

Integrity Oversight Victoria's response to Questions on Notice for the Integrity and Oversight Committee's Inquiry into the Performance of the Victorian integrity agencies 2023/24 and 2024/25

Q1. According to the People Matter Survey, there is a sharp downward trend from 2022 to 2024 in levels of violence or aggression against staff. What has worked in decreasing levels of violence or aggression against staff?

The downward trend in the reports of levels of violence and aggression against staff across the 2022-2024 PMS results is pleasing. This downward trend is likely attributable to the changes we made to our procedures and support for staff and the way we interact with complainants.

In the month prior to the 2022 survey Integrity Oversight Victoria (IOV) experienced an incident involving a complainant who attended the office without an appointment and behaved in an aggressive manner towards staff. We contacted Victoria Police for assistance however the complainant left prior to the police attending. Although the complainant did not access the premises from the lift foyer, it is likely that this incident impacted the 2022 PMS results.

In response to the 2022 event IOV implemented Visitor Checklists so all staff are aware of the process for safely managing unexpected visitors. The checklists include escalation to senior managers in the event of the unexpected visitor demonstrating violent, aggressive or concerning behaviours.

Consistent with advice from our mental health service provider, we also implemented a call back service for complaints. This was in response to the frequency of inappropriate and aggressive behaviours our staff were experiencing over the phone. The call back service has successfully lowered the instances of inappropriate and aggressive behaviour towards our staff.

Since 2022 we have become more proactive in addressing inappropriate, threatening or otherwise aggressive behaviours towards our staff and are quicker to put in place contact management plans when the behaviour of complainants impacts the welfare of our staff.

To further support staff, in 2024 IOV launched a Towards Zero awareness campaign and annual training to minimise negative behaviours (violence, aggression, bullying, discrimination, harassment) and launched the Respect@Work platform for staff to report negative behaviours, with the option to report anonymously. To date there have been no reports via the platform.

IOV has developed a policy document on Managing Unreasonable Client Behaviour and continues to monitor our physical access arrangements to our premises which includes safety measures such as restricted access, CCTV, and duress alarms.

We continue to monitor this issue and have added specific questions to the 2026 PMS to test our assumption that reported levels of violence and aggression against our staff relate to external actions rather than staff conduct.

Q2. In your 2024/25 annual report it is noted that the BP3 measure of proportion of medium complexity complaints completed within 5 months was not met due to an increase of high complexity complaints reducing organisational capacity. The target for this measure was subsequently lowered in 2025/26. Could you provide further background to how you tried to address medium complexity complaints?

IOV introduced performance measures for complaint timeliness in 2023-2024. The targets reflect the variations in the complexity of complaints we receive. After 2 years of results, IOV considered the suitability of the target of 75% of medium complexity complaints completed in 5 months.

Over this period IOV also, as part of our continuous improvement journey for our complaint handling, implemented the following changes to improve our performance:

- launched a complaints and disclosure portal that supports people to anonymously lodge complaints and remain in communication with IOV
- delegated more decision-making to staff to empower them and improve satisfaction with their work
- provided staff with supportive tools to more efficiently analyse complaints involving large volumes of material
- deployed a new file sharing system to enable secure transfer of information and documents with the agencies we oversee
- further customised and improved workflows in our complaints management system

We estimate we will meet these targets in the 2025-26 financial year.

Q3. Please provide a general update on the progress of the monitoring project in IBAC’s handling and oversight of police complaints, where updates can be disclosed.

IOV is completing a monitoring project into IBAC’s handling and oversight of complaints about Victoria Police. The purpose of the project is to gain insight into specific areas of IBAC's practices beyond isolated complaint assessments. Its focus is not to reevaluate individual case outcomes or consider their merits, but rather to consider how IBAC's policies and procedures have been applied, and the consistency of decision-making and practices.

The monitoring project builds on previous work undertaken by IOV including:

- Assessment of individual complaints about IBAC’s handling of complaints about Victoria Police, including information sharing with complainants under section 163 of the IBAC Act following review of complaints referred to Victoria Police for investigation.
- Monitoring Project on IBAC: Police Misconduct Complaints report in October 2019, and
- IOV’s recommendations, which were accepted by IBAC, in our special report: IBAC’s referral and oversight of Emma’s complaints about Victoria Police’s response to family violence by a police officer (the ‘Emma Report’).

