



Integrity and Oversight Committee

Performance of the Victorian integrity agencies 2023/24 and 2024/25

Report

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About the Committee

The Integrity and Oversight Committee is a joint investigatory committee constituted under the *Parliamentary Committees Act 2003* (Vic).

Functions

7 Integrity and Oversight Committee

- (1) The functions of the Integrity and Oversight Committee are—
- (a) to monitor and review the performance of the functions and exercise of the powers of the Information Commissioner; and
 - (b) to consider and investigate complaints concerning the Information Commissioner and the operation of the Office of the Victorian Information Commissioner; and
 - (c) to report to both Houses of Parliament on any matter requiring the attention of Parliament that relates to—
 - (i) the performance of the functions and the exercise of the powers of the Information Commissioner; or
 - (ii) any complaint concerning the Information Commissioner and the operation of the Office of the Victorian Information Commissioner; and
 - (d) to examine the annual report of the Information Commissioner and any other reports by the Information Commissioner and report to Parliament on any matters it thinks fit concerning those reports; and
 - (e) to inquire into matters concerning freedom of information referred to it by the Parliament and to report to Parliament on those matters; and
 - (f) to monitor and review the performance of the duties and functions of Integrity Oversight Victoria, other than those in respect of VAGO officers; and
 - (g) to report to both Houses of the Parliament on any matter connected with the performance of the duties and functions of Integrity Oversight Victoria, other than those in respect of VAGO officers, that require the attention of the Parliament; and
 - (h) to examine any reports made by Integrity Oversight Victoria to the Integrity and Oversight Committee or the Parliament other than reports in respect of VAGO officers; and
 - (i) to consider any proposed appointment of a Chief Integrity Inspector under section 18 of the *Integrity Oversight Victoria Act 2011* and to exercise a power of veto in accordance with that Act; and

- (ia) to receive and assess public interest disclosures about conduct by or in Integrity Oversight Victoria and engage an independent person to investigate any such disclosure that it has assessed to be a public interest complaint; and
- (j) to monitor and review the performance of the duties and functions of the IBAC; and
- (k) to report to both Houses of the Parliament on any matter connected with the performance of the duties and functions of the IBAC that require the attention of the Parliament; and
- (l) to examine any reports made by the IBAC to the Integrity and Oversight Committee or the Parliament; and
- (m) to consider any proposed appointment of a Commissioner under section 20 of the *Independent Broad-based Anti-corruption Commission Act 2011* and to exercise a power of veto in accordance with that Act; and
- (ma) to monitor and review the performance of the duties and functions of the Parliamentary Workplace Standards and Integrity Commission; and
- (mb) to report to both Houses of the Parliament on any matter connected with the performance of the duties and functions of the Parliamentary Workplace Standards and Integrity Commission that require the attention of the Parliament; and
- (mc) to examine—
 - (i) any reports made by the Parliamentary Workplace Standards and Integrity Commission to the Integrity and Oversight Committee; and
 - (ii) the Parliamentary Workplace Standards and Integrity Commission's annual reports to the Parliament; and
- (md) to consider any proposed appointment of a commissioner under section 52 of the *Parliamentary Workplace Standards and Integrity Act 2024* and make decisions under that section; and
- (n) to carry out any other function conferred on the Integrity and Oversight Committee by or under—
 - (i) the *Ombudsman Act 1973*; and
 - (ii) the *Independent Broad-based Anti-corruption Commission Act 2011*; and
 - (iii) the *Integrity Oversight Victoria Act 2011*; and
 - (iv) the *Public Interest Disclosures Act 2012*; and
 - (v) the *Parliamentary Workplace Standards and Integrity Act 2024*.

- (2) Despite anything to the contrary in subsection (1), the Integrity and Oversight Committee cannot—
- (a) reconsider a decision of the Information Commissioner or Public Access Deputy Commissioner in relation to a review of a particular matter; or
 - (b) reconsider any recommendations or decisions of the Information Commissioner or Public Access Deputy Commissioner in relation to a complaint under the *Freedom of Information Act 1982*; or
 - (c) reconsider any findings in relation to an investigation under the *Freedom of Information Act 1982*; or
 - (d) reconsider the making of a public interest determination under the *Privacy and Data Protection Act 2014*; or
 - (e) reconsider the approval of an information usage arrangement under the *Privacy and Data Protection Act 2014*; or
 - (f) reconsider a decision to serve a compliance notice under the *Privacy and Data Protection Act 2014*; or
 - (g) disclose any information relating to the performance of a duty or function or exercise of a power by the Ombudsman, Integrity Oversight Victoria, the IBAC or the Parliamentary Workplace Standards and Integrity Commission which may—
 - (i) prejudice any criminal proceedings or criminal investigations; or
 - (ii) prejudice an investigation being conducted by the Ombudsman, the IBAC or Integrity Oversight Victoria; or
 - (iii) contravene any secrecy or confidentiality provision in any relevant Act; or
 - (h) investigate a matter relating to the particular conduct the subject of—
 - (i) a particular complaint or notification made to the IBAC under the *Independent Broad-based Anti corruption Commission Act 2011*; or
 - (ii) a particular disclosure determined by the IBAC under section 26 of the *Public Interest Disclosures Act 2012* to be a public interest complaint; or
 - (iii) any report made by Integrity Oversight Victoria; or
 - (iv) a particular referral within the meaning of the *Parliamentary Workplace Standards and Integrity Act 2024*; or
 - (i) review any decision by the IBAC under the *Independent Broad-based Anti-corruption Commission Act 2011* to investigate, not to investigate or to discontinue the investigation of a particular complaint or notification or a public interest complaint within the meaning of that Act; or

- (j) review any findings, recommendations, determinations or other decisions of the IBAC in relation to—
 - (i) a particular complaint or notification made to the IBAC under the *Independent Broad-based Anti-corruption Commission Act 2011*; or
 - (ii) a particular disclosure determined by the IBAC under section 26 of the *Public Interest Disclosures Act 2012* to be a public interest complaint; or
 - (iii) a particular investigation conducted by the IBAC under the *Independent Broad-based Anti-corruption Commission Act 2011*; or
 - (k) review any determination by the IBAC under section 26 of the *Public Interest Disclosures Act 2012*; or
 - (l) disclose or share any information that is likely to lead to the identification of a person who has made an assessable disclosure and is not information to which section 53(2)(a), (c) or (d) of the *Public Interest Disclosures Act 2012* applies; or
 - (m) review any decision to investigate, not to investigate, or to discontinue the investigation of a particular complaint made to Integrity Oversight Victoria in accordance with the *Integrity Oversight Victoria Act 2011*; or
 - (n) review any findings, recommendations, determinations or other decisions of Integrity Oversight Victoria in relation to a particular complaint made to, or investigation conducted by, Integrity Oversight Victoria in accordance with the *Integrity Oversight Victoria Act 2011*; or
 - (o) reconsider or review any decision of the Parliamentary Workplace Standards and Integrity Commission to investigate, not to investigate, or to discontinue the investigation of a particular referral in accordance with the *Parliamentary Workplace Standards and Integrity Act 2024*.
- (3) If a member of the Integrity and Oversight Committee has an interest that would conflict with the proper performance of a function of the Committee in respect of the Parliamentary Workplace Standards and Integrity Commission, the member must recuse themselves from the Committee while it is performing that function.

Note

See also Part 8 of the *Public Interest Disclosures Act 2012* and Part VB of the *Ombudsman Act 1973* which set out the functions of the Integrity and Oversight Committee under each of those Acts.

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Chair's foreword

Public trust, accountability and integrity are fundamental to the health of Victoria's democracy. The Victorian integrity agencies examined in this review, the Independent Broad-based Anti-corruption Commission (IBAC), Integrity Oversight Victoria (IOV), the Office of the Victorian Information Commissioner (OVIC), the Parliamentary Workplace Standards and Integrity Commission (PWSIC), and the Victorian Ombudsman (VO), play a critical role in safeguarding and promoting these principles across the public sector and parliamentary institutions.

Throughout the review period, these agencies operated in an environment characterised by increasing demand, more complex matters, evolving community expectations and significant technological change. Despite these challenges, the Committee found that Victoria's integrity agencies generally performed their statutory functions effectively. Collectively, they demonstrated a strong commitment to accountability, transparency, education, prevention and continuous improvement.

A recurring theme across the integrity system was the growing volume and complexity of complaints, investigations and oversight activities. Agencies continued to adapt their practices and procedures in response to these pressures while also placing greater emphasis on complainant and witness welfare, trauma-informed approaches and procedural fairness. These developments reflect an important recognition that effective integrity oversight depends not only on robust powers and processes, but also on maintaining public confidence through respectful, accessible and responsive engagement.

The Committee also observed the increasing importance of technology and information management, including those associated with artificial intelligence, cyber security and the handling of sensitive information. Integrity agencies are required to navigate these challenges while maintaining high standards of independence, accountability and operational effectiveness.

This report highlights important achievements across the integrity sector. These include prevention, education and oversight activities by IBAC, the continued strengthening of oversight and inspection activities by IOV, OVIC's work in responding to growing privacy and information security challenges, the successful establishment of the PWSIC, and the VO's continued contribution to improving public administration and protecting the rights of Victorians.

At the same time, the Committee identified common challenges relating to timeliness, performance measures, organisational capability and resourcing. An effective integrity system depends not only on agencies fulfilling their statutory responsibilities, but also on ensuring they have the resources, governance arrangements and institutional settings necessary to perform those responsibilities effectively. These matters will continue to require careful attention from Parliament and the Government.

The Committee made seven recommendations. For IBAC, the Committee recommended that it complete and report on its Complaints and Assessment Services Optimisation project in a timely manner; review its policies and processes for managing and reporting on the assessment of public interest disclosures received under the *Public Interest Disclosures Act 2012* (Vic); and develop and report on internal key performance target(s) to assess how it is responding to rates of bullying among its staff. For OVIC, the Committee recommended that it be funded directly through Parliament's appropriation, consistent with the funding arrangements for IBAC, IOV and the VO. For the VO, the Committee recommended that it develop safe and appropriate ways to gather and analyse information about whether people from communities facing barriers can access its services; clearer reporting on the timeliness of standard investigations, complex investigations, parliamentary referrals and public interest complaint investigations; and that the *Ombudsman Act 1973* (Vic) be amended to provide the VO with greater flexibility in determining how public interest complaints referred by IBAC are dealt with.

Readers of this report should bear in mind the Committee's report into its Inquiry into the adequacy of the annual budget of the Independent Broad-based Anti-corruption Commission, the Victorian Ombudsman and Integrity Oversight Victoria, which was tabled in May this year. Normally the Committee would combine discussion of the performance of agencies with any comment and recommendations about their funding, as is logical. The separate reports this year were the result of a referral from the Legislative Council to undertake the budget adequacy inquiry.

The Committee is grateful for the cooperation and professionalism of all integrity agencies throughout this review. I also thank my parliamentary colleagues on the Committee—Deputy Chair Hon Kim Wells MP, Ryan Batchelor MP, Jade Benham MP, Eden Foster MP, Paul Mercurio MP, Rachel Payne MP, and Belinda Wilson MP—for their contributions to this Inquiry. I also acknowledge the Committee Secretariat for their efforts in undertaking this Inquiry and preparing the report: Sean Coley, Committee Manager; Dr Chloë Duncan, Senior Research Officer; Tom Hvala, Research Officer; Whitney Kapa, Research Assistant; Emma Daniel, Complaints and Research Assistant; Maria Marasco and Bernadette Pendergast, Committee Administrative Officers.

Victoria's integrity framework plays a vital role in maintaining confidence in public institutions. It is essential that these agencies remain independent, capable and accountable as they respond to emerging integrity challenges and evolving public expectations.

I commend this report to the Parliament.



Dr Tim Read MP
Chair

Recommendations

2 Independent Broad-based Anti-corruption Commission

RECOMMENDATION 1: That the Independent Broad-based Anti-corruption Commission complete and report on its Complaints and Assessment Services Optimisation project in a timely manner, and ensure that the project delivers improvements to performance measures, in particular indicators related to the complexity of assessing complaints and notifications.

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RECOMMENDATION 2: That the Independent Broad-based Anti-corruption Commission review its policies and processes for managing and reporting on the assessment of public interest disclosures received under the *Public Interest Disclosures Act 2012* (Vic), to improve the timeliness of assessments and identify any other areas for improvement, and provide to the Integrity and Oversight Committee recommendations or key findings from the review, as well as substantive data on the increasing complexity of PIDs.

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RECOMMENDATION 3: That the Independent Broad-based Anti-corruption Commission develop and report on an internal key performance target or targets to assess how it is responding to rates of bullying among its staff.

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4 Office of the Victorian Information Commissioner

RECOMMENDATION 4: That the Victorian Government directly fund the Office of the Victorian Information Commissioner through Parliament's appropriation, similar to the funding arrangements for the Independent Broad-based Anti-corruption Commission, Integrity Oversight Victoria and the Victorian Ombudsman.

