

A WHITE PAPER ON INTEGRITY, TRANSPARENCY AND DEMOCRACY

Restoring trust

Why Victorians have stopped believing in government and politics, and what we can do to restore trust, reduce corruption, be more transparent, remove vested interests and make conflicts of interest and abuse of power harder to hide.

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WESTERN VICTORIA · UPPER HOUSE
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EXECUTIVE SUMMARY

A REPUTATION NO LONGER SECURE

Australia's institutions were once regarded as comparatively resilient by international standards, but that reputation is no longer secure. Trust in government has eroded, with the 2026 Edelman Trust Barometer showing the gap in trust between high- and low-income Australians reached 19 points, the widest since 2021, even as the overall Australian trust index rose from 49 to 54, and that **73 per cent of Australians now display an “insular mindset”**, an unwillingness or hesitancy to trust people who differ from them in values, facts, problem-solving approaches or cultural background¹. **The report shows that only around one in five (22 per cent) of Australians believe the next generation will be better off than their own**².

Australia's own trust data shows a public fragmenting along income lines, retreating into insularity and, in its most concerning finding, increasingly willing, particularly among the young, to regard hostile activism as a legitimate response to a system they no longer believe is fair.

That is the mechanism by which democracies erode, not usually through a single dramatic event, but through an accumulation of decisions that could not be explained on the front page of tomorrow's newspaper, each individually defensible, collectively corrosive. The correction that should be available to Victoria is not more promises about integrity. It should be a system, built into law rather than left to administrative discretion, that makes the exercise of public power difficult to hide, easy to trace and costly to abuse. It should also include rebuilding our integrity institutions, legislating for transparency, tightening controls around the revolving door, bringing more mechanisms to bear to prevent vested interests and political capture, and helping to build back a civil society, and checks and balances that have been hollowed out.

1. Edelman (2026) 2026 Edelman Trust Barometer: Trust is in peril as society slides from grievance into insularity. [edelman.com](https://www.edelman.com); Australian Institute of Company Directors (AICD) (2026) Australia defies global trust trends. aicd.com.au

2. Australian Institute of Company Directors (AICD) (2026) Australia defies global trust trends. aicd.com.au

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19.5%

of Victorians think their state government does a good job fighting corruption, the lowest of five states

55

reforms to rebuild Victoria's integrity system

INTEGRITY IN NUMBERS

THE EVIDENCE AT A GLANCE

Every figure is sourced in the chapter that follows

Often we have rules, but **no fines, no penalties, no enforcer.**



Think their state government does a good job fighting corruption, 2025³

VICTORIA
19.5%

WA AND SA
33.2%

GAP **Lowest** of five states



Corruption Perceptions Index score, Australia (Transparency International)

2012
85

2025
76

GAP **-9 points**



Trust in institutions, high vs low income Australians, 2026⁴

HIGH INCOME
63%

LOW INCOME
44%

GAP **19 pts** widest since 2021



FOI decisions granting full access⁵

2015-16
68.4%

2024-25
58.5%

GAP **-9.9 pts** less open



FOI requests lodged in Victoria a year⁶

2016-17
36,219

2024-25
58,181

GAP **+61%** record demand



Funding for IBAC, the Ombudsman and VAGO, share of spending⁷

TA AUSTRALIA MINIMUM
0.15%

VICTORIA
0.12%

GAP **Below** every year since 2019



Registered lobbyists with a former political affiliation⁸

FEDERAL
39%

VICTORIA
54%

GAP **+15 pts** in Victoria



Contractor and consultant spending, Victorian public service⁹

2018-19
\$2.84b

2021-22
\$4.18b

GAP **+47%** vs staff +29%



Major projects: VAGO 2024 review¹⁰

PROJECTS
113

RISE
\$11.66b

GAP **8 of 10** didn't explain why



OECD political finance criteria met, regulation, 2024¹¹

OECD AVG
73%

AUSTRALIA
40%

GAP **-33 pts** widest OECD gap



Year 10 students at the civics proficient standard¹²

2019
38%

2024
28%

GAP **-10 pts** lowest on record



Our survey: rate politics free from vested interests poor / agree IBAC has enough power¹³

RATE POOR
98%

IBAC STRONG
8%

GAP **53** Western Victorians

3. Le Grand, C. (2025) 'Victoria's integrity agencies push for reform amid collapse in public confidence', The Age, 13 October 2025. [theage.com.au](https://www.theage.com.au)

4. Edelman (2026). 2026 Edelman Trust Barometer: Australia Report. Edelman. [edelman.com](https://www.edelman.com); Tom Robinson, quoted in Australian Institute of Company Directors (2026) Australia defies global trust trends. aicd.com.au

5. OVIC (2025) Annual Report 2024-25, p. 66. ovic.vic.gov.au; for 2015-16, OVIC (2019) The State of Freedom of Information in Victoria: Five Years in Review 2014-2019. ovic.vic.gov.au

6. Office of the Victorian Information Commissioner (OVIC) (2025) 2024-25 Annual Report. ovic.vic.gov.au; for 2016-17, OVIC (2019) The State of Freedom of Information in Victoria: Five Years in Review 2014-2019. ovic.vic.gov.au

7. IBAC, Victorian Ombudsman and VAGO (2026) Advancing budget transparency for Victoria's core integrity agencies, February 2026, Figure 1. ibac.vic.gov.au; Parliament of Victoria, Integrity and Oversight Committee (2026) Inquiry into the adequacy of the annual budget allocations of integrity agencies, May 2026, s12.2. parliament.vic.gov.au

8. Centre for Public Integrity, Victorian DPC Lobbying Reform Consultation Submission, 13 February 2025. publicintegrity.org.au

9. VAGO (2023) Contractors and Consultants in the Victorian Public Service: Spending, tabled 29 November 2023. audit.vic.gov.au

10. VAGO (2025) Major Projects Performance Reporting 2024, tabled 19 February 2025. audit.vic.gov.au; ABC News (2025) 'Auditor-General finds lack of transparency in reporting around major Victorian government projects', 19 February 2025. abc.net.au

11. OECD (2024c) Anti-Corruption and Integrity Outlook 2024: Country Notes: Australia. oecd.org

12. Australian Curriculum, Assessment and Reporting Authority (2025), reported in ABC News, 'Australian students record worst ever civics result with 72 per cent not understanding the basics of democracy', 18 February 2025. abc.net.au

13. Western Victoria Community Survey, June to October 2026, n = 53 (campaign survey; self-selected sample). See 'About the survey'.

01 TRUST AND INTEGRITY

RESTORING TRUST
From Australia to Victoria

Australians are splitting on trust, and the gap runs along income lines.

Democratic legitimacy rests on the basic transaction that citizens vote, comply with laws, pay taxes, accept election results and refrain from political violence because they believe the system that asks this of them is basically fair. The evidence below suggests this compact is under strain in Australia, and more so in Victoria.

Political scientist Robert Putnam's work on social capital describes institutional trust, reciprocity, civic networks and engagement as mutually reinforcing rather than running in one direction: trust makes cooperation easier, and cooperation in turn sustains trust, together underpinning voluntary compliance, civic participation, and the kind of cooperative behaviour that keeps a society governable without constant coercion¹⁴. When that reinforcing cycle breaks down, citizens become measurably more open toward disengagement and, at the margin, to anti-democratic and extra-legal appeals.

Australian survey data from the past three years are consistent with parts of this pattern. The 2025 Edelman Trust Barometer, surveying more than 33,000 respondents across 28 countries, placed Australia's Trust Index at 49, that is "distrust" territory, and among the least trusting nations surveyed alongside Japan, Germany, the United Kingdom and the United States¹⁵. Sixty-four per cent of Australians worried government leaders were lying to them; 66 per cent worried business leaders were; 68 per cent worried journalists were¹⁶.

By the 2026 Barometer, Australia's headline index had risen five points, from 49 to 54, moving from 'distrust' to 'neutral'. Beneath that improvement, the gap between high- and low-income Australians widened to 19 points, the largest since 2021 (63 per cent trust among high-income earners against 44 per cent among low-income earners). Edelman Australia's chief executive, Tom Robinson, has said the gap more than doubled in a single year, from nine points to 19¹⁷. **Seventy-three per cent of Australians now report an "insular mindset", an unwillingness to trust people whose values or information sources differ from their own**, paralleling the global finding that societies are moving from grievance toward active withdrawal into ideologically sealed communities¹⁸. There is also a sense of hopelessness for future generations, with only **22 per cent of Australians believing the next generation will be better off**¹⁹.

Edelman Trust Index, Australia

Headline trust rose in 2026. The gap between rich and poor doubled.

49

2025: "distrust"

54

2026: "neutral"

High income 63%
Low income 44%

Trust among high- and low-income earners, 2026. The gap grew from 9 points to 19 in a year.

73%

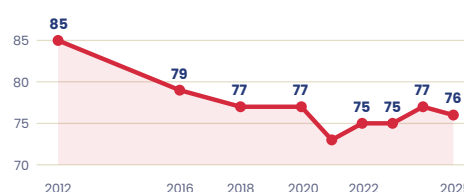
of Australians now show an "insular mindset"

22%

believe the next generation will be better off

Corruption Perceptions Index, Australia

0 = highly corrupt, 100 = very clean



Australia has lost nine points since 2012, after a record low of 73 in 2021. Source: Transparency International.

14. Putnam, R.D. (2000) *Bowling Alone: The Collapse and Revival of American Community*. New York: Simon and Schuster.

15. Edelman (2025) 2025 Edelman Trust Barometer: Australia. [edelman.com](https://www.edelman.com)

16. Edelman (2025) 2025 Edelman Trust Barometer: Australia. [edelman.com](https://www.edelman.com); B&T (2025) 'Australia slips further into distrust: Edelman report warns of rising grievance and hostile activism'. [bandt.com.au](https://www.bandt.com.au)

17. Edelman (2026). 2026 Edelman Trust Barometer: Australia Report. Edelman. [edelman.com](https://www.edelman.com); Tom Robinson, quoted in Australian Institute of Company Directors (2026) Australia defies global trust trends. [aicd.com.au](https://www.aicd.com.au)

18. Edelman Trust Institute. (2026). 2026 Edelman Trust Barometer: Australia Report. Edelman. [edelman.com](https://www.edelman.com); Institute of Community Directors Australia (2026) 'Australians are becoming more insular'. [communitydirectors.com.au](https://www.communitydirectors.com.au)

19. Edelman Trust Institute. (2026). 2026 Edelman Trust Barometer: Australia Report. Edelman. [edelman.com](https://www.edelman.com)

Victorians have less confidence than any other state that their government is fighting corruption.

The OECD's Survey on Drivers of Trust in Public Institutions found that only a quarter (25 per cent) of Australians believed government would refuse a corporation's demand harmful to society (below the OECD average of 30 per cent); 41 per cent expected public employees to refuse bribes (above the OECD average of 36 per cent); and persistent public concern that private interests steer public policy remained largely unchanged. The same survey found 46 per cent of Australians trust the federal government, above the OECD average of 39 per cent, and all of these results concern national institutions rather than Victoria²⁰.

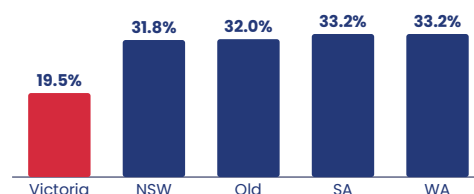
Victoria is an outlier

Within this national picture, Victoria stands out as an outlier. Professor A.J. Brown's study led by Griffith University with the University of Sydney, La Trobe University and Bond University, presented findings that only 19.5 per cent of Victorians believed their state government was doing a good job fighting corruption. This is compared to 31.8 per cent in New South Wales, 32 per cent in Queensland, and 33.2 per cent in both Western Australia and South Australia²¹.

Data from IBAC, the Independent Broad-based Anti-Corruption Commission, which is Victoria's anti-corruption and police oversight agency, are consistent with this finding. Its 2025 voluntary survey of Victorian MPs and councillors (27 MPs and 192 councillors responded) found 81 per cent of participating MPs and 68 per cent of councillors believed corruption was a problem in the state, and 89 per cent of MPs and 57 per cent of councillors regarded their own organisation as moderately or highly vulnerable to it²².

Ninety-six per cent of responding MPs identified inaction, the failure to report known wrongdoing, as the highest corruption risk among their own colleagues, an increase on the 2023 survey. MPs reported lower confidence that colleagues would support them for reporting corruption than they had two years earlier²². This is not a citizenry projecting cynicism onto a well-functioning system. It is the system's own participants describing, with rising rather than falling concern, an environment in which wrongdoing is more likely to be tolerated than reported.

Think their state government does a good job fighting corruption, 2025



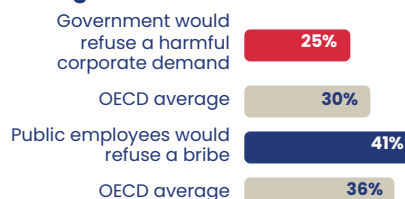
81%

of responding Victorian MPs say corruption is a problem in the state

96%

of MPs name failing to report known wrongdoing as the top risk among colleagues

OECD trust survey: Australia vs OECD average



²⁰. OECD (2024a) OECD Survey on Drivers of Trust in Public Institutions 2024 Results: Country Notes: Australia. [oecd.org](https://www.oecd.org); OECD (2025) Drivers of Trust in Public Institutions in Australia. [oecd.org](https://www.oecd.org)

²¹. Le Grand, C. (2025) 'Victoria's integrity agencies push for reform amid collapse in public confidence', The Age, 13 October 2025. theage.com.au

²². IBAC (2025a) Victorian Perceptions of Corruption 2025: Members of Parliament. ibac.vic.gov.au

What Western Victorians told us: integrity is the root complaint.

In our community survey, honesty, trust and integrity was the worst-rated of eight policy areas, and seven of the twelve lowest-rated issues were about lobbying, donations, conflicts of interest and accountability.

Between June and October 2026, 53 people completed our community survey on fairness, integrity and trust in Victorian government. Almost all live outside Melbourne: 31 in a regional city or large town and 20 in a smaller town, rural or remote area, mostly in and around Geelong, Ballarat and Warrnambool. They rated the state's performance on 65 issues across eight policy areas.²³

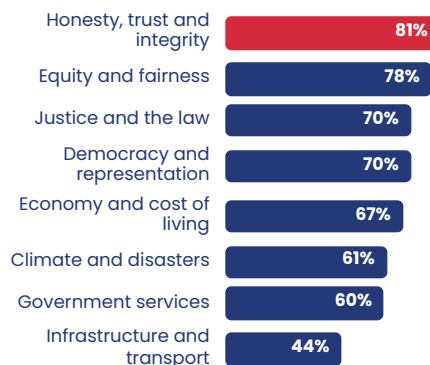
Every policy area drew more poor ratings than good ones, and 81 per cent of respondents are dissatisfied with the direction the state is heading. Honesty, trust and integrity was the worst-rated area: 81 per cent of all ratings in it were poor or very poor, just ahead of equity and fairness at 78 per cent.

Four of the five lowest-rated issues in the whole survey were about lobbying and vested interests: politics being free from vested interests (98 per cent rated it poor), the management of lobby groups (96 per cent), openness about donations and lobbying (94 per cent) and the handling of lobby group influence (92 per cent). Eighty-five per cent rate the integrity of Victorian politicians and officials as low, and 75 per cent say government decisions are made mostly or completely out of public view.

Discontent crosses party lines. The integrity finding is shared by people who voted Labor, Greens, independent and Coalition in 2022. Seventy per cent agree the major parties haven't delivered for average Australians, 75 per cent rate the representation of ordinary Victorians poor, and 51 per cent strongly disagree that people like them are represented in decision-making.

Share of ratings that were poor or very poor, by policy area

COMMUNITY SURVEY n = 53



Share of all ratings, not of respondents. No opinion excluded.

The lowest-rated integrity issues

% of those giving a rating who chose poor or very poor



81%

dissatisfied with the direction Victoria is heading

85%

rate the integrity of politicians and officials low

75%

say decisions are made mostly or completely out of view

62%

say conflicts of interest are poorly managed and rarely disclosed

²³ Western Victoria Community Survey, June to October 2026, n = 53 (campaign survey; self-selected sample). See 'About the survey'.

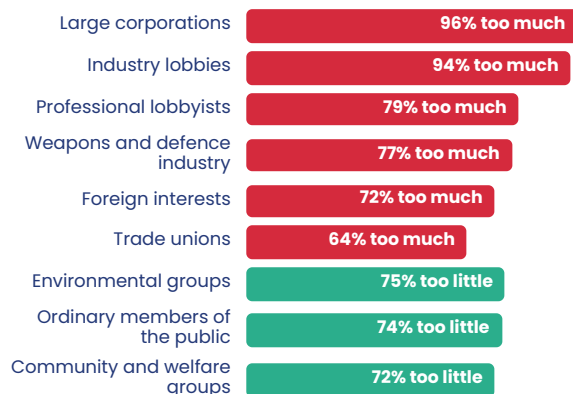
People see who gets heard, and who doesn't.