The monitoring project has 7 phases:

Phase 1 – Review of policies, procedures and guidelines

Phase 2 – Revisit scope and timeframe and consider sample

Phase 3 – Audit of sample cases

Phase 4 – Collate and analyse findings

Phase 5 – Prepare report for procedural fairness process

Phase 6 – Review and update report

Phase 7 – Finalise report

We are currently completing phase 4.

After some delays obtaining the necessary information, we expect to complete our analysis and begin drafting our observations, themes and issues for discussion with IBAC in May. Competing priorities permitting, particularly with the independent performance audit, our goal is to complete the project this financial year.

Q4. While keeping in mind that the Parliamentary Workplace Standards and Integrity Commission is still in its early stages, please describe your actions and preparation for oversight of that Commission.

Since 31 December 2024, IOV has had the following oversight functions of the Parliamentary Workplace Standards and Integrity Commission (PWSIC):

- monitoring PWSIC's use of coercive powers and compliance with procedural fairness
- receiving and assessing complaints about the conduct of PWSIC and its officers
- investigating the conduct of PWSIC and its officers

To prepare for our oversight we provided PWSIC with a guidance document to assist them to create a framework to lawfully exercise powers. The guidance document included PWSIC's notification requirements to IOV and matters for consideration by PWSIC when determining how to use its powers. These considerations related to witness welfare, confidentiality notices, human rights, procedural fairness information to assist witnesses when making investigation requests, and the utility of scripts for issues relate to each interview.

As PWSIC has made notifications to IOV, we have adopted a risk-based approach and reviewed all notifications against legislative requirements, providing feedback where necessary. PWSIC has incorporated this feedback into relevant procedures, templates and guidance. All engagement between IOV and PWSIC has been positive and proactive.

Q5. In your 2023/34 and 2024/25 annual reports, it states that continued pursuit of law reform is in progress. Please advise which law reforms you are currently advocating for, if any, and if they are historical or newly identified issues.

IOV has ongoing engagement with the Department of Justice and Community Safety (DJCS) about reforms to strengthen the integrity system based on our insights from overseeing a broad range of agencies and implementing the public interest disclosure scheme. On complex matters with broader consequences, IOV also engages with relevant agencies to ensure reforms proposed to government via DJCS are fit for purpose. Sharing information about the timing and progress of reforms is limited by Cabinet-in-confidence.

Function to oversight the Social Services Regulator

Since 1 July 2024, the Social Services Regulator has the power to issue confidentiality notices. The *Social Services Regulation Act 2021* established a requirement for the Social Services Regulator to notify IOV if it exercised this power. As IOV was not given the associated function to review and respond to the notifications, IOV has advocated for this function since the introduction of the Bill in 2021. There have been no implications to date as IOV has not received any notifications about confidentiality notices from the Social Services Regulator.

Independent Broad-based Anti-corruption Commission Act 2011 (IBAC Act)

Section 166

Section 166 of the IBAC Act creates an offence if a person receiving a draft or proposed report, or an advance copy of a report, makes an unauthorised disclosure of that report prior to its publication by IBAC.

As noted in our response to QoN 8, in the context of providing embargoed reports to the media, IOV has been engaging with IBAC about its interpretation of section 166 of the IBAC Act since the evidence given by the Commissioner to the IOC at a hearing on 11 November 2024. IOV and IBAC have agreed the provision is ambiguous and have sought amendment.

Section 163

IOV's recommended amendment to section 163 is described at 6.3.4 of the December 2025 report of the IOC into the adequacy of the legislative framework of IBAC (the IOC's inquiry).¹ As explained in IOV's submission to the inquiry, the ambiguity in section 163 over whether information can be shared about referred investigations needs clarification to empower IBAC to communicate meaningfully with complainants following its reviews. IOV recommends amending the Act to allow IBAC to communicate review outcomes to complainants when it reviews a referred matter, as being able to effectively communicate review outcomes can ease complainants' concerns.

Public Interest Disclosures Act 2012 (PID Act)

As outlined in its submission to the IOC's inquiry, IOV supports a review of the PID Act to simplify and clarify the scheme. As a member of the PID Consultative Group (PIDCG) led by IBAC, and the PID Working Group that supports the PIDCG, IOV is contributing to consideration of technical amendments that could simplify the PID Act for complainants and agencies. Given the resources

¹ [The adequacy of the legislative framework for the Independent Broad-based Anti-corruption Commission](#)

required for IBAC to fulfil its PID functions, consideration is also being given to whether a more decentralised model would enhance Victoria's PID scheme.