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6 Victorian Ombudsman

RECOMMENDATION 5: That the Victorian Ombudsman develop safe and appropriate ways to gather and analyse information about whether people from communities that face barriers can access its services, how they experience those services, and what outcomes they achieve, while protecting privacy and ensuring individuals cannot be identified.

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RECOMMENDATION 6: That the Victorian Ombudsman, as part of its review of its Department Performance Statement performance measures, develop differentiated measures or reporting on the timeliness of standard investigations, complex investigations, parliamentary referrals and public interest complaint investigations. Any differentiated approach should include clear definitions, transparent and consistent classification criteria, and the number of investigations for each category.

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RECOMMENDATION 7: That the Victorian Government seek to amend the *Ombudsman Act 1973* (Vic) to provide the Victorian Ombudsman with greater flexibility to determine how public interest complaints referred by the Independent Broad-based Anti-corruption Commission are dealt with, including the discretion to respond proportionately to matters according to their seriousness, evidentiary basis and systemic significance, while preserving appropriate protections for disclosers.

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Acronyms

AI	artificial intelligence
BP3	Budget Paper 3
CAS	Complaints and Assessment Services
CEO	Chief Executive Officer
CLC	Community Legal Centre
COI	Conflict of interest
DJCS	Department of Justice and Community Safety
DPC	Department of Premier and Cabinet
DTF	Department of Treasury and Finance
EAP	Employee Assistance Program
FOI	Freedom of information
FPC Pilot	Focused Police Complaints Pilot
FPC Team	Focused Police Complaints Team
FRV	Fire Rescue Victoria
FTE	Full-time equivalent
HR	Human Resources
IBAC	Independent Broad-based Anti-corruption Commission
IOC	Integrity and Oversight Committee
IOV	Integrity Oversight Victoria
IPPs	Information Privacy Principles
KPI	Key performance indicator
MoU	Memorandum of Understanding
MP	Member of Parliament
mwah	making work absolutely human
OVIC	Office of the Victorian Information Commissioner
PEC	Parliamentary Ethics Committee
PIA	Privacy Impact Assessment
PIC	Public interest complaint
PID	Public interest disclosure
PMS	People Matter Survey
PPFV	Police-perpetrated family violence

PWSIC	Parliamentary Workplace Standards and Integrity Commission
VCAT	Victorian Civil and Administrative Tribunal
VI	Victorian Inspectorate
VO	Victorian Ombudsman
VPDSF	Victorian Protective Data Security Framework
VPS	Victorian Public Service
VPSC	Victorian Public Service Commission

Chapter 1

Introduction

1.1 Overview of Victoria's integrity system

1.1.1 The integrity agencies

Victoria's integrity system comprises a number of bodies performing important roles in maintaining trust and confidence in public administration, which uphold and advance the integrity of the Victorian public sector.

The Independent Broad-based Anti-corruption Commission (IBAC) is responsible for identifying, exposing and preventing corrupt conduct in the Victorian public sector. Its functions include a focus on overseeing Victoria Police. It is also the central agency for receiving, assessing and investigating disclosures about improper conduct by a public officer or public body (known formally as 'public interest disclosures' (PIDs), and, less formally, as 'whistleblower complaints').

Integrity Oversight Victoria (IOV) oversees several key integrity agencies, including IBAC, the VO, the Office of the Victorian Information Commissioner (OVIC) and the Parliamentary Workplace Standards and Integrity Commission (PWSIC). It does this through, among other measures, monitoring their compliance with the law, use of coercive powers and adherence to procedural fairness requirements.

OVIC oversees Victoria's freedom of information (FOI), information privacy, and information security regimes. It aims to facilitate greater access to information while safeguarding privacy and data in appropriate circumstances.

The PWSIC promotes and upholds parliamentary standards by receiving, managing and resolving allegations about parliamentary misconduct involving current and former Members of Parliament (MPs), government ministers and Parliamentary Secretaries.

The Victorian Ombudsman (VO) investigates and resolves complaints about the administrative actions of Victorian government agencies, including local councils. It is also empowered to enquire into any administrative action that is incompatible with the *Charter of Human Rights and Responsibilities Act 2006* (Vic).

These integrity agencies are not subject to the direction or control of the executive government and are directly accountable to the Parliament of Victoria through the Integrity and Oversight Committee (IOC).

1.1.2 The Integrity and Oversight Committee

The IOC is a joint investigatory committee of the 60th Parliament of Victoria established under the *Parliamentary Committees Act 2003* (Vic) ('*PC Act 2003* (Vic)'). The IOC is responsible for monitoring and reviewing the performance of the duties and functions of some of Victoria's leading integrity agencies. The IOC performs this oversight role through, among other actions:

- monitoring and reviewing the performance of the duties and functions of IBAC, IOV, OVIC, the PWSIC and the VO
- examining the agencies' reports, including annual reports
- reporting to both Houses of Parliament on any matter requiring the attention of Parliament.¹

The agencies are required by legislation to perform duties, functions and responsibilities relating to:

- public information, education and prevention
- complaint handling, investigations and reviews of public sector body investigations
- inquiries into public sector bodies (including any consequent recommendations).

In addition to examining agency reports, the Committee exercises oversight by monitoring information about the performance of agencies it has received from complainants, information in the public domain, and information provided by integrity agencies (for example, through correspondence, briefings, submissions and appearances at Committee hearings). Further, the Committee has the power to inquire into matters that have been referred to it by the Parliament of Victoria, or which have been self-referred by the Committee under the *PC Act 2003* (Vic).²

Under the *PC Act 2003* (Vic), the Committee may investigate complaints about the Information Commissioner and the operation of OVIC.³ However, it cannot investigate complaints about IBAC, IOV, PWSIC or the VO. While the Committee cannot investigate these kinds of complaints, it can monitor and review them, and seek further information from the integrity agency concerned, where the Committee considers that a complaint has identified a systemic issue that bears on the performance of the agency (for example, its professionalism and timeliness).⁴ The *PC Act 2003* (Vic) expressly prohibits the Committee, however, from reconsidering the decisions, findings or recommendations made by IBAC, IOV, OVIC, the PWSIC and the VO.⁵

¹ *Parliamentary Committees Act 2003* (Vic) ('*PC Act 2003* (Vic)') s 7(1); *Ombudsman Act 1973* (Vic) ('*VO Act 1973* (Vic)') s 26H(1).

² *PC Act 2003* (Vic) s 33(1), (3).

³ *PC Act 2003* (Vic) s 7(1)(b).

⁴ *PC Act 2003* (Vic) s 7(1); Integrity and Oversight Committee (IOC), *Integrity and Oversight Committee*, 2026, <<https://www.parliament.vic.gov.au/ioc>> accessed 22 July 2026; IOC, *Information for complainants*, May 2025, <https://www.parliament.vic.gov.au/4992a5/contentassets/f6fcfe3fe8634673b04e36e325a4b6b2/ioc_info-for-complainants.pdf> accessed 7 April 2026, pp. 1–2.

⁵ *PC Act 2003* (Vic) s 7(2); *VO Act 1973* (Vic) s 26H(2).

The IOC is authorised to receive public interest complaints (PICs) about IOV, and to engage an independent investigator to investigate them.⁶

The IOC is required to recommend to Parliament the appointment of an independent person to conduct a performance audit of IBAC, IOV and the VO at least once every four years.⁷ The independent performance audit must ‘determine’ whether these agencies are achieving their ‘objectives effectively, economically and efficiently and in compliance’ with their governing legislation.⁸ The inaugural reports of the independent performance auditor on the performance of IBAC and IOV (formerly the Victorian Inspectorate) were tabled in 2022,⁹ and the inaugural report on the VO in 2024.¹⁰ During the review period the independent performance auditor, O’Connor Marsden & Associates Pty Ltd, reviewed the performance of IBAC and IOV, with the report being tabled in the Parliament in August 2026.¹¹

1.2 Performance of the integrity agencies: key findings from the review

In conducting its review of the integrity agencies during 2023/24 and 2024/25, the Committee’s analysis was informed by annual reports, other published material, written responses to detailed questions on notice, and evidence received during public hearings with all five integrity agencies. The Committee thanks the agencies for their cooperation and assistance throughout this review.

The Committee’s review found that Victoria’s integrity agencies generally performed their statutory functions effectively during the review period. Collectively, the agencies demonstrated a strong commitment to accountability, integrity, public trust and continuous improvement. They continued to deliver important complaint handling, investigative, oversight, information, education and prevention functions, while responding to significant organisational, technological and social change.

⁶ *PC Act 2003* (Vic) s 7(1)(ia); *Public Interest Disclosures Act 2012* (Vic) s 56A(1)(d).

⁷ *Independent Broad-based Anti-corruption Commission Act 2011* (Vic) (*‘IBAC Act 2011 (Vic)’*) s 170; *Integrity Oversight Victoria Act 2011* (Vic) (*‘IOV Act 2011 (Vic)’*) s 90D; *VO Act 1973* (Vic) s 24D.

⁸ *IBAC Act 2011* (Vic) s 170(4); *IOV Act 2011* (Vic) s 90D(4); *VO Act 1973* (Vic) s 24D(4).

⁹ Tabled in both Houses of Parliament on 22 December 2022; see: Parliament of Victoria, *Integrity and Oversight Committee: The independent performance audits of the Independent Broad-based Anti-corruption Commission and the Victorian Inspectorate*, 2026, <<https://www.parliament.vic.gov.au/parliamentary-activity/tabled-documents-database/tabled-document-details/6765>> accessed 22 July 2026.

¹⁰ Tabled in both Houses of Parliament on 30 July 2024; see Parliament of Victoria, *Integrity and Oversight Committee: The independent performance audit of the Victorian Ombudsman*, 2026, <<https://www.parliament.vic.gov.au/parliamentary-activity/tabled-documents-database/tabled-document-details/8336>> accessed 22 July 2026.

¹¹ See Parliament of Victoria, IOC, *The independent performance audits of the Independent Broad-based Anti-corruption Commission and the Victorian Inspectorate*, Melbourne, October 2022; O’Connor Marsden & Associates (O’Connor Marsden), *Performance audit of the Victorian Ombudsman: Report to the Integrity and Oversight Committee*, Melbourne, 18 June 2024, in Parliament of Victoria, IOC, *The independent performance audit of the Victorian Ombudsman*, Melbourne, July 2024; and Parliament of Victoria, IOC, *The independent performance audits of the Independent Broad-based Anti-corruption Commission and Integrity Oversight Victoria*, Melbourne, August 2026.

The Committee also identified several recurring themes across the integrity system, as follows:

- **Increasing demand and complexity**

A common challenge facing the agencies was the increasing volume and complexity of their work. Several agencies reported rising complaint numbers, more complex investigations, greater stakeholder expectations and increasing demands associated with procedural fairness, welfare considerations and legislative obligations. While agencies generally adapted effectively to these pressures, increasing demand continues to place significant pressure on resources, timeliness and service delivery.

- **Timeliness and performance measurement**

The Committee observed that timeliness remained a significant challenge across parts of the integrity system. While some agencies continued to meet or exceed performance targets, others experienced delays associated with increasing workloads and more complex matters. The review also highlighted limitations in some existing performance measures, particularly where single indicators do not adequately distinguish between routine and highly complex work. The Committee considers that more sophisticated and outcome-focused performance measures would strengthen transparency and accountability.

- **Technology, information management and emerging risks**

The increasing importance of digital information, cyber security and emerging technologies was evident throughout the review period. Agencies are operating in an increasingly complex technological environment and must continue to invest in information management systems, digital capability and data security. The Committee particularly notes the growing significance of artificial intelligence and welcomes work being undertaken across the sector to manage associated opportunities and risks.

- **Workforce capability, wellbeing and organisational culture**

The Committee found that workforce capability and organisational culture remain critical to the effectiveness of Victoria's integrity system. Agencies continued to invest in staff development, governance, wellbeing and organisational reform. While positive progress has been made, issues such as workforce engagement, workplace culture and staff wellbeing remain ongoing areas of focus.

- **Trauma-informed and complainant-centred practice**

The Committee was encouraged by the increasing emphasis placed on trauma-informed, culturally responsive and complainant-centred approaches across several agencies. These developments reflect a broader recognition that effective oversight requires robust investigative methods that are also accessible, respectful and responsive to the experiences of complainants and witnesses.

1.2.1 IBAC

The Committee found that IBAC continued to perform its corruption prevention, investigative and oversight functions effectively while implementing significant organisational reforms and improvements to its operations. While acknowledging these achievements, the Committee remains concerned about delays to assessing PIDs and growing complaint backlogs, which have been driven by increasing complaint volumes, the greater complexity of matters, and more resource-intensive assessment processes. Timeliness therefore remains a key challenge for the organisation.

