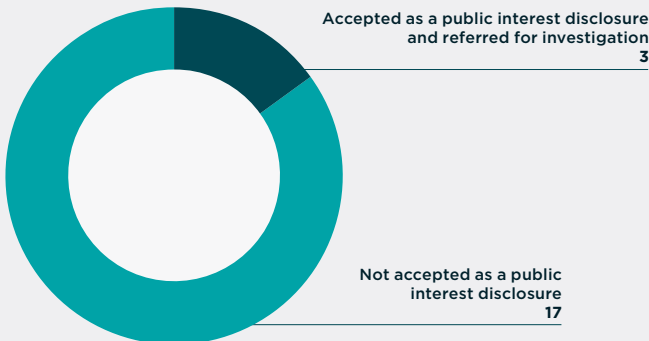


Table 12. ‘Stock on hand’ for PID investigations

	2025–26
PID investigations pending at 1 July 2025	Total – 4 <ul style="list-style-type: none"> • Canberra Health Services – 1 • Community Services Directorate – 1 • ACT Audit Office – 1 • Justice and Community Safety Directorate – 1
PIDs referred for investigation during the year	Total – 3 <ul style="list-style-type: none"> • Canberra Health Services – 1 • Health and Community Services Directorate – 1 • Integrity Commissioner – 1
PID investigations completed or closed No findings of disclosable conduct	Total – 2 <ul style="list-style-type: none"> • ACT Audit Office (s 20(2)(d)(iii)) – 1 • Integrity Commissioner (s 20(2)(d)(iii)) – 1
PID investigations pending at 30 June 2026	Total – 5 <ul style="list-style-type: none"> • Canberra Health Services – 2 • Health and Community Services Directorate – 2 • Justice and Community Safety Directorate – 1

For the 2 PID investigations closed during the financial year, there were no findings of disclosable conduct and no required actions by the head of a public sector entity under section 24 of the Public Interest Disclosure Act.

Investigation of Integrity Commission Act corruption reports

The assessment of corruption reports can result in the commencement of an investigation into the matter, pursuant to section 100 of the Integrity Commission Act. The Commission may also conduct investigations on its own initiative pursuant to section 101 of the Integrity Commission Act.

The Commission worked on 14 investigations throughout the year. Five investigations were new and 9 were carried forward from previous years.

Investigations undertaken by the Commission during the year covered a broad spectrum of allegations of corrupt conduct, including matters involving decisions and actions of senior executives, more junior staff, Ministers, and ministerial staff. These investigations varied significantly in complexity, sensitivity, and scope, often requiring the extensive examination of decision-making processes, relationships, and organisational practices.

Corrupt conduct investigated by the Commission is often concealed within otherwise lawful processes, complex interpersonal relationships, and organisational cultures, requiring investigators to carefully piece together fragmented evidence from multiple sources. This demands a detailed understanding of organisational context while maintaining independence, confidentiality, and adherence to procedural fairness throughout the investigation process.

The Commission must also navigate a range of operational and legal challenges. These include defending litigation arising from its investigative activities, addressing claims of legal professional privilege, public interest immunity and other sensitivities relating to the production of evidence, and managing significant volumes of complex material. The welfare of witnesses remains a paramount consideration, requiring tailored approaches to evidence gathering where appropriate. These challenges must be balanced against the Commission's statutory obligations, including the provision of procedural fairness and ensuring that investigation findings are robust, evidence-based, and capable of withstanding rigorous scrutiny.

Of these investigations, one resulted in a brief of evidence being compiled and referred to the ACT Director of Public Prosecutions for possible criminal charges (Operation Bunjil), a proposed investigation report was released to impacted parties for procedural fairness (Operation Kingfisher), a further special report was tabled in the Legislative Assembly and made public (Operation Luna Part 2), and one was discontinued (Operation Agni).

The Commission initiated one own-initiative investigation and did not undertake any joint investigations with other entities during the reporting period.

The 'stock on hand' for investigations is included in Table 13.

Table 13. 'Stock on hand' of
Commission investigations

Investigations on hand at 1 July 2025	9
New investigations initiated in 2025-26	5
Investigations initiated in previous financial years and finalised in 2025-26	1
Investigations initiated and finalised in 2025-26	0
Investigations on hand at 30 June 2026	13

A year of achievement and maturity

The Investigations team's year was marked by significant progress, achievements and the continued maturation of operational practices. A dedicated strategy to address and clear legacy matters was successfully embedded into business-as-usual operations, ensuring that historical workloads were systematically managed while establishing sustainable processes for the timely progression of newer and future matters.

The year also saw the successful adoption of new investigative techniques, including the exercise of powers under the TIA Act. These capabilities enhanced the team's ability to obtain and analyse critical evidence, strengthening investigative outcomes and supporting more effective decision-making across a range of complex matters.

The Investigations team secured its first referral to the Director of Public Prosecutions for consideration of criminal offences, representing a major milestone in the development and maturity of its investigative function.

In addition, a proposed investigation report in relation to one of the Commission's most significant and complex investigations, Operation Kingfisher, was released to impacted parties and a second special report in relation to Operation Luna was tabled in the Legislative Assembly. Collectively, these accomplishments demonstrate a year of strong operational performance, increased capability and continued organisational growth.

Finalised investigations

The Commission tabled one report during 2025–26 in relation to Operation Luna Part 2. A broad overview of Operation Luna Part 2 is provided below, noting all reports are available on the Commission's website.

Operation Luna Part 2

As noted above, Operation Luna examined the conduct of CIT public officials in relation to the procurement of organisational change consultancy services. Part 2 of the Commission's investigation focused on whether corrupt conduct occurred in connection with the negotiations concerning the payment schedule agreed in, and the procurement of, the sixth contract entered into between the CIT and Redrouge Nominees Pty Ltd (the consultant). This contract provided for substantial amounts to be paid in advance of the services to be provided. The Commission made the following findings:

- A document was created that contained false and dishonest statements, known to both former ACT public officials, as part of the procurement of the sixth contract in purported compliance with Territory procurement requirements.
- The conduct of both parties satisfies the definition of corrupt conduct (section 9, Integrity Commission Act).
- The conduct of both parties amounted to serious corrupt conduct (section 10, Integrity Commission Act). The fictional justification for approving payments in advance to the consultant enabled a contract that gave a substantial commercial gain to the contractor at the cost of the Territory.

The second special report Luna Part 2 was provided to the Speaker on 25 July 2025 and presented to the Legislative Assembly the same day.

The commission continues to investigate a further aspect of misconduct relating to alleged misrepresentation on official documents.

Discontinued investigations

Section 218(1)(q) of the Integrity Commission Act enables the Commission to discontinue investigations it has commenced if satisfied on reasonable grounds that any of the factors in section 71 (when corruption reports can be dismissed) are evident.

During the reporting period, one investigation was discontinued pursuant to section 112(1), being Operation Agni. A broad description of the allegations considered in Operation Agni is provided below.

Operation Agni

Operation Agni investigated an allegation that ACT Government officials failed to comply with ACT procurements legislation, policies and general guidelines during the procurement of hybrid electric fire trucks.

The allegations were also examined by the ACTPS Professional Standards Unit (PSU) and the ACT Auditor-General's Office. Investigators obtained information from both agencies and reviewed the material provided to assess whether the conduct of the ACT Emergency Services Agency amounted to corrupt conduct relating to procurement of hybrid electric fire trucks.

Following thorough analysis of the information received, investigators found no evidence to support a finding of corrupt conduct within the meaning of section 9 of the Integrity Commission Act. The Commission also considered that the matter had already been comprehensively examined by the ACT Auditor-General's Office and any further investigation would duplicate work already undertaken. Accordingly, Operation Agni was discontinued.

Ongoing investigations

Operation Kingfisher

As at the end of the reporting period, Operation Kingfisher was an ongoing investigation into whether the procurement for the Campbell Primary School Modernisation Project was conducted with probity and whether it was affected by corrupt conduct. It examined whether ACT public officials failed to exercise their official functions honestly and/or impartially when making recommendations and decisions regarding the Campbell Primary School Modernisation Project between 2019 and 2020.

During 2025-26:

- 5 confidentiality notices were issued
- 5 summonses were issued to produce documents or things.

Since the investigation commenced:

- 73 confidentiality notices have been issued under section 79
- 46 summonses have been issued to give evidence at an examination under section 147(1)(a)
- 33 summonses have been issued to produce documents or things under section 147(1)(b)
- one summons has been issued to give evidence at an examination and produce documents or things under section 147(a)+(b)
- 17 days of public examinations have involved 11 people
- 32 private examinations have been conducted
- 1,821,077 digital evidence items have been downloaded
- 9 mobile phones have been forensically examined
- over 6,500 files of documents, policies and correspondence have been obtained
- 3,827 pages of transcripts have been compiled.

During July 2024, public hearings occurred over 5 days to hear submissions from counsel assisting the Commissioner and responses to those submissions by the legal representatives of key witnesses. This was an important process to outline in the public domain the salient parts of the evidence given to date and to enable parties who have been potentially the subject of either adverse evidence or some adverse inferences to give a reasoned response to those allegations or material.

On 27 February 2026, the proposed investigation report for Operation Kingfisher was provided to relevant parties for comment, as part of the Commission's legislated procedural fairness process. While the Integrity Commission Act provides recipients 6 weeks to provide comments for the Commissioner's consideration, 10 extension requests were granted to allow recipients extra time to respond. As at 30 June 2026, tabling of the Kingfisher Investigation Report in the Legislative Assembly was imminent.

Operation Marram

In August 2024, the Commission commenced an investigation into allegations of corrupt conduct associated with the procurement, contract management and financial reporting activities by staff of the ACT Health Directorate involved in the Digital Health Records Project (project).

Since the commencement of this investigation the Commission has liaised with the ACT Auditor General to understand the scope of the Auditor-General's program of audits relating to the Project and to minimise any duplication of effort. Having regard to the information gathered by the Commission up to April 2026, and the requirements to cooperate with other entities as set out in Section 55 (2) (ii) of the *Integrity Commission Act 2018*, the Commission made the decision at that time to pause any further work on this investigation, pending the outcome of any findings and recommendations made by the Auditor General that relate to the Project.

Operation Danu

In June this year the Commission publicly confirmed it launched an own-motion investigation into corruption allegations concerning the Phillip Pool development in November 2025. The Commission assessed the circumstances surrounding suggested changes to the Territory Plan for the Phillip Pool site on 9 September 2025 and on 12 November 2025 decided to commence an own-motion investigation under section 101 of the *Integrity Commission Act 2018*. This investigation was codenamed Operation Danu and remains ongoing.

Investigation types and status

Table 14. Types and number of investigations

Investigation	2024-25	2025-26
Investigations of corruption reports carried out under s 100 and s 101 of the Integrity Commission Act	16	14
	Kite	Kingfisher
	Riflebird	Luna
	Falcon	Pluto
	Juno	Bacchus
	Butcherbird	Bunjil
	Athena	Marram
	Mercury	Agni
	Kingfisher	Varuni
	Luna	Indra
	Pluto	Rama
	Bacchus	Kali
	Bunjil	Danu
	Marram	Mitra
	Agni	Mohini
	Varuni	
	Indra	
Investigations commenced in previous years and worked on but not completed during the year	4	8
	Kingfisher	Kingfisher
	Luna	Luna
	Pluto	Pluto
	Bacchus	Bacchus
		Bunjil
		Marram
		Varuni
		Indra
Investigations commenced but not completed during the year (s 218(1)(m)(ii))	5	5
	Bunjil	Rama
	Marram	Kali
	Agni	Danu
	Varuni	Mitra
	Indra	Mohini

Table 15. Investigations undertaken in 2025-26 by allegation type (section 218(1)(m)(i) (A))

Name	Allegation type
Kingfisher	Not exercising functions as a public official in an honest or impartial way
Luna	Not exercising functions as a public official in an honest or impartial way
Pluto	Dishonestly obtaining a benefit
Bacchus	Not exercising functions as a public official in an honest or impartial way
Bunjil	Dishonestly obtaining a benefit
Marram	Not exercising functions as a public official in an honest or impartial way
Agni	Not exercising functions as a public official in an honest or impartial way
Varuni	Misuse of official information
Indra	Not exercising functions as a public official in an honest or impartial way
Rama	Conflict of interest
Kali	Not exercising functions as a public official in an honest or impartial way
Danu	Not exercising functions as a public official in an honest or impartial way
Mitra	Not exercising functions as a public official in an honest or impartial way
Mohini	Conflict of interest

Table 16. Status of investigations as at 30 June 2026

Name	Status
Kingfisher	Report writing
Luna	Part 1 and Part 2 complete, Part 3 report writing
Pluto	Active
Bacchus	Active
Bunjil	Active - waiting on referral agency
Marram	Suspended
Varuni	Active
Indra	Active
Rama	Active
Kali	Active
Danu	Active
Mitra	Active
Mohini	Active

Timeframes for decisions to investigate

The Commission is required to report on the number of days between the day the Commission received a corruption report and the day it decided to investigate a matter. This information is shown in Table 17 in relation to new investigations commenced during the reporting period.

Table 17. Days between receiving a corruption report and deciding to investigate

Name	Days to decision
Rama	568
Kali	244
Mitra	202
Mohini	65

Procedural fairness timeframes

The Commission is required to provide parties to whom a proposed investigation or special report relates with a minimum of 6 weeks to provide comments. This process is commonly referred to as 'procedural fairness'. The Commissioner must consider any comments received during the process and determine if any amendments to the proposed report are required. Sometimes relevant parties seek more time to provide comments. Comments provided during procedural fairness can trigger further investigative steps; for example, where new information comes to light and/or inconsistencies in the evidence requires a re-examination of witnesses. These factors can lead to significant variability in the overall timeframe for each investigation.

Table 18 shows, for each completed investigation, the number of days elapsed from the provision of each proposed report to relevant persons and the finalisation of that report (being the date the final report is provided to the Speaker of the Legislative Assembly).

Table 18. Days between providing a report and resolution

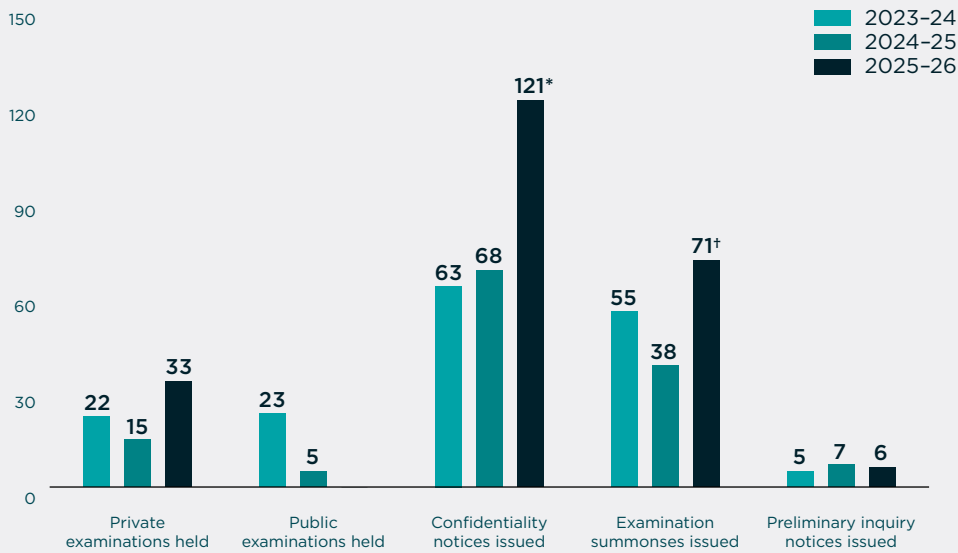
Matter	Proposed report provided to relevant persons	Report sent to Speaker of the Legislative Assembly	Days
Luna Part 2	20 January 2025	25 July 2025	132

Use of powers to acquire information and evidence

The Integrity Commission Act provides the Commission with statutory powers that enable it to obtain information and evidence relevant to its operations. These include powers that relate specifically to the conduct of preliminary inquiries and the conduct of investigations. The power to require a person to give evidence at an examination is only available when conducting investigations.

Figure 15 sets out the number of times the Commission has exercised these powers during the reporting period and the prior year figures. It also shows the number of confidentiality notices that are often issued with notices and summonses to produce documents and/or give evidence.

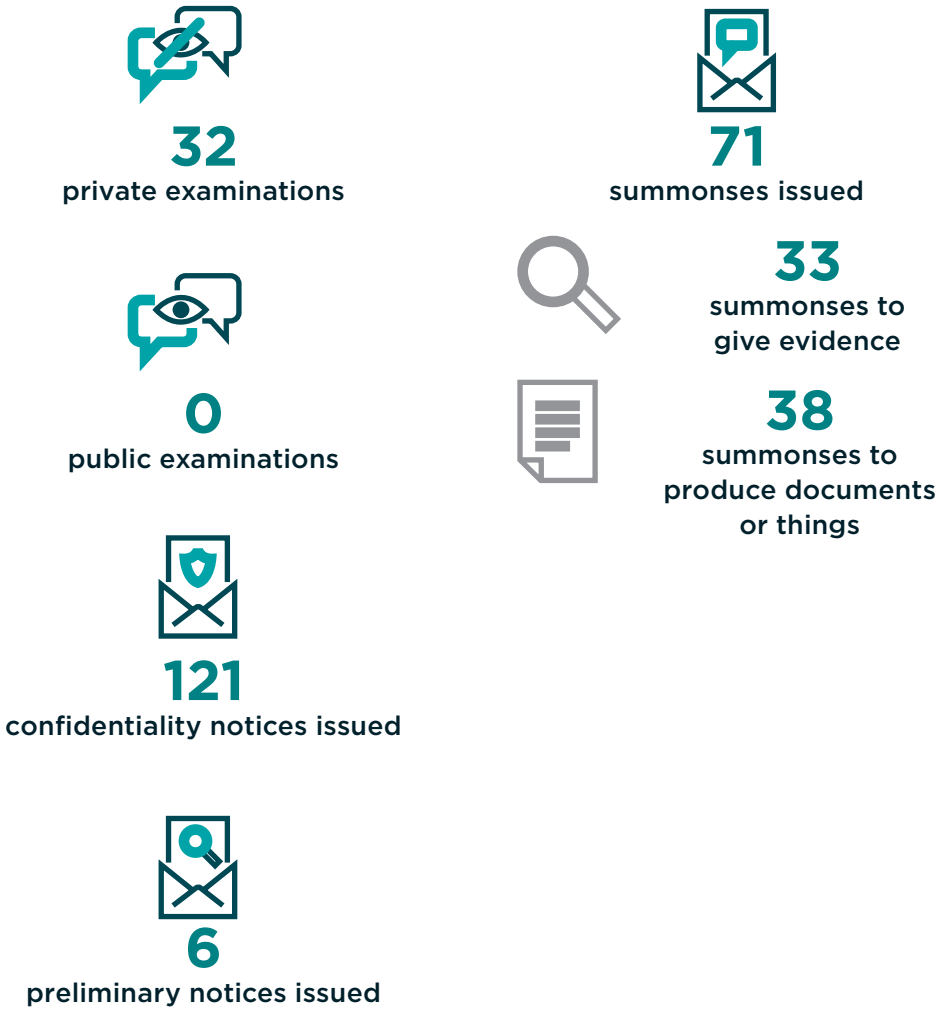
Figure 15. Comparison of use of information/evidence-gathering powers to previous years



* This includes confidentiality notices for preliminary inquiries, issued under section 78 of the *Integrity Commission Act 2018*, and confidentiality notices for investigations, issued under section 79 of the *Integrity Commission Act 2018*.

† Examination summonses issued under section 147 of the *Integrity Commission Act 2018* include summonses to give evidence at an examination (section 147(1)(a)), to produce documents or things (section 147(1)(b)), and to both give evidence and to produce documents or things (issued under both sections 147(1)(a) and 147(1)(b)).