Respondents were asked, group by group, how much influence different interests hold over Victorian Government policy compared with what they should have. Ninety-six per cent said large corporations have too much, as did 94 per cent for industry lobbies such as mining, banking, gambling and property, and 79 per cent for professional lobbyists. For groups without paid access, the picture reverses: 74 per cent said ordinary members of the public have too little influence, along with 75 per cent for environmental groups and 72 per cent for community and welfare organisations.²⁴

Eighty-five per cent say lobby groups have too much power over government, and 62 per cent say conflicts of interest are poorly managed and rarely disclosed. Asked how long former MPs should wait before working in areas they governed, 64 per cent chose at least five years or a permanent ban. Only one person wanted no restriction at all.

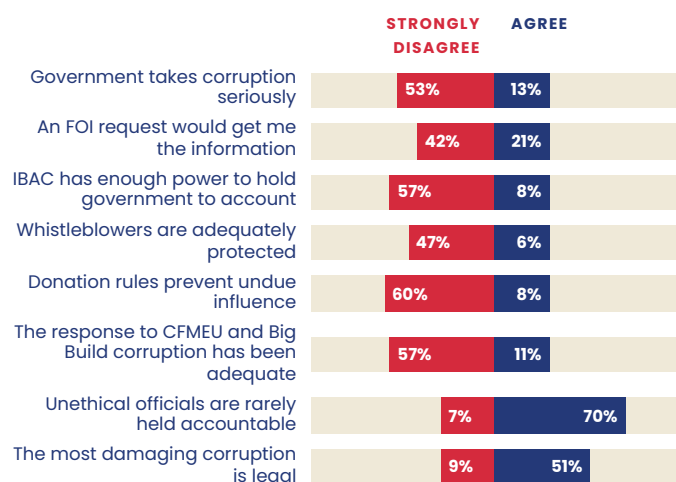
Influence over policy compared with what each group should have

COMMUNITY SURVEY % of all respondents



Views on corruption and accountability in Victoria

COMMUNITY SURVEY % of all respondents



The rest answered neutral, disagree or unsure. The survey export merged "neither" and "disagree", so only "strongly disagree" is shown as disagreement and disagreement is understated.



64%

want former MPs to wait at least five years, or be banned for good, before working in areas they governed

"The money. Take out the money."

SURVEY RESPONDENT
WOMAN, 65+, REGIONAL CITY

Faith in the safeguards is just as thin. Only four respondents (8 per cent) agree IBAC has enough power to hold government accountable, and only 13 per cent believe the government takes corruption seriously. Just over half (51 per cent) agree the most damaging corruption is legal: conduct that's technically allowed but shouldn't be. That points to reform of the rules themselves, not only better enforcement.

²⁴ Western Victoria Community Survey, June to October 2026, n = 53 (campaign survey; self-selected sample). See 'About the survey'.

In their own words: “Money buys access.”

These ratings match what people wrote, unprompted, in the open-text boxes.

“It’s obvious to blind Freddy that lobbyists’ groups are too influential.”

SURVEY RESPONDENT
REGIONAL VICTORIA

“Lobbyist power effectively cancels out a person’s vote. Governments don’t represent voters, their vote is used by governments, hence voters are dissatisfied, and don’t trust governments.”

SURVEY RESPONDENT
MAN, 65+, REMOTE VICTORIA

“The public are not informed as to how much time the lobbyists get to spend with MPs, especially cabinet ministers. Money buys access, which leaves many community groups out in the cold.”

SURVEY RESPONDENT
MAN, 65+, REGIONAL VICTORIA

One retired man from a smaller regional town rated every area in the survey below “fair” and explained why in a single line: “I can’t think of anyone in the Victorian Government I can trust.” Another respondent put the structural problem in institutional terms rather than personal ones:

“MPs who are elected as representatives of a major party owe their primary allegiance to the party and not the electorate. Are they performing as representatives of their electorate when what their electorate wants may be at cross-purposes with what head office decrees? I’d suggest ‘no.’”

MAN, 65+, REGIONAL VICTORIA

Asked what would have to happen for Victoria to feel like a fair, transparent, democratic place, respondents converged on specific recommendations, which have been included, amongst others, in this white paper. This includes real-time disclosure of political donations and lobbying meetings; a properly resourced anti-corruption body with genuine investigative power; a Freedom of Information system that works quickly instead of being, in more than one respondent’s words, “a farce”; and an enforceable ban on the revolving door between a ministerial office and the industries it used to regulate.

“Lobbyists speak for a minute percentage of the population yet they influence decisions by Government over the vast majority of the population.”

SURVEY RESPONDENT, REGIONAL VICTORIA

“An end to secret lobbying and political donations and foreign influence ... An anti-corruption commission that is effective. Freedom of information that is truly responsive, rapid and free.”

SURVEY RESPONDENT
WOMAN, 65+, REGIONAL VICTORIA

“Get money and vested interests out of politics. Get rid of misinformation, disinformation and lies. And get fair dinkum democracy back.”

SURVEY RESPONDENT
MAN, 65+, SMALLER REGIONAL TOWN, RETIRED

ABOUT THE SURVEY

The survey ran online from June to October 2026 and was shared through community networks. After removing one blank test entry and one duplicate, 53 responses remain, 51 of them from regional and rural Victoria.

The sample is self-selected and older and more highly educated than the general population (45 per cent are 65 or over and 66 per cent hold a university degree), so the results are indicative rather than statistically representative.

02 POLARISATION AND AUTOCRATISATION

RESTORING TRUST

Distrust, radicalisation and democratic drift

Distrust doesn't stay quiet. It hardens into hostility.

Sustained institutional distrust is associated with polarisation, insularity and, at the extreme, radicalisation. **One of the most useful things a government can do to improve social cohesion is to improve its own performance on democratic measures.**

The 2025 Edelman Trust Barometer's most consequential Australian finding was that nearly one in three Australians regarded hostile activism, explicitly defined by Edelman to include disinformation and threats or acts of violence, as a legitimate means of driving political change, rising to more than one in two among 18–34-year-olds²⁵.

This is consistent with a growing academic literature linking declining institutional trust to increased willingness to endorse extra-legal and violent means of political participation, notably among younger cohorts²⁶. A 2025 primer on politicisation, polarisation and radicalisation in the *British Journal of Social Psychology* frames these as points on a continuum where citizens come to see institutions as captured or illegitimate, ordinary political disagreement (politicisation) can increase into affective hostility toward the other side (polarisation), which can in turn intensify into a belief that only activity outside, or against, the system can produce change (radicalisation)²⁷.

A growing body of comparative political science finds that democratic erosion is driven less by voters changing their policy positions than by an intensifying emotional hostility between political tribes, "affective polarisation", that makes voters willing to tolerate anti-democratic conduct by their own side as the price of defeating the others²⁷. Trust in neutral, cross-partisan institutions, courts, electoral commissions, anti-corruption bodies, and the public service is widely argued to restrain this dynamic, because it gives citizens a referee both sides can accept. When those institutions are themselves seen as compromised, weak or captured, that restraint weakens.

1 in 3

Australians saw hostile activism, including disinformation and threats or acts of violence, as a legitimate way to drive change in 2025

1 in 2

among 18 to 34-year-olds

From disagreement to rejecting the system

The continuum described in the *British Journal of Social Psychology*

Politicisation

Ordinary political disagreement

Polarisation

Emotional hostility toward the other side

Radicalisation

Belief that only action outside or against the system can work

Trusted, neutral institutions act as a referee both sides can accept. When they're seen as captured, that restraint weakens.

²⁵. Edelman (2025) 2025 Edelman Trust Barometer: Australia. [edelman.com](https://www.edelman.com); B&T (2025), as above. [bandt.com.au](https://www.bandt.com.au)

²⁶. Smith, L.G.E. and Thomas, E.F. (2025) 'A primer on politicization, polarization, radicalization, and activation and their implications for democracy in times of rapid technological change', *British Journal of Social Psychology*, 64(3). bpspsychub.onlinelibrary.wiley.com

²⁷. Muñoz, J., Amat, F., Falcó-Gimeno, A., Guinjoan, M. and Rodon, T. (2026) 'Affective, but not ideological, polarization increases tolerance for undemocratic behavior,' *European Political Science Review*, Cambridge University Press. doi.org

Democracies now erode through elections, not coups.

Globally, we are seeing this distrust fuel a new wave of populism. In turn, populism is giving rise to a new generation of autocrats who come to power through democratic elections, rather than coups, and then gradually dismantle democracy from within by weakening its institutions, checks and balances, and fundamental freedoms, including academic freedom, an independent media, the right to protest and broader civil rights.

44

countries now autocratising, up from 42 a year earlier

41%

of the world's people, 3.4 billion, live under governments moving away from democracy

9%

was the share in 2005

1978

the level the average person's democratic quality has fallen back to

The V-Dem Institute's Democracy Report 2026 finds that 44 countries are now autocratising, up from 42 a year earlier, with a record 41 per cent of the world's population, 3.4 billion people, now living under governments moving away from democratic accountability, compared with 9 per cent in 2005²⁸. For the average global citizen, democratic quality has regressed to 1978 levels, erasing roughly five decades of gains²⁸.

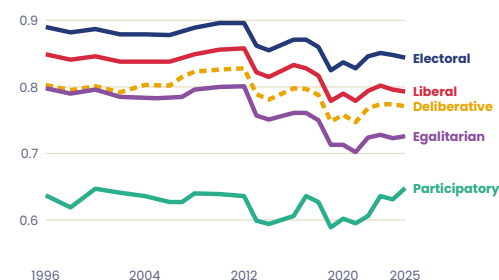
Australia is still classified as a stable liberal democracy, with Australia ranked 12th globally on V-Dem's Liberal Democracy Index, a ranking that has stayed broadly stable for close to a decade even as the country's underlying scores have drifted down, because Australia's peers have been eroding faster than Australia itself²⁹.

Despite this, the data shows that V-Dem's Liberal Democracy Index, which combines free and fair elections with the courts' and legislature's capacity to constrain the executive peaked at 0.858 in 2012 and fell to 0.793 by 2025³⁰.

Australia's ranking is also supported by strong performance on the electoral measures. Once this is disaggregated from the rest of the index data, it shows worrying signals and a decline in much of the democratic machinery (see chart).

Australia's V-Dem democracy indices, 1996–2025

Index score, 0 to 1. Elections hold up; the machinery around them has slipped.



The Liberal Democracy Index peaked at 0.858 in 2012 and fell to 0.793 by 2025. Values rounded from the V-Dem Australia series.³⁰



Autocratising from within. Countries now autocratising are doing it from within, as democratically elected leaders dismantle democratic institutions. V-Dem's 2026 report found US democracy under Donald Trump backslid further in one year than other countries managed in a decade.³¹

²⁸. V-Dem Institute (2026) Democracy Report 2026: Unravelling the Democratic Era? University of Gothenburg. v-dem.net

²⁹. Finkeldey, R. (2026) 'New study shows global democracy hasn't been this bad since 1978. Australia should be worried', The Conversation, 17 March 2026. theconversation.com

³⁰. V-Dem Institute (2026) Democracy Report 2026: Unravelling the Democratic Era? University of Gothenburg. v-dem.net; V-Dem Liberal Democracy Index country data for Australia, via Our World in Data. ourworldindata.org

³¹. University of Vienna, 'The Democracy Report 2026: what it says about the US and what comes next', Rudolphina, 2026 (on the V-Dem Institute's Democracy Report 2026). rudolphina.univie.ac.at

Strong at the ballot box, weak everywhere else.

The Grattan Institute's 2026 assessment found that, while Australia's democracy is relatively strong, democratic participation drops sharply once measurement moves beyond the ballot box, with fewer than one in 100 Australians a member of a political party, around 30 per cent signed a petition in the past year, and just 13 per cent had contacted a politician³².

<1%

of Australians belong to a political party

30%

signed a petition in the past year

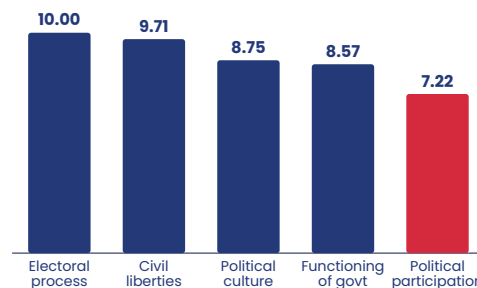
13%

contacted a politician

Integrity reform belongs at the centre of democratic policy and a state that wants to arrest the drift in its own trust and democracy does so by leading by example. It does so by making the exercise of public power sufficiently visible, exercised fairly, and without favour so that trust becomes, once again, a reasonable response. People are fed up with what they see as double standards, a captured political system and having their own rights eroded in the name of social cohesion.

Australia's Democracy Index components, 2024

Score out of 10. Overall 8.85, 11th of 167 countries.



Political participation, which covers civic engagement beyond voting, is the weakest of the five. Source: Economist Intelligence Unit, Democracy Index 2024.

REFORMS ALREADY UNDERWAY

Victoria's integrity system needs substantial further reform. There have been some changes, but these are insufficient. On 1 June 2026, the Victorian Government announced it would support broader corrupt-conduct and "follow-the-money" powers for IBAC; the IBAC Amendment Bill 2026 passed Parliament on 24 September 2026, also removing the "exceptional circumstances" test for public hearings, with changes to police oversight left for a second tranche of reforms. The Parliamentary Workplace Standards and Integrity Commission has been operating since 31 December 2024, receiving 30 misconduct referrals by February 2026. And Victoria's political-finance law was rebuilt within weeks of the High Court's April 2026 decision in *Hopper v Victoria*, re-establishing donation caps and disclosure rules by June 2026.

Sources: Victorian Government media release, 1 June 2026; Victorian Government media release, 24 September 2026; Parliament of Victoria, 'Parliamentary integrity commission probes misconduct referrals'; Parliamentary Workplace Standards and Integrity Act 2024; *Hopper v Victoria* [2026] HCA 11; VEC Political finance laws 2026.

None of these reforms is the end point argued for in this white paper. IBAC's broader powers have been legislated, but their implementation, funding and retrospective reach are untested. The PWSIC can sanction ordinary misconduct itself, but for serious misconduct it can only recommend, not impose, consequences. And the rebuilt donation regime leaves the underlying structural questions, aggregation of related donors beyond corporate bodies, hospitality and access caps, an independent commission with investigation and penalty powers, unresolved. Each is addressed on its merits in the relevant section below.

"Democracy is so easily manipulated or lost. It is much more than a vote every four years. There should be far more consultation with communities and individuals."

SURVEY RESPONDENT
MAN, 55-64, REGIONAL CITY

³² Sathanapally, A., Griffiths, K., Bowes, M. and Geraghty, J. (2026) For the people: future-proofing Australia's democracy, Grattan Institute. grattan.edu.au

03 CORRUPTION PREVENTION

RESTORING TRUST

Grey corruption, case studies and major projects

A decision doesn't need to be corrupt to be unacceptable.

The integrity continuum



IBAC calls conduct that damages confidence without meeting a criminal threshold “grey corruption”.

Victoria has faced a run of serious corruption and integrity scandals. Corruption sits at one end of a longer continuum that runs through to poor accountability (above). IBAC’s own concept of “grey corruption” describes conduct that damages citizen confidence without necessarily meeting a criminal threshold, and Victoria’s recent history is dense with examples. Operation Watts, the first joint IBAC–Ombudsman investigation, found in 2022 that branch stacking within the governing party had produced nepotistic staffing, forged signatures, interference with grants, and the use of publicly funded electorate and ministerial positions for factional organising³³. Operation Sandon found a systematic pattern of developers cultivating councillors and MPs through donations and fundraising to secure planning outcomes³⁴.

Operation Daintree found procurement and lobbying vulnerabilities inside the Department of Health tied to unmanaged conflicts of interest, generating 17 recommendations; the government said it would accept nine in full or in principle, keep seven under review, refer two to Parliament and not support two (the categories overlap)³⁵.

And the Big Build Royal Commission, announced by Premier Ben Carroll on 28 July 2026 and formally constituted by Letters Patent on 20 August 2026, with authorised expenditure of up to \$50 million, will examine allegations that organised crime and CFMEU-linked standover conduct inflated the cost of Victoria’s civil infrastructure program, among the broader questions of its Terms of Reference, following IBAC’s own acknowledgment that a formal referral fell outside its jurisdiction to investigate private subcontracting activity³⁶.