IBAC continued to undertake major investigative work during the reporting period, including Operations Leo and Turton, and monitored the implementation of recommendations from its report into Operation Watts, delivered in 2022.¹² The Committee considers the implementation of the Operation Watts recommendations to be particularly significant, as it directly contributed to major parliamentary integrity reforms, including the establishment of the PWSIC, the Parliamentary Ethics Committee and other integrity mechanisms. These outcomes represent important advances in Victoria's integrity framework. Nevertheless, IBAC did not meet all of its performance targets relating to complex investigations and public sector oversight activities during 2024/25.

The Committee commends IBAC's prevention and education work, noting that it exceeded its targets, delivered a high number of corruption prevention activities and achieved very high stakeholder satisfaction. However, it also questions whether some existing performance targets are sufficiently ambitious.

The chapter highlights IBAC's growing focus on monitoring the implementation of its recommendations, particularly by Victoria Police, which has accepted and implemented the vast majority of them. It also commends IBAC's public apology to Dr Jana Katerinskaja, following findings in the Victorian Inspectorate's special report into *IBAC's referral and oversight of Emma's complaints about Victoria Police's response to family violence by a police officer*,¹³ as a significant milestone that has helped drive reforms aimed at improving complainant welfare and victim survivor engagement.

Finally, while acknowledging substantial investment in workforce capability and organisational development, the Committee remains concerned about workplace bullying and the ongoing gender pay gap among IBAC staff. Overall, the Committee commends IBAC's achievements while identifying continuing challenges relating to complaint backlogs, PID timeliness, investigation performance and workplace culture.

¹² Operation Watts was a joint investigation by the Independent Broad-based Anti-corruption Commission (IBAC) and the Victorian Ombudsman (VO). In this report the Committee has discussed the implementation of the Operation Watts recommendations in Chapter 2, on the performance of IBAC. However, the Committee also acknowledges the contribution of the VO to both the original *Operation Watts* report and the implementation progress report. See IBAC and the VO, *Operation Watts: Investigation into allegations of misuse of electorate office and ministerial office staff and resources for branch stacking and other party-related activities*, Melbourne, July 2022; IBAC and the VO, *Operation Watts: Progress report*, Melbourne, September 2023.

¹³ Victorian Inspectorate, *Special Report: IBAC's referral and oversight of Emma's complaints about Victoria Police's response to family violence by a police officer*, Melbourne, October 2022.

1.2.2 IOV

IOV plays a unique and important role within Victoria's integrity framework, overseeing 13 bodies, including IBAC, the VO, OVIC and PWSIC. Its responsibilities include handling complaints and PIDs, conducting investigations, monitoring the use of coercive and covert powers, and contributing to legislative and systemic reform.

The Committee notes that demand for IOV's services continued to grow in the reporting period. Although IOV met targets for acknowledging complaints and finalising low-complexity matters, it did not achieve its target for completing medium-complexity complaints within required timeframes, largely due to the increasing number of complex matters. The Committee welcomes initiatives to improve efficiency, including an updated complaints portal, enhanced case management systems and improved analytical tools, and will continue to monitor timeliness and transparency.

The Committee commends IOV's investigative and oversight work, particularly in relation to IBAC and the VO, and notes the development of a comprehensive investigation manual. It also recognises IOV's strengthened focus on witness welfare and trauma-informed practices through improved monitoring, reporting and staff training.

A significant area of work has been IOV's monitoring of IBAC's handling of police complaints, including police-perpetrated family violence matters, and its support for the establishment of the PWSIC. The Committee also highlights IOV's extensive oversight of coercive powers and its contribution to integrity system reforms, and acknowledges the leadership of Chief Integrity Inspector Ms Louise Macleod following her appointment in May 2025.

1.2.3 OVIC

OVIC continued to perform its key functions in FOI, privacy and information security during 2023/24 and 2024/25, despite operating in an increasingly challenging environment characterised by rising demand, greater technological complexity and reduced funding.

The Committee notes substantial growth across all of OVIC's core areas of responsibility. FOI complaints and review applications continued to increase, while privacy complaints rose sharply and information security incident notifications grew significantly over the reporting period. Although OVIC increased the number of matters it finalised, the volume of incoming work contributed to longer processing times for FOI complaints and reviews. The Committee remains concerned about timeliness, noting that delays were a common issue raised in complaints received about OVIC.

The Committee commends OVIC's efforts to manage this growing demand, including greater use of informal resolution processes and preliminary inquiries, which have helped resolve many matters more efficiently. It also supports OVIC's proposal to improve performance reporting by adopting measures that better reflect the actual time taken to finalise matters.

OVIC continued important work in privacy and information security through auditing compliance with government data security standards, monitoring information security incidents, providing privacy guidance and supporting agencies to improve information-handling practices. The Committee also recognises OVIC's leadership in addressing emerging technologies, particularly artificial intelligence, where it has provided influential guidance on the safe and privacy-conscious use of generative AI.

The Committee's principal concern relates to OVIC's declining funding despite increasing demand. It considers that funding pressures may affect OVIC's capacity to deliver its functions effectively and recommends that the Government fund OVIC independently to strengthen OVIC's independence and long-term sustainability. Additionally, the Committee notes that fundamental legislative reform will ultimately be needed for OVIC to perform its functions effectively.

1.2.4 PWSIC

The PWSIC made significant progress during its establishment phase, laying important foundations for the promotion of integrity and professional standards within Victorian parliamentary workplaces. However, the Committee notes that the Commission remains in a developmental stage and is still establishing the governance, performance and accountability frameworks needed to demonstrate its effectiveness over time.

During the reporting period, the PWSIC did not have formal Department Performance Statement measures, reflecting its recent establishment. While new performance indicators have since been developed to assess both reactive functions, such as referrals and investigations, and proactive functions, including education and engagement activities, these measures have not yet been tested or reported against. The Committee considers robust performance reporting essential and will continue to monitor implementation closely. It also notes that limited operational data is currently available to assess the PWSIC's effectiveness and efficiency.

The Committee welcomed the transition to an independent parliamentary funding model from 2026/27, which is expected to improve transparency, accountability and parliamentary oversight. Resourcing adequacy will remain an area of ongoing scrutiny as demand for the PWSIC's services develops.

Stakeholder engagement has been a major focus of the PWSIC's early work. The PWSIC undertook extensive engagement with Members of Parliament, parliamentary staff and electorate office employees through information sessions, guidance materials, outreach activities and training initiatives. The Committee regards this as critical to preventing misconduct and fostering ethical workplace culture.

The chapter also highlights the importance of the PWSIC's relationships with other integrity agencies, particularly IBAC, IOV, the Parliamentary Ethics Committee and the Parliamentary Integrity Adviser. These partnerships support effective referral pathways, coordination and consistency across the integrity system. While engagement with parliamentary stakeholders has been strong, the Committee considers expanding public awareness and accessibility to be an important next step as the Commission continues to mature.

1.2.5 VO

The VO continued to perform its core oversight functions effectively during 2023/24 and 2024/25, despite significant organisational change, increasing complaint complexity and ongoing resource constraints. The Committee acknowledges the guidance of Ms Marlo Baragwanath as Ombudsman, who initiated a new Strategic Plan (2025–29), revised governance arrangements and a new executive structure.

The Committee identified complaint handling as a particular strength. The VO managed a high volume of jurisdictional complaints while consistently exceeding its timeliness targets. However, complainant satisfaction remained below target, suggesting that timely resolution does not necessarily translate into positive user experiences. The Committee also noted that limited data on the experiences of different community groups restricts the VO's ability to assess accessibility and equity outcomes.

Investigation performance presented a more significant challenge. Although the VO completed numerous investigations and maintained a very high rate of recommendation acceptance by public bodies, investigation timeliness remained below target due to increasing complexity, procedural fairness requirements, welfare considerations, parliamentary referrals and PIC matters. The Committee supported the development of more nuanced performance measures to better reflect varying investigation complexity and reiterated its recommendation for legislative reform to provide greater flexibility in managing PICs.

The Committee welcomed the VO's increasing focus on prevention, education and community engagement, including outreach to First Nations and vulnerable communities, as well as governance, workforce and information management improvements. Nevertheless, concerns remain regarding workforce engagement, technology risks and the need for stronger, outcome-focused performance measures to better demonstrate the impact of the VO's work.

1.3 Funding and resourcing

In the course of this review the integrity agencies have stated that their ability to perform their functions is hindered by inadequate resourcing. Additionally, IBAC and the VO, alongside the Victorian Auditor-General's Office, have reiterated concerns about the necessity of their funding being provided in a more independent and transparent manner.

The Committee's *Inquiry into the adequacy of the annual budget of the Independent Broad-based Anti-corruption Commission, the Victorian Ombudsman and Integrity Oversight Victoria*, which reported in May 2026, investigated these issues in relation to IBAC, the VO and IOV. The present inquiry discusses resourcing issues in relation to OVIC and the PWSIC.

1.4 Report structure

This report comprises seven chapters. Chapter 1 provides an overview of Victoria's integrity system; the role, functions, jurisdiction and responsibilities of IOC; and a high-level assessment of the performance of Victoria's integrity agencies during 2023/24 and 2024/25. Chapter 2 assesses the performance of IBAC, Chapter 3 examines IOV, Chapter 4 reviews OVIC, Chapter 5 considers the PWSIC, and Chapter 6 evaluates the performance of the VO. Chapter 7 concludes the report by reflecting on the overall performance of the integrity agencies.

Chapter 2

Independent Broad-based Anti-corruption Commission

2.1 Introduction

The Independent Broad-based Anti-corruption Commission (IBAC) is the principal anti-corruption and police oversight body in Victoria. IBAC's jurisdiction encompasses the Victorian public sector, including public service departments, government agencies and local councils; Victoria Police; the Parliament of Victoria; and the judiciary.¹

IBAC is primarily responsible for exposing, investigating and preventing public sector corruption and police personnel misconduct.² Through education, IBAC is responsible for improving the capacity of the Victorian public sector to prevent corruption and misconduct.³ IBAC's functions include receiving, handling, assessing and investigating public complaints and agency notifications about alleged corruption and police personnel misconduct, and it prioritises the investigation of 'serious' and 'systemic' corrupt conduct.⁴

Further, IBAC produces reports and makes recommendations as part of its investigative, audit, research and intelligence activities. It also performs a range of functions under the *Public Interest Disclosures Act 2012* (Vic) ('PID Act 2012 (Vic)'), including assessing and investigating public interest disclosures (PIDs, also known as 'whistleblower complaints'), producing guidelines and reviewing public sector procedures.⁵

In exercising these functions, IBAC is authorised to use a range of investigative powers, including coercive and covert powers such as physical and electronic surveillance and the summoning and questioning of witnesses in public and private examinations.⁶

IBAC is oversighted by Integrity Oversight Victoria (IOV) and the Integrity and Oversight Committee (IOC). IOV focuses on IBAC's compliance with applicable

1 *Independent Broad-based Anti-corruption Commission* (IBAC), *Who we investigate*, <<https://www.ibac.vic.gov.au/who-we-investigate>> accessed 15 June 2026.

2 *Independent Broad-based Anti-corruption Commission Act 2011* (Vic) ('IBAC Act 2011 (Vic)') s 8.

3 See for example, *IBAC Act 2011* (Vic) s 15(5).

4 See for example, *IBAC Act 2011* (Vic) ss 15(1A), 51, 52, 57.

5 *IBAC Act 2011* (Vic), especially ss 8, 15, pt 7; IBAC, *Annual report 2021/22*, Melbourne, 2022, especially pp. 4, 54–55; IBAC, *Annual report 2024/25*, Melbourne, 2025, especially pp. 24–28; *Public Interest Disclosures Act 2012* (Vic) ('PID Act 2012 (Vic)'), especially s 55.

6 *IBAC Act 2011* (Vic), especially pts 3, 4, 6; *Surveillance Devices Act 1999* (Vic), especially pt 4; *Telecommunications (Interception and Access) Act 1979* (Cth), especially chs 1–4.

legislation, in particular the lawful use of its coercive powers, while the IOC monitors and reviews its overall performance.⁷

As part of the Committee's regular review and monitoring of the performance of Victoria's integrity agencies, this chapter reviews selected areas of IBAC's performance of its complaint-handling, investigative, review, audit, educative and preventive functions in 2023/24 and 2024/25. The chapter also examines selected areas of IBAC's performance with respect to its governance, workplace culture and funding, and the discharge of its accountabilities, including an overview of the Victorian Government's response to the IOC's recommendations from its *Inquiry into the adequacy of the Legislative Framework for the Independent Broad-based Anti-corruption Commission (IBAC legislative adequacy inquiry)*.