Figure 16. Notices and summonses



Preliminary inquiry powers

Table 19. Notices issued relating to preliminary inquiries

	2023-24	2024-25	2025-26
Preliminary inquiry notices issued under s 90 of the Integrity Commission Act	5 <ul style="list-style-type: none"> • INV-2023-4 – 1 notice issued • INV-20236 – 2 notices issued • INV-20237 – 1 notice issued • INV-20242 – 1 notice issued 	7 <ul style="list-style-type: none"> • INV-2023-4 – 1 notice issued – 1 extension granted • INV-20246 – 3 notices issued – 1 extension granted • INV-202411 – 1 notice issued • INV-20245 – 1 notice issued • INV-202042 – 1 notice issued 	6 <ul style="list-style-type: none"> • R24-0112 – 1 notice issued • R25-0074 – 2 notices issued • R26-0026 – 1 notice issued • R26-0006 – 1 notice issued • R25-0111 – 1 notice issued
Confidentiality notices for preliminary inquiries issued under s 78 of the Integrity Commission Act	5 <ul style="list-style-type: none"> • INV-2023-4 – 1 notice issued • INV-20236 – 2 notices issued • INV-20237 – 1 notice issued • INV-20242 – 1 notice issued 	7 <ul style="list-style-type: none"> • INV-2023-4 – 1 notice issued • INV-20246 – 3 notices issued • INV-202411 – 1 notice issued • INV-20245 – 1 notice issued • INV-202042 – 1 notice issued 	7 <ul style="list-style-type: none"> • R24-0112 – 1 notice issued • R25-0074 – 3 notices issued • 2 extensions granted • R26-0026 – 1 notice issued • R26-0006 – 1 notice issued • R25-0111 – 1 notice issued

Investigation powers

Table 20. Notices and summonses issued relating to investigations

	2023-24	2024-25	2025-26
Summonses to give evidence at an examination under s 147(1)(a) of the Integrity Commission Act	31 <ul style="list-style-type: none"> • Kingfisher – 20 summonses issued • Athena – 2 summonses issued • Kite – 2 summonses issued • Falcon – 3 summonses issued • Juno – 4 summonses issued 	14 <ul style="list-style-type: none"> • Athena – 3 summonses issued • Bunjil – 1 summons issued • Kingfisher – 1 summons issued • Luna – 3 summonses issued • Marram – 5 summonses issued • Juno – 1 summons issued 	33 <ul style="list-style-type: none"> • Rama – 7 summonses issued • Kali – 25 summonses issued • Marram – 1 summons issued
Summonses to produce documents or things to the Commission under s 147(1)(b) of the Integrity Commission Act	23 <ul style="list-style-type: none"> • Kingfisher – 10 summonses issued • Luna – 8 summonses issued • Mercury – 1 summons issued • Falcon – 1 summons issued • Athena – 1 summons issued • Butcherbird – 2 summonses issued 	23 <ul style="list-style-type: none"> • Athena – 1 summons issued • Bacchus – 3 summonses issued; 3 extensions granted • Bunjil – 3 summonses issued; 1 extension granted • Juno – 2 summonses issued • Kingfisher – 2 summonses issued • Luna – 3 summonses issued • Marram – 5 summonses issued • Mercury – 1 summons issued • Pluto – 1 summons issued; 1 extension granted • Varuni – 2 summonses issued; 2 extensions granted 	38 <ul style="list-style-type: none"> • Kingfisher – 5 summonses issued; 1 extension granted • Pluto – 1 summons issued • Bacchus – 1 summons issued • Bunjil – 2 summonses issued; 1 extension granted • Varuni – 2 summonses issued • Rama – 8 summonses issued; 1 extension granted • Indra – 6 summonses issued; 4 extensions granted • Kali – 12 summonses issued; 2 extensions granted • Marram – 1 summons issued
Summonses to both produce documents and things and to give evidence at an examination under s 147(1)(a) and s 147(1)(b) of the Integrity Commission Act	1 <ul style="list-style-type: none"> • Luna – 1 summons issued 	1 <ul style="list-style-type: none"> • Kingfisher – 1 summons issued 	0 <ul style="list-style-type: none"> • Summonses no longer issued

	2023-24	2024-25	2025-26
Total summonses issued under s 147 of the Integrity Commission Act	55 <ul style="list-style-type: none"> • Kingfisher – 30 summonses issued • Athena – 3 summonses issued • Kite – 2 summonses issued • Falcon – 4 summonses issued • Luna – 9 summonses issued • Mercury – 1 summons issued • Butcherbird – 2 summonses issued • Juno – 4 summonses issued 	38 <ul style="list-style-type: none"> • Athena – 4 summonses issued • Bacchus – 3 summonses issued • Bunjil – 4 summonses issued • Juno – 3 summonses issued • Kingfisher – 4 summonses issued • Luna – 6 summonses issued • Marram – 10 summonses issued • Mercury – 1 summons issued • Pluto – 1 summons issued • Varuni – 2 summonses issued 	71 <ul style="list-style-type: none"> • Rama – 15 summonses issued • Kali – 37 summonses issued • Marram – 2 summonses issued • Kingfisher – 5 summonses issued • Pluto – 1 summons issued • Bacchus – 1 summons issued • Bunjil – 2 summonses issued • Varuni – 2 summonses issued • Indra – 6 summonses issued
Confidentiality notices for investigations issued under s 79 of the Integrity Commission Act	58 <ul style="list-style-type: none"> • Riflebird – 2 notices issued • Kingfisher – 22 notices issued • Luna – 11 notices issued • Magpie – 1 notice issued • Athena – 5 notices issued • Mercury – 2 notices issued • Kite – 2 notices issued • Falcon – 4 notices issued • Butcherbird – 2 notices issued • Juno – 7 notices issued 	61 <ul style="list-style-type: none"> • Luna – 11 notices issued • Kingfisher – 4 notices issued • Juno – 9 notices issued • Athena – 4 notices issued • Mercury – 11 notices issued • Bacchus – 3 notices issued • Bunjil – 5 notices issued • Marram – 11 notices issued • Pluto – 1 notice issued • Varuni – 2 notices issued 	114 <ul style="list-style-type: none"> • Kingfisher – 5 notices issued • Pluto – 11 notices issued • Bacchus – 2 notices issued • Bunjil – 2 notices issued • Varuni – 5 notices issued • Rama – 19 notices issued • Indra – 10 notices issued • Kali – 58 notices issued • Marram – 2 notices issued

Examinations

As shown in Table 20, the Commission issues summonses to individuals requiring them to attend the Commission and answer questions. This process is called an examination and persons providing information under examination are called witnesses.

The Integrity Commission Act enables the Commission to conduct examinations both in private and public. Where examinations are to be held in public, the Commission must consider whether doing so is in the public interest and ensure there is no unreasonable infringement upon the human rights of those subject to the investigation or required to give evidence.⁴ If the Commissioner decides to hold a public examination, the Commission must notify the Inspector of the ACT Integrity Commission at least 7 days before the commencement of examinations and give the Inspector a written notice stating that the Commission intends to hold a public examination and why.⁵

Public examinations require significant organisation and planning, including engaging external security, recording and streaming specialist companies, and transcription services. Public examinations are live streamed, and transcripts of the examinations are made publicly available as soon as they are reviewed by Commission staff.

During 2025–26, the Commission held 32 examinations, all being private examinations.

The Commission is committed to supporting witnesses involved in, or subject to, examinations. The Commission's Witness Wellbeing Policy, and other supporting documents available via the Commission's website, are provided to witnesses when contacted by the Commission, outlining the Commission's processes. These are designed to minimise stresses associated with being involved in a Commission investigation. Further information can be found in **Part D**.

Digital forensics

As part of the Commission's investigative process, significant volumes of information are provided to the Commission. This requires the Commission's digital forensic specialist to ingest, process and make this information available for analysis by Commission investigators and lawyers.

The volume of material ingested during the reporting period was 405 gigabytes, amounting to 1,693,052 items. The contents of 2 mobile phones and one laptop computer were also downloaded, at an additional 716 gigabytes, resulting in a total of 1.1 terabytes of material.

The Commission has strict security and information protocols that govern access to the Commission's forensic laboratory and the information contained within it.

Use of other investigative powers

During the reporting period, the Commission exercised powers under the TIA Act on 2 occasions, for the same investigation. This was the Commission's first use of these powers since being granted access.

The Commission did not use powers available to it under the following legislation:

- *Crimes (Assumed Identities) Act 2009* (ACT)
- *Crimes (Controlled Operations) Act 2009* (ACT)
- *Crimes (Protection of a Witness Identity) Act 2011* (ACT)
- *Crimes (Surveillance Devices) Act 2010* (ACT).

⁴ As per sections 143(2) and (3) of the Integrity Commission Act.

⁵ As per section 144 of the Integrity Commission Act.

Litigation commenced against the Commission

During the reporting period, litigation was commenced against the Commission as outlined below.

Litigation arising from Operation Kingfisher

***Ferguson v ACT Integrity Commission* [2025] ACTSC 375, [2026] ACTSC 37 and [2025] ACTSC 380**

On 23 July 2025, Mr David Ferguson, a witness in Operation Kingfisher, set down proceedings in the ACT Supreme Court for judicial review, an injunction restraining the Commission from reviewing the data downloaded from his mobile phone, and damages for trespass and personal injury in connection with the seizure of his mobile phone under a summons concerning a private examination.

On 7 August 2025, Mr Ferguson then set down an application for an interim injunction to prevent the Commission from reviewing the data pending the resolution of his claims and proceedings. This was heard by his Honour Justice Mossop. On 26 August 2025, his Honour dismissed this interim application on the grounds that none of the claims for judicial review, alleged breaches of the *Human Rights Act 2004* (ACT), and claims for damages for trespass and personal injury, were likely to succeed at a final hearing and that the balance of convenience in completing the investigation favoured the Commission.

Mr Ferguson then set down an application that he be permitted to withdraw his proceedings on the grounds that he ought not to be required to pay the Commission's costs incurred so far defending the proceedings and the interim injunction application. His application was dismissed on 26 February 2026 by his Honour Justice Mossop who ordered that Mr Ferguson pay the Commission's costs.

Litigation outstanding against the Commission as at 30 June 2026

Litigation arising from Operation Juno

***Sofronoff v ACT Integrity Commission* [2025] FCA 1565 (11 December 2025)**

Mr Walter Sofronoff KC, former Chair of the Board of Inquiry into the Criminal Justice System in the ACT, commenced proceedings before the Federal Court of Australia (NSW Registry), challenging the findings of the Commission's report (codenamed Operation Juno).

The proceedings, initiated on 24 March 2025, sought judicial review of the Commission's investigation report's finding that Mr Sofronoff had engaged in serious corrupt conduct during his oversight of the 2023 inquiry. The Commission's investigation focused on unauthorised disclosures of confidential material and communications with journalists prior to the official release of the inquiry's report.

The first hearing on this matter, before her Honour Justice Abraham, was held on 20 May 2025 and concerned the issue of parliamentary privilege of the report. The next hearing was on 21 and 22 July 2025 and concerned the Commission's findings about Mr Sofronoff's conduct. Her Honour delivered her judgment on 11 December 2025. While she found that the report was not privileged, she dismissed the application for judicial review. On 5 February 2026, her Honour ordered that in relation to the issue of parliamentary privilege there was to be no order as to costs, but in relation to the substantive application for judicial review, the applicant was to pay the Commission's costs.

In February 2026, the applicant set down an appeal to the Full Court of the Federal Court, which will be heard on 26 to 27 August 2026.

Litigation resolved against the Commission in 2025-26

Litigation arising from Operation Luna

Cover v ACT Integrity Commission [2024] ACTSC 197

Ms Cover sought judicial review in the ACT Supreme Court of the Commission's findings in its first special report. The Speaker of the Legislative Assembly participated in the proceedings as amicus curiae concerning the issue of parliamentary privilege. The matter was heard on 01 June 2024.

On 13 March 2025, following provision of the proposed second Luna Part 2 Special Report for procedural fairness, Ms Cover then sought an injunction to restrain the second special report from being further progressed or published. This application was dismissed, enabling the Commission to proceed to finalise its second Operation Luna report. This second report was provided to the Speaker of the Legislative Assembly in July 2025.

On 18 September 2025, as regards the substantive application, his Honour Justice Mossop held that the report was admissible as it was subject to parliamentary privilege but otherwise dismissed Ms Cover's application for judicial review. [2025] ACTSC 424

On 25 September 2025, his Honour ordered that Ms Cover pay 85% of the defendant's costs of the proceedings, including reserved costs (the reduction of 15% being an allowance concerning the issue of admissibility of the report). [2025] ACTSC 444



Prevention and education

A function of the Commission under the Integrity Commission Act is to prevent corruption, including by researching corrupt practices and mitigating the risks of corruption, and to provide education programs to public officials about the role of the Commission and the ways in which corrupt conduct can be prevented in public administration.

To deliver on these objectives, the following activities were undertaken by members of the Commission's Corporate, Prevention and Communication (CPC) team.

Stakeholder engagement and relationship building

Throughout the year, the Commission engaged with a broad range of stakeholders to strengthen relationships, share knowledge and enhance corruption prevention practices through collaboration and learning.

Figure 17 shows what the Commission's corruption prevention and engagement function delivered.⁶

Figure 17. Education Statistics



21
training sessions
to 852 people

CPC staff participated in meetings of the Corruption Prevention Practitioners Forum. This engagement offered insights into the priorities and operational strategies of other jurisdictions, enabling the Commission to reflect on and refine its own processes using insights and expertise from all jurisdictions.

Internal collaboration and knowledge sharing continues with the Senior Executives Responsible for Business Integrity and Risk (SERBIRs) in the form of email newsletters. The newsletters contain key integrity and anti-corruption news from across the country to help share key insights on how to prevent, identify and expose corruption.

CPC staff sought feedback from SERBIRs and members of the PSU team to create a series of posters featuring examples of corrupt conduct reported to the Commission. The posters were



e-learning modules

ACT with integrity: An interactive game - 139 completions	Reporting corruption to the ACT Integrity Commission - 1,636 completions
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displayed digitally and physically throughout ACT Government offices and locations since February 2026. This poster campaign aims to help staff in a variety of roles to identify the red flags of corruption and feel empowered to report their suspicions by using real-life scenarios.

Monthly meetings with the PSU continue to facilitate regular communication, troubleshoot emerging issues and align on shared challenges and solutions.

The Commissioner and CEO attended the National Integrity Network in October 2025, engaging with counterparts from across the country to discuss national trends, challenges and opportunities in integrity and governance.

In December 2025, the Commission led a weeklong series of communication and engagement activities to mark International Anti-Corruption Day.

⁶ The Commission's prevention and education functions are outlined in section 23 of the Integrity Commission Act.

2025 Anti-Corruption Day activities

The Commission conducted communication and engagement activities from 8 to 12 December 2025 to coincide with the United Nation's designated International Anti-Corruption Day (9 December 2025).

The objective was to generate awareness of the Commission and its role, help ACTPS employees identify the red flags of corrupt conduct, and direct people to resources and appropriate reporting avenues. Three key activities were conducted:

- Four temporary self-service stalls were placed at the busiest (high foot traffic) ACT Government locations for the duration of the week starting 8 December 2025. These stalls featured a range of resources (fact sheets, flyers, merchandise) and were complemented by a pull-up banner.
- Three 15-minute online education sessions were open to all ACTPS staff members, delivered over lunchtime, focusing on a different topic per session.
- The Commission's educational videos were featured in the loop of content on screens located in multiple ACT Government shared spaces.

An ACTPS-wide email along with an intranet article and social media posts promoted the initiative and outlined the locations of information booths in the foyers of ACT Government buildings.

As the self-service stalls were unattended, based on the number of items taken throughout the week, we estimate between 800 to 1,600 people approached the displays and accessed the resources.

Poster series 2026

Following the Commission's Anti-Corruption Week 2025 campaign, the CPC team circulated a poster series identifying real-world examples of corrupt conduct and ACTPS reporting avenues.

Six posters were designed with the input of SERBIRs and PSU staff. Each poster featured either a Commission-led investigation, or a state or territory counterpart's investigation, and the circumstances that led to someone forming a reasonable suspicion of corrupt conduct, the entity they reported it to, and the outcome of the investigation.

Various reporting avenues were included on the posters, including a QR code to the Commission's website and reporting webform.

A variety of SERBIR, facilities, and communications personnel assisted the CPC team to display the posters in accessible work areas (quiet rooms, meeting rooms, elevators, foyers, and kitchen/lunch areas). These spaces were selected to allow staff to consider the implications of the content and access further information in a safe space or at a time of their own choosing.

To date, the posters have been displayed in 23 ACT Government locations, provided to more than 90 public schools for teacher-only areas, and displayed in some capacity by all 8 directorates and 7 other ACT Government agencies/entities.

Education sessions

In 2025–26, the Commission delivered 21 corruption prevention training sessions to 852 ACTPS employees – an increase of almost 14% from the previous financial year. Monthly online training sessions, open to all ACTPS staff and available via the Human Resources Information Management System, has broadened participation and reinforced the Commission's commitment to proactive education and prevention.

Strengthening arrangements to support witness wellbeing

The Commission established a dedicated witness welfare liaison officer (WWLO) role in line with a recommendation from the April 2025 ACT Integrity Commission Witness Wellbeing Framework Review. The overarching intent of establishing the WWLO role was to create a single point of contact for witnesses in relation to anything to do with their wellbeing throughout their contact with the Commission.

The Commission is also refining a tool to identify witnesses who may be vulnerable and require contact by the WWLO. This risk assessment tool is currently under development and will largely rely on impressions of other Commission staff who have interacted with a witness or their representatives.

The WWLO responsibilities include:

- maintain regular contact with witnesses who require it
- act as a central point of contact for witnesses
- conduct risk assessments of witnesses when required
- provide information about processes, expectations and available supports
- coordinate communication between witnesses and the Commission when required
- ensure processes and interactions are conducted in a culturally appropriate manner
- support understanding of rights and obligations
- explain compulsory attendance requirements
- clarify confidentiality and nondisclosure restrictions
- outline consequences of noncompliance
- provide practical and logistical support
- coordinate attendance arrangements, venues and accessibility needs
- assist with travel, accommodation and expense processes

- support interpreters, support persons or cultural considerations
- provide procedural guidance (without influencing evidence)
- explain how examinations and hearings operate
- describe what witnesses can expect before, during and after giving evidence
- monitor welfare and facilitate support
- monitor potential wellbeing risks
- provide referrals to external support services
- facilitate reasonable adjustments (such as breaks).

Other activities undertaken to support the wellbeing of witnesses in 2025–26 included:

- the maintenance of proactive and regular contact with witnesses about summonses and confidentiality notices, including facilitating requests to include support persons (this included closely monitoring the duration of time these arrangements were in place, ensuring summonses and notices were revoked as soon as practicable, or, where they remained in place, clearly communicating the reasons to the witness)
- completion of a TAFE NSW Trauma Informed Care course for relevant Commission staff
- completion of Mental Health First Aid training by all Commission staff, delivered by an accredited external provider
- completion of Compassionate Foundations training for all relevant Commission staff
- the production of an informative video about what happens when you are summonsed to appear at the Commission (available on the Commission's website).

Media engagement

The CPC team is responsible for the Commission's external engagement, including liaising with the media to promote the Commission's work and provide updates in the public's interest.

In the reporting period, the team circulated 8 media releases and responded to 21 media enquiries.

All media enquiries received were responded to within 2 business days.

Media coverage

The Commission receives media coverage by print, online, radio and other news publications in relation to its investigations or findings in reports.

Litigation for Operations Juno and Luna received moderate coverage in 2025-26, with significant coverage of updates on Operation Kingfisher.

A total of 453 media articles were published that related to the Commission.

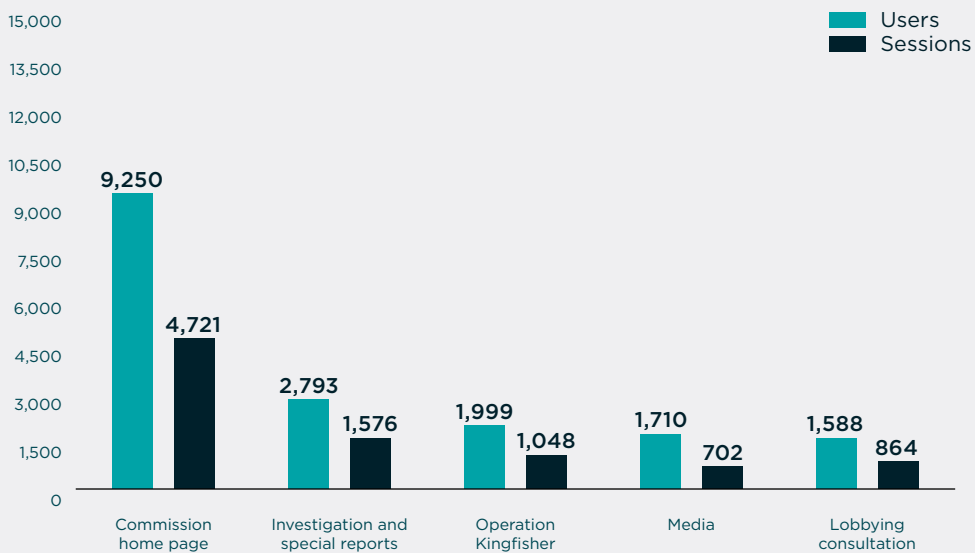
Website

The Commission's website is one of its primary communication channels. Information and resources on the website are used to educate the public on the Commission's role, and current and upcoming activities.

The largest spike in website traffic occurred on 25 July 2025 with the release of the Operation Luna Special Report (Part 2) – the website received a total of 1,499 views on that single day. Figure 18 shows peaks in website visitation.



Figure 18. Commission website statistics by most visited pages



PART **D**

Management, governance and accountability

Internal governance and accountability

During 2025–26, the Commission continued to mature its internal governance arrangements to support strategic decision-making, with a view to maximising operational efficiency and effectiveness through a risk-aware lens. The following committees support governance of the Commission (Figure 19):

- The Senior Management Group (SMG) considers strategic priorities and key projects, and oversees corporate reporting activities.
- The Assessment Panel supports decision-making on allegations reported to the Commission.

- Rapid Triage meetings support the assessment process to speed up the review of all new reports.
- The Operations Group supports the holistic management of the investigations workload of the Commission and ensures resource allocation to investigations is in line with organisational priorities.
- The Risk Management Committee manages the Commission's enterprise risks and changes to the risk landscape, supporting strategic risk discussions at SMG meetings.

The Commission's governance is supported through independent audits conducted by the Commission's external auditors, RSM.

Figure 19. Governance of the Commission

Legislation		<i>Integrity Commission Act 2018</i> <i>Public Interest Disclosure Act 2012</i>	
Final Decision-maker	Commissioner The Commission consists of the Commissioner who is an independent officer of the Legislative Assembly The Commissioner has complete discretion in the exercise of the Commission's functions		
Statutory Functions	Chief Executive Officer - Functions under the <i>Integrity Commission Act 2018</i> <ul style="list-style-type: none">• Manage the day-to-day operations of the Commission• Advise the Commission about the Commission's operations and financial performance		
LEVEL 1 Decision-making	Corporate Governance Senior Management Group	Operational Governance Operations Group Assessment Panel	
	LEVEL 2 Advisory	Risk Management Committee Internal Audit (Independent)	Rapid Triage Assessment
LEVEL 3 Operations	Corporate Governance, Planning and Assurance Team		

Fraud and corruption prevention

The Risk Management Committee and SMG regularly review the effectiveness of controls to prevent, detect and deal with fraud and corruption via a twice-yearly discussion of fraud risks.

Fraud and misconduct

The Commission did not receive any allegations of internal fraud or other forms of misconduct from staff during 2025-26, and no investigations were conducted during the reporting period.

Risk management

The Commission continued to mature its risk management frameworks in 2025-26. In accordance with the SMG workplan, SMG received enterprise risk updates from the Risk Management Committee every quarter and a fraud risk update every 6 months.