CASE STUDY

Operation Esperance: secret commissions at V/Line

IBAC’s Operation Esperance shows what enforcement looks like when it works. Sacked V/Line chief executive James Pinder was sentenced on 3 September 2026 to two years and eight months’ imprisonment for misconduct in public office, after corruptly receiving \$330,000 in secret commissions from Transclean director George Haritos and two associates between 2018 and 2020, favouring Transclean in the award and extension of V/Line and Metro cleaning contracts whose value grew from around \$40 million to more than \$54 million. Pinder, eligible for parole after one year and nine months, faces possible deportation to the United Kingdom. Haritos was sentenced to two years and three months’ imprisonment; three other people were also sentenced, and a civil forfeiture order recovered more than \$520,000 from the Williamstown property Pinder bought with the proceeds. Unlike the “grey corruption” cases this white paper documents elsewhere, where conduct fell short of IBAC’s criminal threshold, Operation Esperance is a case where surveillance, telephone intercepts and hidden cameras produced evidence that met and secured convictions.

Sources: Alexandra Alvaro, ‘Sacked V/Line chief executive James Pinder jailed and facing deportation over secret commissions,’ ABC News, 3 September 2026; IBAC, ‘Two sentenced to prison as part of IBAC probe into secret commissions at V/Line and Metro Trains,’ 4 September 2026.

³³. IBAC and Victorian Ombudsman (2022) Operation Watts: A joint investigation into allegations of serious corrupt conduct involving Victorian public officers, including Members of Parliament. [ombudsman.vic.gov.au](https://www.ombudsman.vic.gov.au)

³⁴. IBAC (2023a) Operation Sandon Special Report: Findings of corrupt conduct in planning decision-making at state and local government. [ibac.vic.gov.au](https://www.ibac.vic.gov.au)

³⁵. IBAC (2023b) Operation Daintree Special Report. [ibac.vic.gov.au](https://www.ibac.vic.gov.au); Victorian Government (2023) Strengthening Victoria’s public sector integrity, media release. [premier.vic.gov.au](https://www.premier.vic.gov.au)

³⁶. ABC News (2026) ‘Former chief justice Christopher Kourakis to head Victoria’s royal commission into construction sector’, 20 August 2026. [abc.net.au](https://www.abc.net.au); Victorian Government (2026) Royal Commission into the Integrity of Major Public and Civil Infrastructure Construction Projects in Victoria (Letters Patent, 20 August 2026). [vic.gov.au](https://www.vic.gov.au)

Up to **\$15 billion** in alleged costs. A Royal Commission to find out.

CASE STUDY

The Big Build Royal Commission

Victoria's approximately \$100 billion "Big Build" program, spanning the Metro Tunnel, West Gate Tunnel, Northeast Link, Suburban Rail Loop and the state's level-crossing removals, is now the subject of a Royal Commission and a newly announced Office of the Special Prosecutor. Letters Patent issued on 20 August 2026 on the advice of Premier Ben Carroll authorised expenditure of up to \$50 million. The commission's Terms of Reference are broader than the construction-sector allegations that prompted it: they extend to all major public and civil infrastructure construction projects commissioned by Victoria, and expressly permit examination of executive government, delivery authorities, contracting arrangements, subcontractors, unions, organised crime, regulatory weaknesses and IBAC's own oversight, including whether Victoria's executive government and delivery authorities adequately fulfilled their oversight and governance responsibilities.

Sources: ABC News, 28–29 July 2026; Royal Commission Letters Patent, 20 August 2026.

The commission follows a public assessment by barrister Geoffrey Watson SC, in his report *Rotting from the Top*, and many reports by the Age newspaper, alleging that Victorian branch officials of the CFMEU, in coordination with outlaw motorcycle gangs and organised crime figures, controlled which subcontractors and labour-hire firms could work on major sites, engaged in standover and intimidation conduct, and ran drug-dealing and exploitation operations alongside legitimate construction work. Watson has estimated the resulting cost to Victorian taxpayers, through inflated contract prices and delays, at approximately \$15 billion. The Victorian Government has disputed the accuracy of that figure without publishing an alternative estimate of its own, so this white paper treats the number as a contested allegation requiring the Royal Commission's own independent assessment.

~\$100b

Big Build program now before a Royal Commission

\$50m

authorised for the Royal Commission

~\$15b

alleged cost to taxpayers, contested by the Government

212

fraud and corruption notifications to VAGO, July 2022 to January 2024

Between July 2022 and January 2024, VAGO received 212 fraud and corruption notifications from public sector agencies required to report suspected significant or systemic fraud, corruption and other losses, of which 29 related to procurement (15 of them involving conflicts of interest), representing an estimated \$3.3 million in notified losses³⁷. An earlier VAGO review of four procurement conflict-of-interest allegations found no evidence that self-interest had unduly influenced the outcomes examined, but also found that none of the agencies reviewed had fully followed their own procurement policies, meaning none could demonstrate their decisions had in fact been fair, impartial and value for money³⁸. This is the central evidentiary point of this white paper: a decision does not need to be corrupt to be unacceptable. Quite simply if government cannot demonstrate a decision was made fairly, the public cannot know that it was.

"A decision does not need to be corrupt to be unacceptable. If government cannot demonstrate a decision was made fairly, the public cannot know that it was."

RESTORING TRUST
THE CENTRAL TEST OF THIS PAPER

³⁷. VAGO (2024a) Assuring the Integrity of the Victorian Government's Procurement Activities. audit.vic.gov.au; tabled 20 June 2024.

³⁸. VAGO (2021) Managing Conflicts of Interest in Procurement. audit.vic.gov.au; tabled 8 September 2021.

Major projects change. The reasons don't get told.

The single most important structural reform of recent years has been removing the “relevant offence” limitation from section 4 of the IBAC Act, extending IBAC’s jurisdiction to capture serious abuses of public office or public trust without requiring the conduct itself to constitute a criminal offence, consistent with the broader statutory definitions the National Anti-Corruption Commission Act 2022 (Cth) and the NSW ICAC operate under³⁹. The Victorian Government already announced on 1 June 2026 that it supported broader corrupt-conduct and “follow-the-money” powers for IBAC, a commitment made before, not because of, Operation Richmond. The August 2026 findings of that investigation strengthen the case for the reform rather than having originated it. Parliament passed that reform on 24 September 2026, and the same bill removed the “exceptional circumstances” test for public hearings.⁴⁰ Its implementation, resourcing and retrospective application should now be monitored so that it enables an independent agency to investigate and report on serious abuse of power, not to criminalise ordinary policy disagreement.

WHAT THIS PAPER RECOMMENDS

Building on the September 2026 reform of the corrupt-conduct definition:

- Reporting publicly on how IBAC uses its public-hearing power now that the “exceptional circumstances” test has been removed, so that hearings become a matter of course in investigations of public interest, consistent with the Fundamental Principles of Australian Anti-Corruption Commissions agreed by all Australian anti-corruption agencies in July 2024 **Rec 2**
- Lowering IBAC’s investigative threshold to reasonable suspicion of serious misconduct **Rec 3**
- Separating Victoria Police oversight into a dedicated body modelled on the NSW Law Enforcement Conduct Commission so that IBAC can focus on public sector corruption **Rec 4**
- Legislating independent, formula-based or tribunal-determined funding for IBAC, the Ombudsman and VAGO, implementing the agencies’ own February 2026 proposals in full, with a legislated minimum funding floor benchmarked against Transparency International Australia’s proposed 0.15 per cent of public expenditure **Rec 5**

3.1 Major project cost reporting: catching anomalies before they compound

113

major projects reviewed,
worth \$145.5 billion

28%

had at least one
significant scope change

8 of 10

projects with cost or date
changes didn’t disclose
the full reasons

\$11.66b

rise in total estimated
cost in a single year

An unexplained cost or schedule anomaly in major infrastructure delivery is not itself proof of corruption – scope changes, inflation, design revisions and genuine technical problems can all produce one. However, these anomalies are legitimate integrity risk indicators. They can be red flags warranting transparent explanation and scrutiny.

VAGO’s *Major Projects Performance Reporting* series found that of 113 major projects worth a combined \$145.5 billion, reviewed in its 2024 cycle, 28 per cent had at least one significant scope change. Eight of the ten projects with cost or completion-date changes had not disclosed the full reasons for those changes in budget-paper reporting, despite guidance requiring disclosure⁴¹.

³⁹. National Anti-Corruption Commission Act 2022 (Cth) s 8; Independent Commission Against Corruption Act 1988 (NSW) ss 7–9.

⁴⁰. Victorian Government (2026) Strengthened powers for IBAC to fight corruption, media release, 24 September 2026. [premier.vic.gov.au](https://www.premier.vic.gov.au); ABC News (2026) ‘IBAC granted “follow the dollar” powers on final sitting day of Victorian parliament’, 24 September 2026. [abc.net.au](https://www.abc.net.au); ABC News (2026) ‘Victoria’s anti-corruption watchdog to get follow-the-money powers’, 1 June 2026. [abc.net.au](https://www.abc.net.au)

⁴¹. VAGO (2025) Major Projects Performance Reporting 2024, tabled 19 February 2025. [audit.vic.gov.au](https://www.audit.vic.gov.au)

Parliament sees less than the government does.

That same 2024 cycle found the net total estimated investment across the reviewed projects had increased by \$11.66 billion in the preceding twelve months alone, on top of comparable increases in each of the two prior years, and that “Parliament and the community have different quality information available” to government’s own internal analysis of the same projects⁴².

Part of the problem is that there are no public checks and balances on government information. VAGO’s subsequent *Major Projects Performance Reporting 2025*, tabled 4 March 2026, examined 110 projects worth a combined \$149.33 billion and reached the same conclusion on newer data: public reporting still does not give Parliament and the community enough information to understand major-project progress and significant variations, so the pattern documented above is current, not historical⁴³. The 2025 review found much smaller year-on-year movement. For the 89 projects examined in both reviews, total estimated investment rose \$169 million (0.12 per cent). Across their lives, those projects now sit \$11.31 billion above their original estimates, and 35 of 110 projects (31.8 per cent) have had at least one significant scope change requiring government approval. Five projects changed cost without disclosing it in the budget papers⁴³.

VAGO’s dedicated 2016 audit, *Managing and Reporting on the Performance and Cost of Capital Projects*, goes further and sets out what a fix looks like. It found the Department of Treasury and Finance already collects detailed project data every quarter for internal government decision-making but “there is limited information made publicly available” from that same data, forcing citizens and even Parliament to reconstruct a partial picture from scattered public sources⁴⁴.

It recommended DTF and the Department of Premier and Cabinet establish a standing public reporting mechanism covering every capital project costing \$10 million or more, disclosing planned and actual costs, timelines, governance arrangements and the extent to which claimed benefits are realised. The audit pointed to New York City’s and Seattle’s public capital-project dashboards as evidence that standardised, machine-readable reporting can “make it harder for underperforming projects to go unnoticed”.⁴⁴

VAGO’s major projects reviews

Same finding, newer data

113 projects worth \$145.5b reviewed in the 2024 cycle

110 projects worth \$149.33b reviewed in 2025, tabled 4 March 2026

\$10m+ the threshold VAGO proposed for standing public reporting on every capital project, back in 2016

This white paper recommends that Victoria use this quarterly data to catch cost anomalies before they compound into multi-billion-dollar blowouts. What is lacking is a legislated obligation to publish it on the same cadence that is already collected internally, and an independent trigger, a defined percentage cost or schedule variance, that would require automatic public disclosure and VAGO review rather than waiting for the next periodic audit cycle to surface the problem after the money has already been spent.

57%

of our survey respondents strongly disagree that the response to CFMEU and Big Build corruption has been adequate

70%

agree unethical senior officials and politicians are rarely held accountable

85%

rate accountability when things go wrong as poor

⁴². VAGO (2025) Major Projects Performance Reporting 2024, tabled 19 February 2025. [audit.vic.gov.au](https://www.audit.vic.gov.au); ABC News (2025) ‘Auditor-General finds lack of transparency in reporting around major Victorian government projects’, 19 February 2025. [abc.net.au](https://www.abc.net.au)

⁴³. VAGO (2026) Major Projects Performance Reporting 2025, tabled 4 March 2026. [audit.vic.gov.au](https://www.audit.vic.gov.au)

⁴⁴. VAGO (2016) Managing and Reporting on the Performance and Cost of Capital Projects, tabled 4 May 2016. [audit.vic.gov.au](https://www.audit.vic.gov.au)

04 INTEGRITY WATCHDOGS

RESTORING TRUST
Victoria's integrity architecture

Strong on paper. Constrained in practice.

Victoria has one of Australia's more developed integrity systems on paper: an anti-corruption commission (IBAC), an Ombudsman, an Auditor-General (VAGO), an Information Commissioner (OVIC), a lobbying register, political donation laws, and extensive procurement and grants rules. They are very strong on paper but constrained in practice.

Until the September 2026 reforms, IBAC's central structural constraint was section 4 of the *Independent Broad-based Anti-corruption Commission Act 2011* (Vic). Under the former provision, "corrupt conduct" was confined to conduct that constituted a "relevant offence", principally an indictable offence or specified common-law offences.⁴⁵ This meant that serious conduct capable of undermining public confidence in government could fall outside IBAC's jurisdiction where it did not cross the criminal threshold. IBAC and other integrity bodies have identified this gap as a form of "grey corruption": conduct that may seriously compromise integrity or public trust without necessarily constituting a criminal offence. The September 2026 reforms subsequently expanded the definition of corrupt conduct to include serious disciplinary matters, including serious misconduct and conduct that would warrant dismissal, and to apply expressly to ministers, MPs and local councillors.⁴⁶ The Government should also ensure that IBAC has sufficient staffing, specialist expertise and investigative resources to exercise its expanded jurisdiction effectively, rather than creating a broader statutory mandate without the capacity to investigate it. Implementation should be independently reviewed after two years, with the review examining the number and nature of matters received under the expanded definition, matters declined or referred elsewhere, investigation timeframes, outcomes and any continuing gaps in the integrity framework.

Operation Richmond is the clearest recent illustration: IBAC found "serious and concerning conduct by senior public officers" in the former Daniel Andrews government, including secret talks between a minister and the firefighters' union that produced a handshake deal later put to cabinet as a "UFU proposal", and a fire authority board member sharing confidential information with the union. Despite this, Commissioner Victoria Elliott made no finding of corrupt conduct, because the IBAC Act as it then stood required conduct to amount to a criminal offence⁴⁷. The National Anti-Corruption Commission and the NSW ICAC both operate under broader statutory definitions that can capture serious abuses of public office or public trust without requiring the conduct itself to constitute a criminal offence.

Victoria's integrity system

Six safeguards on paper

IBAC

Anti-corruption and police oversight

Ombudsman

Administrative conduct

VAGO

Auditor-General

OVIC

Information Commissioner

Lobbying register

Consultant lobbyists

Donation laws

Rebuilt after *Hopper*

OPERATION RICHMOND

IBAC found "serious and concerning conduct" by senior public officers in the former Andrews government: secret talks with the firefighters' union, a handshake deal put to cabinet as a "UFU proposal", and a board member sharing confidential information. It still made no corruption finding, because the law then required a criminal offence.

⁴⁵. Independent Broad-based Anti-corruption Commission Act 2011 (Vic) s 4, as in force before the IBAC Amendment Act 2026; on "grey corruption", see IBAC and Victorian Ombudsman (2022) Operation Watts, which describes it as questionable behaviour that does not necessarily amount to criminal conduct. [ombudsman.vic.gov.au](https://www.ombudsman.vic.gov.au)

⁴⁶. Victorian Government (2026) Strengthened powers for IBAC to fight corruption, media release, 24 September 2026. [premier.vic.gov.au](https://www.premier.vic.gov.au)

⁴⁷. IBAC (2026a) Operation Richmond Special Report, media release, 5 August 2026. [ibac.vic.gov.au](https://www.ibac.vic.gov.au); ABC News (2026) 'IBAC report stops short of corruption finding after years-long Victorian investigation', 5 August 2026. [abc.net.au](https://www.abc.net.au)

The government sets the budgets of the agencies that hold it to account.

Until September 2026, IBAC's public hearing power was similarly constrained: hearings were permitted only in "exceptional circumstances", a test with no equivalent for the NSW ICAC, which holds public hearings as a routine accountability tool. The IBAC Amendment Bill 2026 removed that test, and how often IBAC now uses the power will show whether the change matters in practice. IBAC's investigative capacity is further divided by a dual mandate: like Queensland's Crime and Corruption Commission and Western Australia's Corruption and Crime Commission, it is also responsible for oversight of Victoria Police, which generated 64 per cent of all complaints to IBAC in 2024⁴⁸. New South Wales is the only state with a separate police-oversight body, the Law Enforcement Conduct Commission, and the government has left changes to IBAC's police-oversight role to a second tranche of reforms.⁴⁹

The government sets the budgets of IBAC, the Ombudsman and VAGO, the very agencies that exist to hold it to account. The three agencies have flagged this conflict since at least 2022, most recently in a February 2026 joint paper, *Advancing Budget Transparency for Victoria's Core Integrity Agencies*, describing the current process as opaque and calling for written reasons for funding decisions, parliamentary scrutiny of budget bids and structural independence⁵⁰.