During the reporting period IBAC experienced changeover in its two highest leadership positions, Commissioner and Chief Executive Officer (CEO). On 17 October 2023 Ms Victoria Elliott was announced as the new Commissioner of IBAC, replacing former Acting Commissioner Stephen Farrow, and commenced a five-year tenure from December 2023.⁸ Ms Alison Byrne joined IBAC as CEO in August 2024, replacing Ms Marlo Baragwanath, who had served as Commissioner since 2019.⁹ The Committee thanks Mr Farrow and Ms Baragwanath for their dedicated service during their time at IBAC, and acknowledges the contributions Ms Elliott and Ms Byrne have made since commencing their roles.

2.2 Complaint handling, investigations, reviews and audits

2.2.1 Complaint handling

IBAC receives and assesses complaints, notifications, PIDs and PID notifications about public sector corruption, police misconduct, and 'improper conduct'¹⁰ under the *Independent Broad-based Anti-corruption Commission Act 2011* (Vic) ('*IBAC Act 2011* (Vic)') and *PID Act 2012* (Vic).¹¹

After assessing whether a complaint or notification received under the *IBAC Act 2011* (Vic), or determining that a PID or PID notification received under the *PID Act 2012* (Vic) meets the threshold of a 'public interest complaint', or can otherwise be classified

⁷ *Integrity Oversight Victoria Act 2011* (Vic), especially s 11; *Parliamentary Committees Act 2003* (Vic), especially s 7(1); IBAC, *Annual report 2021/22*, especially pp. 54–56.

⁸ Premier of Victoria, *New Commissioner for State's Integrity Watchdog*, 27 October 2023, <<https://www.premier.vic.gov.au/new-commissioner-states-integrity-watchdog>> accessed 2 August 2026; IBAC, *Annual Report 2023–24*, p. 4.

⁹ IBAC, *IBAC statement on the appointment of CEO*, 26 July 2024, <<https://www.ibac.vic.gov.au/appointment-of-ceo-july-2024>> accessed 31 July 2026; IBAC, *Highly regarded leader appointed new CEO of Victoria's anti-corruption commission*, <<https://www.ibac.vic.gov.au/article/highly-regarded-leader-appointed-new-ceo-of-victoria%27s-anti-corruption-commission>> accessed 31 July 2026. Dr Linda Timothy acted as IBAC's Chief Executive Officer (CEO) for an interim period between Ms Baragwanath's and Ms Byrne's tenures.

¹⁰ See *PID Act 2012* (Vic) s 4 ('Meaning of improper conduct') (see also s 3).

¹¹ *IBAC Act 2011* (Vic) ss 51–52, 57; *PID Act 2012* (Vic) ss 4–5; pt 2; ss 21–22, 55. See also *Victoria Police Act 2013* (Vic) ss 167–170.

as a complaint or notification under the *IBAC Act 2011* (Vic),¹² IBAC must ordinarily decide whether to dismiss, investigate or refer it.¹³

During both its 2021/22 and 2022/23 performance reviews, IOC reported on systemic improvements IBAC has made to its complaint handling operations.¹⁴ The Committee is pleased to see that IBAC has continued to make further improvements in 2023/24 and 2024/25. These improvements include major initiatives such as the Focused Police Complaints Pilot (FPC Pilot) and establishment of the ongoing Focused Police Complaints Team (FPC Team).¹⁵

Over October 2023 to April 2024, IBAC ran the FPC Pilot, a trial to ‘establish a dedicated team to assess and investigate single incident complaints about the conduct of Victoria Police personnel from people who are at a higher risk of experiencing misconduct’, including Aboriginal and Torres Strait Islander peoples, people with disability, people who identify as LGBTIQ+, and other communities.¹⁶ The objectives of the FPC Pilot were to improve the timeliness of IBAC’s complaint handling processes, increase ‘transparency and complainants’ understanding of the outcomes of complaints’, and test better ways to identify complaints within target communities.¹⁷

The FPC Pilot was highly successful, assessing complaints and notifications 56 days faster than IBAC’s normal assessment processes for comparable complaints, and completing single incident investigations 204 days faster than IBAC’s ‘systemic police misconduct investigations’.¹⁸ Subsequently, the FPC Pilot was implemented as a specialist unit within IBAC from December 2024, and as of 10 February 2026 has assessed 120 complaints and commenced 36 investigations.¹⁹

Other improvements to IBAC’s complaints processes have also been made through establishment of a Witness Liaison Team, which among its other activities helps ‘monitor and... manage risks with complainants’ to put ‘complainant... wellbeing and needs at the centre’ of IBAC’s work.²⁰ Additionally, in both 2023/24 and 2024/25, IBAC funded a ‘modest, enhanced complainant experience initiative’ to provide staff training and improve information materials for complainants.²¹ IBAC staff underwent training

¹² *IBAC Act 2011* (Vic) s 7; *PID Act 2012* (Vic) ss 26, 26A.

¹³ *IBAC Act 2011* (Vic) s 58.

¹⁴ Parliament of Victoria, Integrity and Oversight Committee (IOC), *Performance of the Victorian integrity agencies 2021/22*, Melbourne, November 2023, pp. 11–12; Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, Melbourne, May 2025, p. 12.

¹⁵ Independent Broad-based Anti-corruption Commission (IBAC), *Performance of the Victorian integrity agencies 2023/24 and 2024/25*, response to questions on notice received 5 May 2026, pp. 3–4.

¹⁶ IBAC, *IBAC’s Focused Police Complaints Pilot: Changing IBAC’s approach to single incident complaints about police misconduct*, Melbourne, 2024, p. 4.

¹⁷ Ibid.

¹⁸ Ibid., p. 5.

¹⁹ IBAC, response to questions on notice, p. 4; IBAC, *IBAC’s Focused Police Complaints Team launches 28 investigations in first year*, 11 December 2025, <<https://www.ibac.vic.gov.au/IBACs-Focused-Police-Complaints-Team-launches-28-investigations-in-first-year>> accessed 26 July 2026.

²⁰ Alison Byrne, CEO, IBAC, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 4.

²¹ IBAC, Inquiry into the adequacy of the annual budget of the Independent Broad-based Anti-corruption Commission, the Victorian Ombudsman and Integrity Oversight Victoria (‘Budget adequacy inquiry of IBAC, VO and IOV hearings’), response to questions on notice received 20 April 2026, p. 17.

for effectively engaging with complainants, trauma-informed approaches to complaint management, managing complex behaviours, awareness of family violence, and understanding of the Charter of Human Rights and Responsibilities.²²

Additionally, IBAC is planning further, long-term changes through implementation of its Complaints and Assessment Services (CAS) Optimisation project.²³ Implementation began in 2024/25 with the aim of:

optimis[ing] the design of complaint handling systems, processes and ways of working to make the complaint assessment function including the assessment of Public Interest Complaints more efficient.²⁴

The project will make recommendations for long-term improvements to IBAC's CAS systems, and will test changes with the aim of operationalising in the 2026/27 financial year.²⁵

However, despite these improvements, IBAC continues to experience an increasing backlog of complaints.²⁶ In April 2025, IBAC's backlog of complaints was so significant that it committed to writing to affected complainants to advise of serious, ongoing delays,²⁷ with these problems continuing as of June 2026.²⁸

IBAC has attributed its continuing complaint backlog to the greater volume and complexity of complaints and notifications concerning public sector corruption and police misconduct,²⁹ as it has since the 2021/22 reporting period.³⁰ As shown in the Committee's recent report on its *Inquiry into the adequacy of the annual budget of the Independent Broad-based Anti-corruption Commission, the Victorian Ombudsman and Integrity Oversight Victoria (Budget adequacy inquiry of IBAC, VO and IOV)*, after dipping in 2022/23, the number of complaints, PIDs, and notifications received by IBAC has increased.³¹

IBAC's explanation is further borne out by analysis of clearance rates of complaints since 2021/22, as shown in Table 2.1 and Figure 2.1, below.

²² Ibid.

²³ IBAC, response to questions on notice, p. 1.

²⁴ Ibid., p. 2.

²⁵ Alison Byrne, CEO, IBAC, correspondence, 22 June 2026, pp. 1–2.

²⁶ IBAC, Budget adequacy inquiry of IBAC, VO and IOV hearings, response to questions on notice, pp. 5, 11, 14.

²⁷ Alison Byrne, CEO, IBAC, correspondence, 20 April 2025, pp. 1–2; Alison Byrne, CEO, IBAC, correspondence, 22 June 2026, pp. 1–2.

²⁸ Alison Byrne, CEO, IBAC, correspondence, 22 June 2026, pp. 1–2.

²⁹ IBAC, Budget adequacy inquiry of IBAC, VO and IOV hearings, response to questions on notice, p. 11.

³⁰ IBAC, *Annual report 2021/22*, pp. 11, 37. See also IBAC, *Annual report 2020/21*, Melbourne, 2021, p. 7; Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2021/22*, p. 16; Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 13.

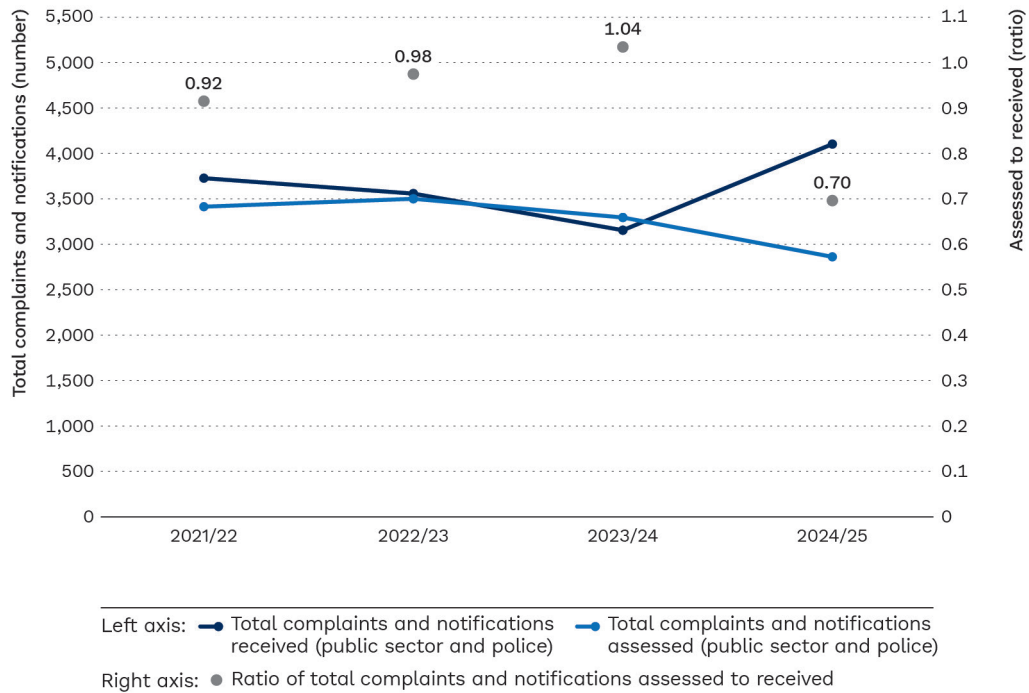
³¹ Parliament of Victoria, IOC, *Budget adequacy inquiry of IBAC, VO and IOV*, May 2026, p. 53.

Table 2.1 Total complaints and notifications received and assessed, and ratio of complaints and notifications assessed to received, 2021/22 to 2024/25

	2021/22	2022/23	2023/24	2024/25
Total complaints and notifications received (public sector and police)	3,728	3,558	3,155	4,103
Total complaints and notifications assessed (public sector and police)	3,414	3,501	3,295	2,862
Ratio of total complaints and notifications assessed to received	0.92	0.98	1.04	0.70

Source: IBAC, *Annual report 2024/25*, Melbourne, 2025, pp. 33, 35.

Figure 2.1 Total complaints and notifications received and assessed, and ratio of complaints and notifications assessed to received, 2021/22 to 2024/25



Source: IBAC, *Annual report 2024/25*, pp. 33, 35.

Despite improvements to IBAC's complaints processes over multiple years, the total number of complaints and notifications assessed by IBAC was fairly steady prior to 2024/25. A comparison of the ratio of complaints and notifications assessed versus those received shows that complaints and notifications were being assessed at a rate of around 9 for every 10 received in 2021/22, and at an almost 1 to 1 rate in 2022/23.³²

In 2023/24, IBAC assessed slightly more than one complaint or notification for every one received.³³ As the total number of complaints and notifications received in 2023/24 dipped to 3155 this increased assessment ratio cannot clearly be attributed to improved processes, but it suggests that IBAC was working to clear a backlog of complaints in 2023/24.