The committee is responsible for monitoring the risk landscape, ensuring treatment plans are implemented, controls remain effective, and emerging risks are considered regularly by the committee and SMG.

The Risk Management Committee met quarterly to monitor the risk register and risk management tools and reported to SMG following each committee meeting. Regularly considering risk via the committee, and reporting updates to SMG, has ensured risk identification and monitoring continues to be considered as a part of day-to-day practices across all functions of the Commission and supports open engagement on risks and risk mitigation.

Internal audit

During 2025-26, the focus of the audit and assurance team was to support line areas to fully implement the audit recommendations from previous internal audits and external reviews of the Commission.

In 2024-25, the Commission completed an internal audit on the Commission's information flows supporting the operations of the Commission, and the handling and protection of sensitive information. The priority in 2025-26 was to address the recommendations, largely facilitated through the introduction of a protected network and stronger technical and access controls. Other supporting activities to address the audit recommendations, such as implementing information and records management policies and procedures, were also achieved.

Outstanding recommendations from investigations completed by the Inspector of the ACT Integrity Commission were also completed, ensuring that the Commission addressed recommendations around conflict of interest and bias training for procurement practices.

Following a review of the Witness Welfare Policy, the Commission addressed recommendations from the independent external reviewer to strengthen staff capability and resources to support witness welfare with a trauma informed and culturally aware lens.

The Commission engaged a new external auditor in 2026 and has developed a strategic audit program to commence in August 2026.

External scrutiny and oversight

The Commission's operations are subject to external scrutiny via the functions performed by the Inspector and the ACT Legislative Assembly. The following section outlines the Commission's engagement with both these mechanisms.

Legislative Assembly oversight

Select Committee on Estimates 2025–26

The Commissioner and the CEO appeared before the committee in July 2025.

Standing Committee on the Integrity Commission and Statutory Office Holders

The Legislative Assembly resolved to establish a Standing Committee on the Integrity Commission and Statutory Office Holders on 3 December 2024.

The committee is responsible for examining various entities, including the Commission. It:

- examines matters related to corruption and integrity in public administration
- enquires into and reports on matters referred to it by the Legislative Assembly or matters that are considered by the committee to be of concern to the community
- performs all functions required of it according to the Integrity Commission Act
- monitors, reviews and reports on the performance of the Commission and the Inspector, or the exercise of the powers and functions of the Commission and the Inspector, including examining the annual reports of the Commission and the Inspector and any other reports made by the Commission.

Nothing in the resolution authorises the committee to investigate a matter of particular conduct or to reconsider a decision to investigate, not to investigate or to discontinue an investigation of a particular complaint made to the Commission, or to reconsider findings, recommendations, determinations or other decisions of the Commission or the Inspector relating to an investigation or complaint.

The Commissioner and CEO appeared before the committee on 14 November 2025 for the inquiry into annual and financial reports 2024–25 and in private meetings as requested by the committee.

Engagement with the Inspector

The functions of the Inspector are set out in the Integrity Commission Act. They are to:

- assess and report on compliance with the Integrity Commission Act and any MOUs or agreements entered under the Integrity Commission Act
- receive, assess and investigate complaints about the Commission and staff members
- make recommendations to the Commission or public bodies about the Commission's practices or procedures in relation to performing its functions under the Integrity Commission Act
- perform any other functions given to the Inspector under the Integrity Commission Act or other legislation.

The Inspector is the ACT Ombudsman.

In accordance with section 205 of the Integrity Commission Act, the Commission provides written monthly reports to the Inspector regarding the use of Commission powers during the preceding month. The Commission and Inspector have agreed that these monthly reports are to be provided within 10 working days of the end of the relevant reporting period.

During the reporting period, the Commission provided all monthly reports to the Inspector and met all relevant requirements as agreed.

Engagement between the Inspector and his staff is governed by a relationship protocol between the Inspector and the Commission.

At the end of the reporting period, the protocol and MOU between the Inspector and Commission was under review by both the Commission and the Inspector to ensure they remain relevant and address recommendations made by the Standing Committee on the Integrity Commission and Statutory Office Holders, following their review of the Inspector's investigation report tabled in the Legislative Assembly on the Commission's handling of a procurement in 2022.

The Inspector's staff meet with the Commission's CEO, the General Counsel and the executive team of the Commission each month. These liaison meetings are important for sharing relevant information about the activities of the Commission, to clarify matters which may arise from the monthly reports submitted to the Inspector and to discuss any other matters of relevance to both agencies.

During the year, the Inspector made 5 requests under section 228 and section 264(2) for information or documents about the Commission's activities. These included:

- requests to complete statutory reviews of the Commission's conflict of interest register
- requests relating to the completion and implementation of recommendations
- requests for information to support investigation into complaints received.

The Inspector requested information from the Commission in relation to 5 investigations it undertook this financial year, following complaints received about the Commission. All have been dismissed as being without merit.

Conflicts of interest reported to the Inspector and Speaker

Section 31 of the Integrity Commission Act requires the Commissioner to avoid any actual, potential or perceived conflicts of interest. It also requires the Commissioner to disclose in writing to the Speaker of the Legislative Assembly and to the Inspector any financial or other personal interests which conflict with, or could conflict with, the Commissioner's functions.

During the reporting period, the Commissioner disclosed no conflicts of interest. During this same period, the Commission's Acting Commissioner, Professor John McMillan AO disclosed in writing of financial or other personal interests which conflict with, or could conflict with, the Commissioner's functions.

The management of conflicts of interest for Commission staff is governed by the Commission's Conflict of Interest Policy and Procedure. The Commission's conflict of interest register is maintained by the General Counsel and is reviewed twice yearly by the Inspector.

Allegations of corrupt conduct by Commission staff

Complaints concerning alleged misconduct of Commission officers can be made directly to the Inspector or to the Commission. Section 105 of the Integrity Commission Act requires the Commission to refer corruption reports about Commission staff to the Inspector. The Inspector may decide to investigate complaints directly or ask the Commission to undertake an investigation and report its findings to the Inspector.

Allegations of corrupt conduct against members of staff may arise in circumstances where complainants are dissatisfied with a decision made by the Commission. The Commission, in consultation with the Inspector, applies a 'low' threshold to referring all allegations of corrupt conduct by Commission staff to the Inspector. This is in accordance with section 105 of the Integrity Commission Act, which requires the Commission to refer any corruption allegation to the Inspector if it involves a Commission staff member.

Commission staff consult with the Inspector's team to discuss, in particular circumstances, whether the threshold for reporting is met. The Commission made one referral to the Inspector this financial year related to allegations of corrupt conduct by Commission staff. Following review, the Inspector was satisfied the issue raised did not support any action to be taken by the Inspector and the matter was finalised.

Appointment of an Acting Integrity Commissioner

During the reporting period, the Commission supported the Speakers Office to run a recruitment process to appoint an Acting Integrity Commissioner under s 40 of the Integrity Commission Act. The recruitment process resulted in the Speaker appointing Professor John McMillan AO as the acting ACT Integrity Commissioner under Disallowable Instrument DI202-283, published on 21 October 2025. The term of the appointment is two years and would take effect if the ACT Integrity Commissioner were unable for any reason to exercise a function or functions of the Commissioner position.

Corporate projects

The Commission undertook several projects to strengthen its internal capabilities during the year. The projects focused on core areas of operation, including communication and engagement, physical and technical infrastructure, and legislation projects.

Communication and engagement projects

Aboriginal and Torres Strait Islander engagement

The Aboriginal and Torres Strait Islander community is a key stakeholder group for the Commission. During 2025–26, the Commission identified an initial 5 ACT Government Aboriginal and Torres Strait Islander entities to approach for advice and recommendations on how to improve its engagement to ensure culturally safe practices, especially for witnesses.

The Commission also met with CMTEDD's Cultural Transformation Group to obtain further feedback and perspectives.

This work is expected to continue and evolve as the Commission identifies new points of contact within the community to collaborate with. Throughout this process, the Commission will use feedback received to create new, or update existing, information resources or other improvements as required.

Witness wellbeing video

Additional support for witnesses providing evidence or key testimony was developed as part of the Witness Welfare Policy. Working with a local supplier, the Commission developed a video designed to help individuals who are called to be witnesses at a Commission examination, providing clear instructions and an overview of the process, with the aim to help witnesses feel more informed and prepared. Once published to the Commission's YouTube channel, links to the video were added to key documents provided to witnesses and promoted via the Commission's social media channels and a newsletter to SERBIRs.

Legislation projects

Telecommunications (Interception and Access) Act 1979 (Cth) powers

In 2025–26, the Commission's temporary declaration arrangements under Chapter 3 (stored communications) and Chapter 4 (telecommunications data) of the TIA Act were renewed by the Minister for Home Affairs. The extension was granted following an extensive review of the Commission's Privacy Impact Assessment (PIA) in relation to the use of TIA Act powers to ensure the PIA reflected changes to the Commission's operating environment, the risks and risk mitigations remained appropriate, and the legal analysis remained accurate.

The Commission continued to work with the Integrity Policy Branch in CMTEDD and the Department of Home Affairs on establishing ongoing access to interception powers under the TIA Act.

The Commission is also participating in the Electronic Surveillance Reform State and Territory Reference Group, led by the Department of Home Affairs, for the purposes of commencing legislative drafting and consultation with key stakeholders on core principles and key policy settings for electronic surveillance reform. This reform is key to establishing the Commission as a law enforcement agency with access to Chapter 2, 3 and 4 powers under the TIA Act.

Implementation of outstanding legislation review recommendations

The Commission is continuing to work with the CMTEDD Integrity Policy Team to prepare responses for consideration by Government in relation to the outstanding recommendations of the 2023 review of the Integrity Commission Act by Mr Ian Govey (Govey Review).

The Commission has been consulted on a second tranche of recommendations and has engaged with the development of a witness reimbursement regulation. By the end of the reporting period, feedback had been provided to the Integrity and Governance Branch on the proposed witness reimbursement regulation, in anticipation of implementation in the next reporting period.

Supporting the development of protocols to streamline the provision of information requested by the Commission under a summons has also been a high priority. Conversations are in progress with the Solicitor General, Head of Service, the Office of the Speaker and the Legislative Assembly Standing Committee on the Integrity Commission to outline the challenges faced and develop a short-term solution that operates within the legislative requirements, while achieving long-term legislative change. Under current practices, the provision of documents requested under a summons are being significantly delayed while the consideration of relevant privileges are appropriately reviewed by document owners. The Commission is seeking to streamline the processes under the current legislation using agreed protocols, to address the significant delays these circumstances cause to investigations. Work on establishing a clear way forward will continue in the new reporting period.

Human resources management

At the end of the reporting period, the Commission had a headcount of 30 staff (including the Commissioner) and planned commencements in the new financial year to fill vacancies in several teams. The Commission has implemented a more visible social media approach to recruitment, promoting all vacancies via Seek and LinkedIn to gain as much reach and interest as possible for all recruitment. The Commission will also be using Dreamjobz to attract Aboriginal and Torres Strait Islander candidates.

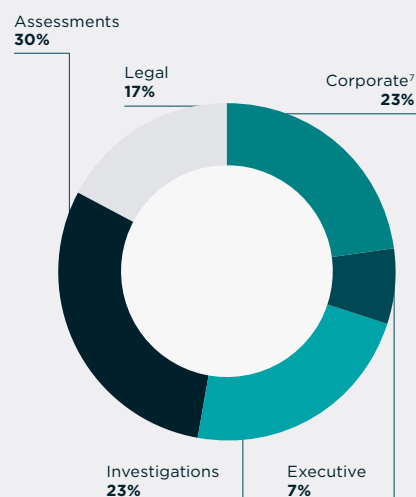
During 2025-26, the Commission's separation rate declined from 32.9% to 16.5%. The following tables provide workforce data for 2025-26.

Table 21. Commission full-time equivalent staff and headcount by team as at 30 June 2026

	FTE	Headcount
Executive	2.0	2
Assessments	8.7	9
Investigations	6.8	7
Legal	5.0	5
Corporate, Prevention and Communication	6.9	7
Total	29.4	30

As outlined in Figure 20, 77% of the Commission's resources are directly involved in the operational functions of the Commission, with the remainder providing corporate and enabling services.

Figure 20. Percentage of headcount per function



7 'Corporate' encapsulates a broad range of activities including the prevention and engagement, corporate governance and assurance functions, and the PROTECTED Network and ICT Services Project. In addition, the team manages the typical range of corporate services to the Commission, including office management, HR and financial management.

Table 22. Commission full-time equivalent staff and headcount by gender

	Female	Male	Non-binary	Total
FTE by gender	21.4	8	0	29.4
Headcount by gender	22	8	0	30
% of workforce	73%	27%	0%	100%

Table 23. Commission headcount by classification and gender

Classification group ⁸	Female	Male	Non-binary	Total
Administrative Officers ⁹	11	0	0	11
Executive Officers	1	1	0	2
Legal Officers ¹⁰	3	1	0	4
Senior Officers ¹¹	7	6	0	13
TOTAL				30

Table 24. Commission staff by employment category and gender

Employment category	Female	Male	Non-binary	Total
Casual	0	0	0	0
Permanent full-time	18	8	0	26
Permanent part-time	3	0	0	3
Temporary full-time	1	0	0	1
Temporary part-time	0	0	0	0

⁸ Classification is determined by the relevant ACT Government enterprise agreements.

⁹ All staff at or below the Administrative Services Officer Class 6 classification are considered administrative officers.

¹⁰ All staff employed as Legal Officers under the Legal Professionals Enterprise Agreement are considered legal officers. This includes the Commission's Principal Lawyers.

¹¹ All staff at or above the Senior Officer Grade C classification under the Administrative and Related Classifications Enterprise Agreement are considered senior officers.

Table 25. Commission staff by diversity

	Headcount	% of total staff
Aboriginal and/or Torres Strait Islander	0	0.0%
Culturally and linguistically diverse	3	10.3%
People with a disability	1	3.4%

Table 26. Average years of service by gender

Gender	Female	Male	Non-binary	Total
Average years of service	3.6	3.8	0.0	3.7

Table 27. Recruitment and separation rates for the Commission

	Recruitment rate	Separation rate
Total	16.5	16.5

Table 28. Separation by length of service

Separation by length of service	Headcount	% of total staff
Less than 12 months	0	0%
Greater than 12 months < 2 years	2	25%
Greater than 2 years	1	13%
Greater than 3 years	1	13%
Total	4	51%

Staffing obligations

The Commission's Development and Performance Framework documents the expectations of all staff to demonstrate workplace behaviours consistent with the ACTPS, including the values of respect, integrity, collaboration and innovation. Commission staff are also expected to demonstrate behaviours consistent with Commission values: independence, professionalism, accountability, fairness and integrity. There is significant emphasis placed on these values to ensure the Commission demonstrates the behaviours expected of others and to maintain public trust.

In addition to the framework expectations, the Commission has robust systems in place to always promote operational integrity, including the requirement for all staff to obtain and maintain a Negative Vetting 1 security clearance from the Australian Government Security Vetting Agency (AGSVA).

Staff are required to comply with the AGSVA condition to declare circumstances or associations that may impact their suitability to hold the clearance and continue being a Commission employee, as well as to comply with internal security and integrity policies to:

- declare any conflicts of interest that arise in the course of their employment
- provide an updated conflict of interest and associations declaration annually, even where they have nothing to declare.

The Inspector reviews the Commission's conflict of interest register twice a year.

The role of the Agency Security Advisor is outlined in the Commission's Protective Security Policy and performed by the Senior Director, CPC. The Agency Security Advisor ensures the Commission complies with the ACT Government Protective Security Policy Framework and its own processes, and provides training and advice on information, personnel and physical security requirements to staff. During the reporting period, Commission staff attended security training particularly focused on cyber security in readiness for the Commission moving to a protected network.

Learning and development

The Commission is committed to ensuring staff have access to training and development opportunities that meet the requirements of their roles along with preparing for future skill requirements. During their employment with the Commission, staff can access a broad range of learning and development opportunities. These opportunities can be discussed with their manager as part of the development and performance management process.

The Commission is also committed to learning from other integrity entities and jurisdictions. The Commission attended the National Anti-Corruption Investigation Network Conference, run by the NSW Independent Commission Against Corruption (NSW ICAC).

Commission teams regularly attend lunchtime seminars provided by the Corruption Prevention Network, the Institute of Public Administration Australia ACT and NSW ICAC.

Team members from all teams across the Commission have attended a range of conferences and seminars, both in person and virtual, and brought back insights for further consideration and adoption.

Regular in-house training is given to staff by vendors of systems used by the Commission, such as CONDOR, as well as training on procedures such as TIA Act roles and responsibilities.

In addition to supporting staff to pursue bespoke learning and development opportunities in line with their individual requirements, staff are invited to join virtual events such as legal proceedings in which the Commission is involved. These provide staff with the opportunity to immerse themselves in the work of the Commission.

Work health and safety

The health and safety of the Commission's staff and other people who engage with the Commission in the course of its work is of utmost importance.

The Commission follows all ACTPS work health and safety (WHS) guidance to address hazards and risks specific to the Commission's workplace. Staff were reminded that WHS and wellbeing is everyone's responsibility, and those responsibilities include:

- reporting all work-related incidents via the ACTPS WHS Portal, including 'near misses' such as a slip, trip or fall which may not have resulted in an immediate injury but where an injury may emerge sometime later, and incidents occurring outside the Commission environment but on the broader premises or environs during work time
- notifying supervisor/s of WHS hazards and taking immediate steps to remove or manage the hazard if it's safe to do so
- participating in any WHS improvement program/plan and other WHS consultation activities that may take place
- working to always ensure the health and safety of all staff in the workplace
- using and maintaining all workplace equipment in accordance with instructions given by the business area to ensure its safe and proper use
- cooperating with managers and supervisors to ensure business WHS responsibilities are met.

During 2025–26, the Commission was not issued with any notices or enforceable undertakings under the *Work Health and Safety Act 2011*.

The CPC team regularly participates in whole of government WHS strategy meetings to ensure the Commission is aware of the latest developments, discussions and opportunities in this area.

Statutory instruments

Three instruments were notified under the Integrity Commission Act during the reporting period:

- Notifiable Instrument NI2025-414, made under section 295A (Commission – wellbeing policy), was notified on 21 July 2025. This instrument was introduced following the implementation of a Govey Review recommendation that required the Commission to make a policy about how the Commission is to protect the wellbeing of people involved in matters before the Commission (section 295A (1)).
- Notifiable Instrument NI2025-497, made under section 251B (Staff of the inspector – personal interest guidelines), made by the Inspector of the Commission.
- Disallowable Instrument DI2025-283, made under section 25 and section 40, was notified on 23 October 2025. This instrument was notified following a recruitment process undertaken by the Speaker's office to appoint an acting Commissioner, if at any point in time an acting Commissioner is required to be appointed. The instrument is in effect from 24 October 2025 to 23 October 2027.

Access to information

The *Freedom of Information Act 2016* (FOI Act) generally enables public access to information held by government agencies, including the Commission. It allows individuals and organisations to apply for access to information held by an agency. However, access to some information held by the Commission is taken to be contrary to the public interest and therefore not subject to release, unless the information is administrative in nature. This means that information relating to the Commission's investigations are not subject to public access under the FOI Act.

The FOI Act also provides that where factors favour non-disclosure in the public interest, disclosure is not required. Section 96 of the FOI Act requires agencies to report on their obligations under the FOI Act. The Commission's report is set out in Part F, Appendix B.

The Commission received 4 freedom of information (FOI) requests in the reporting period. The applications were processed within the required 20 working days. The Commission also received and complied with one third-party request for information from another ACT Government directorate in relation to FOI requests they had received.

The Commission is required to maintain a record of access applications received, known as a disclosure log. The log must include each access application received, the decision made and the information, if any, to which access was granted, unless the access application is for personal information or information about a person's business, commercial, financial or professional affairs where the publication of the information would be unreasonable in the circumstances.

The Commission's disclosure log is available on the Commission's website at integrity.act.gov.au/about-us/freedom-of-information.

Compliance with other ACT legislation

Period Products and Facilities (Access) Act 2023

In accordance with Part III (Workplace access to facilities) of the *Period Products and Facilities (Access) Act 2023*, Commission staff have access to appropriate toilets, sanitary waste and handwashing facilities in a way that respects the dignity of the person.

Carers Recognition Act 2021

In line with ACTPS requirements, the Commission upholds and promotes the care relationship principles for any carer employees by providing carer-friendly flexible working options and considering the principles contained in the *Carers Recognition Act 2021* in its human resources policies and procedures.

Ecological sustainability reporting

The Commission is committed to the ecologically sustainable development principles in the *Climate Change and Greenhouse Gas Reduction Act 2010* (ACT) and the *Environment Protection Act 1997* (ACT).

Employees are encouraged to reduce the Commission's ecological footprint by only printing documents when essential and recycling plastics, paper and cardboard. The Commission also uses motion-sensor lighting in its office, ensuring lights are only on when the office is occupied; carbon-neutral paper; recyclable printer toner cartridges; and a waste disposal system that separates recyclable material from non-recyclable material.

The Commission continued to maintain its electric fleet vehicle in line with ACT Government policy.

Disability Inclusion Act 2024

The Commission is committed to maintaining a workplace which meets the requirements of the *Disability Inclusion Act 2024*, including implementing strategies to value people with disability as important and valuable members of the diverse ACT community. We do this by embedding disability inclusion in our work practices to ensure barriers to accessibility and inclusion that may arise are dealt with promptly and to promote an environment free from ableism. The Commission will adopt strategies in the CMTEDD Disability Inclusion Plan where it is appropriate to do so noting the organisation's size and workforce composition.