Transparency International Australia has argued for a minimum benchmark of 0.15 per cent of public expenditure devoted to core integrity functions. The three agencies' own chart shows combined funding at about 0.12 per cent of government expenditure in the 2025–26 budget. The agencies found that funding has trended down since 2016–17, has been below that minimum since 2019, and is increasingly behind New South Wales⁵¹.

These factors, among others, justify overhauling integrity watchdogs, strengthening legislation, and reducing reliance on government funding.

Integrity agency funding as a share of government spending

IBAC, the Ombudsman and VAGO combined, 2025–26

TI Australia minimum 0.15%



Victoria has been below Transparency International Australia's benchmark every year since 2019.

Complaints to IBAC, 2024

Victoria Police oversight takes most of IBAC's complaint load



NSW is the only state with a separate police-oversight body, the Law Enforcement Conduct Commission.

⁴⁸. IBAC (2024) Independent oversight of Victoria Police 2024, media release. ibac.vic.gov.au

⁴⁹. ABC News (2026) 'IBAC granted "follow the dollar" powers on final sitting day of Victorian parliament', 24 September 2026. abc.net.au

⁵⁰. IBAC, Victorian Ombudsman and VAGO (2026) Advancing budget transparency for Victoria's core integrity agencies, joint paper, February 2026. ibac.vic.gov.au; Victorian Ombudsman (2026) Victoria's integrity agencies renew call for transparent, independent funding, 18 February 2026. ombudsman.vic.gov.au

⁵¹. IBAC, Victorian Ombudsman and VAGO (2026) Advancing budget transparency for Victoria's core integrity agencies, February 2026, Figure 1. ibac.vic.gov.au; Parliament of Victoria, Integrity and Oversight Committee (2026) Inquiry into the adequacy of the annual budget allocations of integrity agencies, May 2026, s 1.2.2. parliament.vic.gov.au

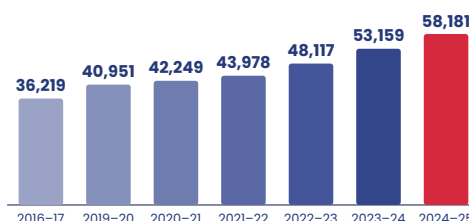
Record demand. Falling openness.

Freedom of Information is the most direct legal expression of the principle that public information belongs to the public by default. Victoria's system is failing that test, as its own numbers show. In 2024–25, Victorian agencies received a record 58,181 FOI requests, up 9.4 per cent on the previous year and continuing an unbroken decade-long climb from 36,219 in 2016–17⁵².

Data shows that 9,673 requests remained outstanding as of 30 June 2025, an 11.2 per cent increase⁵³. More significant than the volume is the trend in outcomes, which shows declining levels of transparency: in 2015–16, 68.4 per cent of FOI decisions resulted in full access; by 2024–25 that had fallen to 58.5 per cent, with 38.2 per cent partial-access and 3.3 per cent full refusals⁵⁴. The pattern is not that government refuses everything. It is that an increasing proportion of decisions result in partial rather than full access. OVIC's data show the shift but don't by themselves explain it. Without stronger disclosure duties, the trend is likely to continue.

In September 2024, the Parliament's Integrity and Oversight Committee made 101 recommendations after its inquiry into the *Freedom of Information Act 1982* (Vic). OVIC strongly supported replacing the Act with a modern right-to-information law modelled on proactive disclosure, fewer and narrower exemptions, and modern records management⁵⁵. Such a law would reduce delay and cost and open more of government to public scrutiny.

FOI requests lodged in Victoria each year



Outcome of FOI decisions

2015–16

Full access 68.4%

Partial or refused

2024–25

Full access 58.5%

Partial 38.2%

3.3% of decisions in 2024–25 were full refusals. Source: OVIC annual reports.

WHAT THIS PAPER RECOMMENDS

Four targeted reforms, distinct from a general review of the Act, alongside a shift to proactive publication by default:

- A legislated financial penalty, payable by the responsible department rather than an individual officer, for failure to determine a request within the statutory timeframe without reasonable excuse **Rec 11**
- A statutory presumption of disclosure requiring agencies to affirmatively justify any exemption **Rec 10**
- A shortened, independently assessed appeal pathway, since a right of review that takes many months to resolve provides little practical deterrent **Rec 12**
- Closure of the ministerial personal-document loophole **Rec 12**
- Proactive publication as the default for ministerial diaries, gifts and hospitality, government contracts and variations, grant decisions, cost-benefit analyses and departmental advice, and lobbying and donation records, lessening the need for citizens to request what government should publish **Rec 13**

⁵². Office of the Victorian Information Commissioner (OVIC) (2025) 2024–25 Annual Report. ovic.vic.gov.au; for 2016–17, OVIC (2019) *The State of Freedom of Information in Victoria: Five Years in Review 2014–2019*. ovic.vic.gov.au

⁵³. Office of the Victorian Information Commissioner (OVIC) (2025) 2024–25 Annual Report. ovic.vic.gov.au

⁵⁴. OVIC (2025) Annual Report 2024–25, p. 66. ovic.vic.gov.au; for 2015–16, OVIC (2019) *The State of Freedom of Information in Victoria: Five Years in Review 2014–2019*. ovic.vic.gov.au

⁵⁵. Parliament of Victoria, Integrity and Oversight Committee (2024) *Inquiry into the operation of the Freedom of Information Act 1982 (Vic)*, September 2024. parliament.vic.gov.au; OVIC (2024) *Report on the Inquiry into the Operation of the Freedom of Information Act 1982 (Vic)* tabled in Parliament, media release, 23 September 2024. ovic.vic.gov.au

06 MONEY OUT OF POLITICS

RESTORING TRUST
Donations, caps and disclosure

A donation on Monday can shape a policy on Tuesday, and stay hidden for three weeks.

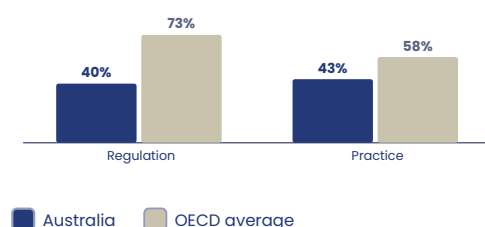
Victoria's political finance law has been in a state of near-continuous reconstruction. On 15 April 2026, the High Court unanimously held in *Hopper v Victoria* that Part 12 of the *Electoral Act 2002* (Vic) was constitutionally invalid, finding that the caps, combined with the nominated-entity exception, impermissibly burdened the implied freedom of political communication by allowing major parties effectively to exceed the caps binding independents and minor parties⁵⁶. Because the Court found the provisions could not be severed, Victoria lost all of Part 12, including its donation caps, disclosure rules and foreign-donation ban, months before a state election scheduled for November 2026. The rebuilt regime sets a general donation cap of \$5,190 for the period to 28 November 2026, rising to \$7,740 (indexed) from 29 November 2026 under the Electoral Further Amendment Act 2026; a disclosure threshold of \$1,290; a 21-day disclosure requirement; and bans on foreign and large anonymous donations. A qualifying "new entrant", including an eligible independent candidate, can receive up to twice the ordinary general cap, currently \$10,380 from an individual donor before the 2026 election⁵⁷.

Broadly Australia's federal political finance regulatory regime is, on the OECD's own 2024 assessment, well below the OECD average: only 40 per cent of regulatory criteria and 43 per cent of practice criteria met, against OECD averages of 73 and 58 per cent, with no independent body responsible for overseeing political party and campaign financing⁵⁸. Twenty-one-day disclosure is a meaningful improvement on annual reporting. However, during an active campaign it can still let a donation made on a Monday shape a policy announcement on Tuesday while remaining publicly invisible for up to three weeks. Operation Sandon's 2023 findings on the property-development sector, donors making political donations, donating to fundraisers and cultivating relationships with councillors and MPs to secure favourable planning outcomes, have been only partly addressed: the government accepted 32 of IBAC's 34 Sandon recommendations in full or in principle in March 2024, but Victoria's rebuilt donation laws still contain no ban on donations from property developers of the kind New South Wales has⁵⁹.

How Victoria lost, and rebuilt, its donation laws

- | | |
|-------------|--|
| 15 Apr 2026 | High Court rules in <i>Hopper v Victoria</i> that Part 12 of the Electoral Act is invalid. Caps, disclosure rules and the foreign-donation ban all fall. |
| June 2026 | Parliament rebuilds the regime: caps, 21-day disclosure and bans on foreign and large anonymous donations. |
| 28 Nov 2026 | State election. The general cap rises from \$5,190 to \$7,740 afterwards. |

Political finance: OECD criteria met, 2024



⁵⁶. High Court of Australia (2026) *Hopper v Victoria* [2026] HCA 11, judgment summary, 15 April 2026. [hcourt.gov.au](https://www.hcourt.gov.au)

⁵⁷. Victorian Electoral Commission (VEC) Political finance laws 2026. vec.vic.gov.au; VEC, Political donations (current cap, threshold and new-entrant amounts). vec.vic.gov.au

⁵⁸. OECD (2024c) Anti-Corruption and Integrity Outlook 2024: Country Notes: Australia. [oecd.org](https://www.oecd.org)

⁵⁹. IBAC (2023a) Operation Sandon Special Report: Findings of corrupt conduct in planning decision-making at state and local government. ibac.vic.gov.au; Victorian Government (2024) Strengthening planning and local government, media release, 20 March 2024. [premier.vic.gov.au](https://www.premier.vic.gov.au)

Real-time disclosure, and no developer donations.

WHAT THIS PAPER RECOMMENDS

- Disclosure of all donations above a low threshold within 24–48 hours rather than 21 days **Rec 14**
- A prohibition on donations from property developers with planning applications under active consideration **Rec 15**
- Closing the remaining avoidance mechanisms in the donation cap for associated persons, trusts, non-corporate vehicles and entities under common effective control, building on the existing rule that related bodies corporate already counts as a single donor **Rec 16**
- A cap on the value of hospitality, gifts and fundraising-dinner access, for example a \$150 per-head cap on fundraising events, with anything above that threshold captured by the donation cap **Rec 17**
- An independent Electoral Integrity Commission, separate from the VEC's election-administration function, with power to investigate breaches, compel financial records and impose meaningful penalties **Rec 18**

Victoria's rebuilt donation rules, 2026

\$5,190	general donation cap to 28 November 2026
\$7,740	cap after the election
\$1,290	disclosure threshold
21 days	to disclose a donation
\$0	ban on property developer donations. NSW has one; Victoria doesn't.

32 of 34

Operation Sandon recommendations accepted in full or in principle in March 2024, yet still no developer donation ban



Big gifts are still allowed. In April 2026 Pauline Hanson unveiled a plane she said was donated by One Nation supporters. Used models sell for well over \$1 million. Politicians can still receive large gifts or charge for expensive per-head dinners. ⁶⁰

94%

of our survey respondents rate openness about donations and lobbying as poor

60%

strongly disagree that donation rules prevent undue influence

3 weeks

a donation can stay hidden under 21-day disclosure

⁶⁰. AAP, 'Hanson flaunts "sexy" new plane before donor law change', 29 April 2026. [aapnews.aap.com.au](https://www.aapnews.aap.com.au)

07 LOBBYING AND ACCESS

RESTORING TRUST
Buying influence

Most lobbying is done in-house, where the register can't see it.

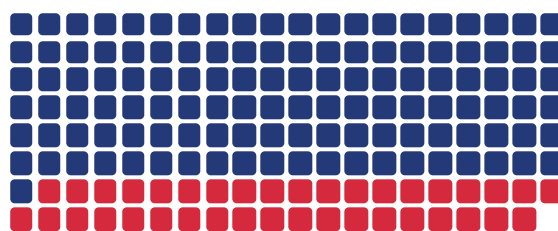
Victoria has a Lobbyists and Government Affairs Directors Register, but it has several weaknesses, and a recent case shows exactly how they play out in practice.

LOBBYING IN ACTION

The strata giant and the confidential submission

In June 2026, *The Age* revealed that PICA Group, Australia's largest strata management company, had been granted confidential status by the government's own expert review panel while it privately lobbied against a proposed ban on insurance commissions⁶¹. PICA reportedly told the panel, privately, that banning the commissions would cause 70 per cent of strata management companies to collapse. That figure appears in the panel's final report, but the only trace of PICA's involvement is a single footnote referring to an unnamed "confidential submission"⁶². The panel had received 159 written submissions in total; only 121 were published, and 38, including PICA's, were kept from public view⁶². It demonstrates, inside a live government process, the exact structural gap this white paper identifies.

Submissions to the government's expert panel



■ 121 published ■ 38 kept from view, including PICA's

70%

of strata firms would collapse, PICA claimed in private. The claim made the final report. PICA's name didn't.

Victoria does maintain a Register of Government Affairs Directors alongside its consultant lobbyist register, so in-house activity is not entirely unregulated, but that register imposes substantially weaker disclosure requirements and produces none of the transaction-level detail, such as who was lobbied, about what, when and for what outcome, that the consultant lobbyist register is meant to provide. As Adam Promnitz of the Strata Owners Alliance put it, the episode looked like "classic closed-door lobbying from the strata industry's big end of town," where "transparency matters, and the influence of the big end of town... should not be hidden from public view"⁶². *The Age* described the episode as secret lobbying. PICA Group has said it "has been very open and public about our concerns regarding the prohibition of insurance commissions"⁶¹.

Three specific gaps exist in the current regime.

"Classic closed-door lobbying from the strata industry's big end of town."

ADAM PROMNITZ
STRATA OWNERS ALLIANCE

Up to 80%

of lobbying is done in-house, by staff of companies, industry groups and unions, under a weaker register

⁶¹. Rachael Dexter, "Strata giant unmasked in secret lobbying to save insurance kickbacks," *The Age*, 8 June 2026. Reported in Insurance Business (2026) 'Strata giant allegedly lobbied in secret to preserve insurance commissions'. [insurancebusinessmag.com](https://www.insurancebusinessmag.com)

⁶². Rachael Dexter, "Strata giant unmasked in secret lobbying to save insurance kickbacks," *The Age*, 8 June 2026.

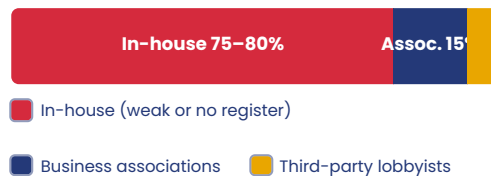
Up to 80% of lobbying never has to register.

First, the definition of “lobbyist” in the Victorian Government Professional Lobbyist Code of Conduct, an administrative code rather than legislation, captures only third-party consultant lobbyists; in-house lobbyists, employees of corporations, industry associations and unions lobbying on their own employer’s behalf, sit under the weaker Register of Government Affairs Directors, notwithstanding that in-house lobbying is estimated to account for up to 80 per cent of all lobbying activity⁶³. The Centre for Public Integrity’s February 2025 submission on Victorian lobbying reform makes the same point in starker terms: the vast majority of government relations work in Australia, somewhere between 75 and 80 per cent, is now done in-house, with only around 15 per cent going through business associations and the remainder through third-party consultants⁶⁴. This is not a fringe practice: most large Australian firms are now thought to keep at least three government relations staff on payroll, whose job includes lobbying government directly, and such firms typically don’t bother engaging a third-party lobbyist at all because the function already sits in-house⁶⁵.

This is not a uniquely Victorian problem, and it is not improving. New federal analysis published by the Australian Democracy Network in August 2026 found that a majority of Australia’s 100 largest listed companies, and around 70 per cent of the top 300, representing roughly \$1.6 trillion in value, do not appear on the Commonwealth lobbyist register at all, because as in-house operators they are not required to⁶⁶. NAB, Commonwealth Bank, Santos, Qantas, Tabcorp, Aristocrat Leisure, News Corp and APA Group were all named as absent⁶⁶. “Lobbying is part of democracy,” ADN chief executive Saffron Zomer said. “The problem is when corporate money buys a level of access and influence ordinary Australians could never afford”⁶⁶. Victoria’s register has the identical structural blind spot.

Who does government relations work in Australia

Centre for Public Integrity estimate



~70%

of Australia’s top 300 listed companies, worth about \$1.6 trillion, aren’t on the Commonwealth lobbyist register

“The problem is when corporate money buys a level of access and influence ordinary Australians could never afford.”

SAFFRON ZOMER
AUSTRALIAN DEMOCRACY NETWORK

94%

of our survey respondents say industry lobbies have too much influence

79%

say the same of professional lobbyists

96%

rate the management of lobby groups poor

⁶³. Parliament of Victoria Research and Information Service (2024) Lobbying in Victoria, Research Note No. 1, February 2024. parliament.vic.gov.au

⁶⁴. Centre for Public Integrity (2025) Submission to the Department of Premier and Cabinet lobbying reform consultation, 13 February 2025. publicintegrity.org.au

⁶⁵. Bell, S. (2023) ‘Large firms in Australian politics: the institutional dynamics of the government relations function’, Australian Journal of Political Science, 58(1), 124–140. doi.org

⁶⁶. Ben McKay (AAP), “Reform calls as big business dodges lobbying register,” 25 August 2026, citing Australian Democracy Network analysis. aapnews.aap.com.au

The same names appear on the lobbying register and the donations list.