In 2024/25, however, the total number of complaints and notifications received increased sharply to 4103, an increase of '18 per cent compared to the average across the three-year period'.³⁴ At the same time the assessment ratio dropped to about 7 complaints and notifications assessed for every 10 received—a substantial drop from previous years.³⁵ These trends are likely connected, although IBAC has also explained that the drop in assessment rates has been caused by the complexity of some complaints,³⁶ as well as IBAC's

complaints handling processes adopt[ing] a trauma-informed approach—which is good and necessary, but... often requires additional time to thoroughly assess and respond to each allegation, and provide information to complainants who can themselves have complex needs. Between 2021 and 2024, the length of IBAC's complaint assessments increased by 60 per cent due to these added processes.³⁷

Despite this, over the same period, IBAC's performance against its Department Performance Statement performance measures³⁸ for timeliness of complaint and notification assessments broadly improved, as shown in Table 2.2.

³² IBAC, *Annual report 2024/25*, pp. 33, 35; IBAC *Annual Report 2021/22*, p. 39; IBAC, *Annual report 2022/23*, Melbourne, 2023, pp. 31, 41–43. Please note that some complaints and notifications assessed in a given financial year may have been received in a previous year.

³³ IBAC *Annual report 2023/24*, Melbourne, 2024, pp. 8, 35, 37.

³⁴ IBAC, response to questions on notice, p. 1.

³⁵ IBAC *Annual Report 2024/25*, pp. 33, 35.

³⁶ IBAC, response to questions on notice, p. 2.

³⁷ Ibid., p. 3.

³⁸ Formerly Budget Paper 3 (BP3) measures.

Table 2.2 Department Performance Statement timeliness performance measures for complaints and notifications, 2021/2022 to 2026/27

Timeliness	Target vs actual 2021/22	Target vs actual 2022/23	Target vs actual 2023/24	Target vs actual 2024/25	Target vs expected outcome 2025/26	2026/27 target
Proportion of complaints or notifications about police personnel conduct and police personnel corrupt conduct assessed by IBAC within 45 days	90% 52% ↓	85% 48% ↓	60% ³⁹ 48% ↓	60% 60%	60% 38% ↓	60%
Proportion of complaints or notifications about public sector corrupt conduct (excluding police personnel conduct and police personnel corrupt conduct) assessed by IBAC within 45 days	85% 38% ↓	85% 55% ↓	60% 58% ↓	60% 66%	60% 54%	60%

Sources: Department of Treasury and Finance (DTF), *Budget Paper No. 3: service delivery 2021/22*, Melbourne, 2022, p. 377; DTF, *Budget Paper No. 3: service delivery 2022/23*, Melbourne, 2023, p. 383; DTF, *Budget Paper No. 3: service delivery 2023/24*, Melbourne, 2024, pp. 363–364; DTF, *2024/25 Department Performance Statement*, Melbourne, 2025, p. 162; DTF, *2025/26 Department Performance Statement*, Melbourne, 2025, p. 174; DTF, *2026/27 Department Performance Statement*, Melbourne, 2025, p. 169.

Notably, IBAC did not meet its timeliness targets for assessing complaints and notifications in 2023/24, but did in 2024/25.⁴⁰ IBAC has attributed its improved performance to implementation of the CAS Optimisation project, which

aimed to optimise the design of complaint handling systems, processes and ways of working to make the complaint assessment function including the assessment of Public Interest Complaints more efficient.⁴¹

During the 2023/24 and 2024/25 reporting period, therefore, IBAC adopted both measures to make complaint assessment more efficient, and measures that made the assessment of some complaints and notifications more time-consuming.⁴² The Committee commends IBAC for making continuous efforts to improve its complaint handling function. It also recognises the importance of accounting for complainants' welfare and the effects of trauma on complainants—aims the Committee has advocated for in previous performance inquiries.⁴³

However, the Committee also notes IBAC's comments that some of these improvements have resulted in longer assessment times, especially for complex complaints.⁴⁴ Several of these improvements have only recently been implemented, such as the

³⁹ 'The lower 2023–24 target reflects that the complexity of a portion of the complaints received has increased, resulting in more time being needed for the assessment process': Department of Treasury and Finance, *Budget paper No. 3: service delivery 2023/24*, Melbourne, 2024, <<https://s3.ap-southeast-2.amazonaws.com/budgetfiles202324.budget.vic.gov.au/2023-24+State+Budget+-+Service+Delivery.pdf>> accessed 23 July 2026, p. 364.

⁴⁰ IBAC *Annual report 2023/24*, p. 33; IBAC, *Annual report 2024/25*, pp. 16–17.

⁴¹ IBAC, response to questions on notice, p. 2.

⁴² Ibid, pp. 2–3.

⁴³ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, Chapter 6, pp. 91–106; Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2020/21: focus on witness welfare*, October 2022.

⁴⁴ IBAC, response to questions on notice, p. 2–3.

establishment of the FPC Team in December 2024,⁴⁵ or are ongoing multi-year initiatives, such as the CAS optimisation program and the complainant experience project.⁴⁶ As these initiatives are finalised and mature, and new practices become business-as-usual, assessment times may reduce. Nevertheless the increase in assessment times is not sustainable and will require close attention. The Committee will continue to monitor the implementation of these initiatives and their effects on assessment times in future performance reviews, and consider whether IBAC needs additional resources to continue using a trauma-informed approach toward complainants. As of May 2026, IBAC was not expected to meet its timeliness targets for assessing complaints and notifications for 2025/26.⁴⁷

In 2023/24, IBAC stated that it:

updated our risk and complexity matrix to better quantify the complexity of complaints. This allows us to contextualise our timeliness results. While the number of complaints we receive is stabilising after the COVID-19 pandemic, there was a 15 per cent increase from 2022/23 to 2023/24 in the number of complaints and notifications that we rated as 'medium' or 'high' complexity.⁴⁸

While the Committee commends IBAC's development and use of a complexity matrix for complaints and notifications, IBAC's annual reporting does not include it, meaning that it is not subject to public scrutiny. Further, IBAC's annual reporting does not include details about how many of the complaints and notifications it receives are rated high or medium complexity, or provide information about assessment time for high- or medium- complexity complaints and notifications compared to lower-complexity ones.

The Committee notes that it expressed concern in the *Performance of the Victorian integrity agencies 2022/23* that IBAC does not provide public information on complaint and notification complexity and its relationship to assessment timeframes.⁴⁹ In that report, IOC recommended that:

- the Victorian Government, in consultation with IBAC, review and, if necessary, revise its BP3 assessment targets to ensure their adequacy and fitness for purpose, taking into account the volume and complexity of complaints and notifications handled by IBAC
- IBAC develop, use and consistently publicly report on key performance indicators, including complexity indicators, for its assessment of complaints and notifications.⁵⁰

⁴⁵ IBAC, *Annual report 2024/25*, p. 37.

⁴⁶ Ibid., p. 7

⁴⁷ Department of Treasury and Finance, *2026/27 Department performance statement*, <<https://s3.ap-southeast-2.amazonaws.com/vicbudgetfiles2026.27vicbudget/2026-27+State+Budget+-+Department+Performance+Statement.pdf>> accessed 23 July 2026, p. 169.

⁴⁸ IBAC, *Annual report 2023/24*, p. 33.

⁴⁹ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 15.

⁵⁰ Ibid., p. 16.

The Committee reiterated these recommendations in its *Budget adequacy inquiry of IBAC, VO and IOV* of May 2026, emphasising the importance of these issues and their link to appropriate resourcing for IBAC.⁵¹ IBAC has accepted the second of these recommendations.

IBAC has advised that at the beginning of the 2025/26 financial year it introduced a 'new BP3 measure to consider and report [on] the quality of IBAC's complaint assessments'.⁵² This is a positive development, and the Committee looks forward to considering the new performance target during its 2025/26 performance review.

However, IBAC has also advised work in this area is ongoing, with further development of the complexity indicators contingent on completion of the CAS Optimisation project,⁵³ to be finalised in 30 June 2027.⁵⁴ The Committee emphasises its ongoing interest in this area of IBAC's work, and requests that IBAC progress the development of key quantitative and qualitative performance indicators, including complexity indicators, for assessment of complaints and notifications.

The Committee reiterates Recommendations 1 and 2 of the 2022/23 performance inquiry and Recommendations 10 and 11 of the *Budget adequacy inquiry of IBAC, VO and IOV*.⁵⁵ The Committee also recommends that IBAC complete and deliver the CAS project in a timely manner, ensuring that the project delivers improvements to IBAC's performance measures, especially indicators related to the complexity of assessing complaints and notifications. Additionally, the Committee requests that IBAC provide it with ongoing updates on the progress of the CAS Optimisation project until its completion, with a focus on any data or findings coming out of the project which impact the development of complexity indicators.

RECOMMENDATION 1: That the Independent Broad-based Anti-corruption Commission complete and report on its Complaints and Assessment Services Optimisation project in a timely manner, and ensure that the project delivers improvements to performance measures, in particular indicators related to the complexity of assessing complaints and notifications.

2.2.2 Public interest disclosures

IBAC did not meet its timeliness performance targets for assessing PIDs and PID notifications under the *PID Act 2012* (Vic) in either 2023/24 or 2024/25. This is part of a longstanding pattern—as shown in Table 2.3, IBAC has not completely met its timeliness targets for assessing PIDs since they were introduced in 2021/22.

⁵¹ Parliament of Victoria, IOC, *Budget adequacy inquiry of IBAC, VO and IOV*, p. 60.

⁵² IBAC, response to questions on notice, IOC recommendations updates, p. 3.

⁵³ Ibid., IOC recommendations updates, pp. 3–4.

⁵⁴ Alison Byrne, CEO, IBAC, correspondence, 29 June 2026, p. 3.

⁵⁵ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 16; Parliament of Victoria, IOC, *Budget adequacy inquiry of IBAC, VO and IOV*, p. 60.

Table 2.3 Public interest disclosure timeliness performance targets and levels achieved, 2021/22 to 2026/27

Timeliness	Target vs actual 2021/22	Target vs actual 2022/23	Target vs actual 2023/24	Target vs actual 2024/25	Target vs expected outcome 2025/26	2026/27 target
Proportion of public interest disclosures complaints and notifications assessed within 30 days ⁵⁶	70% 62%↓	70% 65%↓	70% 69%↓	70% 59%↓ ⁵⁷	70% 43%↓ ⁵⁸	70%

Sources: DTF, *Budget Paper No. 3: service delivery 2021/22*, pp. 377; DTF, *Budget Paper No. 3: service delivery 2022/23*, p. 383; DTF, *Budget Paper No. 3: service delivery 2023/24*, pp. 363–364; DTF, *2024/25 Department Performance Statement*, p. 162; DTF, *2025/26 Department Performance Statement*, p. 175; DTF, *2026/27 Department Performance Statement*, p. 169.

IBAC has consistently argued since 2021/22 that it has not met its PID timeliness targets because of increases in volumes of complaints received and their growing complexity.⁵⁹ However, the Committee found in its *Performance of the Victorian integrity agencies 2022/23* report that the number of allegations in disclosures and notifications IBAC assessed under the *PID Act 2012* (Vic) fell significantly between 2022/23 and 2023/24,⁶⁰ suggesting that these disclosures and notifications were *not* growing in complexity.

Unfortunately, IBAC has not provided the same level of detail about allegations in PIDs in its *Annual report 2024/25* as in earlier years.⁶¹ Compared to 2023/24, in 2024/25 IBAC streamlined its reporting under the *PID Act 2012* (Vic) to provide less detail about:

- allegations in PIDs, including outcomes and whether the PID related to Victoria Police or the public sector
- legislative head under which disclosures were made, and whether s 21 disclosures related to Victoria Police or the public sector

⁵⁶ Introduced in 2021/22: Department of Treasury and Finance, *Budget Paper No. 3: service delivery 2021/22*, Melbourne, 2022, <<https://s3-ap-southeast-2.amazonaws.com/budgetfiles202122.budget.vic.gov.au/2021-22+State+Budget+-+Service+Delivery.pdf>> accessed 23 July 2026, p. 377.

⁵⁷ Although the number included in the table is the actual number for 2024/25 and not the expected outcome, it is still notable that IBAC had commented that '[t]he 2024–25 expected outcome is lower than the 2024–25 target due to an overall increase in complaints and notifications placing more demand for existing resources': Department of Treasury and Finance, *2025/26 Department performance statement*, Melbourne, 2026, <<https://s3-ap-southeast-2.amazonaws.com/vicbudgetfiles2025.26budgetvic/2025-26+State+Budget+-+Department+Performance+Statement.pdf>> accessed 23 July 2026, p. 175.

⁵⁸ 'The 2025–26 expected outcome is lower than the 2025–26 target due to a smaller number of PID matters being referred to IBAC, along with a greater concentration of PID matters with higher complexity and seriousness being notified': Department of Treasury and Finance, *2025/26 Department performance Statement*, <<https://s3-ap-southeast-2.amazonaws.com/vicbudgetfiles2026.27vicbudget/2026-27+State+Budget+-+Department+Performance+Statement.pdf>> accessed 23 July 2026, p. 169.