Multiculturalism Act 2023 reporting

The Commission is committed to maintaining a workplace that meets the requirements of the *Multiculturalism Act 2023*, including implementing strategies that recognise and value people from culturally and linguistically diverse backgrounds as important and valued members of the diverse ACT community. We do this by embedding multicultural inclusion in our work practices and interactions with witnesses, ensuring that cultural barriers to participation and engagement are identified and addressed promptly, and promoting an environment free from discrimination and racism. The Commission will adopt relevant strategies from applicable ACT Government multicultural action plans where appropriate, considering the organisation's size and workforce composition.

Aboriginal and Torres Strait Islander reporting

The Commission is committed to maintaining a workplace that meets the requirements of the ACT Aboriginal and Torres Strait Islander Agreement 2019–2028, including implementing strategies that recognise and value Aboriginal and Torres Strait Islander peoples as important and valued members of the diverse ACT community. Evidence of this is demonstrated in the communication and engagement section of this report. We embed Aboriginal and Torres Strait Islander inclusion in our work practices, ensuring that barriers to participation, engagement and cultural safety are identified and addressed promptly, and promoting an environment free from racism and discrimination. The Commission is committed to contributing to the agreement's outcomes framework and supporting the implementation of relevant focus area action plans, where it is appropriate to do so noting the organisation's size and workforce composition.

PART **E**

Financial statements

Management discussion and analysis

Financial performance

The following financial information is based on audited Financial Statements for 2025-26, and the forward estimates contained in the 2026-27 Budget Statements.

1. Total expenses

1.1. Comparison to budget

Total expenses were **\$8.639 million** and were **\$1.513 million** (14.9%) lower than the budget. The variance mainly reflects the rollover of \$0.678 million from 2024-25 into 2025-26 under the budget protocols for Officers of the Legislative Assembly, as agreed between the Treasurer and the Speaker. Annual ICT support costs were also below budget because the Commission's new outsourced ICT services arrangement did not commence until June 2026. Lower professional services expenditure further contributed to the variance, reflecting fewer public hearings and internal audits than expected, together with the recovery of legal fees.

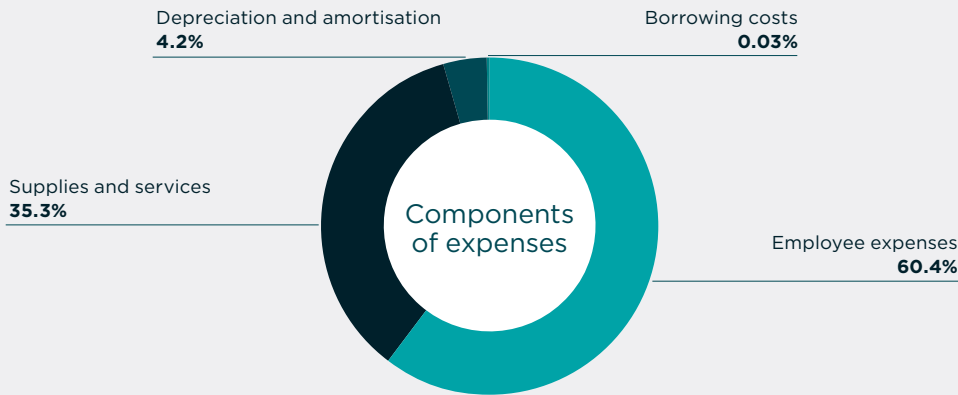
1.2. Components of expenses

Figure 21 shows the components of the Commission's expenses for 2025-26.

The main components were:

- employee expenses of **\$5.221 million** (60.4%); and
- supplies and services of **\$3.048 million** (35.3%), which included the following:
 - ICT Service Arrangements of \$1.383 million
 - professional services (legal, accounting and management) of \$0.376 million
 - accommodation costs of \$0.447 million
 - software, subscriptions and memberships of \$0.284 million
 - shared services – human resources and ICT services of \$0.301 million.

Figure 21. Components of expenses 2025-26



1.3. Comparison to 2024-25 actuals

Total expenses in 2025-26 were **\$1.338 million** (18.3%) higher than reported in 2024-25. The increase mainly reflects the Commission's investment in outsourced ICT service arrangements, eliminating its reliance on DCBR for the majority of its ICT operational needs.

1.4. Future trends

Total expenses are forecast to increase by **\$1.074 million** (12.4%) to **\$9.713 million** in 2026-27. The increase is mainly due to \$0.940 million in funds rolled over from 2025-26 under the budget protocols for Officers of the Legislative Assembly, as agreed between the Treasurer and the Speaker. These protocols support the independence of the Commission and provide it with greater flexibility in the management and utilisation of its appropriated funds.

2. Total income

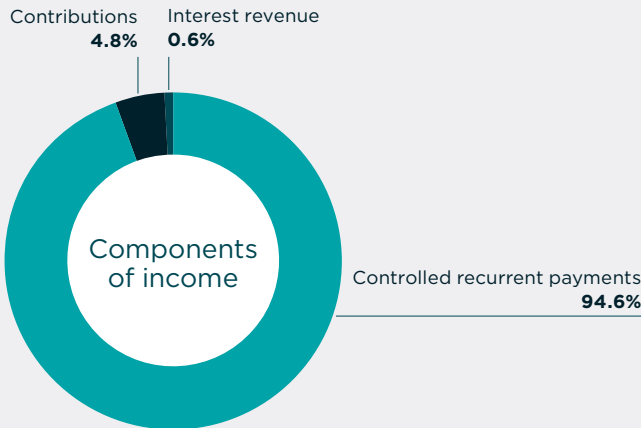
2.1 Comparison to budget

Total income for the year was **\$8.634 million**, which was **\$1.219 million** (12.4%) below budget. The variance mainly reflects the Commission drawing down less Controlled Recurrent Payment (CRP) funding than budgeted because it had sufficient cash reserves to meet its operational needs. Under the budget protocols for Officers of the Legislative Assembly, as agreed between the Treasurer and the Speaker, the Commission has rolled forward \$0.940 million in CRP funding from 2025-26 into the 2026-27 budget.

2.2 Components of income

Figure 22 shows the Commission's income components for 2025-26. CRP funding was the Commission's primary income source, contributing \$8.168 million (94.6%) of total income.

Figure 22. Components of income 2025-26



2.3 Comparison to 2024–25 actuals

Total income for 2025–26 was **\$1.755 million** (25.5%) higher than in 2024–25. The increase mainly reflects the drawdown of CRP funding to support the Commission's investment in outsourced ICT service arrangements and eliminate its reliance on DCBR for most of its ICT operational needs.

2.4 Future trends

Total income is expected to increase by **\$0.755 million** (8.7%) to **\$9.389 million** in 2026–27. The increase is mainly due to \$0.940 million in funds rolled over from 2025–26 under the budget protocols for Officers of the Legislative Assembly, as agreed between the Treasurer and the Speaker.

Financial position

3. Total assets

3.1. Comparison to budget

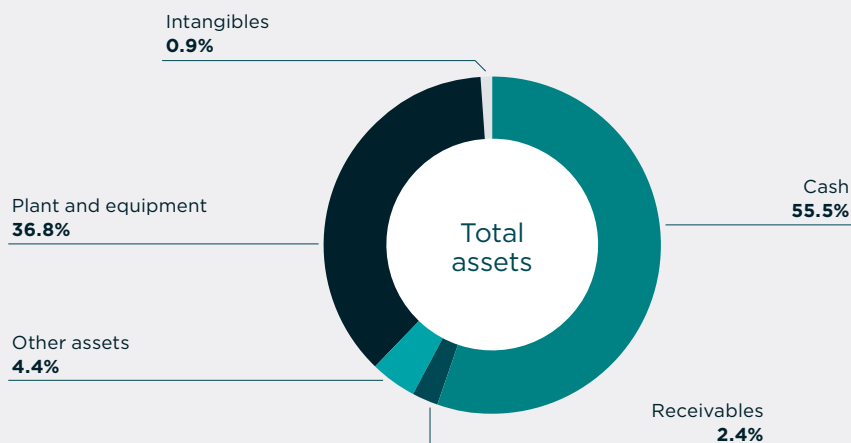
At 30 June 2026, the Commission's total assets were **\$3.801 million**, which was **\$1.033 million** (37.3%) above budget. The variance mainly reflects an increase in the Commission's cash balance, with CRP funding drawn down to meet accrued costs and complete the ICT services outsourcing project.

3.2. Components of total assets

Figure 23 shows the components of the Commission's total assets at 30 June 2026. The main components were:

- cash of **\$2.110 million** (55.5%)
- plant and equipment of **\$1.399 million** (36.8%).

Figure 23. Total assets at 30 June 2026



3.3. Comparison to 30 June 2025 actuals

Total assets at 30 June 2026 were **\$0.960 million** (33.8%) higher than at 30 June 2025. The increase mainly reflects the Commission's higher cash balance, with CRP funding drawn down to meet accrued costs and complete the ICT services outsourcing project.

3.4. Future trends

Total assets held by the Commission at the end of 2026-27 are expected to be **\$1.624 million** lower than in 2025-26, reflecting the Commission's anticipated lower cash balance needed to meet its operational requirements.

4. Total liabilities

4.1. Comparison to budget

At 30 June 2026, the Commission's total liabilities were **\$1.740 million**, which was **\$0.754 million** (76.5%) above budget. The variance mainly reflects higher accrued expenses associated with the Commission's ICT services outsourcing project.

4.2. Components of total liabilities

Figure 24 shows the components of the Commission's total liabilities at 30 June 2026. The main components were:

- employee benefits of **\$0.983 million** (56.5%)
- payables of **\$0.709 million** (40.7%).

4.3. Comparison to 30 June 2025 actuals

Total liabilities at 30 June 2026 were **\$0.739 million** (73.8%) higher than at 30 June 2025. The increase mainly reflects higher accrued expenses associated with the Commission's ICT services outsourcing project.

4.4. Future trends

The Commission's total liabilities are estimated to be **\$0.771 million** at the end of 2026-27, reflecting lower accrued expenses following payment of costs associated with the ICT services outsourcing project.

Figure 24. Total liabilities at 30 June 2026



Financial statements of the ACT Integrity Commission

For the year ended 30 June 2026

Independent auditor's report



AUDITOR-GENERAL AN OFFICER
OF THE ACT LEGISLATIVE ASSEMBLY 

INDEPENDENT AUDITOR'S REPORT

To the Members of the ACT Legislative Assembly

Opinion

I have audited the financial statements of the ACT Integrity Commission (Commission) for the year ended 30 June 2026 which comprise the statement of responsibility and statement by the chief finance officer, operating statement, balance sheet, statement of changes in equity, statement of cash flows, statement of appropriation and notes to the financial statements, including a summary of material accounting policies and other explanatory information.

In my opinion, the accompanying financial statements:

- (i) present fairly, in all material respects, the Commission's financial position as at 30 June 2026, and its financial performance and cash flows for the year then ended; and
- (ii) are presented in accordance with the *Financial Management Act 1996* and comply with Australian Accounting Standards.

Basis for opinion

I conducted the audit in accordance with the Australian Auditing Standards. My responsibilities under the standards are further described in the 'Auditor's responsibilities for the audit of the financial statements' section of this report.

I am independent of the Commission in accordance with the ethical requirements of the Accounting Professional and Ethical Standards Board's APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* (Code). I have also fulfilled my other ethical responsibilities in accordance with the Code.

I believe that the audit evidence obtained is sufficient and appropriate to provide a basis for my opinion.

Responsibilities of the Commissioner for the financial statements

The Commissioner is responsible for:

- preparing and fairly presenting the financial statements in accordance with the *Financial Management Act 1996* and relevant Australian Accounting Standards;
- determining the internal controls necessary for the preparation and fair presentation of the financial statements so that they are free from material misstatements, whether due to error or fraud; and
- assessing the ability of the Commission to continue as a going concern and disclosing, as applicable, matters relating to going concern and using the going concern basis of accounting in preparing the financial statements.

Auditor's responsibilities for the audit of the financial statements

Under the *Financial Management Act 1996*, the Auditor-General is responsible for issuing an audit report that includes an independent opinion on the financial statements of the Commission.

My objective is to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion.

Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Australian Auditing Standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

As part of an audit in accordance with Australian Auditing Standards, I exercise professional judgement and maintain professional scepticism throughout the audit. I also:

- identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for my opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- obtain an understanding of internal controls relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for expressing an opinion on the effectiveness of the Commission's internal controls;
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Commission;
- conclude on the appropriateness of the Commission's use of the going concern basis of accounting and, based on audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Commission's ability to continue as a going concern. If I conclude that a material uncertainty exists, I am required to draw attention in this report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify my opinion. I base my conclusions on the audit evidence obtained up to the date of this report. However, future events or conditions may cause the Commission to cease to continue as a going concern; and
- evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether they represent the underlying transactions and events in a manner that achieves fair presentation.

I communicated with the Commissioner regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that I identified during my audit.



Clea Lewis
Assistant Auditor-General, Financial Audit
11 August 2026

Statement of Responsibility

In my opinion, the ACT Integrity Commission's financial statements fairly reflect the financial operations for the year ended 30 June 2026 and its financial position on that date.



Hon. Michael Adams KC
ACT Integrity Commissioner
20 July 2026

Statement by the Chief Finance Officer

In my opinion, the ACT Integrity Commission's financial statements have been prepared in accordance with the Australian Accounting Standards and are in agreement with its accounts and records and fairly reflect its financial operations for the year ended 30 June 2026 and financial position on that date.

A handwritten signature in dark teal ink, reading "S. Hickey". The signature is fluid and cursive, with a large, sweeping "S" and a checkmark-like flourish at the end.

Scott Hickey, CA
Chief Finance Officer
20 July 2026

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Operating Statement

For the Year Ended 30 June 2026

	Note No.	Actual 2026 \$'000	Original Budget 2026 \$'000	Actual 2025 \$'000
Income				
Controlled Recurrent Payments	#	8,168	9,417	6,812
Contributions Income		416	398	16
Interest Revenue		50	38	51
Total Income		8,633	9,853	6,879
Expenses				
Employee Expenses	3	5,221	5,883	5,009
Supplies and Services	4	3,048	3,944	1,962
Depreciation and Amortisation		367	310	325
Borrowing Costs		3	15	5
Total Expenses		8,639	10,152	7,301
Operating Result		(5)	(299)	(422)
Total Comprehensive Result		(5)	(299)	(422)

The above Operating Statement is to be read in conjunction with the accompanying notes.

Refer to the Statement of Appropriation.

Balance Sheet

As at 30 June 2026

	Note No.	Actual 2026 \$'000	Original Budget 2026 \$'000	Actual 2025 \$'000
Current Assets				
Cash	5	2,110	1,255	968
Receivables		91	47	40
Other Assets	6	166	132	140
Total Current Assets		2,367	1,434	1,147
Non-Current Assets				
Plant and Equipment	7	1,399	1,287	1,638
Intangibles		35	47	56
Total Non-Current Assets		1,434	1,334	1,694
Total Assets		3,801	2,768	2,841
Current Liabilities				
Payables	8	709	135	155
Lease Liabilities	9	12	11	11
Employee Benefits	10	916	687	726
Total Current Liabilities		1,637	833	892
Non-Current Liabilities				
Lease Liabilities	9	36	59	48
Employee Benefits	10	67	94	61
Total Non-Current Liabilities		103	153	109
Total Liabilities		1,740	986	1,001
Net Assets		2,061	1,782	1,840
Equity				
Accumulated Funds		2,061	1,782	1,840
Total Equity		2,061	1,782	1,840

The above Balance Sheet is to be read in conjunction with the accompanying notes.

Statement of Changes in Equity

For the Year Ended 30 June 2026

	Note No.	Accumulated Funds Actual 2026 \$'000	Total Equity Actual 2026 \$'000	Original Budget 2026 \$'000
Balance at 1 July 2025		1,840	1,840	1,855
<i>Comprehensive Income</i>				
Operating Result		(5)	(5)	(299)
Total Comprehensive Result		(5)	(5)	(299)
Transactions Involving Owners Affecting Accumulated Funds				
Capital Injections	#	226	226	226
Total Transactions Involving Owners Affecting Accumulated Funds		226	226	226
Balance at 30 June 2026		2,061	2,061	1,782

	Accumulated Funds Actual 2025 \$'000	Total Equity Actual 2025 \$'000
Balance at 1 July 2024	2,263	2,263
<i>Comprehensive Income</i>		
Operating Result	(422)	(422)
Total Comprehensive Result	(422)	(422)
Balance at 30 June 2026	1,840	1,840

The above Statement of Changes in Equity is to be read in conjunction with the accompanying notes.

Refer to the Statement of Appropriation.

Statement of Cash Flows

For the Year Ended 30 June 2026

	Note No.	Actual 2026 \$'000	Original Budget 2026 \$'000	Actual 2025 \$'000
Cash Flows from Operating Activities				
Receipts				
Controlled Recurrent Payments		8,168	9,417	6,812
Goods and Services Input Tax Credits from the Australian Taxation Office		175	187	129
Interest Received		50	38	51
Total Receipts from Operating Activities		8,393	9,642	6,992
Payments				
Employee Expenses		5,024	5,879	4,992
Supplies and Services		2,105	3,553	1,934
Interest Expense		-	15	-
Goods and Services Tax Paid to Suppliers		230	187	129
Total Payments from Operating Activities		7,359	9,634	7,055
Net Cash Inflows/(Outflows) from Operating Activities	5	1,034	8	(63)
Cash Flows from Investment Activities				
Payments				
Purchase of Plant and Equipment		107	5	64
Total Payments from Investment Activities		107	5	64
Net Cash Inflows/(Outflows) from Investing Activities		(107)	(5)	(64)

	Note No.	Actual 2026 \$'000	Original Budget 2026 \$'000	Actual 2025 \$'000
Cash Flows from Financing Activities				
Receipts				
Capital Injections	#	226	226	-
Total Receipts from Financing Activities		226	226	-
Payments				
Repayment of Lease Liabilities – Principal		11	5	11
Total Payments from Financing Activities		11	5	11
Net Cash Inflows/(Outflows) from Financing Activities		215	221	(11)
Net Increase/(Decrease) in Cash		1,142	224	(138)
Cash at the Beginning of the Reporting Period		968	1,031	1,106
Cash at the End of the Reporting Period	5	2,110	1,255	968

The above Statement of Cash Flows is to be read in conjunction with the accompanying notes.

Refer to the Statement of Appropriation.

Statement of Appropriation

For the Year Ended 30 June 2026

Description and Material Accounting Policies relating to Controlled Recurrent Payments

CRP are revenue received from the ACT Government to fund the costs of delivering outputs.

CRP is recognised when the Commission gains control over the funding which is obtained upon the receipt of cash, given they do not contain enforceable and sufficiently specific performance obligations as defined by Australian Accounting Standards Board (AASB).

Capital injection appropriations are not recognised as income, but instead are recognised as equity injections and a cash inflow which is used to purchase/build assets or to reduce liabilities.

Column Heading Explanations

The Original Budget column shows the amounts that appear in the Statement of Cash Flows in the Budget Papers. This amount also appears in the Statement of Cash Flows.

The Total Appropriated column is inclusive of all appropriation variations occurring after the Original Budget.

The Appropriation Drawn is the total amount of appropriation received by the Commission during the year. This amount appears in the Statement of Cash Flows.

	Original Budget 2026 \$'000	Total Appropriated 2026 \$'000	Appropriation Drawn 2026 \$'000	Appropriation Drawn 2025 \$'000
Controlled Recurrent Payments (CRP)	9,417	9,417	8,168	6,812
Capital Injections	226	226	226	-
Total Appropriation	9,643	9,643	8,394	6,812

The above Statement of Appropriation should be read in conjunction with the note below.

Reconciliation of Appropriation for 2025-26

	CRP 2026 \$'000	Capital Injections 2026 \$'000
Original Appropriation for 2025-26	9,417	226
Total Appropriated	9,417	226
Budget Rollover	(940)	-
Undrawn Funds	(309)	-
Total Appropriation Drawn	8,168	226

Controlled Recurrent Payments (CRP)

Variance between '2025-26 Total Appropriated' and '2025-26 Appropriation Drawn'

The \$1.249 million difference in the Controlled Recurrent Payments (CRP) primarily reflects the Commission's decision not to draw down its full 2025-26 appropriation, as existing cash reserves were sufficient to meet operational requirements. The Commission has rolled forward \$0.940 million into the 2026-27 budget in accordance with the budget protocols for Officers of the Legislative Assembly. These protocols support the independence of the Commission and provide it with greater flexibility in the management and utilisation of its appropriated funds.

Variance between '2025-26 Appropriation Drawn' and '2024-25 Appropriation Drawn'

The \$1.356 million increase in CRP primarily reflects the Commission's use of funds to establish outsourced ICT services, eliminating its reliance on Digital Canberra for the majority of its ICT operational needs.

Notes to and Forming Part of the Financial Statements

For the year ended 30 June 2026

Overview Notes

Note 1. Objectives of the ACT Integrity Commission

Operations And Principal Activities

The ACT Integrity Commission (the Commission) is established by the *Integrity Commission Act 2018* (the Act).

The Commission consists of the Commissioner who is an independent officer of the ACT Legislative Assembly. Subject to the Act and to other Territory laws, the Commissioner has complete discretion in the exercise of the Commission's functions.

The Commissioner is assisted by staff employed under the *Public Sector Management Act 1994* and the *Integrity Commission Act 2018*. The staff of the Commission are not subject to direction from anyone other than the Commissioner or another member of staff of the Commission authorised by the Commissioner to give directions.

The Commission is also responsible for administering the *Public Interest Disclosure Act 2012* (PID Act). The PID Act provides a way for people to disclose wrongdoing in the public sector and protect whistleblowers who do so.

Under Section 23 of the Act, the Commission's functions are to:

- investigate conduct that is alleged to be corrupt conduct;
- refer suspected instances of criminality or wrongdoing to the appropriate authority for further investigation and action;
- prevent corruption, including by:
 - researching corrupt practices; and
 - mitigating the risks of corruption.