A comparison of the Victorian Register of Lobbyists against Victorian Electoral Commission donation disclosures for the 2023/24 financial year found registered third-party lobbyists who donated to the Victorian ALP that year included GXO Strategies, headed by former Queensland ALP state secretary Cameron Milner; Pyne & Partners, chaired by former federal defence minister Christopher Pyne; and Markstone Group. Clients who retained a registered lobbyist and also donated to the Victorian ALP over the same period included the Pharmacy Guild of Australia Victoria, Idameneo, Victorian Hydrogen and Ammonia Industries, Mazzei Group, Kinetic Group, Marand Precision Engineering, and Symal Group/Symal Infrastructure⁶⁷. The Centre for Public Integrity does not allege any impropriety by the firms or individuals named. Because in-house lobbyists don't have to register at all, this cross-check almost certainly understates how often the two channels overlap. IBAC itself flagged the connection between donations and lobbying as a corruption risk in a dedicated special report in October 2022⁶⁸, a warning the government has had four years to act on.

Victoria also already bans "success fees", payments dependent on a lobbyist achieving their client's outcome, but only for one narrow category of success: the tendering or awarding of a public project⁶⁹. A lobbyist can still be paid on success for designing the wording of legislation or securing a favourable policy change, which is exactly the kind of outcome that rewards doing "whatever it takes" to win⁷⁰.

Second, Victoria does not require publication of ministerial diaries at a level of detail that would let the public link a meeting to an outcome, and the requirement applies only to ministers, not to the ministerial staff and senior officials through whom much external engagement occurs. Diary summaries are published quarterly and are meant to record the date, organisation, attendees and purpose of any scheduled meeting with a stakeholder, lobbyist or Government Affairs Director⁷¹. Even that limited disclosure has not been fully complied with. When the Centre for Public Integrity reviewed the scheme in February 2025, three quarterly releases had been published, too few to assess whether it was working⁶⁷. But as the PICA episode shows, meaningful lobbying often happens before or outside a scheduled ministerial meeting altogether, inside a review process the government itself commissioned, where confidentiality can be granted at the panel's discretion. The public never learns who asked for it or why.

Lobbyists and clients who also donated to the Victorian ALP, 2023–24

Registered third-party lobbyists

GXO STRATEGIES PYNE & PARTNERS
MARKSTONE GROUP

Clients of registered lobbyists

PHARMACY GUILD (VIC) IDAMENEO
VIC HYDROGEN & AMMONIA INDUSTRIES
MAZZEI GROUP KINETIC GROUP
MARAND PRECISION ENGINEERING
SYMAL GROUP

In-house lobbyists don't register, so this cross-check almost certainly understates the overlap.

Ministers only

diaries don't cover ministerial staff or senior officials

⁶⁷. Centre for Public Integrity, Victorian DPC Lobbying Reform Consultation Submission, 13 February 2025. publicintegrity.org.au

⁶⁸. Independent Broad-based Anti-corruption Commission, *Corruption Risks Associated with Donations and Lobbying*, 12 October 2022. ibac.vic.gov.au

⁶⁹. Victorian Government Professional Lobbyist Code of Conduct, cl 3.6. lobbyists.vic.gov.au

⁷⁰. Ng, Y-F. (2020) 'Regulating the influencers: the evolution of lobbying regulation in Australia', *Adelaide Law Review*, 41(2). classic.austlii.edu.au

⁷¹. Victorian Government, Ministerial diary disclosures. vic.gov.au

No fines, no penalties, no enforcer.

Third, Victoria's regime carries no fines or criminal penalties for breaches of the Lobbyist Code of Conduct, and the Human Rights Law Centre has described equivalent federal arrangements as "full of loopholes, and almost never enforced". The absence of recorded breaches does not establish the absence of problematic conduct⁷².

Ireland's Regulation of Lobbying Act 2015 is the international benchmark this white paper draws on: it applies to all lobbying activity, requires disclosure of organisations lobbied, topics discussed and outcomes sought in a single searchable public register, and is enforced by the Standards in Public Office Commission, which can investigate breaches, issue fixed-payment notices and prosecute.⁷³

A further, distinct channel of influence operates through direct government funding of the peak bodies that simultaneously lobby government: grants, program funding and procurement relationships that sit entirely outside both the lobbying register and the donations regime. No comprehensive Victorian register currently discloses which industry associations receive government funding, in what amount, for what purpose, and whether the recipient is simultaneously lobbying the funding department's own portfolio. The four largest industry associations alone report around \$140 million a year in combined revenue.

Four big industry associations, annual revenue

Combined annual revenue of about \$140 million (latest year reported)

Australian Industry Group (2022)	\$68m
Property Council of Australia (2023)	\$38m
Minerals Council of Australia (2021)	20.6m
Australian Banking Association (2021)	\$14m

Source: The Australia Institute, Trade associations in Australia, December 2024.

WHAT THIS PAPER RECOMMENDS

- Primary legislation covering all lobbying activity, including in-house lobbyists **Rec 19**
- A single, publicly searchable register recording organisations lobbied, topics discussed, outcomes sought and amounts spent **Rec 19**
- Statutory force and meaningful penalties for the Lobbyist Code of Conduct, with enforcement transferred to IBAC **Rec 20**
- A prohibition on registered lobbyists sitting on government-appointed boards while registered, and a broadened ban on success-fee arrangements covering any legislative or policy outcome, not just the awarding of public projects, which create a structural incentive to use whatever means are necessary, including potentially corrupt means, to secure a client outcome **Rec 22**
- Integration of the Register of Lobbyists with ministerial diary disclosures and Victorian Electoral Commission donations data, so that the overlap between lobbying and donating is visible without a manual cross-check **Rec 21**
- A public register of government funding to peak bodies and industry associations, with recipients above a funding threshold required to disclose membership, revenue sources and lobbying expenditure as a condition of continued funding **Rec 23**
- In direct response to the PICA case, a rule that any confidential submission to a government-commissioned review that is subsequently relied on, cited or quoted in that review's public findings must have the submitting party's identity disclosed, even where the content itself remains confidential **Rec 13**

⁷². Human Rights Law Centre (2024c) Albanese Government should stop selling out Australia's democracy to lobbyists, media release, 18 March 2024. hrlc.org.au

⁷³. Regulation of Lobbying Act 2015 (Ireland); Standards in Public Office Commission, Register of Lobbying. lobbying.ie

08 THE REVOLVING DOOR

RESTORING TRUST

From public office to private influence

The pipeline into lobbying runs through ministers' offices.

The movement of ministers, advisers and senior officials into roles that lets them monetise government relationships, frequently by lobbying their former colleagues, is among the most corrosive elements of Victoria's integrity environment. It creates an incentive for a decisionmaker to favour a prospective future employer in a current decision, and it gives private interests an advantage no ordinary citizen can obtain. None of the individual instances documented here is known to be unlawful, which is precisely the structural concern: the law creates no meaningful barrier between political office and the subsequent commercialisation of the access and relationships built inside it.

The revolving door into lobby firms

More than half of Australia's registered lobbyists have previously worked in government⁷⁴. *The Age's* own reporting has tracked this for years. A 2023 investigation found that almost 65 per cent of lobbying firms registered in Victoria had lobbyists on their books who were former MPs, ministerial staffers or party officials⁷⁵.

The Centre for Public Integrity's analysis conducted in early 2025 found the pattern more pronounced at the state level than nationally. 167 of Victoria's registered lobbyists, or 54 per cent, disclosed a former political affiliation, against 39 per cent on the federal register⁷⁶. Among Victoria's registered Government Affairs Directors, the figure was starker still: 98.4 per cent of all disclosed affiliations were people who had worked as a chief of staff, senior adviser or adviser in a ministerial office. Among third-party lobbyists specifically, the same category, former chief of staff, senior adviser or adviser, accounted for 47.2 per cent of all disclosed affiliations, confirming that the dominant pipeline into lobbying isn't ex-ministers themselves but the staffers who worked immediately around them⁷⁶.

50%+

of Australia's registered lobbyists previously worked in government

~65%

of Victorian-registered lobbying firms had former MPs, staffers or party officials on the books (2023)

Registered lobbyists disclosing a former political affiliation



IT'S NOT EX-MINISTERS. IT'S THE PEOPLE WHO SAT BESIDE THEM.

98.4%

of Government Affairs Directors' disclosed affiliations were former chiefs of staff or advisers

47.2%

of third-party lobbyists' affiliations were in the same category

⁷⁴. Human Rights Law Centre (2024c) Albanese Government should stop selling out Australia's democracy to lobbyists, media release, 18 March 2024. [hrlc.org.au](https://www.hrlc.org.au)

⁷⁵. Royce Millar, "Ex-Labor MPs, advisers flock to lobbying roles," *The Age*, 6 July 2023

⁷⁶. Centre for Public Integrity, Victorian DPC Lobbying Reform Consultation Submission, 13 February 2025. publicintegrity.org.au

Eighteen months, then open for business.

Victoria's cooling-off periods are 18 months for former ministers and cabinet secretaries, and 12 months for parliamentary secretaries, ministerial officers and public service executives.⁷⁷ A former minister cannot register as a lobbyist during that window, but can freely establish a consulting business, provide "strategic advisory" services functionally indistinguishable from lobbying, and also build commercial relationships with interests likely to lobby the government they formerly led. Yee-Fui Ng of Monash University put the comparative picture bluntly: "Victoria has quite a way to go in terms of achieving more robust regulation of lobbying," trailing NSW, Queensland and jurisdictions like Canada⁷⁸.

Since March 2024, the *Code of Conduct for Directors of Victorian Public Entities* has barred directors from lobbying on matters that may relate to their entity's functions, requires them to confirm this at each board meeting, and requires them to declare relevant past lobbying⁷⁹. The code is an administrative instrument, not legislation. It does not stop registered lobbyists being appointed, and it sets no stand-down period between lobbying and appointment. The Centre for Public Integrity has proposed a defined stand-down period after someone stops lobbying before they become eligible for appointment to a public board⁸⁰.

Cooling-off periods before former officeholders can lobby

Months

Victoria now: ministers	18
Victoria now: staff and executives	12
Proposed: ministers	24
Proposed: staff and senior officials	18
Canada: designated officeholders	60

Victoria's rules stop former ministers registering as lobbyists, but not from "strategic advisory" work that does the same job.

"Victoria has quite a way to go in terms of achieving more robust regulation of lobbying."

YEE-FUI NG
MONASH UNIVERSITY

18 months

Victoria's ban on former ministers lobbying

2 years

this paper's proposal for ministers

5 years

Canada's standard, the benchmark for review

None

stand-down period between lobbying and a board seat

WHAT THIS PAPER RECOMMENDS

- Extending cooling-off restrictions to two years for ministers, and 18 months for ministerial staff and senior public servants at SES Band 2 and above **Rec 24**
- Closing the strategic-advisory loophole by defining restricted activity to cover conduct substantially equivalent to lobbying, regardless of whether it involves formal contact with a current officeholder **Rec 25**
- A mandatory annual post-employment declaration, published by IBAC, confirming a former officeholder is not engaged in a role connected to matters they oversaw in office **Rec 26**
- Benchmarking the ministerial restriction against Canada's five-year standard for future review, in line with the Centre for Public Integrity's federal recommendation **Rec 27**
- A defined stand-down period after someone stops lobbying before they can be appointed to a public board, and putting the Directors' Code lobbying restriction into legislation, with penalties, and extending it to all lobbying **Rec 22**
- Extending the same disclosure logic to public board appointments generally, requiring the government to publish, alongside each A and B tier appointment, the appointee's declared political party membership or affiliation status and the selection criteria applied **Rec 30**

⁷⁷. Parliament of Victoria Parliamentary Library and Information Service (2024) Lobbying in Victoria, Research Note No. 1, February 2024. parliament.vic.gov.au

⁷⁸. Royce Millar, "Ex-Labor MPs, advisers flock to lobbying roles," The Age, 6 July 2023

⁷⁹. Victorian Public Sector Commission (2024) *Code of Conduct for Directors of Victorian Public Entities* 2024, cl 3.13. vpssc.vic.gov.au

⁸⁰. Centre for Public Integrity, Victorian DPC Lobbying Reform Consultation Submission, 13 February 2025. publicintegrity.org.au

Lobbyists don't just walk the halls. They fund the parties.

An ABC Four Corners investigation in August 2026 put a sharper point on the scale of the problem at the federal level. Victoria's cooling-off periods are similar to the Commonwealth's, so the same exposure applies here. The investigation identified at least 60 former defence ministers, senior military officers and department officials who have moved into weapons companies or defence-focused lobbying firms, including former defence minister Christopher Pyne, whose firm describes itself as "number one in defence", and a former senior officer who moved into a multinational contractor's top local role within days of leaving the Australian Defence Force⁸¹. The same investigation found that registered and unregistered lobbyists routinely outnumber elected members inside Parliament House itself, and that lobbying by industry associations and in-house corporate government-relations teams, as distinct from third-party consultant lobbyists, falls outside the federal register altogether, so a significant share of paid access-seeking is never disclosed at all⁸². Its analysis of donations from the 93 firms on the federal lobbyists register found they had given a combined \$13.5 million to political parties between 1998 and 2025, with the ten largest donor firms accounting for more than a third of that total and one firm alone responsible for \$1.16 million to Labor⁸³.

The Centre for Public Integrity's 2023 federal research, *Closing the Revolving Door*, drew the connection explicitly between donations and access. Its analysis of the Federal Register of Lobbyists and political donations data pointed to a recurring pattern of former officeholders lobbying for entities that had donated to their parties while they were in office, and that weak post-employment restrictions let former officials cash in on their connections almost immediately after leaving office⁸⁴. That report's central recommendation, extending the post-employment cooling-off period to five years and applying it to all MPs rather than just ministers, remains the benchmark this white paper adopts by reference to Canada's equivalent five-year ban, administered by an independent Commissioner of Lobbying with genuine enforcement power⁸⁴.

60+

former defence ministers, senior officers and officials now in weapons companies or defence lobbying firms

Donations from firms on the federal lobbyists register, 1998–2025

93

registered lobbying firms analysed

Top 10 donor firms' share of the total

More than a third

\$13.5m

given to political parties

83 other firms

One firm alone, to Labor

\$1.16 million

⁸¹. ABC News (2026) 'Dozens of government insiders lobbying for defence industry, analysis shows', 24 August 2026. [abc.net.au](https://www.abc.net.au)

⁸². ABC News (2026) 'Inside Parliament House, powerful lobbyists can outnumber politicians', 23 August 2026. [abc.net.au](https://www.abc.net.au)

⁸³. Centre for Public Integrity (2023) *Closing the revolving door: corporate influence and the need for lobbying reform*, April 2023. publicintegrity.org.au

⁸⁴. Lobbying Act, RSC 1985, c C-44, s 10.11(1) (Canada); Centre for Public Integrity (2023) *Closing the revolving door: corporate influence and the need for lobbying reform*, April 2023. publicintegrity.org.au

Strong at entry and in office. Weak at the exit.

The OECD's guidance on managing conflict of interest treats the revolving door as a lifecycle risk requiring controls at entry to office, during service, and at exit. It finds that jurisdictions regulating only the middle stage leave the most commercially valuable period of an official's access, the years immediately after departure, largely unregulated⁸⁵. Victoria is comparatively strong on entry and service-stage controls and comparatively weak at exit. The cooling-off period is short, strategic-advisory work is excluded from its scope entirely, and there is no requirement that a former officeholder ever confirm, at any point, that their subsequent conduct in fact complied with the restrictions that notionally applied to them.

The revolving door to boards

A fundamental concern is not just the revolving door into lobbying, it is also appointments to boards. A defined subset of Victoria's public board governance system, comprising 843 boards and approximately 6,000 positions and spanning portfolios from major infrastructure and health services to water and cemetery trusts, is distinct from, and considerably narrower than, the broader Victorian Public Sector Commission universe of more than 3,500 boards and roughly 31,000 members (VPSC, June 2022), discussed later in this white paper, which also aggregates categories such as school councils, cemetery trusts and land-management committees.

The Victorian Ombudsman's December 2023 report, *Alleged politicisation of the public sector*, examined 16 former ministerial staff appointed to senior public sector roles and found widespread departures from normal merit-based processes, poor documentation and 11 direct appointments without a competitive process.⁸⁶ But it explicitly did not find evidence that those appointments were motivated by overt partisan considerations or designed to advance the governing party's objectives. That qualification matters: it distinguishes a real, evidenced procedural risk from a proven case of partisan appointment, and this white paper adopts the same distinction rather than treating the two as equivalent.

It can be particularly problematic when someone governs a board in an area they previously oversaw as a minister or senior official. Taken together, these findings suggest that the guidelines governing board appointments, which formally require both merit-based selection and demographic representativeness, may in practice be subordinated to patterns capable of creating perceptions of patronage and undermining confidence in merit-based appointments, even where patronage itself has not been established.