⁵⁹ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 13–15; IBAC, response to questions on notice, p. 2; see for example, IBAC, *Annual report 2021/22*, p. 37.

⁶⁰ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 15.

⁶¹ Compare IBAC, *Annual report 2024/25*, pp. 106, 107; IBAC, *Annual report 2023/24*, p. 117; *Annual report 2022/23*, pp. 112–113; IBAC, *Annual report 2021/22*, pp. 70, 71.

- whether PICs decided for investigation were handled by investigations or preliminary inquiries
- whether PICs decided for investigation, referrals or dismissal were made in relation to Victoria Police or the public sector.⁶²

This is significantly less information than provided previously, and some of it—such as the information about allegations and whether investigations or preliminary inquiries were held—can directly shed light on the complexity of PIDs and PICs. The Committee believes that this represents a step backwards in terms of reporting on complexity, and goes against the spirit of Recommendation 2 to IBAC in its report on the *Performance of the Victorian integrity agencies 2022/23*.⁶³

The Committee observes that IBAC has not completely met its timeliness targets for assessing PIDs in any year since these targets were introduced. While IBAC has attributed this to increasing complexity of PIDs received, trends in data about PIDs do not necessarily bear this out, and less data being received in 2024/25 means this conclusion cannot be made in the current reporting period. Given IBAC's role in providing leadership to the public sector on the handling of PIDs and PICs, and its public educative role in promoting the purposes of the *PID Act 2012* (Vic),⁶⁴ it is critical that IBAC models best practice in this area.

The Committee therefore recommends that IBAC undertake an internal review of its processes for managing the assessment of PIDs with the aim of determining the underlying causes for not meeting its timeliness targets and identifying areas for improvement. The Committee requests that IBAC report to it on any recommendations and key findings arising from the review.

RECOMMENDATION 2: That the Independent Broad-based Anti-corruption Commission review its policies and processes for managing and reporting on the assessment of public interest disclosures received under the *Public Interest Disclosures Act 2012* (Vic), to improve the timeliness of assessments and identify any other areas for improvement, and provide to the Integrity and Oversight Committee recommendations or key findings from the review, as well as substantive data on the increasing complexity of PIDs.

2.2.3 Investigations, reviews and preliminary inquiries

IBAC undertakes 'oversight activities' to 'investigate and expose corrupt conduct' within Victoria Police and the Victorian public sector, including 'preliminary inquiries, investigations and review'.⁶⁵

⁶² Ibid.

⁶³ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 16.

⁶⁴ *PID Act 2012* (Vic) s 55, Part 9—Guidelines, procedures and education; IBAC, *Handling Public Interest Disclosures*, 26 September 2023, <<https://www.ibac.vic.gov.au/handling-public-interest-disclosures>> accessed 26 July 2026; IBAC, *Annual report 2024/25*, p. 106.

⁶⁵ IBAC, *Annual report 2023/24*, p. 16.

Table 2.4 Performance measures related to investigations, reviews and preliminary inquiries, 2022/23 to 2026/27

Timeliness	Target vs actual 2022/23	Target vs actual 2023/24	Target vs actual 2024/25	Target vs expected outcome 2025/26	2026/27 target
Number of police oversight activities (including preliminary inquiries, investigations, active monitoring and reviews) completed	n/a n/a	242 260	242 254	242 242	242
Number of public sector oversight activities (including preliminary inquiries, investigations and reviews) completed	n/a n/a	32 43	32 13↓	32 32	32
Proportion of complex IBAC investigations completed within 540 days	60% n/a ⁶⁶	60% 89%	60% 25%↓	60% 60%	60%
Proportion of standard IBAC investigations completed within 270 days	60% n/a ⁶⁷	60% 100%	60% 80%	60% 80%	60%

Sources: DTF, *Budget Paper No. 3: service delivery 2022/23*, p. 383; DTF, *Budget Paper No. 3: service delivery 2023/24*, pp. 363–364; DTF, *2024/25 Department Performance Statement*, p. 162; DTF, *2025/26 Department Performance Statement*, p. 175; DTF, *2026/27 Department Performance Statement*, p. 169.

In 2023/24 IBAC met all its performance measures related to these activities, as shown in Table 2.4 above.⁶⁸

Additionally, IBAC introduced reporting on key performance indicators (KPIs) set internally in IBAC and shared in its annual report on how many of its recommendations made under s 159 of the *IBAC Act 2011* (Vic) were accepted by agencies.⁶⁹

For Victoria Police, IBAC set a target of 85% acceptance of section 159 recommendations and exceeded this target, achieving an acceptance rate of 88%.⁷⁰ For public sector agencies, IBAC also set a target of 85% acceptance and exceeded this target, with all recommendations accepted (100%).⁷¹

In 2024/25 IBAC did not meet its performance target regarding completion rates of public sector oversight activities, nor its target regarding timeliness of completing complex investigations.⁷² Between 2023/24 and 2024/25 IBAC changed its ‘measurement of investigation timeliness from business days to calendar days’, meaning that deadlines for completing all investigations were brought forward.⁷³ This explains the drop in proportion of both standard and complex investigations within

⁶⁶ Metric described as 18 months in 2022–23: DTF, *Budget Paper No. 3: service delivery 2022/23*, p. 383.

⁶⁷ Metric described as 9 months in 2022–23: DTF, *Budget Paper No. 3: service delivery 2022/23*, p. 383.

⁶⁸ IBAC, *Annual report 2023/24*, pp. 15–16.

⁶⁹ IBAC, *Annual report 2024/25*, p. 18.

⁷⁰ Ibid.

⁷¹ Ibid.

⁷² Ibid., pp. 16–17.

⁷³ Ibid., p. 16.

target timelines⁷⁴—noting that IBAC still exceeded its timeliness target for completing standard investigations, albeit at a lesser rate than in 2023/24.

Additionally, IBAC has stated that the target for public sector oversight activities, which include the number of preliminary inquiries, investigations and reviews completed in a financial year, ‘was not met due to investigation complexity and delays by departments in providing finalised investigations to IBAC for review’, the latter of which limited IBAC’s capacity to review matters.⁷⁵ IBAC undertook 13 public sector oversight activities, falling short of its target of 32.⁷⁶ Recent statements by IBAC to this Committee have emphasised the increasing complexity of assessing complaints and notifications, rather than of investigations;⁷⁷ however, IBAC has stated that in 2025/26 it has ‘redeployed’ employees from functions including investigations and reviews to complaint handling,⁷⁸ and has described the effects on its investigations teams:

Resourcing across all investigation teams is effectively saturated. There is very little, if any, latent capacity to investigate increasing complaints without trade-offs such as pausing other investigations or extending timelines, which elevates risk to the investigation, witnesses and the exposure of corruption or misconduct. It will also impact IBAC’s ability to meet BP3 targets.⁷⁹

While the Committee recognises that making changes to how the investigations targets were measured would have compressed IBAC’s timelines for completing investigations, it also considers that the reduced timelines could have been better anticipated and planned for. On the other hand, the Committee recognises that increasing complexity of complaints may affect other business areas, including investigations—noting, as stated earlier in this chapter, that more substantive data needs to be provided regarding the increasing complexity of complaints. The Committee will continue to monitor the timeliness of completing complex investigations in its next reporting period.

Further, the Committee is pleased to see that IBAC has introduced a Key Performance Indicator (KPI) to measure the outcomes of agencies implementing its recommendations under s 159 of the *IBAC Act 2011* (Vic). IBAC has previously reported in detail on the substantive outcomes of agencies implementing its recommendations,⁸⁰ and the KPIs are a welcome complement to this. These KPIs are also in line with IBAC’s aim to provide better accountability and transparency around implementation of its recommendations, discussed further in Section 2.2.5. Finally, the Committee commends IBAC’s achievement in meeting these targets.

⁷⁴ Under the previous methodology, in 2024/25, IBAC would have completed 67% of complex investigations within 540 business days: IBAC, *Annual report 2024/25*, p. 16.

⁷⁵ Ibid. When IBAC refers a complaint to police or public sector agency, IBAC’s reviews consider whether completed investigations have been appropriately managed, including if it has been thorough, impartial, timely, evidence-based with fair and reasonable outcomes: IBAC, *Annual report 2024/25*, p. 5.

⁷⁶ IBAC, *Annual report 2024/25*, p. 16.

⁷⁷ See for example, IBAC, response to questions on notice, pp. 2–3.

⁷⁸ IBAC, *Budget adequacy inquiry of IBAC, VO and IOV*, response to questions on notice, p. 15.

⁷⁹ Ibid.

⁸⁰ See, for example, IBAC, *Annual report 2023/24*, pp. 25, 28–29.

2.2.4 Investigations—systems improvements and major investigations

As with its complaint handling work, over the 2023/24 and 2024/25 reporting period IBAC made changes to its systems to improve outcomes for its investigations. These include:

- full implementation of IBAC’s Investigations Framework, which was introduced in September 2023, and updated in November 2024⁸¹
- establishment in 2023 of the Witness Liaison Team, which manages the welfare of individuals involved in investigations with a focus on management of complex behaviours⁸²
- implementation in 2024 of an External Communication and Reporting Framework to guide how IBAC develops, manages and delivers ‘external reports and associated communication products’⁸³
- provision of status reports at the end of each planned stage or phase of an investigation.⁸⁴

Additional improvements to IBAC’s investigations processes currently under development include:

- development of a formal guideline on how to prepare stakeholder engagement and communication plans, including guidance on providing copies of embargoed special reports to the media⁸⁵
- updates to IBAC’s natural justice policy and procedure for special reports, which is currently being reviewed, and adoption of a two-step process for assessing whether a person or public body requires access to IBAC’s evidence to be able to respond fully during natural justice processes.⁸⁶

The Committee is pleased to see IBAC’s ongoing commitment to improving its investigatory processes.

In relation to the number of investigations commenced and completed, there has been an increase in the number of investigations related to police in comparison to investigations related to public sector corruption since the 2022/23 period. In IBAC’s 2021/22 annual report, 12 preliminary inquiries were commenced, 18 investigations were commenced, 10 preliminary inquiries were completed and nine investigations were

⁸¹ IBAC, response to questions on notice, IOC Recommendations Updates, p. 6.

⁸² IBAC, *Budget adequacy inquiry of IBAC, VO and IOV*, response to questions on notice, pp. 17–18.

⁸³ IBAC, response to questions on notice, p. 13.

⁸⁴ Ibid., pp. 10–11.

⁸⁵ Ibid., p. 13.

⁸⁶ Ibid., p. 9.

completed but the breakdown between police and public sector investigations was not reported.⁸⁷ At the time, 258 reviews of Victoria Police investigations, and 23 reviews of public sector investigations were completed⁸⁸ which was IBAC's highest number of reviews at the time.⁸⁹ IBAC has continued to record high numbers of reviews of Victoria Police investigations since.

Table 2.5 Investigations, preliminary inquiries and reviews, 2022/23 to 2024/25

Investigations	2022/23	2023/24	2024/25
Police			
Preliminary inquiries commenced	8	5	7
Investigations commenced	4	32	30
Preliminary inquiries completed	6	6	7
Investigations completed	5	23	26
Public sector			
Preliminary inquiries commenced	10	9	5
Investigations commenced	7	4	2
Preliminary inquiries completed	6	11	3
Investigations completed	9	8	3
Reviews			
Reviews of Victoria Police investigations completed	192	231	221
Reviews of public sector investigations completed	38	24	7
Total completed	256	303	267

Sources: IBAC, *Annual report 2022/23*, Melbourne, 2023, pp. 32, 34, 44, 46; IBAC, *Annual report 2023/24*, Melbourne, 2024, pp. 10, 40, 43, 51; IBAC, *Annual report 2024/25*, pp. 5, 38, 41, 44, 46.

⁸⁷ IBAC, *Annual report 2021/22*, p. 40.

⁸⁸ IBAC, *Annual report 2021/22*, p. 48.

⁸⁹ IBAC, *Annual report 2021/22*, p. 13.