- publish information about investigations conducted by the Commission, including lessons learned;
- provide education programs about the operation of this Act and the Commission, including providing advice, training and education services to:
 - the Legislative Assembly and the public sector to increase capacity to prevent corrupt conduct;
 - people who are required to report corrupt conduct under this Act; and
 - the community about the detrimental effects of corruption on public administration and ways in which to assist in preventing corrupt conduct.
- foster public confidence in the Legislative Assembly and public sector.

Under Sections 17A and 19 of the PID Act, the Commission's functions are to:

- Assess disclosures of disclosable conduct.
- Investigate or refer the public interest disclosures for investigation to an investigating entity.

Note 2. Basis of Preparation of the Financial Statements

Legislative Requirement

The *Financial Management Act 1996* (FMA) requires the preparation of annual financial statements for ACT Government Agencies.

The FMA and the *Financial Management Guidelines* issued under the FMA, requires the Commission's financial statements to include:

- an Operating Statement for the year;
- a Balance Sheet at the end of the year;
- a Statement of Changes in Equity for the year;
- a Statement of Cash Flows for the year;
- a Statement of Appropriation for the year;
- the material accounting policies adopted for the year; and
- other statements as necessary to fairly reflect the financial operations of the Commission during the year and its financial position at the end of the year.

These general-purpose financial statements have been prepared in accordance with Australian Accounting Standards (as required by the FMA), supplemented by following the ACT Accounting and Disclosures.

Accrual Accounting

The financial statements have been prepared using the accrual basis of accounting. The financial statements are prepared according to historical cost convention, except for financial instruments which are valued at fair value in accordance with (re)valuation policies applicable to the Commission during the reporting period.

Currency

These financial statements are presented in Australian dollars, which is the Commission's functional currency.

Individual Not-For-Profit Reporting Entity

The Commission is an individual not-for-profit reporting entity.

Reporting Period

These financial statements state the financial performance, changes in equity and cash flows of the Commission for the year ended 30 June 2026 together with the financial position of the Commission as at 30 June 2026.

Comparative Figures

Budget Figures

To facilitate a comparison with the Budget Papers, as required by the FMA, budget information for 2025-26 has been presented in the financial statements. Budget numbers in the financial statements are the original budget numbers that appear in the Budget Papers.

Prior Year Comparatives

Comparative information has been disclosed in respect of the previous period for amounts reported in the financial statements, except where an Australian Accounting Standard does not require comparative information to be disclosed.

Where the presentation or classification of items in the financial statements is amended, the comparative amounts have been reclassified where practical. Where a reclassification has occurred, the nature, amount and reason for the reclassification is provided.

Rounding

All amounts in the financial statements have been rounded to the nearest thousand dollars (\$'000). Use of "-" represents zero amounts or amounts rounded down to zero.

Going Concern

The 2025-26 financial statements have been prepared on a going concern basis as the Commission has been funded in the ACT Government 2026-27 Budget and the Budget Papers include forward estimates for the Commission.

Impact Of Accounting Standards Issued But Yet To Be Applied

All Australian Accounting Standards and Interpretations issued but yet to be applied are applicable to future reporting periods and will be adopted from their application date.

Standards and Interpretations issued but yet to be applied have been assessed as not being relevant to the Commission or will have an immaterial financial impact on the Commission. However, AASB 18 Presentation and Disclosure in Financial Statements (applicable 1 January 2027 for for-profit public sector agencies or applicable 1 January 2028 for not-for-profit public sector agencies) does contain some major presentation/disclosure changes that may impact on the Commission including:

- that operating, investing and financing categories as well as additional subtotals have to be included in the agency's operating statement;

- the disclosure of management-defined performance measures and reconciliations of these measures with the subtotals required by AASB Standards; and
- enhanced requirements for the grouping (aggregation and disaggregation) of information in the financial statements and in the notes.

The AASB has issued an exposure draft (ED 338 Application of AASB 18 and AASB 107 by Superannuation and Not-for-Profit Entities and Operating Cash Flow Reconciliation) that outlines modifications to AASB 18 for not-for-profit public sector entities. If these modifications in the exposure draft are adopted, they will effectively enable the Commission to continue to broadly apply the existing disclosure requirements contained in AASB 101 Presentation of Financial Statements. However, as this exposure draft is not yet finalised, the impact on Commission's financial statements from the adoption of AASB 18 cannot be determined at this time.

Expense Notes

Note 3. Employee Expenses

Description and Material Accounting Policies Relating to Employee Expenses

Employee expenses comprise all costs incurred in relation to employing staff including wages and salaries, fringe benefits tax, leave entitlements, annual leave loading, termination payments, workers' compensation insurance premiums, accrued flextime, non-monetary benefits, and other employee benefits and on-cost expenses.

Wages and salaries are recognised in the reporting period when the employee renders services to the Commission. They are measured based on the amount paid to employees during the year as well as any wages and salaries due to employees that remain unpaid at the end of the financial year.

(See Note 10 Employee Benefits for accrued wages and salaries, and annual and long service leave, for benefits expected to be settled after 12 months).

Superannuation Expense

Employees of the Commission will have different superannuation arrangements due to the type of superannuation schemes available at the time of commencing employment, including both defined benefit and defined contribution superannuation scheme arrangements.

For employees who are members of the defined benefit Commonwealth Superannuation Scheme (CSS) and Public Sector Superannuation Scheme (PSS) the Commission makes employer superannuation contribution payments to the Territory Banking Account at a rate determined by the Chief Minister, Treasury and Economic Development Directorate. The Commission also makes productivity superannuation contribution payments on behalf of these employees to the Commonwealth Superannuation Corporation, which is responsible for administration of the schemes.

For employees who are members of defined contribution superannuation schemes (the Public Sector Superannuation Scheme Accumulation Plan (PSSAP) and schemes of employee choice) the Commission makes employer superannuation contribution payments directly to the employees' relevant superannuation fund.

All defined benefit employer superannuation contributions are recognised as expenses on the same basis as the employer superannuation contributions made to defined contribution schemes. The accruing superannuation liability obligations are expensed as they are incurred and extinguished as they are paid.

	2026 \$'000	2025 \$'000
Wages and Salaries	4,431	4,371
Annual Leave	78	(7)
Long Service Leave	75	27
Superannuation Contributions to the Territory Banking Account	61	88
Superannuation to External Providers	525	477
Other Employee Benefits and On-Costs	51	53
Total Employee Expenses	5,221	5,009

In 2025-26 the Commission averaged 27.6 FTE (2024-25 28.0 FTE), including the Commissioner.

Note 4. Supplies and Services

Description and Material Accounting Policies Relating to Supplies and Services

General – Supplies and Services

Purchases of Supplies and Services generally represent the day-to-day running costs incurred in normal operations, recognised in the reporting period in which the expenses are incurred. Supplies and Services are measured at the amount paid or payable, or where Supplies and Services have been provided free of charge, they are measured at their fair value at the time they are provided.

ICT Service Arrangements

The Commission has arrangements for IT infrastructure, software access and managed services. These arrangements are assessed under AASB 16 Leases and AASB 138 Intangible Assets. Where arrangements do not convey the right to control the use of an identified asset, they are accounted for as service arrangements. Software accessed via supplier-hosted cloud arrangements (SaaS) does not meet the definition of an intangible asset due to lack of control and is expensed as incurred. Configuration and implementation costs are expensed unless they result in a separately identifiable intangible asset controlled by the Commission.

Significant judgement has been applied in assessing whether IT arrangements contain a lease under AASB 16 or give rise to an intangible asset under AASB 138. The Commission determined that arrangements provide access to services rather than control of underlying assets; accordingly, no leases or software intangibles have been recognised.

Professional Services

Professional services includes the fees for contractors and consultants that are engaged by the Commission to provide specific services, for matters where the Commission does not have specific expertise or internal resources available. This includes legal expenses related to legal services received free of charge from the ACT Government Solicitor's Office (GSO). The GSO advises the Commission of the fair value of the services provided.

Accommodation

Accommodation includes rent and outgoings provided by Infrastructure Canberra (iCBR) free of charge. iCBR is directly appropriated to deliver these services and as such, the Commission is required to use these services. iCBR advises the Commission of the fair value of the services provided.

Audit Fees

Remuneration is paid to the ACT Audit Office for the audit of the Commission's financial statements. No other services were provided by the ACT Audit Office.

	2026 \$'000	2025 \$'000
ICT Service Arrangements	1,383	-
Professional Services	376	805
Accommodation Services	447	413
Software, Subscriptions and Memberships	284	240
Shared Services – Human Resources and ICT Services	301	133
Staff Recruitment	14	85
Travel, Training and Staff Development	46	63
Audit Fees	58	55
Act of Grace Payments	-	55
Other Expenses	139	113
Total Supplies and Services	3,048	1,962

The \$1.086 million increase in Total Supplies and Services primarily reflects the Commission's investment in outsourced ICT service arrangements, eliminating its reliance on Digital Canberra for the majority of its ICT operational needs. The \$0.429 million decrease in Professional Services reflects lower use of contractors and consultants for HR services, public hearings, secondments and legal services.

Asset Notes

Note 5. Cash

Description and Material Accounting Policies Relating to Cash

The Commission holds a number of bank accounts with the Westpac Bank as part of the whole-of-government banking arrangements. As part of these arrangements, the Commission receives interest on its operating account.

	2026 \$'000	2025 \$'000
(a) Cash		
Cash at Bank	2,110	968
Total Cash	2,110	968

The \$1.142 million increase in Total Cash mainly reflects the Commission's drawdown of CRP to fund supplies and services associated with outsourcing its ICT services.

(b) Reconciliation of Cash at the End of the Reporting Period in the Statement of Cash Flows to Equivalent Items in the Balance Sheet		
Total Cash Recorded in the Balance Sheet	2,110	968
Cash Recorded at the End of the Reporting Period in the Statement of Cash Flows	2,110	968
(c) Reconciliation of the Operating Result to the Net Cash Inflows from Operating Activities		
Operating Result	(5)	(422)
Add Non-Cash Items		
Depreciation of Property, Plant and Equipment	367	325
Cash Before Changes in Operating Assets and Liabilities	362	(97)
Changes in Operating Assets and Liabilities		
Decrease/(Increase) in Receivables	(51)	5
Decrease/(Increase) in Other Assets	(27)	(8)
Increase/(Decrease) in Payables	554	20
Increase/(Decrease) in Employee Benefits	196	18
Net Changes in Operating Assets and Liabilities	673	35
Net Cash Inflows/(Outflows) from Operating Activities	1,034	(63)
(d) Reconciliation of Liabilities Arising from Financing Activities		
Lease Liabilities		
Carrying Amount at the Beginning of the Reporting Period	59	70
Cash Flow Changes:		
Cash Paid	(11)	(11)
Carrying Amount at the End of the Reporting Period	48	59

Note 6. Other Assets

	2026 \$'000	2025 \$'000
Other Assets		
Prepayments	166	140
Total Other Assets	166	140

Total Other Assets mainly relates to the prepayment of software subscriptions.

Note 7. Plant and Equipment

Description and Material Accounting Policies Relating to Plant and Equipment

The Commission has the following four classes of Plant and Equipment

- **Plant and Equipment** are tangible assets like office and computer equipment, furniture and fittings and motor vehicles.
- **Right-Of-Use (ROU) Plant and Equipment** has the same definition as plant and equipment, with the exception that they are held under a lease. ROU Plant and Equipment held by the Commission includes motor vehicles and equipment.
- **Leasehold Improvements** are capital expenditure items incurred in relation to leased assets. Leasehold improvements represent fit-outs in leased buildings.
- **Capital Works in Progress (CWIP)** is plant and equipment that is in the process of being constructed and as such is not yet in use or available for use. That is, CWIP is plant and equipment which is not in a location and condition necessary for it to be capable of operating in a manner intended by management. CWIP relating to intangible assets is included in intangible assets.

Acquisition and Recognition of Plant and Equipment

Plant and Equipment is initially recorded at cost. Right-of-use assets are also measured at cost on initial recognition, where cost comprises the initial amount of the lease liability, initial direct costs, prepaid lease payments, estimated cost of removal and restoration less any lease incentives received.

CWIP is recognised at the time the construction activity occurs. These assets are measured at the cost of constructing the asset and include construction activities with a minimum value of \$1 (ex GST). The cost includes direct construction costs (e.g. direct materials and direct labour costs of construction workers), and 'directly attributable' costs in bringing the asset to a location and condition ready for use. Directly attributable costs included: initial delivery and handling costs of materials, installation and assembly costs, functional testing and professional fees.

Where plant and equipment is acquired at no cost, or minimal cost, cost is its fair value as at the date of acquisition.

Plant and equipment with a minimum value of \$5,000 (ex GST) is capitalised..

Measurement of Plant and Equipment After Initial Recognition

After recognition as an asset, an item of plant and equipment is carried at its cost less any accumulated depreciation and any accumulated impairment losses.

After the commencement date, all right-of-use assets are measured at cost less any accumulated depreciation and accumulated impairment losses and adjusted for any re-measurement of the lease liability. Right-of-use assets are presented in plant and equipment in their own separate asset class.

Plant and equipment has a finite useful life. Plant and equipment is depreciated on a straight-line basis over its useful life, over a period not exceeding 10 years.

Impairment of Assets

The Commission assesses, at each reporting date, whether there is any indication that an asset may be impaired. Assets are also reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable.

	2026 \$'000	2025 \$'000
Equipment		
Equipment at Cost	257	97
Less: Accumulated Depreciation	(105)	(67)
Total Equipment	153	30
Leasehold Improvements		
Leasehold Improvements at Cost	2,824	2,817
Less: Accumulated Depreciation	(1,625)	(1,327)
Total Leasehold Improvements	1,199	1,490
Right-Of-Use Plant and Equipment		
ROU Plant and Equipment	76	76
Less: Accumulated Depreciation	(28)	(18)
Total ROU Plant and Equipment	47	58
Capital Works in Progress		
Equipment Works in Progress	-	60
Total Capital Works in Progress	-	60
Total Plant and Equipment	1,399	1,638

The \$0.239 million decrease in Total Plant and Equipment is mainly related to depreciation of the Commission's assets.

Reconciliation of Plant and Equipment

The following table shows the movement of Plant and Equipment during 2025-26.

	Equipment \$'000	Leasehold Improvements \$'000	ROU Plant and Equipment \$'000	Equipment Works in Progress \$'000	Total \$'000
Carrying Amount at the Beginning of the Reporting Period	30	1,490	58	60	1,638
Additions	160	7	-	-	167
Equipment Works in Progress Completed and Transferred to Equipment	-	-	-	(60)	(60)
Depreciation	(37)	(298)	(11)	-	(346)
Carrying Amount at the End of the Reporting Period	153	1,199	47	-	1,399

The following table shows the movement of Plant and Equipment during 2024-25.

	Equipment \$'000	Leasehold Improvements \$'000	ROU Plant and Equipment \$'000	Equipment Works in Progress \$'000	Total \$'000
Carrying Amount at the Beginning of the Reporting Period	43	1,720	68	60	1,891
Additions	-	64	-	-	64
Depreciation	(13)	(294)	(10)	-	(317)
Carrying Amount at the End of the Reporting Period	30	1,490	58	60	1,638

Liability Notes

Note 8. Payables

Description and Material Accounting Policies Relating to Payables

Total current payables are amounts payable for goods and services provided to the Commission prior to the end of the reporting period and are recognised at the amount to be paid for these goods and services when the liabilities are settled.

Payables are initially recognised at fair value based on the transaction cost and, subsequent to initial recognition, at amortised cost, with any adjustments to the carrying amount being recorded in the Operating Statement. All amounts are now normally settled within 28 days.

Payables include Trade Payables and Accrued Expenses.

	2026 \$'000	2025 \$'000
Current Payables		
Trade Payables	28	33
Accrued Expenses	682	122
Total Current Payables	709	155

The \$0.554 million increase in Total Current Payables mainly relates to accrued costs associated with the Commission's outsourced ICT service arrangements.

Note 9. Lease Liabilities

Description and Material Accounting Policies Relating to Lease Liabilities

The Commission has leases over a range of assets including motor vehicles and ICT equipment. There are a number of leasing arrangements that have resulted in the recognition of a lease liability while other leasing arrangements have not resulted in a liability being recognised. The below information provides details relating to the leases in place and a split between those that have been taken up as a lease liability and those that have not.

Leases that have resulted in the Commission recognising a lease liability are as follows:

Terms and Conditions of Leases

Motor vehicles – The Commission holds 1 motor vehicle lease (1 in the previous financial year). The term is for three years. The lease allows for extensions, but has no terms of renewal or purchase options, nor escalation clauses.

IT Equipment – The Commission holds 1 IT equipment lease (1 in the previous financial year). The term is for five years. The lease has no terms for extensions, renewal, purchase options, nor escalation clauses.

Leases that have not resulted in the Commission recognising a lease liability are as follows:

Terms and Conditions of Leases

IT equipment (low value leases) – The Commission has numerous low value leases for IT equipment. The Commission has applied the AASB 16 exemption from recognising the related lease liabilities in the balance sheet. Therefore the Commission does not take up a lease liability for these leases but instead accounts for the cost of these leases as an expense through the Operating Statement as incurred.

Extension Options

Where a lease contains extension options, at commencement date and at each subsequent reporting date, the Commission assesses where it is reasonably certain that the extension options will be exercised.

	2026 \$'000	2025 \$'000
Current Lease Liabilities		
IT Equipment	3	3
Motor Vehicles	9	8
Total Current Lease Liabilities	12	11
Non-Current Lease Liabilities		
IT Equipment	2	6
Motor Vehicles	33	42
Total Non-Current Lease Liabilities	36	48
Total Lease Liabilities	48	59
	2026 \$'000	2025 \$'000
Reconciliation of Lease Liabilities		
Opening Balance of Lease Liabilities	59	70
Less: Payments to Reduce the Principal of the Liability	(11)	(11)
Closing Balance of Lease Liabilities	48	59

Note 10. Employee Benefits

Description and Material Accounting Policies Relating to Employee Benefits

Accrued Wages and Salaries

Accrued wages and salaries are measured at the amount that remains unpaid to employees at the end of the reporting period.

Annual and Long Service Leave

Annual and long service leave including applicable on-costs that are not expected to be wholly settled before twelve months after the end of the reporting period when the employees render the related service are measured at the present value of estimated future payments to be made in respect of services provided by employees up to the end of the reporting period. Consideration is given to the future wage and salary levels, experience of employee departures and periods of service. At the end of each reporting period, the present value of future annual leave and long service leave payments is estimated using market yields on Commonwealth Government bonds with terms to maturity that match, as closely as possible, the estimated future cash flows.

Annual leave liabilities have been estimated on the assumption they will be wholly settled within three years. This financial year the rate used to estimate the present value of future:

- annual leave payments is 98.0% (99.5% in the previous financial year); and
- payments for long service leave is 95.5% (100.1% in the previous financial year).

The long service leave liability is estimated with reference to the minimum period of qualifying service. For employees with less than the required minimum period of qualifying service (i.e. 7 years for employees under 55 years and 1 year for employees 55 years or older), the probability that employees will reach the required minimum period has been taken into account in estimating the provision for long service leave and applicable on-costs.

On-costs only become payable if the employee takes annual and long service leave while in service, a probability that employees will take annual and long service leave while in service has been taken into account in estimating the liability for on-cost.

Significant judgements have been applied in estimating the annual and long service leave liabilities, given the Commission uses the Whole-of-Government present value, probability and on-cost factors. These factors are issued by ACT Treasury and apply to all ACT Government Agencies. ACT Treasury organises an actuarial review to be undertaken every three years by the Australian Government Actuary to estimate each of these factors. The latest assessment was undertaken in December 2024 and early 2025, with the next review expected to be undertaken by late 2027.

Annual leave and long service leave liabilities are classified as current liabilities in the Balance Sheet where there are no unconditional rights to defer the settlement of the liability for at least 12 months. Conditional long service leave liabilities are classified as non-current because the agency has an unconditional right to defer the settlement of the liability until the employee has completed the requisite years of service.

Superannuation Liability

The employer superannuation benefits payable to Commission employees, who are members of the defined benefit CSS or PSS Schemes, are recognised in the financial statements of the Superannuation Provision Account.

	2026 \$'000	2025 \$'000
Current Employee Benefits		
Annual Leave	316	237
Long Service Leave	382	313
Accrued Salaries	219	176
Total Current Employee Benefits	916	726
Non-Current Employee Benefits		
Long Service Leave	67	61
Total Non-Current Employee Benefits	67	61
Total Employee Benefits	983	787
Estimated Amount Payable within 12 Months		
Annual Leave	278	200
Long Service Leave	48	47
Accrued Salaries	219	176
Total Employee Benefits Payable within 12 Months	545	423
Estimated Amount Payable after 12 Months		
Annual Leave	38	37
Long Service Leave	400	327
Total Employee Benefits Payable after 12 Months	438	364
Total Employee Benefits	983	787

The \$0.196 million increase in employee benefits was driven by higher staffing levels at 30 June 2026, with 29.35 FTE compared to 25.35 FTE at 30 June 2025, together with staff taking less paid leave during 2025-26.

Other Notes

Note 11. Financial Instruments

Material Accounting Policies Relating to Financial Instruments

Details of the material accounting policies and methods adopted, including the criteria for recognition, the basis of measurement, and the basis on which income and expenses are recognised, with respect to each class of financial asset and financial liability are disclosed in the note to which they relate.

Credit Risk

Credit risk is the risk that one party to a financial instrument will fail to discharge an obligation and cause the other party to incur a financial loss.

Credit risk is managed by the Commission for cash at bank by holding bank balances with the ACT Government's appointed transactional bank, Westpac Banking Corporation (Westpac). S&P Global Ratings has assigned a AA- issuer credit rating to Westpac. A 'AA-' credit rating means the obligor has a 'very strong to strong capacity to meet its financial commitments'.

There have been no significant changes in credit risk exposure since last reporting period.