Conflict-of-interest controls across an official's career

Entry: strong In office: strong Exit: weak

The OECD treats the revolving door as a lifecycle risk. The years after leaving office are the most commercially valuable, and the least regulated.

843

public boards with about 6,000 positions

11 of 16

former ministerial staff given senior public sector roles were appointed directly, with no competitive process

The test should not be “did you personally handle this exact matter?”
The question that should be posed should be: does your new employment, or appointment, materially benefit from the government relationships and influence you acquired in office?

⁸⁵. OECD (2003) Recommendation of the Council on Guidelines for Managing Conflict of Interest in the Public Service, OECD/LEGAL/0316. legalinstruments.oecd.org; OECD (2004) Managing Conflict of Interest in the Public Service: OECD Guidelines and Country Experiences.

⁸⁶. Victorian Ombudsman (2023) *Alleged politicisation of the public sector: Investigation of a matter referred from the Legislative Council on 9 February 2022, Part 2*, December 2023. ombudsman.vic.gov.au

09 THE BIG FOUR AND CONSULTANCIES

RESTORING TRUST
Outsourcing government

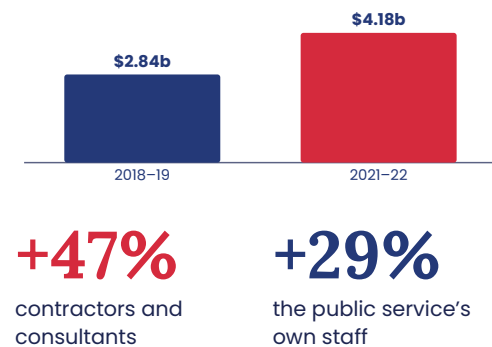
Spending on consultants grew faster than spending on staff.

Victoria's consulting and outsourcing dependency is not a peripheral procurement issue. It is a distinct integrity risk: these businesses have different incentives and drivers, and significant conflict-of-interest risks.

The scale of the dependency

The growing reliance of the Victorian public sector on external consultants and contractors raises broader questions about the capacity, efficiency and accountability of government. Analysis by the Victorian Auditor-General's Office (VAGO) illustrates the scale of this shift. VAGO's audit of contractor and consultant spending across the Victorian public service found total spending rose from \$2.84 billion in 2018–19 to \$4.18 billion in 2021–22, a 47 per cent increase, with spending on consultants and contractors growing faster than spending on the public service's own staff, which rose only 29 per cent over the same period⁸⁷. Consultant spending alone totalled \$561 million over the four years from 2018–19 to 2021–22, and over the six years to 2022–23 just five firms (KPMG, EY, PwC, Deloitte and Boston Consulting Group) received \$434 million of \$821 million in consultant spending, or 53 per cent⁸⁸. The government's own professional-services reduction targets were missed almost across the board: professional-services spending grew 40 per cent against a target reduction of 50 per cent. Only the Department of Premier and Cabinet met its target. VAGO found only four of nine departments monitored contractor and consultant spending on anything more frequent than an annual basis, comparing actual spend against budget only once a year, far too infrequently to catch a cost anomaly. This white paper supports VAGO's recommendation that every department monitor this spending at least quarterly. It also recommends that the Department of Treasury and Finance set common reporting rules, so that every department records contractor and consultant spending the same way, and that the data be published routinely rather than released only in response to Freedom of Information requests.⁸⁷

Contractor and consultant spending, Victorian public service



53%

of \$821m in consultant spending over six years went to five firms

4 of 9

departments check this spending more than once a year

+40%

growth in professional-services spending, against a target to cut it by 50%. Only one department met its target.

⁸⁷. VAGO (2023) Contractors and Consultants in the Victorian Public Service: Spending, tabled 29 November 2023. audit.vic.gov.au

⁸⁸. VAGO (2023) Contractors and Consultants in the Victorian Public Service: Spending, tabled 29 November 2023. audit.vic.gov.au; Government News (2023) 'Victorian spending on consultants blows out despite reduction targets'. governmentnews.com.au

Chinese walls aren't a safeguard.

The pattern is not confined to Victoria. The Centre for Public Integrity's analysis of Commonwealth AusTender data found spending on "management advisory services" contracts with the "Big Four" accounting and consulting firms, Deloitte, EY, KPMG and PwC, rose 1,276 per cent in a decade, from \$44 million in 2012–13 to \$605 million in 2021–22, with KPMG alone securing more than \$800 million in Defence-linked management advisory contracts over the period⁸⁹.

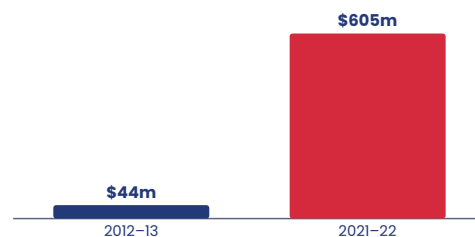
Why firewalls are not enough

These companies are businesses and are not bound by the same requirements as public servants, and they operate under different incentive structures, driven by profit rather than public good. They also deal directly with and advising multiple private and public companies where real conflicts can exist. The 2023 disclosure that a PwC Australia partner shared confidential Commonwealth tax policy information with colleagues, who used it to advise clients on how to sidestep the very laws being designed, is the domestic case study for a structural problem rather than an isolated ethical lapse⁹⁰.

The same pattern has occurred internationally. In the United States, the Food and Drug Administration engaged McKinsey & Company for opioid-regulation advisory work, while a separate McKinsey division was simultaneously advising opioid manufacturers on strategies to counter that same regulatory action. Documents obtained by the US House Committee on Oversight and Reform showed the notional separation between the two engagements had not in practice constrained the firm's conduct.⁹¹

Both episodes demonstrate that an internal information barrier within a single firm, a "Chinese wall", governed only by that firm's own internal policy and disclosed only at the firm's own discretion, is not a reliable safeguard where both sides of a regulatory or policy relationship simultaneously pay the same firm. Two federal inquiries have examined these firms. The Senate Finance and Public Administration References Committee's June 2024 final report recommended an Australian Law Reform Commission review of large partnerships and a public-interest clause in government consulting contracts, and the Parliamentary Joint Committee on Corporations and Financial Services reported on ethics and professional accountability in the audit, assurance and consultancy industry in November 2024. It is this white paper's view that partnerships of that scale make internal separation between a firm's audit, tax and advisory arms progressively harder to police as the firm grows⁹².

Commonwealth spending on Big Four 'management advisory' contracts



+1,276%

Deloitte, EY, KPMG and PwC. Source: Centre for Public Integrity analysis of AusTender data.

TWO WARNINGS

PwC, 2023. A partner shared confidential Commonwealth tax policy with colleagues who used it to advise clients on sidestepping the laws being designed.

McKinsey, US. Advised the FDA on opioid regulation while another division advised opioid makers on countering it.

⁸⁹. Centre for Public Integrity (2023) Opaque big four contracts increase 1276%. publicintegrity.org.au

⁹⁰. Senate Finance and Public Administration References Committee (2023) PwC: A calculated breach of trust. aph.gov.au; Tax Practitioners Board, deregistration of Peter-John Collins, 2023.

⁹¹. US House Committee on Oversight and Reform, Majority Staff (2022) The Firm and the FDA: McKinsey & Company's Conflicts of Interest at the Heart of the Opioid Epidemic, 13 April 2022. oversightdemocrats.house.gov

⁹². ABC News (2024) 'Big Four consultancies "operating in the shadows for too long" as Senate committee demands new rules for government contracts', 12 June 2024. abc.net.au; Centre for Public Integrity (2023) Opaque big four contracts increase 1276%. publicintegrity.org.au; Senate Finance and Public Administration References Committee (2024) Management and assurance of integrity by consulting services: final report, June 2024; Parliamentary Joint Committee on Corporations and Financial Services (2024) Ethics and Professional Accountability: Structural Challenges in the Audit, Assurance and Consultancy Industry, November 2024. aph.gov.au

Treat large consultancies as a named integrity risk.

WHAT THIS PAPER RECOMMENDS

This white paper recommends Victoria treat the Big Four and other large consulting and advisory firms holding government work as a distinct, named category of integrity risk requiring:

- **A public register of current government engagements with large consulting and advisory firms**, updated on a rolling basis, disclosing the firm, the engaging department or agency, the dollar value, the duration and a genuine, non-generic description of the scope of work, not the vague, boilerplate descriptions VAGO and the Centre for Public Integrity have both found make current disclosure practically meaningless. **Rec 34**
- **Mandatory, public, continuously updated conflict-of-interest files for any firm holding government work above a defined threshold**, disclosing every current private-sector client engagement in the same portfolio, sector or regulatory matter as the government work, filed before the contract is awarded and updated for the life of the engagement, not a one-off declaration buried in a tender response. **Rec 35**
- **A legislated prohibition on reliance on internal information barriers as a sufficient safeguard**. Consistent with the lessons of both the McKinsey opioid-advisory conflict and the PwC tax leak, Victorian procurement rules should provide that a firm may not accept or continue a government contract where it simultaneously holds a private-client engagement directly conflicting with that government work, and that an internal "Chinese wall" between teams or divisions of the same firm is not, by itself, an accepted justification for allowing the engagement to proceed regardless of what the firm's own internal compliance framework asserts. **Rec 36**
- **A legislated cap on the share of program and departmental budgets that may be spent on external consulting, contractor and labour-hire engagements**, set as a declining percentage over a defined multi-year period, with narrow, published exemptions for genuinely specialised or short-term technical work, replacing the current pattern of internally set, non-binding reduction targets that VAGO has found are missed by most departments without consequence. **Rec 37**
- **Statutory force for a public-interest duty clause** in every government consulting contract, modelled on the Senate committee's recommendation, making explicit that a contracted provider's obligation runs to the public interest in the delivery of government work, not solely to its own commercial interest or that of its other clients. **Rec 38**
- **Restoring in-house policy and delivery capability as the default**, with an independent, published capability audit identifying functions currently outsourced that could be delivered by a properly resourced public service, and dedicated, ring-fenced funding, on the model of the Commonwealth's APS Capability Reinvestment Fund, to rebuild that capability rather than renewing the consulting contract each time it lapses. **Rec 39**
- **Extending whistleblower protection to consulting staff working on government contracts**, so that a consultant who observes a conflict of interest, a misuse of confidential government information, or a breach of the public-interest duty above has a protected channel to report it, rather than relying solely on their employer's own internal governance to detect and correct the conduct. **Rec 40**

\$434m

of consultant spending went to just five firms over six years

+1,276%

Commonwealth Big Four advisory spending in a decade

50%

the cut in professional services the government promised and missed

10 GRANTS AND APPOINTMENTS

RESTORING TRUST
Public money and public office

Could an outsider see who decided, and why?

Government grants and appointments are particularly vulnerable to political influence because they involve genuinely discretionary decisions over public resources and public office. Operation Watts found irregularities in grants to three community organisations associated with factional figures within the governing party, and recommended stronger conflict-of-interest controls and improved grants administration. The government subsequently updated its *Better Grants by Design* guidelines⁹³. That is a necessary but insufficient response.

Victoria still lacks a single, searchable, whole-of-government grants register like the Commonwealth's GrantConnect, where agencies must publish grant details within 21 days of a grant agreement taking effect. Victorian grant information is instead spread across departmental annual reports and individual program pages, which makes it hard to see who received what, and why.⁹⁴ Ministerial discretion in grant allocation above nominal thresholds remains unconstrained by any legislative requirement for merit-based assessment or public reporting against criteria. The same structural gap that produced the Commonwealth's "sports rorts" and car-park grant controversies remains without a systemic safeguard in Victoria.

Appointments present the same dynamic in a different form. More than 31,000 people sit on Victorian public sector boards (VPSC, June 2022)⁹⁵. The OECD's 2024 Outlook finds that while Australia has a comprehensive regulatory framework defining how conflicts of interest should be managed, the country does not, in practice, fully track whether declarations are verified or what sanctions, if any, follow when they are not⁹⁶. This in effect means a declared conflict is treated as an administrative record rather than an operative constraint. At the national level, the Centre for Public Integrity's October 2025 Integrity Report Card found the federal government had withheld the 2023 Briggs Review of Public Sector Board Appointments, commissioned explicitly to end a "jobs for mates" culture, and that new appointments to the Australian Centre for Disease Control contained no merit-based appointment provision, despite the government's own acknowledgment elsewhere that such provisions are needed⁹⁷. In Victoria, the Ombudsman's 2023 investigation into politicisation of the public sector (section 8) is the closest equivalent, although it examined senior public service appointments rather than board appointments.

Where can you see who got a grant?

COMMONWEALTH

21 days

to publish each grant on GrantConnect, one searchable register

VICTORIA

No register

grants scattered across annual reports and program pages

31,000+

people sit on Victorian public sector boards

100%

OECD conflict-of-interest rules met by Australia on paper (2024)

33%

met in practice, below the OECD average of 40%

⁹³. IBAC and Victorian Ombudsman (2022) Operation Watts: A joint investigation into allegations of serious corrupt conduct involving Victorian public officers, including Members of Parliament. ombudsman.vic.gov.au

⁹⁴. Department of Finance (2024) Commonwealth Grants Rules and Principles 2024 (reporting on GrantConnect within 21 calendar days). finance.gov.au; GrantConnect. grants.gov.au

⁹⁵. Victorian Public Sector Commission, Board numbers and demographics. vpsc.vic.gov.au

⁹⁶. OECD (2024c) Anti-Corruption and Integrity Outlook 2024: Country Notes: Australia. oecd.org

⁹⁷. Centre for Public Integrity (2025c) The Albanese Government's Integrity Report Card, 27 October 2025. publicintegrity.org.au

If the answer is no, there's an integrity problem.

The core evidentiary standard this white paper applies to every discretionary decision over public money or public office is this: could an independent observer see who influenced the decision, what information was considered, what interests were declared, what alternatives were rejected, and why the public's money, or the public's trust, in the case of an appointment, was spent? If the answer is no, an integrity problem exists whether or not a criminal offence has been committed.

WHAT THIS PAPER RECOMMENDS

- Abolishing purely discretionary ministerial grants above \$50,000 in favour of published, competitive, merit-based processes with publicly disclosed criteria, scores and decision rationale **Rec 28**
- A real-time, whole-of-government grants register which records for every significant grant, the eligibility criteria, applicant, amounts requested and awarded, assessors, any ministerial intervention and reasons for departing from departmental advice, the final contract, and whether funds were acquitted or recovered **Rec 29**
- A requirement that government board appointments above a defined threshold follow a publicly advertised, merit-based process with an independent assessment panel, followed by public reporting of outcomes, and documented justification for any departure from the panel's recommendation **Rec 30**
- A mandatory, publicly accessible, actively verified electronic register of financial interests, directorships, shareholdings, gifts, hospitality and prior political or lobbying employment for ministers, senior public servants and board members, with a genuine financial penalty (this white paper proposes up to \$50,000, indexed periodically) for a sitting or former official found to have entered an undeclared conflict or failed to manage a declared one, replacing the current reliance on internal disciplinary process alone **Rec 31–32**

“Commercial-in-confidence is the excuse always proffered; commercial-in-confidence when it's taxpayers' money.”

SURVEY RESPONDENT
MAN, 65+, REGIONAL CITY

21 days

for Commonwealth agencies to publish grants. Victoria has no single register.

\$50,000

the threshold above which purely discretionary ministerial grants would end

31,000+

people on Victorian public boards, with no mandatory public merit test

11 WHISTLEBLOWERS, PARLIAMENT AND CIVIC SPACE

RESTORING
TRUST

Other integrity
measures

No integrity system works if people are afraid to report.

Whistleblowers. No integrity system functions if the people who witness wrongdoing are afraid to report it. Victoria's *Public Interest Disclosures Act 2012* provides the formal framework. Still, IBAC's 2025 survey found MPs less confident of a colleague's support for reporting corruption than they were in 2023. While 89 per cent of the 27 responding MPs said they would report wrongdoing (62 per cent strongly and 27 per cent somewhat) they observed⁹⁸, there is a gap between stated willingness and perceived institutional safety that no framework can close through legislative wording alone.

Key deficiencies include the absence of an independent, adequately resourced whistleblower support service; a disclosure process complex enough to itself deter disclosure; and penalties for detrimental action against disclosers too low to deter retaliation by a well-resourced public agency meaningfully. On coverage, the Public Interest Disclosures Act 2012 (Vic) is broader than it is sometimes given credit for. The Victorian Ombudsman confirms anyone, including a contractor or subcontractor, can make a disclosure about improper conduct involving a public body, and the Act provides confidentiality, immunity from civil and criminal liability, protection against defamation liability and remedies against detrimental action to a person who does.