IOV is also focused on reducing ambiguity in the Act to ensure lawful application of the Act is not at odds with its policy intent.

Integrity Oversight Victoria Act 2011 (IOV Act)

IOV has several proposed technical amendments to improve its operational efficiency and clarify the scope of our oversight which we can brief the IOC on separately.

Amendments to improve protections within integrity system

- Section 92 of the IOV Act creates an offence for unauthorised disclosures of information in a proposed report, or a draft of a proposed report when provided for procedural fairness purposes. As a result of the High Court judgement in *AB (a pseudonym) & Anor v IBAC [2024]*, section 92 will not protect any additional material provided to the recipient of a draft report as part of a procedural fairness process. IOV proposed amending section 92 to cover adverse material provided to a draft report recipient.
- Amending s97AA(4) of the IOV Act would provide IOV an important tool to support witness welfare in appropriate circumstances, such as where a person does not have a spouse. The required amendment is to expressly permit IOV to authorise disclosure, similar to IOV's ability to authorise disclosure for confidentiality notices (see s39(2)(a)).

Q6. Please describe the most significant updates to processes led by the *Justice Legislation Amendment (Defamation, Integrity and Other Matters) Act 2024*, or describe the reforms from that Act that have had the most impact or consequence on your operations.

There were two significant amendments in the *Justice Legislation Amendment (Defamation, Integrity and Other Matters) Act 2024* (JLA Act) that have had a meaningful impact on IOV operations.

The first is the change to our name from the Victorian Inspectorate to Integrity Oversight Victoria – a name change that better reflects our role. Prior to the change, we were often mistaken for the former Wage Inspectorate and Local Government Inspectorate by the media, public and job applicants. We consistently received enquiries intended for these other inspectorates.

Since our name change on 10 February 2025, the number of enquiries we have received mistaking us for the Wage Inspectorate or Local Government Inspectorate has decreased:

	1 July 2023 to 30 June 2024	1 Jul 2024 to 30 June 2025	1 July 2025 to 31 Mar 2026²
Local Government Inspectorate	8	7	0
Wage Inspectorate Victoria	6	3	0

The second impactful change in the JLA Act gave IOV discretion to refuse to investigate a public interest complaint in certain circumstances. From 11 September 2024, IOV could decide not to investigate a public interest complaint where:

- the subject is trivial or the complaint frivolous, vexatious or lacks substance or credibility
- the disclosure was not made genuinely or was made for a mischievous purpose
- the alleged conduct does not amount to improper conduct or detrimental action within the meaning of the *Public Interest Disclosures Act 2012*
- the investigation would prejudice any criminal proceedings or investigations
- the disclosure was made more than 12 months after the discloser became aware of the matter and did not give a satisfactory explanation for the delay in making the disclosure

Appropriate exercise of the discretion not to investigate means the resources of IOV and the relevant agency and its staff, who would need to respond to the complaint, are not used unnecessarily. Since September 2024, IOV has exercised its discretion not to investigate two allegations assessed as public interest complaints, which were contained in one disclosure. One allegation was not investigated on the basis that it lacked substance. A preliminary inquiry was commenced in relation to the second allegation, but IOV found it also lacked substance and an investigation was not conducted.

² Please note that these figures may differ in the 2025-26 Annual Report as the reporting period runs until 30 June 2026.

Q7. Understanding there is no dedicated resource to keep building on improving processes in your case management system, how long will it be until your monthly report production is fully automated and being utilised regularly?

During the IOC hearing on 2 March 2026, IOV took on notice how long it will be until IOV's reporting of welfare risks can be automatically generated and emailed to those that need reports.

By way of background, following the recommendations in the IOC's 2022 report 'Performance of the Victorian integrity agencies 2020/21: focus on witness welfare', IOV began developing and enhancing two reports relating to welfare in our CMS for staff use - one for complainants and one for witnesses. These reports have a broader purpose than identifying welfare concerns that have potentially led to incidents – they also detail the vulnerabilities faced by a complainant or witness (e.g. disclosed disability or communication barrier).