IBAC tabled reports on three major investigations during the 2023/24 and 2024/25 financial years:

- Operation Watts progress report—tabled 3 September 2023.⁹⁰ Operation Watts was IBAC’s first joint investigation with the VO, and followed from referrals alleging ‘branch stacking’ involving ‘misuse of public funds’ by Members of Parliament.⁹¹ IBAC and the VO’s special report on the outcomes of Operation Watts was released on 20 July 2022,⁹² with the 2023 report providing an update on progress implementing the initial report’s recommendations.
- Operation Leo special report—tabled 15 October 2024.⁹³ This investigation ‘examined allegations of bribery and misconduct’ by local government councillors.⁹⁴
- Operation Turton special report—tabled 15 October 2024.⁹⁵ This investigation examined unauthorised disclosure of information within Victorian fire services, and highlighted the association between unauthorised information access and corruption risks.⁹⁶

Operation Watts was a highly significant operation for IBAC in terms of its collaboration with the VO, and particularly important in terms of its outcomes for Victoria’s integrity system. The original *Operation Watts* report included recommendations for major changes to Victoria’s integrity system, including:

- establishment of a Parliamentary Ethics Committee⁹⁷
- establishment of a Parliamentary Integrity Commissioner⁹⁸
- establishment and appointment of a Parliamentary Integrity Adviser⁹⁹
- changes to the roles of Parliament’s privileges committees in both the Legislative Assembly and the Legislative Council.¹⁰⁰

⁹⁰ IBAC and the Victorian Ombudsman (VO), *Operation Watts progress report*, Melbourne, 2023, <<https://www.ibac.vic.gov.au/operation-watts-progress-report>> accessed 26 July 2026; Parliament of Victoria, *Operation Watts progress report*, September 2023, <<https://www.parliament.vic.gov.au/parliamentary-activity/taled-documents-database/taled-document-details/7462>> accessed 15 June 2026: tabled in both Houses.

⁹¹ IBAC and the VO, *Operation Watts: investigation into allegations of misuse of electorate office and ministerial office staff and resources for branch stacking and other party-related activities*, Melbourne, 2022, <<https://www.ibac.vic.gov.au/operation-watts-special-report>> accessed 26 July 2026, p. 4.

⁹² Ibid.

⁹³ Parliament of Victoria, *Special report on Operation Leo*, <<https://www.parliament.vic.gov.au/parliamentary-activity/taled-documents-database/taled-document-details/8500>> accessed 15 June 2026: tabled in both Houses.

⁹⁴ IBAC, *Operation Leo special report*, Melbourne, 2024, <<https://www.ibac.vic.gov.au/operation-leo-special-report>> accessed 15 June 2026, p. 4.

⁹⁵ Parliament of Victoria, *Special report on Operation Turton*, <<https://www.parliament.vic.gov.au/parliamentary-activity/taled-documents-database/taled-document-details/8483>> accessed 15 June 2026: tabled in both Houses.

⁹⁶ IBAC, *Operation Turton special report*, Melbourne, 2024, <<https://www.ibac.vic.gov.au/operation-turton-special-report>> accessed 26 July 2026, p. 8.

⁹⁷ IBAC and the VO, *Operation Watts progress report*, pp. 10–12.

⁹⁸ Ibid, p. 12.

⁹⁹ Ibid., p. 14.

¹⁰⁰ Ibid., p. 14.

These and all other recommendations in the report were accepted by the Victorian Government,¹⁰¹ and \$8.52 million was allocated to the Department of Parliamentary Services to implement recommendations relating to the operations of Parliament.¹⁰² Major changes resulting from implementation have included:

- introduction of the Parliamentary Ethics Committee as a joint committee of Parliament under the *Parliamentary Workplace Standards and Integrity Act 2024* (Vic) ('*PWSI Act 2024* (Vic)')¹⁰³
- establishment of the Parliamentary Workplace Standards and Integrity Commission (PWSIC) on 31 December 2024 under the *PWSI Act 2024* (Vic)¹⁰⁴
- appointment of Professor Charles Sampford as Parliamentary Integrity Adviser on 22 June 2023,¹⁰⁵ with a tenure running from 31 December 2024 to 28 March 2027.¹⁰⁶

Operation Leo identified many of the same problems with the misuse of Council powers as were previously highlighted in IBAC's reporting on Operation Sandon.¹⁰⁷ The Victorian Government has previously accepted and implemented recommendations from Operation Sandon related to reforms to the *Local Government Act 2020* (Vic) to 'help prevent and identify corruption across local government'.¹⁰⁸ The Operation Leo report further recommended that:

the Minister for Local Government [ensure] that Local Government Victoria includes in the Model Code of Conduct for Councillors a clear expectation that councillors report suspected corrupt conduct. The Model Code should include guidance on how councillors should report such conduct, including how to ensure compliance with the *Public Interest Disclosures Act 2012*.¹⁰⁹

In October 2024, the Department of Government Services released *Guidance on the Model Councillor Code of Conduct*, which clarifies the expectation that suspected 'fraudulent, criminal, unethical or corrupt behaviour or behaviour that constitutes serious misconduct, gross misconduct or... breach[es] of the Act' should be reported, and provides guidance on how to make reports.¹¹⁰ As of 26 October 2024, all local body councillors have been required to observe the Model Code of Conduct.¹¹¹

¹⁰¹ Premier of Victoria, *Sweeping Integrity Reforms For Victoria*, 20 July 2022, <<https://www.premier.vic.gov.au/sweeping-integrity-reforms-victoria>> accessed 15 June 2026.

¹⁰² IBAC and the VO, *Operation Watts progress report*, p. 11.

¹⁰³ Parliament of Victoria, *Parliamentary Ethics Committee*, <<https://www.parliament.vic.gov.au/pec>> accessed 15 June 2026.

¹⁰⁴ Parliamentary Workplace Standards and Integrity Commission, *About us*, 4 June 2026, <<https://www.pwsic.vic.gov.au/about-pwsic>> accessed 15 June 2026.

¹⁰⁵ Victoria, Legislative Assembly, 2 August 2023, *Parliamentary debates*, <<https://www.parliament.vic.gov.au/parliamentary-activity/hansard/hansard-details/HANSARD-2145855009-21248>> accessed 26 July 2026, p. 2577.

¹⁰⁶ State Government of Victoria, *Parliamentary Integrity Adviser*, 31 July 2025, <<https://www.boards.vic.gov.au/parliamentary-integrity-adviser>> accessed 15 June 2026.

¹⁰⁷ IBAC, *Operation Leo special report*, p. 16.

¹⁰⁸ Ibid.

¹⁰⁹ Ibid., p. 21.

¹¹⁰ State of Victoria (Department of Government Services), *Guidance on the Model Councillor Code of Conduct*, Melbourne, 2024, <https://www.localgovernment.vic.gov.au/_data/assets/pdf_file/0016/211381/Guidance-on-the-Model-Councillor-Code-of-Conduct-2024-061124.pdf> accessed 26 July 2026, p. 10.

¹¹¹ Ibid., p. 5.

2.2.5 Reviews and audits—reporting on implementation of IBAC’s recommendations to Victoria Police

IBAC has an oversight function in relation to Victoria Police, including receiving complaints, investigating and reviewing investigations on alleged Victoria Police misconduct.¹¹² In December 2023, IBAC released its special report into *Victoria Police’s responses to IBAC’s recommendations* (*Police response report*), with the aim of

increas[ing] transparency and accountability around Victoria Police’s responses to recommendations and signal[ing] IBAC’s intention to report on them on a regular basis.¹¹³

The *Police response report* analyses how Victoria Police has responded to IBAC’s recommendations between January 2016 and March 2022 following from investigations, special reports, and research and audit reports.¹¹⁴ Victoria Police was found to have implemented over 90% of IBAC’s recommendations over this period:

- 92% of recommendations were fully accepted
- 4% were partially accepted
- 3% were rejected.¹¹⁵

IBAC notes that recommendations were only partially accepted or rejected primarily where Victoria Police ‘considered that the current policy settings were appropriate’.¹¹⁶ As of November 2022, IBAC found that Victoria Police had implemented or partially implemented 98% of accepted recommendations, and attributed this high rate of implementation to Victoria Police policy changes and long-term engagement with IBAC.¹¹⁷

The *IBAC Act 2011* (Vic) only requires Victoria Police to report to IBAC on implementation where it has not adopted or will not adopt a recommendation.¹¹⁸ However, IBAC usually requests Victoria Police report back on implementation of all recommendations within 6–12 months.¹¹⁹ While the overall rate of implementation was

¹¹² *IBAC Act 2011* (Vic), ss 5, 15.

¹¹³ IBAC, *Victoria Police’s responses to IBAC’s recommendations*, Melbourne, 2023, <<https://www.ibac.vic.gov.au/victoria-polices-responses-to-ibacs-recommendations>> accessed 26 July 2026, p. 5.

¹¹⁴ Ibid.

¹¹⁵ Ibid., p. 9.

¹¹⁶ Ibid.

¹¹⁷ Ibid.: ‘excluding rejected recommendations and recommendations not finalised as of 1 November 2022’.

¹¹⁸ *IBAC Act 2011* (Vic) s 161; See also IBAC, *Victoria Police’s responses to IBAC’s recommendations*, p. 12.

¹¹⁹ IBAC, *Victoria Police’s responses to IBAC’s recommendations*, p. 12.

high, IBAC also identified that ‘Victoria Police [was] usually late when reporting on implementation’, with 90% of first implementation reports being received late.¹²⁰

In November 2020, IBAC introduced a process for managing overdue responses to recommendations, including sending a reminder a month before the due date, and engaging with Victoria Police as soon as implementation responses became overdue.¹²¹ These improvements appear to have been highly successful, with the average length of time by which Victoria Police was overdue in reporting reducing from 129 days in 2020 to 30 days in 2021.¹²²

Another area in which the *Police response report* resulted in improvements to Victoria Police processes was in conflict of interest (COI) identification. In 2016 and 2022, IBAC conducted audits into how Victoria Police handled complaints about COIs.¹²³ In the 2022 audit, COI forms were attached as required to 84% of complaint files; however, IBAC found deficiencies in 42% of those forms.¹²⁴ IBAC recommended that Victoria Police strengthen training and guidance on COIs for complaint investigators; this recommendation was accepted, and in August 2022, Victoria Police released an updated COI policy.¹²⁵

The Committee commends IBAC for its work with Victoria Police to manage overdue responses to recommendations and improve processes related to COIs. Further, the Committee recognises the importance of IBAC’s work in monitoring and reporting on responses to its recommendations, regarding both those to Victoria Police and other stakeholders such as the Victorian Government. The additional layer of accountability and increased transparency provided by ongoing reporting appears to have clear results in improving both integrity in the public sector and Victoria’s integrity system as a whole. The Committee supports IBAC continuing its ongoing monitoring and reporting work, and its expansion where appropriate.

2.2.6 Police-perpetrated family violence, IBAC’s response to IOV’s *Emma’s report*, and public apology to Dr Jana Katerinskaja

In the report on its Inquiry into the *Performance of the Victorian integrity agencies 2022/23*, the Committee discussed issues related to IBAC’s oversight of police-perpetrated family violence (PPFV),¹²⁶ as highlighted in IOV’s 2022 *Special Report: IBAC’s referral and oversight of Emma’s complaints about Victoria*

¹²⁰ Ibid. There was high variation in the lateness of implementation reports: most reports were between 25 and 100 days overdue, with reporting on 14 recommendations being less than 2 weeks overdue, whereas the reporting for 21 recommendations was over 150 days overdue.

¹²¹ Ibid.

¹²² Ibid.

¹²³ Ibid., p. 17.

¹²⁴ Ibid.

¹²⁵ Ibid.

¹²⁶ Parliament of Victoria, IOV, *Performance of the Victorian integrity agencies 2022/23*, pp. 91–95.

*Police's response to family violence by a police officer (Emma's report).*¹²⁷ *Emma's report* examined concerns with IBAC's oversight of PPFV in the case of Dr Jana Katerinskaja.¹²⁸ Dr Katerinskaja made a complaint to IBAC following 'serious violent act[s] by [their] then partner, a Victoria Police officer',¹²⁹ and a 'police response that was riddled with problems', alleging that these problems were 'systemic'.¹³⁰ Dr Katerinskaja ultimately made a second complaint to IBAC regarding further detrimental treatment from Victoria Police.¹³¹

Emma's report identified six serious issues with IBAC's handling of Dr Katerinskaja's complaints, with IOV considering that the consequences of the mishandling were so serious that it publicly made recommendations to IBAC.¹³² In its response to *Emma's report*, IBAC accepted all four recommendations but stated their implementation would be impacted by the 'realities of the constraints and parameters within which IBAC operates', specifically funding and resourcing pressures.¹³³

On 2 March 2026, the IBAC Commissioner apologised to Dr Katerinskaja at the hearings for the review of the *Performance of the Victorian integrity agencies 2023/24 and 2024/25*.¹³⁴ The apology was simultaneously published on IBAC's website.¹³⁵

The Commissioner apologised unreservedly to Dr Katerinskaja and their children for how IBAC handled their complaints and for how IBAC publicly responded to IOV's criticisms in *Emma's report*.¹³⁶ Acknowledging major flaws in how the complaints were handled, the Commissioner stated that IBAC's public response to *Emma's report* was 'highly adversarial', 'inappropriate and insensitive', and the way they treated Dr Katerinskaja and their family heightened their 'pain, fear and distress'.¹³⁷ The Commissioner expressed deep regret for IBAC's 'lack of insight and compassion', and identified areas where IBAC should have done things differently, as well as flaws in IBAC's response such as focusing on constraints rather than on prioritising resources.¹³⁸

Following reflection on its conduct in handling Dr Katerinskaja's complaints, IBAC 'has made many internal changes' to its processes and systems, and has committed to further improvements to its handling of police misconduct complaints.¹³⁹ IBAC

¹²⁷ Victorian Inspectorate (VI), *Special report: IBAC's referral and oversight of Emma's complaints about Victoria Police's response to family violence by a police officer*, Melbourne, October 2022 ('*Emma's report*'). Note this report was released before the VI was renamed as IOV.