The major gap is narrower and more specific: protections and coverage become uneven for employees of private contractors and subcontractors performing outsourced government work further down a contracting chain, where it is less clear who qualifies as a discloser and who bears the detrimental-action obligations. Ireland's Protected Disclosures Acts of 2014 and 2022, with a dedicated Disclosures Commissioner holding proactive outreach and genuine enforcement power, are the international benchmark.

Would MPs report wrongdoing they saw?

27 responding Victorian MPs, IBAC 2025

Strongly 62%

Somewhat 27%

But MPs were less confident than in 2023 that colleagues would back them for reporting.

What the parliamentary integrity commission can do

Impose

apologies, training, mediation and behaviour agreements for ordinary misconduct

Recommend

suspension or loss of a seat for serious misconduct. Parliament or the Premier don't have to act.

30

misconduct referrals to the Parliamentary Workplace Standards and Integrity Commission by February 2026

⁹⁸. IBAC (2025a) Victorian Perceptions of Corruption 2025: Members of Parliament. ibac.vic.gov.au

Integrity bodies find problems. Enforcement stalls.

Parliamentary integrity. Operation Watts recommended a Parliamentary Ethics Committee and a Parliamentary Integrity Commissioner with power to investigate misconduct by any MP regardless of party. In 2023, the government committed to establishing this body, describing it at the time as “the most significant overhaul of parliamentary oversight in the country.” That commitment has since been delivered: the Parliamentary Workplace Standards and Integrity Commission (PWSIC) was established on 31 December 2024 under the *Parliamentary Workplace Standards and Integrity Act 2024* and has been operating since, having received 30 misconduct referrals by February 2026.

The open question is no longer whether a parliamentary integrity body exists, but whether it can actually enforce what it finds. For ordinary parliamentary misconduct, the PWSIC can itself impose sanctions such as apologies, training, mediation and behavioural agreements. For serious misconduct, it generally cannot impose a sanction directly. It can recommend stronger consequences, including suspension or potentially vacation of a seat, to Parliament or the Premier, who are not obliged to act on that recommendation. This white paper treats that gap between finding and enforceable consequence as emblematic of the wider pattern documented throughout: Victoria’s own integrity institutions identify necessary reform, but delay or dilute at the point of enforcement. The PWSIC’s powers, independence, resources, transparency and enforcement capacity for serious misconduct should be reviewed against that standard.

MPs’ expenses and shareholdings. Two smaller measures would make parliamentary conduct easier to scrutinise. Publishing MPs’ office and work credit card statements would let the public see how that money is spent, item by item. And requiring MPs to hold any share investments only through broad exchange-traded funds would remove the risk that an MP votes on a matter affecting a company they own shares in, a risk that declaring the holding on the register of interests doesn’t remove (recommendations 8 and 9).

Civic space and protest rights. Civil society, an important check on government, has also faced new restrictions. The Human Rights Law Centre’s 2024 report *Protest in Peril: Our Shrinking Democracy* documents 49 distinct pieces of legislation affecting protest rights introduced across Australian jurisdictions over 20 years, and finds jurisdictions without a human rights instrument have, on average, enacted harsher anti-protest laws than Victoria, Queensland and the ACT, each of which has a human rights charter⁹⁹. Victoria’s own trajectory complicates any assumption that its Charter provides durable protection. The *Justice Legislation Amendment (Police and Other Matters) Act 2025*, passed after the December 2024 firebombing of a Melbourne synagogue, gave police new powers to direct removal of face coverings, created offences around “lock-on” devices and conduct near places of worship, and allows an exclusion order banning a person from a defined public area after repeated move-on orders.

Anti-SLAPP legislation. Separately, the Human Rights Law Centre’s *Stop the SLAPP* report, backed by 85 civil society organisations, documents the use of strategic litigation, defamation proceedings brought primarily to impose cost and delay rather than to vindicate a genuine legal right, against environmental campaigners, First Nations advocates, journalists and community organisations¹⁰⁰. The ACT remains the only Australian jurisdiction with dedicated anti-SLAPP legislation. The Human Rights Law Centre notes it excludes defamation and is too narrow to serve as a model¹⁰⁰.

49

laws affecting
protest rights
across Australia in
20 years

1

jurisdiction with
anti-SLAPP laws: the
ACT

⁹⁹. Human Rights Law Centre (2024a) *Protest in Peril: Our Shrinking Democracy*. hrlc.org.au

¹⁰⁰. Human Rights Law Centre (2024b) *Stop the SLAPP: Protecting Free Speech in Australia*. hrlc.org.au

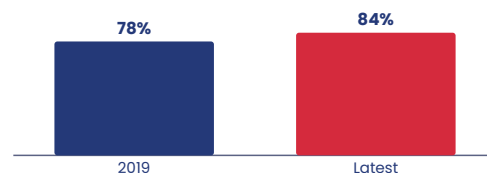
Four companies take 84 per cent of newspaper revenue.

Media plurality. A democracy needs independent journalism capable of investigating government. Australia's news market is unusually concentrated: four companies, News Corp, Nine Entertainment, Seven West Media and Australian Community Media, accounted for approximately 84 per cent of Australian newspaper revenue in the most recent measurement, up from 78 per cent in 2019¹⁰¹. The Australian Communications and Media Authority's own 2026 evidence points to a related but distinct gap: detailed statutory control data exists for only 13 per cent of professional news outlets, because 87 per cent, including every online news outlet, fall outside the media-control rules that were built for a print and broadcast era¹⁰². This matters specifically for regional Victoria: local accountability depends on journalists who attend council meetings, court hearings and planning decisions, and the Australia Institute has found News Corp retains only a fraction of its historical stand-alone regional mastheads, with most now folded into a digital-only model¹⁰¹. Competition mergers are already regulated through the ACCC framework. The more precise gap is that Australia's media ownership and control rules, unlike competition law, do not extend to most online news outlets. This white paper recommends extending ACMA-equivalent ownership and control scrutiny to digital news distribution, closing that specific gap rather than duplicating the ACCC's competition role, and sustaining independent, arm's-length public-interest journalism funding rather than leaving regional journalism dependent on the same government it is meant to hold to account.

Don't repeat the mistake with social media and AI

Australia let newspaper ownership concentrate for decades before anyone acted. The same thing is now happening faster online. A handful of global platforms decide what news many Australians see in their feeds, and a few companies control the most widely used artificial intelligence tools, which increasingly summarise the news and answer people's political questions. The ownership and control rules built for newspapers and broadcasters don't reach them, and the algorithms that rank what people see aren't open to public scrutiny. Victoria should push for the same plurality, transparency and accountability standards to apply to platforms and AI as to traditional media, before that concentration becomes entrenched.

Share of newspaper revenue held by the four biggest companies



News Corp, Nine, Seven West Media and Australian Community Media.

Professional news outlets covered by media-control rules

13% 87% outside the rules, including every online outlet



Rupert Murdoch. His News Corp Australia, formerly News Limited, is one of the four companies that together take about 84% of Australian newspaper revenue.¹⁰¹

¹⁰¹. The Australia Institute (2025) Newspaper competition in Australia: Declining competition and increasing concentration. australiainstitute.org.au

¹⁰². Australian Communications and Media Authority (ACMA) (2026) Indicator 1: News outlet controllers, News Media in Australia report series. acma.gov.au

Protect the people who speak up.

Disinformation in election campaigns. South Australia has prohibited materially inaccurate and misleading statements of fact in electoral advertising since 1985, and the ACT passed a similar law in 2020 that first applied at its 2024 election. Victoria has no equivalent, so a false factual claim in campaign material carries no electoral penalty. Recommendations 45 and 49 would close that gap, with enforcement by an independent body and a narrow focus on statements of fact rather than opinion.¹⁰³

Truth in political advertising laws

SA 1985	misleading statements of fact in electoral ads banned
ACT 2020	similar law, first applied at the 2024 election
Victoria	no equivalent

WHAT THIS PAPER RECOMMENDS

- An independent Victorian Whistleblower Support Service, operationally separate from IBAC, the Ombudsman, and the public service **Rec 41**
- Ensuring comprehensive Public Interest Disclosures Act protection throughout government contracting and subcontracting chains, closing the specific gaps that arise for employees of private contractors and subcontractors further down an outsourcing chain, rather than treating contractor coverage as entirely absent **Rec 42**
- Materially strengthening penalties for detrimental action against disclosers **Rec 43**
- Reviewing whether the Parliamentary Workplace Standards and Integrity Commission, established 31 December 2024 and operating since, has sufficient powers, independence, resources, transparency and enforcement capacity, distinguishing the sanctions it can impose itself for ordinary misconduct from serious misconduct, and where it can currently only recommend stronger sanctions to Parliament or the Premier **Rec 44**
- Introduce dedicated Victorian anti-SLAPP legislation that covers defamation, based on the design principles in the Human Rights Law Centre's *Stop the SLAPP* report and the strongest overseas models, such as Ontario's *Protection of Public Participation Act 2015* **Rec 46**
- Commissioning an independent statutory review of the 2025 policing powers within 18 months, reporting publicly on whether they have been used beyond their stated justification **Rec 47**
- Extending ACMA-equivalent media ownership and control scrutiny, distinct from the ACCC's existing competition-merger role, to digital news distribution, where 87 per cent of professional news outlets, including all online outlets, currently fall outside the control rules **Rec 48**
- Sustaining independent, arm's-length public-interest journalism funding rather than leaving regional journalism dependent on the same government it is meant to hold to account **Rec 48**
- Applying the same plurality, transparency and accountability standards to social media platforms and AI tools that distribute news and political content as to traditional media, including transparency about how their algorithms rank it **Rec 50**

82%

of our survey respondents rate whistleblower protection poor

89%

of responding MPs say they would report wrongdoing

84%

of newspaper revenue held by four companies

¹⁰³. Electoral Act 1985 (SA) s 113; The Australia Institute, Truth in political advertising laws. australiainstitute.org.au

Australia is open on budgets. It shuts citizens out of them.

Australia has been a member of the Open Government Partnership since 2015, and its third National Action Plan, covering 2024–2025, commits the Commonwealth to further open contracting and other transparency measures¹⁰⁴. No Victorian government has adopted an equivalent state-level open government action plan, or sought Open Government Partnership membership as a subnational government in its own right, leaving Victoria without the recurring, independently monitored public commitment cycle that federal open government reform already runs on.

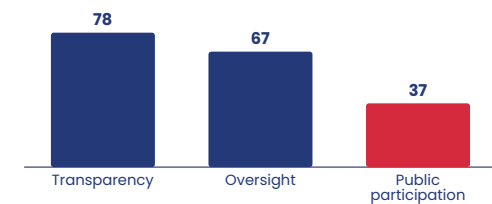
Where Australia is independently assessed, the results are mixed in a way that can be seen as instructive for Victoria. The International Budget Partnership's Open Budget Survey 2023 scored Australia 78 out of 100 for budget transparency, eleventh of 125 countries assessed, and 67 out of 100 for formal oversight by the legislature and the Auditor-General¹⁰⁵. Public participation in the budget process scored just 37 out of 100, the clear outlier of the three, reflecting the absence of any structured mechanism for citizens to help shape spending decisions rather than simply receive reporting on them after the fact.

Civil society's capacity to scrutinise government in between these formal processes depends on organisations that are themselves free to speak. That freedom has been contested before: Commonwealth funding agreements imposed on community legal centres in 2015 attempted to restrict organisations from using any funding, including their own non-government income, for law reform advocacy or public commentary critical of government policy, prompting sustained sector pushback, before the Albanese Government removed the advocacy restrictions from the National Legal Assistance Partnership 2020–25 in November 2022^{106,107}. Victoria has no standing statutory protection against a state government funding agreement doing the same.

There is also a generational dimension. The 2024 National Assessment Program in civics and citizenship recorded the lowest results since testing began in 2004. Only 28 per cent of Year 10 students met the proficient standard, down from 38 per cent in 2019, and only 43 per cent of Year 6 students did, down from 53 per cent¹⁰⁸. A generation with a weaker grasp of how government and accountability institutions work is, on its own terms, less able to notice when those institutions are captured, under-resourced or bypassed, which makes civics education a long-run integrity measure in its own right rather than a separate school policy question.

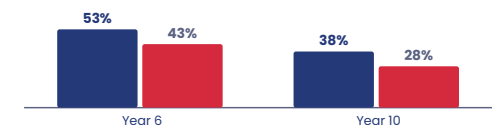
Open Budget Survey 2023: Australia

Score out of 100



Australia ranked 11th of 125 countries on budget transparency.

Students at the civics proficient standard



■ 2019 ■ 2024, the lowest since testing began

¹⁰⁴. Attorney-General's Department (2023) Australia's Third Open Government Partnership National Action Plan 2024–2025. [ag.gov.au](https://www.ag.gov.au)

¹⁰⁵. International Budget Partnership (2023) Open Budget Survey 2023: Australia. internationalbudget.org

¹⁰⁶. Attorney-General Mark Dreyfus (2022) Ending the gag on legal assistance providers, media release, 29 November 2022. [markdreyfus.com](https://www.markdreyfus.com)

¹⁰⁷. ABC News (2015) 'Community legal centres fear being silenced by "gag clause" in new Government agreement', 12 June 2015. [abc.net.au](https://www.abc.net.au)

¹⁰⁸. Australian Curriculum, Assessment and Reporting Authority (2025), reported in ABC News, 'Australian students record worst ever civics result with 28 per cent not understanding the basics of democracy', 18 February 2025. [abc.net.au](https://www.abc.net.au)

Let citizens see, follow and shape the budget.

WHAT THIS PAPER RECOMMENDS

- Adopting a Victorian Open Government Action Plan aligned with, and reported alongside, Australia's national Open Government Partnership commitments, and seeking Open Government Partnership subnational membership in Victoria's own right **Rec 54**
- Adopting an open budget process that publishes all expenditure at transaction level, modelled on Brazil's Open Budget Transparency Portal **Rec 54**
- Institutionalising participatory and deliberative budgeting for a defined share of new capital and discretionary program spending, building on Victoria's own citizens' jury and community-panel experience at local government level **Rec 54**
- Requiring Victorian departments and major delivery authorities to publish procurement data to the Open Contracting Data Standard, consistent with Australia's existing federal Open Government Partnership commitment on open contracting **Rec 54**
- Prohibiting non-advocacy ("gag") clauses in Victorian government funding and grant agreements with community organisations, community legal centres and peak bodies, and guaranteeing by statute their right to engage in law reform advocacy and public commentary using non-government funds **Rec 54**
- Publishing an annual, independently assessed State of Open Government report to Parliament, benchmarked against the Open Budget Survey's transparency, participation and oversight methodology **Rec 54**
- Strengthening Victoria's Open Data Policy with a legislated presumption of open-by-default publication for non-sensitive government data, with agency-level compliance reporting to Parliament **Rec 54**

"There should be far more consultation with communities and individuals and much less emphasis on the party system."

SURVEY RESPONDENT
MAN, 55-64, REGIONAL CITY

37/100

Australia's score for public participation in the budget

2015

Australia joined the Open Government Partnership. Victoria has no plan of its own.

28%

of Year 10 students met the civics standard in 2024

Australia isn't short of rules. It's short of checks that they work.

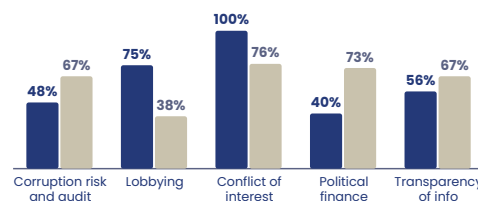
The OECD's 2017 Recommendation on Public Integrity sets out the internationally agreed architecture this white paper draws on throughout: a coherent, whole-of-government integrity system; independent oversight and enforcement; a culture in which public officials are supported to act with integrity rather than merely instructed to; and accountability mechanisms with real consequences for non-compliance¹⁰⁹. The OECD measures every member country against this standard twice over, once for the strength of its regulatory design, and separately for how consistently that regulation is actually implemented in practice. Australia's own results are the clearest evidence in this white paper showing why "the rules exist" is not the same claim as "the rules work."

13.1 Where Australia ranks poorly against its OECD peers

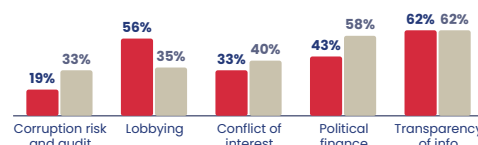
The OECD's *Anti-Corruption and Integrity Outlook 2024* country fact sheet for Australia identifies, in its own words, three "areas to improve": anti-corruption strategy implementation, corruption risk management and audit, and conflict-of-interest practice, set against three "greatest strengths": conflict-of-interest regulation, lobbying regulation, and transparency-of-information practice¹¹⁰. First, while the OECD records a strategic framework for anti-corruption (including the Public Interest Disclosure Act 2013 and the Commonwealth Fraud Control Framework), Australia has no anti-corruption action plan in force and no central coordination function responsible for monitoring, evaluating, or reporting on the implementation of its own anti-corruption framework, meaning no single body is tasked with checking whether Australia's anti-corruption regulations are working¹¹⁰.