Given IOV's current IT set up, full automation is not possible as our Case Management System (CMS), by design, is not housed on an internet enabled network that connects to email.

This financial year we will complete our project to move complaints and enquiries cases into a cloud environment. Following that, we will explore whether the CMS can be securely linked to Outlook emails, and if so, whether we can automate reporting to relevant emails of welfare risks arising in complaints and enquiries. As investigation cases will not be hosted in the cloud environment, such automated reporting will not extend to witnesses.

However, the current practice is for the Welfare Governance Officer (WGO) to run the reports monthly and we are implementing monthly executive briefings from the WGO. Although the process to generate the reports is quick and easy, IOV will continue exploring automation of these reports within the constraints of our air-gapped system and the new cloud system. This will be subject to budget and an available technical resource.

In addition, we continue to refine our guidance, information and supports for staff to identify and manage welfare risks in real time. This includes analysing the vulnerabilities identified in the CMS reports and ensuring that staff training and welfare resource materials provided are fit for purpose.

The CMS reports are also supported by additional information stored in a Witness Welfare and Incident Register. The Register is the primary tool capturing welfare incidents. It captures information including the date of incident, where the incident has taken place (e.g. email or phone) and the actions taken including whether emergency services have been contacted.

When managing an incident, staff are required to notify their manager and the WGO and provide a completed incident report to the WGO. The WGO assists where required with welfare incident management and ensures the Register is maintained.

Q8. Are you aware of IBAC seeking to rely on s 166 of the IBAC Act 2011 (Vic) to provide embargoed reports to journalists since they last told this Committee they had undertaken this practice with Clara and Daintree?

IOV has been engaging with IBAC about its interpretation of section 166 of the *Independent Broad-based Anti-corruption Commission Act 2011* (IBAC Act) since the evidence given by the Commissioner to the IOC at a hearing on 11 November 2024.

IOV and IBAC have agreed the provision is ambiguous and have raised amendment of the provision with DJCS. IBAC has advised IOV it will not definitively rely on the provision as a legal protection and will not release reports to the media under embargo. IBAC has also advised IOV its response to the IOC recommendation to develop a rigorous and transparent policy to guide decision-making remains a work in progress and it will provide a copy of the policy to IOV once it is finalised.

IOV has obtained assurances from IBAC it has not relied on the provision to provide embargoed reports to the media since 11 November 2024.

Q9. What work have you done in the reporting period and more recently to develop and refine Memorandums of Understanding with the agencies you oversight?

IOV entered Memorandums of Understanding (MoUs) with IBAC and the Victorian Ombudsman in June and July 2025 respectively. These MoUs will be reviewed in June 2030 to ensure they remain effective; however they can be varied at any time by written agreement in response to changes in the operational arrangements of any party.

IOV has briefly discussed with PWSIC, OVIC and the Chief Examiner the possibility of entering an MoU. IOV has not progressed this work to date due to insufficient resources, impacted by the independent performance audit.

Q10. Please advise whether IOV accepts the below recommendation and, if so, confirm that it has been fully implemented.

Performance of the Victorian integrity agencies 2022/23 Recommendation 13: That, taking into account Inner Melbourne Community Legal's evidence to the Committee's review, Integrity Oversight Victoria (IOV) consider, in its police oversight monitoring project, whether any other measures, in addition to the recommendations in Emma's report, are needed to improve how the Independent Broad-based Anti-corruption Commission handles police-perpetrated family violence matters. Further, that IOV report to the Committee on the processes and outcomes of its police oversight monitoring project.

IOV accepts this recommendation. Please see IOV's response to QoN 3 for the status of the monitoring project.

Q11. You have previously advised the Committee you were working with IBAC on their development of a ‘Guide for witnesses appearing in IBAC public examinations’. Has this been fully implemented, and what actions did IOV take in assisting IBAC with this process?

In June 2025, IBAC provided a draft guide for witnesses appearing at public examinations to IOV for review. On 22 October 2025, representatives of IOV and IBAC met to discuss the content of the guide and a related draft template.

On 3 December 2025, IOV provided written feedback to IBAC on the draft guide. On 13 February 2026, IBAC provided IOV with a revised version of the guide for review. On 10 March 2026, IOV provided further feedback to IBAC on one point, which was incorporated into the final version of the guide.

‘IBAC public examinations: a guide for witnesses’ was published on IBAC’s website on 30 March 2026.