Liquidity Risk

Liquidity risk is the risk that the Commission will encounter difficulties in meeting obligations associated with financial liabilities that are settled by delivering cash or another financial asset. To limit its exposure to liquidity risk, the Commission ensures that it does not have a large portion of its financial liabilities maturing in any one reporting period and that, at any particular point in time, it has a sufficient amount of current financial assets to meet its current financial liabilities. Also, the Commission is able to draw down additional Controlled Recurrent Payments in the next reporting period to cover its financial liabilities when they fall due. This ensures the Commission has enough liquidity to meet its emerging financial liabilities.

The Commission's exposure to liquidity risk and the management of this risk has not changed since the previous reporting period.

Carrying Amount of Each Financial Liability

The carrying amount of financial assets and financial liabilities approximate their fair value.

Note 12. Commitments

Description and Material Accounting Policies Relating to Commitments

Commitments are a firm intention, but not a present obligation, at the end of the reporting period to incur future expenditure. As such, commitments do not constitute a liability. Commitments usually arise from contracts but can arise from other things like placing an order.

Commitments are measured at their nominal value, inclusive of GST.

Other Commitments	2026 \$'000	2025 \$'000
Within one year	1,348	368
Later than one year but not later than five years	2,510	253
Later than 5 years	1	1
Total Other Commitments	3,859	622

Other commitments contracted at reporting date that have not been recognised as liabilities, are payable as above. Other commitments includes contractual arrangements for goods and services, and short-term or low value leased assets where the Commission has applied the AASB 16 exemption from recognising the related lease liabilities in the balance sheet.

The \$3.237 million increase in Total Other Commitments mainly reflects the Commission entering into a contract for outsourced ICT services in 2025–26.

Note 13. Related Party Disclosures

Description and Material Accounting Policies Relating to Related Party Disclosures

A related party is a person that controls or has significant influence over the reporting entity, or is a member of the Key Management Personnel (KMP) of the reporting entity or its parent entity, and includes their close family members and entities in which the KMP and/or their close family members individually or jointly have controlling interests.

KMP are those persons having authority and responsibility for planning, directing and controlling the activities of the Commission, directly or indirectly.

KMP of the Commission are the Commissioner and Chief Executive Officer.

(A) Key Management Personnel

A.1 Compensation of Key Management Personnel

All of the KMP of the Commission are employed and compensated by the Commission.

Compensation by the Commission to KMP is set out below.

	2026 \$'000	2025 \$'000
Short-term employee benefits	934	946
Post employment benefits	113	107
Other long-term benefits	9	9
Total Compensation by the Commission to KMP	1,056	1,062

A.2 Transactions with Key Management Personnel

There were no transactions with KMP that were material to the financial statements of the Commission.

Note 14. Budgetary Reporting

Significant Accounting Judgements and Estimates

Significant judgements have been applied in determining what variances are considered 'major variances'. Variances are considered major if both of the following criteria are met:

- The line item is a significant line item: where either the line item actual amount accounts for more than 10% of the relevant associated category (Income, Expenses and Equity totals) or more than 10% of the sub-element (e.g. Current Liabilities and Receipts from Operating Activities totals) of the financial statements; and
- The variances (original budget to actual) are greater than plus (+) or minus (-) 10% and \$0.500 million of the budget for the financial statement line item.

Operating Statement Line Items

	Actual 2026 \$'000	Original Budget 2026 \$'000	Variance \$'000	Variance %
Controlled Recurrent Payments ^a	8,168	9,417	(1,249)	(13.3)
Employee Expenses ^b	5,221	5,883	(662)	(11.3)
Supplies and Services ^c	3,048	3,944	(896)	(22.7)

Variance Explanations

- Controlled Recurrent Payments – The \$1.249 million variance primarily reflects the Commission's decision not to draw down the full 2025-26 appropriation because existing cash reserves were sufficient to meet operating requirements. Of the amount not drawn down, \$0.940 million has been rolled forward to the 2026-27 budget (2024-25 rollover: \$0.678 million) under the budget protocols for Officers of the Legislative Assembly agreed between the Treasurer and the Speaker.
- Employee Expenses – The \$0.662 million variance primarily reflects rolled over funds (\$0.448 million) from 2024-25 that were allocated to the budget for this line item. The Commission's FTEs for 2025-26 were consistent with the published budget.
- Supplies and Services – The \$0.896 million variance reflects three main factors: the Commission did not transition to its new outsourced ICT services arrangement until June 2026, reducing annual support costs; expenditure on professional services decreased due to lower use of contractors, consultants and legal services; and \$0.230 million of rolled-over funds from 2024-25 was allocated to the budget for this line item.

Balance Sheet Line Items

	Actual 2026 \$'000	Original Budget 2026 \$'000	Variance \$'000	Variance %
Cash ^d	2,110	1,255	855	68.1

Variance Explanations

- d. Cash – The \$0.855 million variance mainly reflects funds drawn down by the Commission to cover accrued costs and costs associated with completing the ICT services outsourcing project.

Statement of Cash Flows Line Items

	Actual 2026 \$'000	Original Budget 2026 \$'000	Variance \$'000	Variance %
Controlled Recurrent Payments ^e	8,168	9,417	(1,249)	(13.3)
Employee Expenses ^f	5,024	5,879	(855)	(14.5)
Supplies and Services ^g	2,105	3,553	(1,448)	(40.8)

Variance Explanations

- e. Controlled Recurrent Payments – The \$1.249 million variance primarily reflects the Commission's decision not to draw down the full 2025-26 appropriation because existing cash reserves were sufficient to meet operating requirements. Of the amount not drawn down, \$0.940 million has been rolled forward to the 2026-27 budget (2024-25 rollover: \$0.678 million) under the budget protocols for Officers of the Legislative Assembly agreed between the Treasurer and the Speaker.
- f. Employee Expenses – The \$0.855 million variance primarily reflects rolled over funds (\$0.448 million) from 2024-25 that were allocated to the budget for this line item. The Commission's FTEs for 2025-26 were consistent with the published budget.
- g. Supplies and Services – The \$1.448 million variance reflects three main factors: the Commission did not transition to its new outsourced ICT services arrangement until June 2026, reducing annual support costs; expenditure on professional services decreased due to lower use of contractors, consultants and legal services; and \$0.230 million of rolled-over funds from 2024-25 was allocated to the budget for this line item.

Statement of Changes in Equity

Variance explanations for the Statement of Changes in Equity line items are covered in other financial statements.

Note 15. Contingent Liabilities and Contingent Assets

Material Accounting Policies Relating to Contingent Liabilities and Contingent Assets

Contingent liabilities and contingent assets are not recognised in the Balance Sheet due to the uncertainty regarding any possible amount or timing of any underlying claim or obligation. Instead they are disclosed and, if quantifiable, the best estimate is disclosed.

Legal Claims

As at 30 June 2026, the Commission was managing one legal claim. The Commission's liability if this claim is successful is limited to \$5,000 (2025: \$10,000) which represents the excess amount payable on this action, as the Commission is covered by insurance provided by the ACT Insurance Authority (ACTIA).

Government Contracts

In 2025-26, the Commission engaged several suppliers to provide goods and services. Engagements with a value of \$25,000 (including GST) or more are listed in Table 29.

Table 29. Contracts entered into by the Commission in 2025-26

Contract number	Type of contract	Supplier	Contract title	Contract amount
PIIN0010020	Contract	Spec Indigenous Pty Ltd	Office Cleaning Services	\$56,204.00
PIIN0002095	Contract	Centorrino Technologies	ACTIC Protected Network and IT Services	\$5,433,478.00
PIIN0011177	Contract	RSM Australia Pty Ltd	Internal Audit Services	\$240,000.00

PART **F**

Appendices

Appendix A: Proposed legislative amendments

Since the Commission's launch in 2019, several potential legislative amendments have been identified that would help to exercise the Commission's functions more effectively. These proposed amendments have been outlined in the appendices of the Commission's previous annual reports.

The ACT Government conducted a statutory review (the review) in 2023 of the *Integrity Commission Act 2018*, as required by section 303 of the Act. The Commission made a submission to this review which reflected, at that time, its thinking on proposed amendments to the Act.

The Commission's submission can be found on the Commission's website. To date, 18 of the Review's 66 recommendations have been implemented via the *Integrity Legislation Amendment Bill 2024*. The Commission understands that work is underway by policy makers to address other recommendations from this review.

Legislative Proposals in course

The Commission notes that work is underway for changes to the *Telecommunications (Interception and Access) Act 1979* (Cth) for the Commission to be declared an eligible authority and a criminal law-enforcement agency that would enable it to exercise the full suite of powers under that Act.

The Commission also notes that policy work is underway to introduce changes to partially abrogate claims for territory legal professional privilege in relation to documents summonsed by the Commission.

Outstanding policy and legislation issues

The following paragraphs highlight issues for consideration for legislative amendment. It is not a comprehensive list of all possible legislative amendments previously ventilated in prior Annual Reports and/or the review and is intended to highlight issues of significance from the Commission's perspective.

Amendment to allow questions of privilege to be decided by the Commissioner

This issue was extensively set out in the 2022 to 2023 report. The issue is a very important one for the Commission and the Territory government and, in this past year, there have been discussions and consultations about the issue with senior Territory government officials.

Division 3.6.2 of the Integrity Commission Act establishes a process for deciding claims of privilege. This requires the Commission to apply to the Supreme Court of the ACT to decide whether the privilege claim is made if the Commissioner presses the disclosure in issue. In courts, including local or magistrates courts, the presiding judicial officer rules on the objection and may examine the material if it is useful to do so. There does not appear to be any significant legal or policy reason why this should not also be the case for privilege claims made before the Commission. This is especially so when the Commissioner (as at present) is a retired Supreme Court judge. The Commissioner has the advantage of knowing the potential significance of the material objected to in the context of an ongoing investigation, which is even more significant where privilege requires it to be balanced with public interest in accordance with Division 3.10.1C of the *Evidence Act 2011* (ACT) (journalist privilege) or section 130 of that Act (public interest immunity). This amendment would also have the benefit of expediting the resolution of privilege claims and reducing costs.

The Commission maintains that it is imperative that Division 3.6.2 be amended. The only practical solution is to give the Commissioner the power to determine whether material before it is privileged (and therefore required to be excluded from the relevant investigation). This power is conferred on the commissioners of the NSW ICAC. The Commission notes that this approach is also an everyday feature in civil proceedings where the presiding judge must rule on privilege as well as decide the outcome of the case. This is also the position in criminal proceedings where a judge is presiding without a jury and so must determine the facts of the case and adjudicate on privilege claims. This procedure has been approved by all Australian Courts, up to the High Court of Australia, and forms part of the procedural law that governs the recognition of legal professional privilege by the law. The only reason provided for the present scheme is that it was thought that the Commissioner “has an interest” in abrogating the privilege and there being able to inspect the claimed privileged matter. This is a fundamental misunderstanding of the Commissioner’s position: he or she only has an interest in undertaking an investigation in accordance with the legal requirements that apply, including the right of a person to maintain their claim of legal professional privilege. It is an inherent feature of the Commissioner’s role that there is no personal interest whatever in the outcome of any investigation and to act on the basis that the obligation to investigate corrupt conduct nevertheless would or could lead to a biased decision on the question of privilege is a contradiction of that foundational understanding.

Amendments regarding witness expenses and legal assistance

A regulation pursuant to section 171 of the Integrity Commission Act concerning legal assistance

The Commission would like to see the introduction of a regulation pursuant to section 171 of the Act to provide for Territory-funded legal assistance for witnesses called to give oral evidence in an examination before the Commission.

The Commission understands that the Chief Minister, Treasury and Economic Development Directorate is already considering such a proposal, and it supports that work.

Amendment to section 171 of the Integrity Commission Act concerning legal costs associated with document production

Currently, the regulation-making power in section 171 of the Act is confined to legal costs associated with appearances to give evidence at the Commission. It does not apply to the legal costs associated with the production of documents or doing other things (for example, obtaining advice with respect to the scope of the notice or claims of privilege). The Commission suggests consideration should be given to extending assistance to the latter situations. Any assistance should be restricted to legal costs reasonably incurred by private individuals and entities, or to such other circumstances as the Territory sees fit.

Amendment to section 172 of the Integrity Commission Act concerning witness costs associated with requirements to produce documents

The regulation making power in section 172 of the Integrity Commission Act is currently confined to witness expenses associated with appearances to give evidence at the Commission. It does not apply to the costs associated with producing documents or doing other things. The Commission suggests consideration should be given to extending assistance to the latter situations. Any assistance should be restricted to legal costs reasonably incurred by private individuals and entities, or to such other circumstances as the Territory sees fit.

Amendments regarding access to employment records

Section 110(2)(c) of the Standards allows the Public Sector Standards Commissioner (PSSC) to 'access records about employment in the service'. The Commission assumes this means the PSSC has access to the Shared Services database for employment records.

Given that records about employment in the ACT public service are central to the work of the Commission – including, for example, identifying whether someone is or has been a public servant for the purpose of determining whether the Commission has jurisdiction in a particular case – it believes an amendment to the Act that confers equivalent access to employment records to that possessed by the PSSC should be made.

Resignations of CEO and Commissioner

Section 28(1) of the Act provides that the Commissioner must not be appointed for longer than 7 years. Under subsection (2), the appointment term must not end within 12 months before or after the end of the CEO's appointment.

Section 42 (1) The CEO must not be appointed for longer than 7 years. However, under subsection (2), the appointment term of the CEO must not end within 12 months before or after the end of the Commissioner's appointment.

Subsection 28(2) and subsection 42(2) are not only unwieldy and difficult to manage, they are also unenforceable and unfair constraints on employment and tenure of the persons holding the roles of Commissioner and CEO respectively. The Commission's view is that both subsections should be repealed.

The provision of evidence to referral agencies

Provision of Video Recordings of Evidence to Referral Agencies

Section 58 of the 2018 Act provides that if a person attends the Commission for an examination in accordance with an examination summons, the Commission must ensure that the person's attendance is video recorded. Under subsection (2), unless the Commission considers on reasonable grounds that doing so may prejudice an investigation, a person who is examined must be given a copy of the video recording of the person's evidence; and any transcript created of the person's evidence.

Under section 96, dealing with disclosure of information by Commission, the Commission may disclose any information that has been disclosed to, or obtained by, the Commission in the exercise of its functions under this Act to an information sharing entity if the Commission considers that (a) the information is relevant to the exercise of the functions of the information sharing entity; and (b) the disclosure of the information to the information sharing entity is appropriate. These referral agencies include law enforcement agencies, prosecutorial bodies, the Public Sector Standards Commissioner or the Legislative Assembly Commissioner for standards.

Subsection (2) of s 96 contains restrictions on the power of the Commission to provide video recordings of a person's evidence. There is no obvious reason for the constraints on the Commission's power to provide the evidence to these referral agencies when it can provide transcripts. The Commission maintains that it should be able to provide these agencies with video recordings along with transcripts. Not only might a video recording resolve ambiguities, it also adds to the appreciation of the evidence by allowing an assessment of demeanour. The assessment of a person's evidence includes not just what they say but how they say it. It is clear that the present prohibition on provision of the videorecording was based on an elementary misunderstanding of the forensic incidents of evidentiary admissibility and assessment.

Accordingly, if the Commission may share transcripts of evidence to these referral agencies, then it should, by parity of reasoning, also have the same power to provide the video recording of that evidence.

Provision of evidence to and its use by prosecutorial agencies

Where the Commission has referred an investigation report to a prosecutorial agency, there is an expectation that the prosecutorial agency will consider and, if appropriate according to that agency's prosecutorial protocols, commence a prosecution in respect of it which will focus on the person against whom corrupt or other serious adverse findings are made.

The Commission uses the power to refer matters to the ACT DPP sparingly and will only do so in the clearest and strongest cases. There are discussions between the Commission and the ACT DPP concerning the referral of Commission investigations and reports to the ACT DPP for prosecution.

The main issue concerns the disclosure of compulsorily obtained evidence. It is important to note that there are many statutory procedures that require persons to compulsorily provide information that is capable of incriminating them and rules governing its use have been developed by the courts to maintain the appropriate application of the privilege against self-incrimination in the administration of justice. The general rule is that statements made by an accused person which are not given voluntarily cannot be used against them in their trial. However, this rule does not prevent their use, in other circumstances – for example, in deciding whether they should be charged or where they are merely a witness – where their use is governed by the generally applicable rules of evidence. Nor does it preclude their use where, although not voluntarily provided, they are not adverse to the person, even though they are an accused. Furthermore, the duty of disclosure of a prosecutor of all material that might assist an accused either as evidence or disclosing possible lines of inquiry or for testing of evidence requires the disclosure to be made to the relevant party whether or not it would or might be admissible. Accordingly, there is no proper basis for an absolute prohibition on providing compulsorily obtained evidence. Indeed, to do so breaches fundamental requirements of the administration of justice.

There are limits on the use that a prosecuting agency may make of non-voluntary evidence (in addition to its not being admissible evidence against an accused who provided it) designed to maintain the integrity of the due administration of justice. These limits involve its not being disclosed to those actually conducting the prosecution.

The important point is that elaborate rules govern the use by prosecutorial agencies of incriminatory statements that are not voluntary and there is no need to apply a differing regime merely because the statements are made in the course of a compulsory examination by the Integrity Commission.

The Commission maintains that the Act should be amended so to make it clear that, where a matter is referred to a prosecuting agency to consider whether to prosecute a person for a criminal offence and, if so, what evidence is disclosable or admissible for that purpose, all relevant matter should be able to be made available, leaving it to the prosecuting agency to determine how the rules governing prosecutorial conduct apply. It follows that s 196 of the Integrity Commission Act must be completely recast.

Amendments regarding compulsory production of documents or things

Amendment to sections 91 and 148(1) (b) of the Integrity Commission Act to include material in a person's custody

The provisions of these sections of the Integrity Commission Act confine the Commission's powers to compel people to provide documents in their 'possession or control'. The usual phrasing in compulsory production consists of three parts: possession, custody or control. While these notions are related, 'custody' fastens on the actual physical holding of a document or thing, regardless of connected legal rights that are (or might be) implied.

It is entirely in keeping with the Commission's function to investigate alleged corrupt conduct in a way that, where appropriate, enables it to obtain relevant material that has, for example, been placed in someone else's custody (to obstruct the Commission or otherwise). For clarity and completeness, and to minimise the risk of unnecessary litigation, the provisions should be amended.

Introduction of a provision to allow for the possibility of a person other than a notice recipient to comply with the notice

Part 3.3 of the Integrity Commission Act concerning preliminary inquiries permits the Commission to give a notice requiring the production of documents and/or things to a person and require that person to attend the Commission and produce the documents and/or things. It also requires that the person seal any documents that are the subject of a claim of privilege. An examination summons issued under section 147(1)(b) of the Integrity Commission Act imposes similar obligations.

There may well be occasions where a recipient without a lawyer may wish to send a trusted colleague to attend the Commission on their behalf, especially where production is not contested. The Commission believes the Act should be amended to allow this. Any amendments would need to take careful account of the architecture and restrictions imposed by the confidentiality notice regime. However, this is a drafting technicality.

Amendments regarding statements of information

Amendment to enable statements of information to be required for investigations

Section 89 allows the Commission to request information from the head of a public sector entity that the Commission considers relevant to a preliminary inquiry. However, there is no equivalent provision available for investigations.

While it is true that, in an investigation, the Commission can obtain evidence by requiring an individual to attend an examination, obtaining it in this way can be cumbersome, inconvenient and expensive. This is especially the case where the required information is likely to be uncontroversial.

The Commission should be empowered, for the purposes of both preliminary inquiries and investigations, to require specified information to be provided in writing. There is no good reason for limiting this obligation to a head of service (who may be required to obtain the information from another official). The provision of written information also avoids the necessity of requiring relevant officials, such as the head of a service, to personally attend an examination when it is deemed unnecessary to the investigation for them to do so. The protections of privilege would still apply, as would immunity from the use of the information against the person in any prosecution. A confidentiality notice could also, for obvious reasons, be issued (see further below). This is an efficient and relatively inexpensive investigatory tool, especially for obtaining non-contentious information.

Amendment to permit voluntary and compelled statements to be subject to confidentiality requirements during preliminary inquiries

In some cases, it is useful for investigators to obtain information (for example, the location or identity of a person of interest) informally from a witness. In order not to prejudice the investigation it will most often be necessary to ensure confidentiality. As the Act currently stands, confidentiality notices can only be issued during a preliminary inquiry when the Commission gives a person a preliminary inquiry notice (which requires the production of documents or things).

The Commission believes it would safeguard the course of investigations if confidentiality notices could be given to everyone its investigators communicate with during preliminary inquiries, whether formally or informally. This would include, in relation to section 89 of the Integrity Commission Act, requests for statements. As with confidentiality notices issued currently, these would operate without prejudice to the recipient's ability to obtain legal advice or professional medical assistance. Amendments regarding arrest and search warrants

Amendments regarding arrest and search warrants

Amendment to section 160(6) of the Integrity Commission Act to extend the time within which an arrested person must be released

An amendment to section 160(5)(c) of the Act is sought to enable a person who is named in an arrest warrant to be brought before the Commission 'as soon as practicable', as opposed to 'immediately'. For example, this would allow for a person who is arrested after-hours to be brought to the Commission the next morning and not require the Commission to convene in the middle of the night.

A consequential amendment would also be appropriate to provide that a police officer complies with the requirement of section 160(5)(c) if the warrant has been executed on a business day and the person is brought before the Commission on that day during the normal business hours in which the Commission operates or – if the warrant has been executed on a weekend or public holiday – on the next business day during the normal business hours in which the Commission operates.

Amendment to section 159 of the Integrity Commission Act (Examination – warrant to arrest witness who fails to appear)

The Act should permit the Commission to issue or apply for a warrant to arrest a person whose evidence is desired, necessary and relevant to an investigation under the Act and where:

- it is probable that the person will not attend the Commission to give evidence unless compelled to do so, or
- the person is about to, or is preparing to, leave the Territory and their evidence will not be obtained by the Commission if the person departs.