Second, on corruption risk management and internal audit, the specific function that would catch a conflict of interest, a procurement irregularity or a major-project cost anomaly before it became a scandal, Australia meets only 48 per cent of OECD regulatory criteria and just 19 per cent of practice criteria, against OECD averages of 67 and 33 per cent respectively. Australia has no regulatory standards specific to internal auditors, no required external assessment of internal audit activity, and no available data on how many public organisations are internally audited at all¹¹⁰.

Regulatory design: % of OECD criteria met



Practice: % of OECD criteria met



■ Australia, design ■ Australia, practice

■ OECD average

Source: OECD Anti-Corruption and Integrity Outlook 2024, Australia.

¹⁰⁹. OECD (2017) Recommendation of the Council on Public Integrity, OECD/LEGAL/0435. legalinstruments.oecd.org

¹¹⁰. OECD (2024c) Anti-Corruption and Integrity Outlook 2024: Country Notes: Australia. oecd.org

The machinery to check the rules is what's missing.

Political finance is the widest gap of any category measured in the OECD's 2024 Outlook: Australia meets only 40 per cent of regulatory criteria and 43 per cent of practice criteria, against OECD averages of 73 and 58 per cent, with no independent body responsible for overseeing the financing of political parties and election campaigns^{III}. And even in conflict of interest, nominally Australia's strongest category, meeting 100 per cent of regulatory criteria against an OECD average of just 76 per cent, collapses to only 33 per cent, below the OECD average of 40 per cent, because Australia does not systematically track whether declared interests are verified or what sanctions, if any, follow when a conflict is found^{III}. The one clear exception to this pattern is lobbying, where Australia's regulatory design (75 per cent) and practice (56 per cent) both exceed OECD averages (38 and 35 per cent), a reminder that Victoria's specific weaknesses in this area, discussed in section 7, are a Victorian regulatory gap layered on top of a comparatively sound national baseline, not evidence that lobbying regulation is hard to do well.

Broadly, the OECD data show that Australia is not short of rules, and the same appears true of Victoria. What is missing at both levels is the machinery to check whether the rules are followed and to impose consequences when they are ignored.

19%

of OECD practice criteria met on corruption risk management and audit (OECD average 33%)

0

anti-corruption action plans in force, and no central body checking the framework works

RECOMMENDATIONS THAT RESPOND DIRECTLY TO THE OECD EVIDENCE

- Establishing a central coordination and monitoring function for Victoria's own integrity strategy, akin to the whole-of-government integrity strategy already recommended in cross-cutting terms **Rec 51**
- Legislating specific standards for internal audit function, activity reporting and external assessment, addressing the OECD's most acute practice gap **Rec 51**
- Establishing the independent Electoral Integrity Commission recommended in section 6, addressing the single widest regulatory gap the OECD identifies **Rec 18**
- Building active verification of interest declarations, with published data on conflicts declared, investigated and sanctioned, into the conflict-of-interest register recommended in section 10, turning Australia's on-paper strength in this category into a genuine one **Rec 31**
- Legislating civil penalties and enforceable undertakings for breaches of integrity obligations, including the lobbying code, interest declarations and post-employment restrictions, with an independent body with the power to impose them **Rec 53**

III. OECD (2024c) Anti-Corruption and Integrity Outlook 2024: Country Notes: Australia. oecd.org

Victoria against the best in the world.

Table 1 sets out how Victoria compares against the OECD standard and against five reference jurisdictions across the domains examined in this white paper.

Table 1: Victoria against national and international integrity benchmarks

Domain	Victoria	New South Wales	New Zealand	Ireland	Canada	OECD Best Practice
Anti-corruption body	Definition broadened and “exceptional circumstances” hearing test removed in September 2026; dual mandate with police oversight	ICAC: broad definition, routine public hearings; separate Law Enforcement Conduct Commission for police	Clear-mandate Serious Fraud Office and Auditor-General model	Standards in Public Office Commission: independent, broad mandate, binding powers	No single anti-corruption commission; Conflict of Interest and Ethics Commissioner; RCMP for criminal matters	Independent body with investigation and referral powers and public reporting
Budget independence	No independent mechanism; oversight committee barred from seeing agency budget bids	Treasurer required to report to Parliament on integrity-agency appropriations	Statutory, independent-officer appropriation	Oireachtas-determined statutory independence	Treasury Board scrutiny; independent parliamentary officers	Independent or formula-based appropriation
Lobbying	Code not legislated; in-house lobbyists (up to 80% of activity) minimally regulated; no independent enforcer or penalties	Statutory register (Lobbying of Government Officials Act 2011) administered by the NSW Electoral Commission; third-party lobbyists only	No statutory lobbying register; reform under debate in 2026	Regulation of Lobbying Act 2015: covers all lobbying, SIPO enforces	5-year post-ministerial ban; independent Commissioner of Lobbying	All lobbying regulated; independent oversight and enforcement
Political donations	Rebuilt post-Hopper; 21-day disclosure; no independent oversight body; developer-planning conflict unaddressed	Donation caps; bans on property developer, tobacco, liquor and gambling industry donations; NSW Electoral Commission oversight	Election expense limits and donation disclosure; Electoral Commission	Donation caps; annual disclosure to SIPO	Strict caps (individuals only; corporate and union donations banned); Commissioner of Canada Elections; quarterly party reporting	Independent oversight body; real-time disclosure; comprehensive caps
FOI / transparency	Declining full-access rate (58.5%); no proactive-disclosure default; broad Cabinet exemption	Mandatory proactive publication; independent commissioner	World-leading OIA; presumptive disclosure; Ombudsman oversight	Strong FOI culture; Information Commissioner	Independent commissioner; proactive disclosure	Presumption of disclosure; independent oversight
Whistleblowers	PID Act; no independent support service; uneven protection for subcontractor staff	Similar framework; ICAC referral pathway	Protected Disclosures (Protection of Whistleblowers) Act 2022; Ombudsman oversight	Protected Disclosures Acts 2014/2022; dedicated Commissioner, proactive outreach	Public Servants Disclosure Protection Act; independent PSIC	Independent authority; dedicated support; contractor coverage
Appointments	No mandatory public merit test; wide ministerial discretion over statutory bodies	Partial independent merit-test reform underway	Crown Entities Act merit standard	Public Appointments Service	Treasury Board oversight and merit requirements	Transparent, merit-based, independently overseen
Enforcement	Non-binding recommendations; no penalties for non-compliance; no central coordination function	Some binding orders; stronger enforcement culture	Binding recommendations where legislated	Standards Commission binding powers; criminal penalties	Parliamentary oversight; binding in some domains	Binding recommendations; sanctions; central coordination
External consultants / Big Four oversight	No public register of Big Four engagements; no COI-breach register; no spend cap; reliance on internal firewalls accepted	Contracts register partially public; no dedicated Big Four oversight regime	Strong in-house policy capability norm; consulting use comparatively limited	Statutory accountability for consultants engaged on public contracts	Treasury Board guidelines favour in-house delivery; disclosure requirements	Independent regulator; mandatory standards; public disclosure of government use

Sources: OECD (2024c); Centre for Public Integrity (2025); Human Rights Law Centre (2024); Ireland's Regulation of Lobbying Act 2015; Canada's Lobbying Act; New Zealand's Official Information Act 1982 and Protected Disclosures Act 2022; NSW ICAC, Auditor-General and integrity legislation; Lobbying of Government Officials Act 2011 (NSW); Electoral Funding Act 2018 (NSW).

Make public power hard to hide, easy to trace and costly to abuse.

The recommendations below are grouped by domain. Three principles run through all of them, and are the standard against which each should be judged. Transparency should be the legislated default; enforcement must sit with a body genuinely independent of the government whose conduct it reviews; and penalties must be significant enough to function as an actual deterrent, not an accepted cost of doing political business.

A Anti-corruption architecture

- 1 Review the broadened statutory definition of corrupt conduct legislated in September 2026 within three years, and strengthen it if it fails to capture serious breaches of public trust or abuse of office.
- 2 Report publicly on IBAC's use of public hearings now that the "exceptional circumstances" test has been removed, and resist any move to reinstate it.
- 3 Lower IBAC's investigative threshold to reasonable suspicion of serious misconduct.
- 4 Separate Victoria Police oversight into a dedicated agency, freeing IBAC to focus on public sector corruption.
- 5 Legislate independent, formula-based or tribunal-determined budget-setting for IBAC, the Ombudsman and VAGO, with a legislated minimum funding floor of at least 0.15 per cent of public expenditure.
- 6 Call on the Big Build Royal Commission to report specifically on both the scale of the alleged cost to taxpayers and the adequacy of IBAC's existing powers to have detected it earlier.
- 7 Legislate a standing public reporting obligation for every capital project costing \$10 million or more, at the same quarterly cadence at which DTF already collects the underlying data, disclosing planned and actual cost, schedule, governance and benefits-realisation against original approved parameters, with an automatic disclosure and VAGO-review trigger where cost or schedule variance exceeds a defined threshold, implementing VAGO's own recommendation in *Managing and Reporting on the Performance and Cost of Capital Projects*.
- 8 Require publication of MPs' office and work credit card statements.
- 9 Require MPs to hold share investments only through exchange-traded funds.

B Transparency and the right to know

- 10 Replace the *Freedom of Information Act 1982* with a modern Right to Information Act built on a statutory presumption of disclosure.
- 11 Introduce a departmental financial penalty for missed statutory Freedom of Information (FOI) timeframes, published by the Office of the Victorian Information Commissioner (OVIC).
- 12 Shorten FOI appeal and review timeframes and close the ministerial personal-document loophole.
- 13 Mandate proactive publication of ministerial diaries, contracts, grants, tender evaluations, cost-benefit analyses and lobbying and donation records by default, and disclosure of the identity of anyone whose confidential submission is relied on in a government review's findings.

C Money in politics

- 14 Require donation disclosure within 24–48 hours, not 21 days.
- 15 Ban donations from property developers with active planning matters before government.
- 16 Close remaining avoidance mechanisms in the donation cap, covering associated persons, trusts, non-corporate vehicles and entities under common effective control, building on the existing rule that related bodies corporate already count as a single donor.
- 17 Cap hospitality and fundraising-event access at \$150 per head and disclose it as a form of donation. Cap allowable gift or in-kind contributions.
- 18 Establish an independent Electoral Integrity Commission with investigation, compulsion and penalty powers, separate from the VEC's electoral-administration role.

D Lobbying and access

- 19 Legislate a comprehensive lobbying framework covering in-house lobbyists, industry associations and government-relations directors, not only third-party consultants.
- 20 Give the Lobbyist Code of Conduct statutory force, with meaningful financial and criminal penalties, enforced by IBAC.
- 21 Publish ministerial and senior-official diaries within two weeks, linked by a common identifier to the lobbying register and donation disclosures.
- 22 Prohibit registered lobbyists from sitting on government boards while registered, prohibit success-fee lobbying arrangements, and set a defined stand-down period before a former lobbyist can be appointed.
- 23 Establish a public register of government funding to peak bodies and industry associations, with disclosure of recipient lobbying activity as a funding condition.

E The revolving door

- 24 Extend cooling-off restrictions to two years for ministers and 18 months for ministerial staff and senior officials.
- 25 Close the “strategic advisory” loophole by defining restricted post-employment activity functionally, not by formal job title.
- 26 Require an annual, published post-employment declaration from former officeholders during their cooling-off period.
- 27 Benchmark ministerial restrictions against Canada’s five-year standard for future review.

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F Grants, procurement and appointments

- 28 Abolish discretionary ministerial grants above \$50,000 in favour of competitive, merit-assessed, publicly disclosed processes.
- 29 Establish a real-time, whole-of-government grants register recording the full decision trail for every significant grant, as well as acquittals.
- 30 Require merit-based, independently assessed, publicly advertised processes for board appointments above a defined threshold and those with a direct conflict of interest to be removed from appointment panels, publishing each appointee’s declared party membership and the selection criteria applied.
- 31 Establish a verified, publicly accessible electronic register of interests for ministers, senior officials and board members, with automatic conflict-flagging and published data on conflicts declared, verified, investigated and sanctioned, directly addressing the OECD’s finding that Australia does not track this data in practice¹¹².
- 32 Introduce a financial penalty of up to \$50,000 for undeclared or improperly managed conflicts of interest.
- 33 Introduce a public, searchable government contracts register modelled on the UK’s Contracts Finder and the Commonwealth’s AusTender.

G The Big Four and external consultancies

- 34 Establish a public register of current government engagements with large consulting and advisory firms, updated on a rolling basis, disclosing firm, engaging department, dollar value, duration and a genuine, specific description of scope.
- 35 Require mandatory, public, continuously updated conflict-of-interest files for any firm holding government work above a defined threshold, disclosing conflicting private-sector engagements before award and for the life of the contract.
- 36 Legislate that reliance on internal information barriers (“Chinese walls”) is not by itself a sufficient safeguard permitting a firm to hold simultaneous conflicting public and private engagements.
- 37 Legislate a declining cap on the share of program and departmental budgets that may be spent on external consulting, contractor and labour-hire engagements, with narrow published exemptions.
- 38 Give statutory force to a public-interest duty clause in every government consulting contract.
- 39 Fund an independent, published capability audit and a ring-fenced capability-rebuilding fund to restore in-house policy and delivery capability as the default, on the model of the Commonwealth’s APS Capability Reinvestment Fund.
- 40 Extend whistleblower protection to consulting staff engaged on government contracts.

¹¹² OECD (2024c) Anti-Corruption and Integrity Outlook 2024: Country Notes: Australia. [oecd.org](https://www.oecd.org)

H Whistleblowers and parliamentary integrity

- 41** Establish an independent Victorian Whistleblower Support Service, operationally separate from IBAC and the Ombudsman.
- 42** Ensure comprehensive Public Interest Disclosures Act protection throughout government contracting and subcontracting chains, closing the specific gaps that arise for employees of private contractors and subcontractors further down an outsourcing chain, rather than treating contractor coverage as entirely absent.
- 43** Materially strengthen penalties for detrimental action against disclosers.
- 44** Review whether the Parliamentary Workplace Standards and Integrity Commission, established 31 December 2024 and operating since, has sufficient powers, independence, resources, transparency and enforcement capacity, to distinguish the sanctions it can impose itself for ordinary misconduct (apology, training, mediation, behaviour agreements) from serious misconduct, where it can currently only recommend stronger sanctions, including suspension or seat vacation, to Parliament or the Premier rather than impose them directly.

I Disinformation, civic space and media

- 45** Legislate truth-in-political-advertising rules targeting materially false factual claims in election campaigns.
- 46** Introduce dedicated Victorian anti-SLAPP legislation that covers defamation, based on the design principles in the Human Rights Law Centre's *Stop the SLAPP* report and the strongest overseas models, such as Ontario's *Protection of Public Participation Act 2015*.
- 47** Commission an independent statutory review of the 2025 protest-policing powers within 18 months.
- 48** Extend ACMA-equivalent media ownership and control scrutiny, distinct from the ACCC's existing competition-merger role, to digital news distribution, and sustain independent public-interest journalism funding.
- 49** Reform VEC legislation to target political disinformation campaigns.
- 50** Introduce platform-neutral transparency standards that apply equally to newspapers, broadcasters, social media platforms and AI tools that distribute news: mandatory ownership disclosure, disclosure of paid political content or media content generated by political or affiliated parties, published correction policies, transparency about how algorithms rank news and political content, and a clear, visible separation between political-party publications and independent journalism.

J Cross-cutting

- 51** Establish a central anti-corruption and integrity coordination function, responsible for publishing a whole-of-government anti-corruption action plan and for monitoring, evaluating and publicly reporting on its implementation, addressing the OECD's finding that Australia currently has neither, including legislated standards and external assessment for internal audit.
- 52** Publish a single, integrated, machine-readable transparency portal linking the contracts register, grants register, lobbying register, ministerial diaries, conflict-of-interest register and donation disclosures, so relationships between funding, access and decisions can be cross-referenced by the public rather than examined only in isolation.
- 53** Adopt a legislated Victorian Integrity and Transparency Charter, setting out the presumption of disclosure, traceability of public money, and independence of integrity institutions as binding statutory principles rather than aspirational statements, enforced through civil penalties and enforceable undertakings imposed by an independent body.
- 54** Adopt a Victorian Open Government Action Plan and seek Open Government Partnership membership in Victoria's own right, including transaction-level publication of public spending, procurement data published to the Open Contracting Data Standard, participatory budgeting for a share of discretionary spending, a statutory ban on "gag" clauses in funding agreements with community organisations, an annual, independently assessed State of Open Government report to Parliament, and a legislated open-by-default presumption for non-sensitive government data.
- 55** Call on the Victorian Government to table a formal, itemised public response to every recommendation in this white paper within twelve months, indicating acceptance, acceptance in principle, rejection with reasons, or referral for further work, the same standard of accountability this white paper applies throughout to government responses to its own integrity agencies.

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