An amendment to enable an investigator to apply to a magistrate for a warrant to search premises to authorise a search for items on a person in the premises

Section 122(1) of the Integrity Commission Act allows for an investigator to apply for a warrant to enter and search premises. By extending this power to allow for the issue of a warrant to search a person, investigators could also search for documents or other things (such as mobile telephones and USB flash drives) otherwise satisfying the search criteria that are in the physical possession of a person on the premises. This is a conventional provision in search warrants. It is unreasonable for a person to be able to avoid production of a device or other object or document because it happens to be secreted on their person. Of course, were the power of personal search provided, the Commission would be required to promulgate rules for conducting the search appropriately consistent with the rules applicable to police searches.

Amendments regarding secrecy provisions

Removal of ability to rely on secrecy requirement in section 95(1)(b)(ii) of the Integrity Commission Act

Section 95 of the Act enables a person who receives a preliminary inquiry notice to rely on a secrecy requirement under a law in force in the Territory to resist producing a document or thing. This provision, which has no reasonable policy basis, is not available to recipients of a summons to produce documents or things issued under section 147, and its inclusion in section 95 creates an unnecessary inconsistency in the Act and the Commission's powers. It hampers, without good reason, the Commission's ability to obtain relevant information for the purposes of deciding whether to dismiss, refer or investigate a corruption report, or investigate a matter of its own initiative. It cannot be justified, at least as far as public officials or public entities are concerned.

Amendment to section 297(4) of the Integrity Commission Act to narrow the circumstances in which the secrecy provisions can be overborne

Section 297 of the Act imposes a secrecy obligation on the Commissioner, the Commission's staff, the Inspector, the Inspector's staff and others exercising functions under the Act.

Unauthorised use or divulgence of protected information is a criminal offence. Section 297(3) specifies some exceptions, including in relation to court proceedings (see section 297(3)(a)(iii)). Section 297(4) provides that a person does not need to disclose the protected information to a court 'unless it is necessary to do so for this Act or another law in force in the Territory'. This requirement creates uncertainty and has the potential to jeopardise Commission investigations. It could also create an unacceptable risk of inappropriately compromising the privacy, security or welfare of a person. The Commission considers that 'except for the purposes of a prosecution or disciplinary proceedings instituted because of an investigation conducted by the Commission in the exercise of its functions' is more appropriate wording. This is language used in section 111(3) of the ICAC Act.

Inclusion of 'restricted information' as defined in section 76 of the Integrity Commission Act and in describing 'protected information' in section 297(5)

Currently, the Commissioner, the Commission's staff, the Inspector and the Inspector's staff are prohibited from using or divulging protected information that does not include the categories of restricted information set out in section 76 of the Act.

There is no prohibition on these individuals revealing restricted information that, if it is not 'information about a person that is disclosed to or obtained by' them under the Act, is not considered protected information for the offence provision in section 297. This appears to be an oversight requiring correction.

The insertion of a general exception to secrecy provisions

The Integrity Commission Act permits the disclosure of confidential or secret information in specific circumstances. However, the highly variable nature of investigations and the information obtained does not always sit clearly within those specified exceptions.

The Commission considers it necessary to have a broad, general exception to its secrecy obligations to permit the disclosure of information in appropriate circumstances as the need arises. It proposes that this general exception be available at the direction of the Commissioner or Inspector, if the Commissioner or Inspector certifies that it is necessary to do so in the public interest, or similar circumstances.

The Commission believes this provision is necessary to enable it to carry out its core functions. For example, it could be used to provide necessary information to other agencies for the purposes of obtaining relevant evidentiary material from them. Commonwealth or non-ACT agencies that are not compellable by the Commission may be willing to provide the Commission with documents or information if the Commission can show an appropriate reason (which it may not be able to do currently due to secrecy provisions). This appears to impose an unnecessary restraint on the Commission's interactions with other responsible bodies.

Requiring provision of a section 108 report to the Commission

Section 108(2) of the Integrity Commission Act empowers the Commission to request a written report from a 'referral entity', following referral of a corruption report under section 107. The provision appears to operate without a corresponding obligation on individuals and entities to provide such a report to the Commission, although that may be implicit.

The obligation to provide a report (including one that addresses the matters in section 108(2)(a)–(b)) should be explicit. A provision to enable the Commissioner to comment publicly on such reports should also be included. Section 54 of the ICAC Act, and sections 66 and 67 of the *Law Enforcement Integrity Commissioner Act 2006* (Cth), provide examples of these requirements in related jurisdictions.

Alternatively, the Commission could rely on the power to issue a special report to publicly comment on an entity's failure to report back to the Commission. However, the rigorous protocol within the legislation regarding the issue of draft reports for comment could make this a cumbersome way of addressing the issue – especially if there are many instances of non-compliance with section 108 across the ACT public sector.

Amendments to facilitate and protect whistleblower disclosures

Clarifying non-applicable of penalties for voluntary disclosure

Section 288 of the Integrity Commission Act and section 35 of the *Public Interest Disclosure Act 2012* (PID Act) provide that if a person makes a corruption complaint or a public interest disclosure (PID) to the Commission, the making of the complaint or PID is not a breach of certain rules or codes. In the case of a PID about a member of the Legislative Assembly, it is not a contempt of the assembly. The sections also provide that a person making a report will not incur a civil or criminal liability simply because they have made the report or disclosure.

To give greater comfort to those contemplating making a report to the Commission, these provisions should be amended to make it explicit that a person or entity who voluntarily discloses information to the Commission to make a complaint or during an investigation will not be subject to penalty from the fact of making the complaint. This should include disclosures that would otherwise amount to a breach of section 9(2)(d) of the PSM Act and section 153(1) of the *Crimes Act 1900* (Cth).

Amendments to the *Public Interest Disclosure Act 2012*

Amendment to Section 15 – introduction of timeframe for compliance

Section 27 allows a whistleblower to pass their disclosure or report to a Member of the Legislative Assembly (MLA) and retain the PID Act protections in instances where three months have passed and they have not been notified of the Commission's assessment.

However, there is nothing in the PID Act that imposes a time limit on the disclosure officer or the other people to whom a disclosure can be made (under section 15) to forward the disclosure to the Commission or disclosure officer. It appears that even if there were a significant delay, of three months or more, the whistleblower would still be entitled to rely on section 27 (regardless of whether the report would otherwise meet the criteria for a PID).

The Commission maintains that a time frame should be introduced for a disclosure officer or other person to whom a disclosure can be made to forward the disclosures to the appropriate person. At the very least, this time frame should apply to the individuals captured by section 15 of the PID Act who are not disclosure officers – of which Ministers are one category. This is in circumstances where such individuals must forward reports to a disclosure officer (section 15(2)).

Amendment to section 27A(1)(b) – clarification of conjunctive requirements

This paragraph requires a small amendment, by way of the insertion of the word 'and' after subparagraphs (i) and (ii), to make it clear that section 27A(1)(b) is a tripartite requirement, and not a series of three alternatives.

Amendment to section 33(2)(a) – substitution of 'for' by 'of'

Section 33(2)(a) states that there are 'clear obligations on public sector entities and their public officials to take action to protect disclosers for public interest disclosures'. The word 'for' is clearly mistaken and should be replaced by 'of' so that the provision refers to 'disclosers of public interest disclosures'.

Amendment to section 44 – clarification that provision does not apply to MLAs and journalists

Section 44 is an offence provision that concerns the improper use or divulgence of 'protected information'. Section 44(6) lists the categories of people the offence provision applies to. It does not appear as though the section applies to MLAs or journalists, as they do not fall into any of the specified categories of 'persons to whom this section applies', apart from one exception.

The only potentially relevant category is in (b), being 'anyone ... who has exercised a function under this Act'. Except when a minister receives a report under section 15, neither MLAs nor journalists have any functions to exercise under the Act. Therefore, the exception to the prohibition on information disclosure does not appear to apply to them.

This conclusion seems inconsistent with the legislative intention and policy position of allowing disclosures to MLAs and journalists. The Commission recommends that the application of section 44 with respect to MLAs and journalists is clarified.

Appendix B: Statistical data

The following tables include information the Commission is required to report under the Integrity Commission Act and the Public Interest Disclosure Act that has not been reported elsewhere in this report.

Table 30 shows the mechanism under which each corruption report was made, the decision details, the number of working days taken to assess the report, and how the Commission categorised the report upon receipt.

Table 30. Assessment decisions made in 2025-26

Includes outcomes of preliminary inquiries

Includes own initiative matters

Based on date of section 70 decision

Reference number	Reporting mechanism	Nature of allegations	Decision	Grounds to dismiss	Workdays for a decision under s 70
01/2022-23	s 57	Conflict of interest	s 100		582
02/2024-25	s 57	Conflict of interest	s 71(2) + s 71(4)	s 71 (3)(k)	296
03/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 107		290
04/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	296
05/2024-25	s 62	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(i)	286
06/2024-25	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2)	s 71 (3)(k)	229
07/2024-25	s 62	Conduct of a public official in a way that is not honest or impartial	s 100		252
08/2024-25	s 62	Conduct of a public official in a way that is not honest or impartial	s 100		251
09/2024-25	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2) + s 71(4)	s 71 (3)(k)	264
10/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	201
11/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	262

Reference number	Reporting mechanism	Nature of allegations	Decision	Grounds to dismiss	Workdays for a decision under s 70
12/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	249
13/2024-25	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2)	s 71 (3)(i)	212
14/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	245
15/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	269
16/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	256
17/2024-25	s 57	Dishonestly obtaining a benefit	s 71(2)	s 71 (3)(k)	198
18/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	227
19/2024-25	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2)	s 71 (3)(k)	158
20/2024-25	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2)	s 71 (3)(k)	76
21/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	73
22/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	62
23/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	61
24/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 100		176
25/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	47
26/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	32

Reference number	Reporting mechanism	Nature of allegations	Decision	Grounds to dismiss	Workdays for a decision under s 70
27/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	100
28/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	36
29/2024-25	s 57	Other/out of jurisdiction	s 71(2)	s 71 (3)(k)	47
30/2024-25	s 59	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	232
31/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	40
32/2024-25	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(b)	63
33/2024-25	s 57	Misconduct – bullying/harassment	s 71(2)	s 71 (3)(k)	20
34/2024-25	s 57	Misconduct – bullying/harassment	s 71(2)	s 71 (3)(k)	36
35/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	80
36/2025-26	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2)	s 71 (3)(k)	25
37/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	62
38/2025-26	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2)	s 71 (3)(k)	18
39/2025-26	s 62	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(c)	206
40/2025-26	s 57	Conflict of interest	s 71(2) + s 71(4)	s 71 (3)(k)	234
41/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	84
42/2025-26	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2)	s 71 (3)(k)	35
43/2025-26	s 62	Fraud	s 107		194

Reference number	Reporting mechanism	Nature of allegations	Decision	Grounds to dismiss	Workdays for a decision under s 70
44/2025-26	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2)	s 71 (3)(k)	157
45/2025-26	s 57	Workplace management issues	s 71(2) + s 71(4)	s 71 (3)(k)	73
46/2025-26	s 62	Maladministration Workplace management issues	s 71(2) + s 71(4)	s 71 (3)(k)	32
47/2025-26	s 63	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	175
48/2025-26	s 57	Workplace management issues	s 71(2) + s 71(4)	s 71 (3)(k)	22
49/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	36
50/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	74
51/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	81
52/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	63
53/2025-26	s 57	Workplace management issues	s 71(2)	s 71 (3)(k)	19
54/2025-26	s 62	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	182
55/2025-26	s 57	Abuse of official power or authority	s 71(2) + s 71(4)	s 71 (3)(k)	202
56/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	177
57/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	67
58/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	69
59/2025-26	s 62	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	129

Reference number	Reporting mechanism	Nature of allegations	Decision	Grounds to dismiss	Workdays for a decision under s 70
60/2025-26	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2)	s 71 (3)(k)	169
61/2025-26	Own initiative	Conduct of a public official in a way that is not honest or impartial	s 101		37
62/2025-26	s 57	Conflict of interest	s 71(2) + s 71(4)	s 71 (3)(k)	108
63/2025-26	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2)	s 71 (3)(k)	30
64/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	79
65/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	36
66/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	83
67/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(b)	142
68/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	16
69/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	103
70/2025-26	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2) + s 71(4)	s 71 (3)(b)	88
71/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	15
72/2025-26	s 57	Conflict of interest	s 71(2)	s 71 (3)(k)	40
73/2025-26	s 57	Dissatisfaction with gov't services/decisions of a public official	s 71(2)	s 71 (3)(k)	100
74/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	110
75/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	95

Reference number	Reporting mechanism	Nature of allegations	Decision	Grounds to dismiss	Workdays for a decision under s 70
76/2025-26	s 57	Unlawful activity by a public official	s 71(2)	s 71 (3)(k)	68
77/2025-26	s 57	Unlawful activity by a public official	s 71(2)	s 71 (3)(k)	67
78/2025-26	s 57	Workplace management issues	s 71(2)	s 71 (3)(k)	72
79/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	27
80/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	76
81/2025-26	s 57	Disclosable conduct	s 71(2)	s 71 (3)(g)	98
82/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(i)	53
83/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(b)	92
84/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(d)	52
85/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(d)	52
86/2025-26	s 57	Misconduct – other code of conduct issues	s 71(2) + s 71(4)	s 71 (3)(k)	29
87/2025-26	s 62	Conduct of a public official in a way that is not honest or impartial	s 100		62
88/2025-26	s 57	Dishonestly obtaining a benefit	s 71(2) + s 71(4)	s 71 (3)(k)	36
89/2025-26	s 57	Workplace management issues	s 71(2) + s 71(4)	s 71 (3)(b)	46
90/2025-26	s 57	Misconduct – other code of conduct issues	s 71(2)	s 71 (3)(b)	29
91/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	63
92/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2)	s 71 (3)(k)	38
93/2025-26	s 57	Conduct of a public official in a way that is not honest or impartial	s 71(2) + s 71(4)	s 71 (3)(k)	40

Table 31 shows all of the reports received in the reporting period and the time taken for decision.

Table 31. Reports received in 2025-26, description and time taken to deal with each

Reference number	Reporting mechanism	Description	Workdays for a decision
2025-26/01	s 57	Conduct of a public official in a way that is not honest or impartial	80
2025-26/02	s 57	Conduct of a public official in a way that is not honest or impartial	62
2025-26/03	s 57	Abuse of official power or authority	Assessment in progress
2025-26/04	s 57	Dissatisfaction with gov't services/decisions of a public official	25
2025-26/05	s 57	Dissatisfaction with gov't services/decisions of a public official	18
2025-26/06	s 62	Conduct of a public official in a way that is not honest or impartial	206
2025-26/07	s 57	Conflict of interest	234
2025-26/08	s 57	Conduct of a public official in a way that is not honest or impartial	84
2025-26/09	s 62	Fraud	194
2025-26/10	s 57	Dissatisfaction with gov't services/decisions of a public official	35
2025-26/11	s 57	Dissatisfaction with gov't services/decisions of a public official	157
2025-26/12	s 57	Workplace management issues	73
2025-26/13	s 62	Workplace management issues	32
2025-26/14	s 63	Conduct of a public official in a way that is not honest or impartial	175
2025-26/15	s 57	Conduct of a public official in a way that is not honest or impartial	36
2025-26/16	s 57	Conduct of a public official in a way that is not honest or impartial	74
2025-26/17	s 57	Workplace management issues	22
2025-26/18	s 57	Conduct of a public official in a way that is not honest or impartial	81
2025-26/19	s 57	Conduct of a public official in a way that is not honest or impartial	63
2025-26/20	s 57	Workplace management issues	19
2025-26/21	s 62	Conduct of a public official in a way that is not honest or impartial	182
2025-26/22	s 57	Abuse of official power or authority	202
2025-26/23	s 57	Conduct of a public official in a way that is not honest or impartial	177

Reference number	Reporting mechanism	Description	Workdays for a decision
2025-26/24	s 57	Conduct of a public official in a way that is not honest or impartial	67
2025-26/25	s 57	Conduct of a public official in a way that is not honest or impartial	69
2025-26/26	s 62	Conduct of a public official in a way that is not honest or impartial	129
2025-26/27	s 57	Dissatisfaction with gov't services/decisions of a public official	169
2025-26/28	s 57	Conflict of interest	108
2025-26/29	s 57	Dissatisfaction with gov't services/decisions of a public official	30
2025-26/30	s 57	Conduct of a public official in a way that is not honest or impartial	79
2025-26/31	s 57	Conduct of a public official in a way that is not honest or impartial	36
2025-26/32	s 57	Conduct of a public official in a way that is not honest or impartial	83
2025-26/33	s 57	Conduct of a public official in a way that is not honest or impartial	142
2025-26/34	s 57	Conduct of a public official in a way that is not honest or impartial	103
2025-26/35	s 57	Conduct of a public official in a way that is not honest or impartial	16
2025-26/36	s 57	Dissatisfaction with gov't services/decisions of a public official	88
2025-26/37	s 57	Conduct of a public official in a way that is not honest or impartial	Assessment in progress
2025-26/38	s 57	Conduct of a public official in a way that is not honest or impartial	Assessment in progress
2025-26/39	s 62	Conduct of a public official in a way that is not honest or impartial	Assessment in progress
2025-26/40	s 57	Conduct of a public official in a way that is not honest or impartial	Assessment in progress
2025-26/41	s 57	Conduct of a public official in a way that is not honest or impartial	Assessment in progress
2025-26/42	s 57	Conduct of a public official in a way that is not honest or impartial	Assessment in progress
2025-26/43	s 57	Conduct of a public official in a way that is not honest or impartial	Assessment in progress
2025-26/44	s 57	Conduct of a public official in a way that is not honest or impartial	Assessment in progress
2025-26/45	s 57	Conduct of a public official in a way that is not honest or impartial	Assessment in progress

Reference number	Reporting mechanism	Description	Workdays for a decision
2025-26/46	s 62	Conduct of a public official in a way that is not honest or impartial	Assessment in progress
2025-26/47	s 57	Conduct of a public official in a way that is not honest or impartial	Assessment in progress
2025-26/48	s 57	Conduct of a public official in a way that is not honest or impartial	15
2025-26/49	s 57	Conflict of interest	40
2025-26/50	s 57	Dissatisfaction with gov't services/ decisions of a public official	100
2025-26/51	s 57	Conduct of a public official in a way that is not honest or impartial	110
2025-26/52	s 57	Conflict of interest	Assessment in progress
2025-26/53	s 62	Conflict of interest	Assessment in progress
2025-26/54	s 57	Conduct of a public official in a way that is not honest or impartial	95
2025-26/55	s 57	Unlawful activity by a public official	68
2025-26/56	s 57	Unlawful activity by a public official	67
2025-26/57	s 57	Conflict of interest	106
2025-26/58	s 57	Workplace management issues	72
2025-26/59	s 57	Conduct of a public official in a way that is not honest or impartial	27
2025-26/60	s 57	Conduct of a public official in a way that is not honest or impartial	76
2025-26/61	s 57	Disclosable conduct	98
2025-26/62	s 57	Conduct of a public official in a way that is not honest or impartial	92
2025-26/63	s 57	Conduct of a public official in a way that is not honest or impartial	53
2025-26/64	s 57	Dissatisfaction with gov't services/ decisions of a public official	Assessment in progress
2025-26/65	s 57	Conduct of a public official in a way that is not honest or impartial	52
2025-26/66	s 62	Inappropriate use of or access to information	Assessment in progress
2025-26/67	s 57	Maladministration	Assessment in progress
2025-26/68	s 57	Maladministration	Assessment in progress
2025-26/69	s 57	Misconduct – other code of conduct issues	29

Reference number	Reporting mechanism	Description	Workdays for a decision
2025-26/70	s 57	Conduct of a public official in a way that is not honest or impartial	52
2025-26/71	s 57	Misconduct	Assessment in progress
2025-26/72	s 57	Dishonestly obtaining a benefit	36
2025-26/73	s 57	Workplace management issues	46
2025-26/74	s 62	Conduct of a public official in a way that is not honest or impartial	62
2025-26/75	s 57	Misconduct – other code of conduct issues	29
2025-26/76	s 57	Conduct of a public official in a way that is not honest or impartial	63
2025-26/77	s 57	Conduct of a public official in a way that is not honest or impartial	38
2025-26/78	s 57	Conduct of a public official in a way that is not honest or impartial	40

Table 32. Description of reporting requirements under the *Freedom of Information Act 2016*

Reporting requirement	Number
Decisions to publish open access information under section 24(1) (section 96(3)(a)(i))	0
Decisions not to publish open access information under section 24(1) (section 96(3)(a)(ii))	4
Decisions under section 24(2)(a) not to publish a description of open access information not made available (section 96(3)(a)(iii))	0
Number of the above access applications that were decided within s 40 timeframes	4
Number of access applications that were decided outside of s 40 timeframes but within extended timeframes agreed to with the applicant	0
Number of access applications that were decided outside of s 40 timeframes but within extended timeframes agreed to with the Ombudsman	0
Number of access applications not decided within the timeframes required under the FOI Act – that is, the number of deemed decisions	0
Number of access applications where the decision refused access to all of the information sought s 35(1)(c)	4
Number of access applications where the decision gave access to some of the information sought s 35(1)(c) and s 50	0
Number of access applications where the decision gave access to all of the information sought s 35(1)(a)	0
Requests made to amend personal information under section 59 (section 96(3)(a)(x))	0
Number of applications made to the Ombudsman under section 74 and particulars of the results of the applications (section 96(3)(b))	N/A
Number of applications made to the ACT Civil and Administrative Tribunal under section 84 and particulars of the results of the applications (section 96(3)(c))	0
Of the access applications finalised in 2025–2026, the number that were finalised in;	
within 30 working days	4
within 45 working days	0
within 60 working days	0
over 60 working days	0
Number of decisions that the information is not held under s(35)(1)(b)	1
Total charges and application fees collected from access applications (section 96(3)(f))	\$0

Table 33. Assessments reporting requirements under the *Integrity Commission Act 2018* and the *Public Interest Disclosure Act 2012*

	2025-26
Number of corruption complaints referred to the Commission under section 59 of the Integrity Commission Act	0
A description of each corruption complaint made under section 59 of the Integrity Commission Act	N/A
Number of corruption complaints withdrawn under section 60 of the Integrity Commission Act	0
Referrals to referral entities withdrawn under section 109 of the Integrity Commission Act	0
Referrals to the judicial council or a judicial commission under section 110 of the Integrity Commission Act	0
Referrals to prosecutorial bodies under section 111 of the Integrity Commission Act	1
Number of disclosures under the Public Interest Disclosure Act taken to be a corruption complaint under section 59A of the Integrity Commission Act	0
A description of each disclosure under the Public Interest Disclosure Act taken to be a corruption complaint under section 59A of the Integrity Commission Act	N/A
Number of investigations ended under section 20 of the Public Interest Disclosure Act	2
Grounds mentioned in section 20(2) for ending an investigation under the Public Interest Disclosure Act	ACT Audit Office (s 20(2)(d)(iii)) and Integrity Commissioner (s 20(2)(d)(iii))
Number of referrals under section 21 of the Public Interest Disclosure Act	2
Information about any action taken in accordance with section 24 of the Public Interest Disclosure Act	0
Number of reviews under section 29 of the Public Interest Disclosure Act	1
Number of reports under section 30 of the Public Interest Disclosure Act	0
Number of prosecutions under section 40 of the Public Interest Disclosure Act	0
Information about education and training programs about disclosable conduct and public interest disclosures undertaken or coordinated by the Integrity Commissioner	Refer to Part C prevention and education

The Commission did not deliver any specific training programs about PIDs during the reporting period, instead discussing PIDs in standard training sessions on the Commission's work.

Table 34. Investigations reporting requirements under the *Integrity Commission Act 2018*

	2025-26
Own-initiative preliminary inquiries conducted under section 87 of the Integrity Commission Act	1
Own-initiative investigations conducted under section 101 of the Integrity Commission Act	1
Description of each matter investigated under section 101 of the Integrity Commission Act	Op Danu
Joint investigations conducted under section 104 of the Integrity Commission Act	0
Investigations discontinued under section 112(1) of the Integrity Commission Act	1
Number of reports given to another entity under section 112(2) of the Integrity Commission Act	0
Private recommendations made under section 179 of the Integrity Commission Act	0
Number of investigation reports presented to the Legislative Assembly under section 189 of the Integrity Commission Act	0
For each investigation completed during the year, the number of days between the day the investigation was completed and the day the investigation report was presented to the Legislative Assembly ¹²	0
Number of confidential investigation reports given to the relevant Legislative Assembly committee under section 192 of the Integrity Commission Act	0
For each confidential investigation completed during the year, the number of days between the day the investigation was completed and the day the confidential investigation report was presented to the relevant Legislative Assembly committee ¹³	0
Prosecutions and termination actions arising out of Commission investigations	0
Outcomes published under section 203 of the Integrity Commission Act	0
Number of reputational damage matters dealt with under section 204 of the Integrity Commission Act	0
Special reports presented to the Legislative Assembly under section 213 of the Integrity Commission Act	1
Number of confidential Special Reports given to the relevant Legislative Assembly committee under section 216 of the Integrity Commission Act	0
Legal advice directions made under section 193 of the Integrity Commission Act	5

12 The commission considers an investigation 'complete' when an investigation report is transmitted to the Legislative Assembly.

13 The commission considers an confidential report 'complete' when a confidential report is transmitted to the Legislative Assembly.

Table 35. Information and evidence-gathering reporting requirements under the *Integrity Commission Act 2018*

	2025-26
Search warrants issued under section 122 of the Integrity Commission Act	0
Private Examinations held under section 140 of the Integrity Commission Act	32
Public examinations held under section 143 of the Integrity Commission Act	0
Total days during the year spent conducting examinations	24
Suppression orders issued under section 154 of the Integrity Commission Act	0
Arrest warrants issued under section 159 of the Integrity Commission Act	0
Applications for contempt of the Commission made under section 167 of the Integrity Commission Act	0

Table 36. Information disclosures by the Commission under section 196 of the *Integrity Commission Act 2018*

	2025-26
ACT Auditor-General	1
ACT Corrective Services	13
ACT Government Solicitor	1
ACT Inspector of Custodial Services	2
Australian Federal Police/ACT Policing	4
City and Environment Directorate	4
Canberra Health Services	5
CIT Board Chair	1
Education Directorate	1
Environment, Planning and Sustainable Development Directorate	1
Health and Community Services Directorate	4
Human Rights Commission	1
Icon Water	1
Public Sector Standards Commissioner/Professional Standards Unit	9
South Australia Police	1



PART **G**

Compliance statement

The Commission has prepared this annual report in accordance with the *Annual Reports (Government Agencies) Act 2004* and the Annual Reports (Government Agencies) Directions 2026 (No 1). All mandatory reporting requirements under the Integrity Commission Act and Public Interest Disclosure Act have been addressed.

Aids to access

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Acronyms and abbreviations used in this report

Acronym	Meaning
AASB	Australian Accounting Standards Board
ACTPS	ACT Public Service
AGSVA	Australian Government Security Vetting Agency
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CIT	Canberra Institute of Technology
CMTEDD	Chief Minister, Treasury and Economic Development Directorate
CPC	Corporate, Prevention and Communication (team)
CRP	Controlled Recurrent Payments
DCBR	Digital Canberra
DPP	Director of Public Prosecutions
EAP	employee assistance program
FOI	freedom of information
FOI Act	<i>Freedom of Information Act 2016 (ACT)</i>
FTE	full-time equivalent
ICAC Act	<i>Independent Commission Against Corruption Act 1988 (NSW)</i>
ICT	information and communication technology
ISM	Information Security Manual
Integrity Commission Act	<i>Integrity Commission Act 2018</i>
IRAP	Infosec Registered Assessors Program
MLA	Member of the ACT Legislative Assembly
MOU	memorandum of understanding
NSW ICAC	NSW Independent Commission Against Corruption
PIA	Privacy Impact Statement
PID	Public Interest Disclosure
PSM Act	<i>Public Sector Management Act 1994</i>
PSPF	Protective Security Policy Framework
PSSC	ACT Public Sector Standards Commissioner
PSU	Professional Standards Unit
Public Interest Disclosure Act	<i>Public Interest Disclosure Act 2012</i>
SERBIR	Senior Executive Responsible for Business Integrity and Risk
SES	Senior Executive Service
SMG	Senior Management Group
TIA Act	<i>Telecommunications (Interception and Access) Act 1979 (Cth)</i>
WHS	work health and safety
WWLO	witness welfare liaison officer

Glossary

Some of the terms in this annual report have a particular meaning in the Integrity Commission Act. The list below provides a short description of each term and references its section number in the Integrity Commission Act.

Term	Meaning
Confidentiality notice	A notice by the Commission directing a person to not disclose restricted information. Confidentiality notices may be given where the disclosure of restricted information is likely to prejudice a Commission's preliminary inquiry or investigation, affect the safety or reputation of a person, or impede the fair trial of a person who has or may be charged with an offence. See Part 3.2 of the Integrity Commission Act.
Corruption complaint	A report to the Commission about possible corrupt conduct made by any person or entity that is not subject to the mandatory corruption notification provisions of the Integrity Commission Act. See section 57 of the Integrity Commission Act.
Mandatory corruption notification	A report to the Commission about conduct that a person, subject to the mandatory corruption notification requirements, suspects on reasonable grounds is serious or systemic corrupt conduct. See Division 3.1.2 of the Integrity Commission Act.
Preliminary inquiry	An inquiry carried out by the Commission to decide whether to dismiss, refer or investigate a corruption report. The Commission must not use certain coercive or covert information-gathering powers when carrying out a preliminary inquiry. See Part 3.3 of the Integrity Commission Act.
Referral (of corrupt conduct to the Commission)	A report to the Commission from a relevant entity that received a complaint from a person about possible corrupt conduct. See section 59 of the Integrity Commission Act.
Restricted information	Includes any information given to, or obtained by, the Commission while performing its functions or exercising its powers. See section 76 of the Integrity Commission Act.
Serious corrupt conduct	Corrupt conduct that is likely to threaten public confidence in the integrity of government or public administration. See section 10 of the Integrity Commission Act.
Systemic corrupt conduct	A pattern of corrupt conduct instances in one or more public sector entities. See section 11 of the Integrity Commission Act.

Annual reporting requirements

The following tables outline the Commission's reporting requirements under both the Integrity Commission Act and the Public Interest Disclosure Act, and reference where that information can be found in this report.

Table 37. Integrity Commission Act 2018 annual reporting requirements

Act	Section(s)	Requirement	Title
IC	218(1)(a)	No. of Integrity Commissioner conflicts of interest reported to the Speaker and Inspector	External Scrutiny and Oversight
IC	218(1)(b)	No. of corruption complaints made to the commission under section 57 (Anyone may make corruption complaint)	Corruption Reports
IC	218(1)(b)(i) and 218(1)(b)(ii)	A description of each corruption complaint made to the commission under section 57 (Anyone may make corruption complaint) and the time taken to deal with each complaint (in days)	Corruption Reports & Appendix B: Statistical Information
IC	218(1)(b)(iii)	The average time taken to deal with corruption complaints (in days) made to the commission under section 57 (Anyone may make corruption complaint)	How corruption complaints and mandatory corruption notifications were assessed under the Integrity Commission Act
IC	218(1)(c)	No. of corruption complaints referred to the commission under section 59 (Other entities may refer corruption complaints)	Appendix B: Statistical Information
IC	218(1)(c)	A description of each corruption complaint made to the commission under section 59 (Other entities may refer corruption complaints) and time taken to deal with each report (in days)	Appendix B: Statistical Information
IC	218(1)(d)	No. of disclosures under the <i>Public Interest Disclosure Act 2012</i> taken to be a corruption complaint under section 59A (Certain disclosures under <i>Public Interest Disclosure Act 2012</i> may be corruption complaints)	Appendix B: Statistical Information
IC	218(1)(d)	A description of each disclosure under the <i>Public Interest Disclosure Act 2012</i> taken to be a corruption complaint under section 59A (Certain disclosures under <i>Public Interest Disclosure Act 2012</i> may be corruption complaints) and the time taken to deal with each report (in days)	Appendix B: Statistical Information
IC	218(1)(e)	No. of corruption complaints withdrawn under section 60 (Withdrawal of corruption complaints)	Appendix B: Statistical Information
IC	218(1)(f)	No. of mandatory corruption notifications made by heads of public sector entities under section 61 (Meaning of mandatory corruption notification) Note: Includes notifications required under sections 62 and 63	Corruption Reports

Act	Section(s)	Requirement	Title
IC	218(1)(f)	A description of each mandatory corruption notification made by the head of a public sector entity under section 61 (Meaning of mandatory corruption notification) and time taken to deal with report (in days) Note: Includes notifications required under sections 62 and 63	Corruption Reports and Appendix B: Statistical Information
IC	218(1)(g)	No. of corruption reports dismissed under section 71 (When corruption reports must be dismissed)	Reports assessed in 2025-26 & How corruption complaints and mandatory corruption notifications were assessed under the Integrity Commission Act
IC	218(1)(g)(i)	For each corruption report dismissed under section 71, the grounds for the decision to dismiss (reference specific parts of section 71)	Appendix B: Statistical Information
IC	218(1)(g)(ii)	No. of corruption reports given to another entity under section 71 (4)	How corruption complaints and mandatory corruption notifications were assessed under the Integrity Commission Act
IC	218(1)(h)	No. of confidentiality notices issued under section 78 (Confidentiality notices for preliminary inquiries)	Legal processes including use of information and evidence-gathering powers
IC	218(1)(h)	No. of confidentiality notices issued under section 79 (Confidentiality notices for investigations)	Legal processes including use of information and evidence-gathering powers
IC	218(1)(i)(i)	No. of preliminary inquiries carried out under section 86 (Preliminary inquiries about corruption reports)	Investigations and preliminary inquiries
IC	218(1)(i)(ii)	No. of preliminary inquiries carried out under section 87 (Preliminary inquiries about own initiative matters)	Investigations and preliminary inquiries Statistical information
IC	218(1)(j)	No. of days (total) during the year spent conducting preliminary inquiries	Investigations and preliminary inquiries

Act	Section(s)	Requirement	Title
IC	218(1)(k)	No. of preliminary inquiry notices issued under section 90 (Power to issue preliminary inquiry notice)	Legal processes including use of information and evidence-gathering powers
IC	218(1)(l)	Extensions of time to comply with a preliminary enquiry notice given under section 94A (Preliminary inquiry notice – extension)	Investigations and preliminary inquiries
IC	218(1)(m)	No. of investigations conducted under section 100 (Commission may investigate corruption report)	Investigations and preliminary inquiries
IC	218(1)(m)(i)(A)	For each corruption report investigated, a description of the matter investigated	Investigations and preliminary inquiries
IC	218(1)(m)(i)(B)	For each corruption report investigated, the number of days between the day the commission received the corruption report and the day the commission decided to conduct the investigation	Investigations and preliminary inquiries
IC	218(1)(m)(ii)	No. of investigations commenced but not completed during the year No. of investigations commenced and completed during the year No. of investigations carried over from previous financial year which were not completed during the year No. of investigations carried over from previous financial year which were completed during the year	Investigations and preliminary inquiries
IC	218(1)(n)	No. of investigations conducted under section 101 (Commission may investigate on own initiative) including a description of each matter investigated	Investigations and preliminary inquiries Statistical information
IC	218(1)(o)	No. of joint investigations conducted under section 104 (Investigation may be conducted as joint investigation)	Investigations and preliminary inquiries Statistical information
IC	218(1)(p)(i)	No. of corruption reports referred to the inspector under section 105 (Commission must refer corruption reports about staff to inspector)	External Scrutiny and Oversight
IC	218(1)(p)(ii)	No. of corruption reports referred to a referral entity under section 107 (Commission may refer corruption reports to referral entity)	How corruption complaints and mandatory corruption notifications were assessed under the Integrity Commission Act
IC	218(1)(p)(ii)	No. of corruption reports withdrawn under section 109 (Referral to referral entity – withdrawal of referral)	Appendix B: Statistical Information

Act	Section(s)	Requirement	Title
IC	218(1)(p)(iii)	No. of corruption reports referred to the judicial council or a judicial commission under section 110 (Commission may refer reports to judicial council or judicial commission)	Appendix B: Statistical Information
IC	218(1)(p)(iv)	No. of corruption reports referred to a prosecutorial entity under section 111 (Commission may refer matters to prosecutorial body)	Appendix B: Statistical Information
IC	218(1)(q)	No. of investigations discontinued under section 112 (1) (Discontinuing an investigation)	Legal processes including use of information and evidence-gathering powers and Appendix B: Statistical Information
IC	218(1)(q)(i)	For each investigation discontinued under section 112 (1) (Discontinuing an investigation), the ground for the decision	Legal processes including use of information and evidence-gathering powers
IC	218(1)(q)(ii)	No. of reports given to another entity under section 112 (2)	Appendix B: Statistical Information
IC	218(1)(r)	No. of search warrants issued under section 122 (Warrants – generally)	Appendix B: Statistical Information
IC	218(1)(s)	No. of examinations held under section 140 (Power to hold examination)	Legal processes... Appendix B: Statistical information
IC	218(1)(s)(i)	No. of public examinations under section 143 (Examinations may be public or private)	Legal processes... Appendix B: Statistical information
IC	218(1)(s)(ii)	No. of days (total) during the year spent conducting examinations	Legal processes... Appendix B: Statistical information
IC	218(1)(t)	No. of examination summonses issued under section 147 (Power to issue examination summons)	Legal processes...
IC	218(1)(u)	No. of suppression orders issued under section 154 (Examination – commission may issue suppression order)	Appendix B: Statistical Information
IC	218(1)(v)	Extensions of time to comply with an examination summons given under section 156A (Examination summons – extension)	
IC	218(1)(w)	No. of arrest warrants issued under section 159 (Examination – warrant to arrest witness who fails to appear)	Appendix B: Statistical Information

Act	Section(s)	Requirement	Title
IC	218(1)(x)	No. of applications for contempt of the commission made under section 167 (Commission may apply to Supreme Court to deal with contempt)	Appendix B: Statistical Information
IC	218(1)(y)	No. of private recommendations made under section 179 (Commission may make private recommendation at any time)	Appendix B: Statistical Information
IC	218(1)(z)	No. of investigation reports presented to the Legislative Assembly under section 189 (Investigation report – presentation to Legislative Assembly)	Appendix B: Statistical Information
IC	218(1)(z)	For each investigation completed during the year – the number of days between the day the investigation was completed and the day the investigation report was presented to the Legislative Assembly	Appendix B: Statistical Information
IC	218(1)(za)	No. of confidential investigation reports given to the relevant Assembly committee under section 192 (Confidential investigation report)	Appendix B: Statistical Information
IC	218(1)(za)	For each (confidential) investigation completed during the year – the number of days between the day the investigation was completed and the day the confidential investigation report was given to the relevant Assembly committee	Appendix B: Statistical Information
IC	218(1)(zb)	No. of legal advice directions made under section 193 (Legal advice directions)	Appendix B: Statistical Information
IC	218(1)(zc)	No. of information sharing entities to whom the commission has disclosed information under section 196 (Disclosure of information by commission)	Appendix B: Statistical Information
IC	218(1)(zc)	A description of the general nature and extent of information disclosed to information sharing entities under section 196 (Disclosure of information by commission)	Appendix B: Statistical Information
IC	218(1)(zd)	No. of prosecutions and termination actions arising out of (commission) investigations	Appendix B: Statistical Information
IC	218(1)(zd) (i)	No. of outcomes published under section 203 (Outcome of prosecutions and termination action to be published)	Appendix B: Statistical Information
IC	218(1)(zd) (ii)	No. of reputational damage matters dealt with under section 204 (Reputational repair protocols)	Appendix B: Statistical Information
IC	218(1)(ze)	No. of special reports presented to the Legislative Assembly under section 213 (Special report – presentation to Legislative Assembly)	Legal processes... Appendix B: Statistical information
IC	218(1)(zf)	No. of confidential special reports given to the relevant Assembly committee under section 216 (Confidential special report)	Appendix B: Statistical Information
IC	218(1)(zg) (i)	No. of times the commission exercised functions under the <i>Crimes (Assumed Identities) Act 2009</i>	Legal processes...

Act	Section(s)	Requirement	Title
IC	218(1)(zg)(ii)	No. of times the commission exercised functions under the <i>Crimes (Controlled Operations) Act 2008</i>	Legal processes...
IC	218(1)(zg)(iii)	No. of times the commission exercised functions under the <i>Crimes (Protection of Witness Identity) Act 2011</i>	Legal processes...
IC	218(1)(zg)(iv)	No. of times the commission exercised functions under the <i>Crimes (Surveillance Devices) Act 2010</i>	Legal processes...
IC	218(2)(a)	A summary of each recommendation of change to territory laws, or for administrative action, that the commission considers should be made as a result of the exercise of its functions	Legal processes... and Appendix B: Statistical information
IC	218(2)(b)	A description of the commission's activities during the year in relation to its educating and advising functions	Corruption Prevention and Engagement

Table 38. Public Interest Disclosure Act 2012 annual reporting requirements

Act	Section(s)	Requirement	Title
PID	45(1)(a)	No. of disclosures of disclosable conduct given to the integrity commissioner under section 17	Corruption reports Public interest disclosures
PID	45(1)(b)	No. of disclosures of disclosable conduct taken to be public interest disclosures under section 17A (3)	Public interest disclosures
PID	45(1)(c)	No. of disclosures of disclosable conduct not taken to be public interest disclosures under section 17A (3)	Public interest disclosures
PID	45(1)(d)	For each disclosure of disclosable conduct not taken to be a public interest disclosure under section 17A (3), the grounds the integrity commissioner was not satisfied of in relation to the disclosure	Appendix B: Statistical Information
PID	45(1)(e)	No. of referrals under section 19 (Integrity commissioner—investigate or refer public interest disclosure)	Public interest disclosures
PID	45(1)(f)	No. of investigations under section 20	Public interest disclosures
PID	45(1)(f)(i)	For each investigating entity for a public interest disclosure – the number of investigations of public interest disclosures by the entity	Public interest disclosures
PID	45(1)(f)(ii)	For each public interest disclosure investigation undertaken by an investigating entity, whether or not (yes/no/not concluded) the public interest disclosure investigation was about disclosable conduct	Public interest disclosures
PID	45(1)(f)(iii)	No. of public interest disclosure investigations brought to an end under section 20	Public interest disclosures and Appendix B: Statistical Information

Act	Section(s)	Requirement	Title
PID	45(1)(f) (iv)	For each public interest disclosure investigation brought to an end under section 20, the ground mentioned in section 20 (2) for ending the investigation	Appendix B: Statistical Information
PID	45(1)(g)	No. of referrals under section 21 (Referral to chief police officer)	Appendix B: Statistical Information
PID	45(1)(h)	For each instance requiring action, information about any action taken by a public sector entity in accordance with section 24 (Public sector entity must take action)	Appendix B: Statistical Information
PID	45(1)(i)	No. of reviews under section 29 (Integrity commissioner may review decisions)	Appendix B: Statistical Information
PID	45(1)(j)	No. of reports under section 30 (Report by integrity commissioner)	Appendix B: Statistical Information
PID	45(1)(k)	No. of prosecutions under section 40 (Offence – taking detrimental action)	Appendix B: Statistical Information
PID	45(1)(l)	Information about education and training programs about disclosable conduct and public interest disclosures undertaken or coordinated by the integrity commissioner	Corruption Prevention and Engagement Appendix B: Statistical Information