¹²⁸ Dr Katerinskaja was referred to in the report by the pseudonym 'Emma' to protect their confidentiality, and has subsequently identified themselves as the subject of the report: Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 92.

¹²⁹ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 93, citing VI, *Emma's report*, pp. 9–10.

¹³⁰ VI, *Emma's report*, p. 9.

¹³¹ *Ibid.*, p. 23.

¹³² *Ibid.*, pp. 25–40, 10.

¹³³ *Ibid.*, Appendix A, paras. 5.5–5.6.

¹³⁴ Victoria Elliott, Commissioner, IBAC, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, pp. 1–2.

¹³⁵ IBAC, *Public statement*, 2 March 2026, <<https://www.ibac.vic.gov.au/public-statement>> accessed 16 June 2026.

¹³⁶ Victoria Elliott, *Transcript of evidence*, p. 1.

¹³⁷ *Ibid.*, p. 2.

¹³⁸ *Ibid.*

¹³⁹ *Ibid.*

has thanked Dr Katerinskaja for their contributions to improving IBAC's work, and expressed a wish to engage with them in future.¹⁴⁰

The Committee notes specific work IBAC has done to manage risks related to complainants' welfare, including in relation to complainants experiencing PPFV. These include the establishment of the Witness Liaison Team, mentioned in Section 2.2.1, which engages with 'prevention staff so that they can help them to monitor and to manage risks with complainants... putting complainant or witness wellbeing and needs at the centre of what we do'.¹⁴¹ Learnings from the FPC Team, also mentioned earlier in this chapter, are used to 'inform a number of prevention activities'.¹⁴²

Additionally, IBAC is undertaking prevention and education work to:

engage with advocacy groups and engage with victim-survivors to get the message out there that we are improving and to be able to hear from their direct experience. So in that way we hope to hear more, learn more and then obviously incorporate that into what we are doing.¹⁴³

The Committee acknowledges that the apology is an enormous milestone for IBAC, and commends it both as a mark of respect towards Dr Katerinskaja, who worked dedicatedly to achieve an appropriate outcome for their case, and as a demonstration of IBAC's renewed consideration towards all complainants. During past inquiries, IOC has reported extensively on the welfare of people who come into contact with IBAC, including witnesses¹⁴⁴ and victim-survivors of PPFV,¹⁴⁵ and the Committee continues to monitor this aspect of IBAC's work. Given its ongoing interest in this area, the Committee is strongly supportive of IBAC's apology to Dr Katerinskaja and encourages it to continue to engage positively with complainants.

The Committee received correspondence from the former IBAC Commissioner, Hon Robert Redlich AM KC, questioning the Committee's powers to hear evidence regarding Dr Katerinskaja's case during its recent inquiry. Hon Robert Redlich AM KC was the IBAC Commissioner at the time of Dr Katerinskaja's complaints to IBAC, and during IOV's report on Emma's case, and approved IBAC's original response to the IOV report.¹⁴⁶

¹⁴⁰ Ibid.

¹⁴¹ Alison Byrne, *Transcript of evidence*, p. 4.

¹⁴² IBAC, response to questions on notice, p. 4.

¹⁴³ Alison Byrne, *Transcript of evidence*, p. 5.

¹⁴⁴ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2020/21: focus on witness welfare*, chapter 3, pp. 43–87.

¹⁴⁵ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, chapter 6, pp. 91–106.

¹⁴⁶ Dr Katerinskaja, human rights lawyer, survivor advocate, Inner Melbourne Community Legal, *Inquiry into the adequacy of the Legislative Framework for the Independent Broad-based Anti-corruption Commission (IBAC legislative adequacy inquiry)*, public hearing, Melbourne, 25 August 2025, *Transcript of evidence*, pp. 36–37.

Hon Robert Redlich AM KC's supplementary submission to that inquiry stated a view that provisions of the *PC Act 2003* (Vic) 'precluded it from exploring such individual matters and complaints'.¹⁴⁷

In addition, after being told by the current IBAC Commissioner that she intended to apologise publicly to Dr Katerinskaja, in email correspondence to the Committee dated 2 March 2026, Hon Robert Redlich AM KC stated that the Committee 'should not permit Ms Elliott to use the Committee's proceedings for a prohibited and extraordinarily unfair process'.¹⁴⁸

Hon Robert Redlich AM KC stated that this was to ensure 'the Committee's processes do not unfairly result in the infliction of reputational damage to IBAC or its officers'.¹⁴⁹

The Committee disagrees with Hon Robert Redlich AM KC in this case.

The Committee's interest in this matter arises from a special report from IOV, tabled in the Parliament on 11 October 2022. This was only the second special report tabled by the Chief Integrity Inspector into IBAC. Its contents and subject are a matter of public interest.

The Committee has a responsibility to the parliament and the people of Victoria to oversee the performance of Victoria's integrity agencies, and specifically under section 7(1)(h) of the *PC Act 2003* (Vic) to 'examine any reports made by Integrity Oversight Victoria to the Integrity and Oversight Committee or the Parliament.'

This matter was squarely within the jurisdiction of the Committee to consider.

IBAC's oversight body, IOV, found a 'fundamental failing of the integrity system' in this matter.¹⁵⁰

Upon further reflection it became IBAC's own opinion that the organisation erred in the handling of Dr Katerinskaja's case.

The apology was proper, as was the Committee's decision to hear it made.

The Committee notes the views of the then Ombudsman in her 2017 good practice guide titled *Apologies* that 'in the many cases where someone has a legitimate grievance, a genuine apology is a powerful remedy'.¹⁵¹

¹⁴⁷ Hon Robert Redlich AM KC, *Submission 6a*, received 27 October 2025, p. 10.

¹⁴⁸ Hon Robert Redlich AM KC, email correspondence, 2 March 2026.

¹⁴⁹ Ibid.

¹⁵⁰ VI, *Emma's report*, p. 41.

¹⁵¹ VO, *Apologies*, Melbourne, 2017, <<https://apo.org.au/sites/default/files/resource-files/2017-04/apo-nid75757.pdf>> accessed 27 July 2026, p. 2.

2.3 Public information, education and prevention

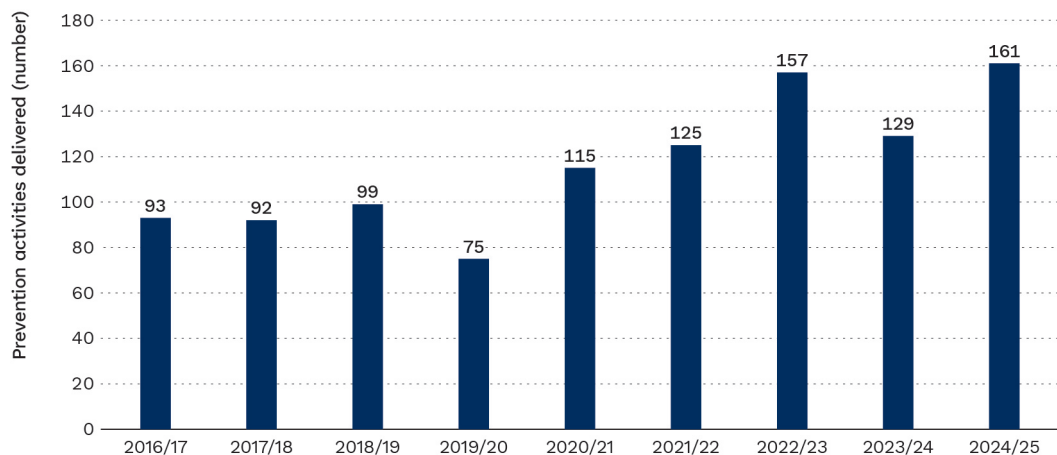
IBAC has explicit education and prevention functions under the *IBAC Act 2011* (Vic), including the provision of advice, educational training, publications and other resources to the public sector and the general public on the impact and prevention of corruption and police misconduct.¹⁵² Additionally, IBAC's functions under the *PID Act 2012* (Vic) include promoting the purposes of the Act and providing educational information to the public sector to facilitate its compliance with the Scheme, including issuing procedural guidelines for the receipt and handling of PIDs and the protection of disclosers.¹⁵³

IBAC considers that its work to 'prevent corruption and police misconduct' is 'just as vital' as its work on investigations, reviews, preliminary inquiries, and complaint handling.¹⁵⁴ IBAC's prevention work includes:

- engagement activities
- development of prevention tools and resources for the public sector
- awareness-raising campaigns for the community.¹⁵⁵

Figure 2.2 shows the total number of prevention activities delivered by IBAC over the 2016/17 to 2024/25 period. Broadly speaking, IBAC has increased its output of prevention activities in the years since 2019/20, with a dip in activities delivered in 2023/24 and then a return to the overall trend in 2024/25.

Figure 2.2 Prevention activities delivered by the Independent Broad-based Anti-corruption Commission, 2016/17 to 2024/25



Source: Parliament of Victoria, IBAC, Inquiry into the adequacy of the annual budget of the Independent Broad-based Anti-corruption Commission, the Victorian Ombudsman, and Integrity Oversight Victoria hearings, response to questions on notice received 20 April 2026, p. 28.

¹⁵² *IBAC Act 2011* (Vic) s 15 (especially (5)–(6)).

¹⁵³ *PID Act 2012* (Vic) ss 1, 55(2).

¹⁵⁴ IBAC, *Budget adequacy inquiry of IBAC, VO and IOV*, response to questions on notice, p. 25.

¹⁵⁵ *Ibid.*

In both 2023/24 and 2024/25, IBAC had three Department Performance Statement performance measures related to its prevention and education activities: a quantity measure and two quality measures.¹⁵⁶ All three targets were met in both 2023/24 and 2024/25, as shown in Table 2.6.

Table 2.6 IBAC’s performance against its corruption prevention and education measures, 2023/24 and 2024/25

Performance measure	2023/24			2024/25		
	Target	Actual	Result	Target	Actual	Result
Quantity						
Corruption prevention initiatives delivered by IBAC	115	129	Met	120	161	Met
Quality						
Average satisfaction with corruption prevention forums and events delivered by IBAC for a public sector (including police) audience	95%	96.3%	Met	95%	97%	Met
Average satisfaction with corruption prevention forums and events delivered by IBAC that are open to the public	75%	92.3%	Met	75%	91%	Met

Source: IBAC, *Annual report 2023/24*, p. 22; IBAC, *Annual report 2024/25*, p. 17.

These performance results are highly commendable. However, the Committee notes that IBAC significantly exceeded its measure on satisfaction with corruption prevention activities open to the public over both 2023/24 and 2024/25 and the Committee questions whether this performance measure is appropriately aligned with IBAC’s work outputs.

IBAC’s two quality measures for prevention work, differentiating activities by audience, were introduced in 2023/24. Previously, IBAC had a single Department Performance Statement performance measure encompassing satisfaction with all ‘[s]atisfaction with corruption prevention initiatives delivered by IBAC’.¹⁵⁷ This means the target has been significantly exceeded for all years it has been in use. However, it is noted that the expected outcome for 2025/26 is 80%, which is closer to the 75% target for public events.¹⁵⁸ It is also acknowledged that IBAC is ‘continu[ing] to review its BP3 measures annually, in consultation with’ the Department of Treasury and Finance (DTF).¹⁵⁹ The Committee will continue to monitor the appropriateness of this metric but commends IBAC for a positive result in public education.

¹⁵⁶ IBAC, *Annual report 2023/24*, p. 22; IBAC, *Annual report 2024/25*, p. 17.

¹⁵⁷ IBAC, *Annual report 2022/23*, p. 18.

¹⁵⁸ DTF, 2026/27 Department performance statement, p. 168.

¹⁵⁹ IBAC, response to questions on notice, p. 10.

2.4 Governance and workplace

2.4.1 Workplace culture—bullying

In its *Performance of the Victorian integrity agencies 2022/23*, IOC noted that rates of workplace bullying reported in IBAC's People Matter Survey results for 2024 (PMS) were, at 16%, higher than IBAC's comparator group, at 8.9%, and the broader public sector, at 11.2%.¹⁶⁰ IBAC's rate is higher than it was in 2019, when the Committee 'first expressed concerns about the agency's workplace culture'.¹⁶¹

In 2025, reported levels of bullying over the past 12 months had dropped somewhat to 14.9% of PMS participants.¹⁶² However, IBAC's reported rates of bullying at 14.9% were still higher than in the comparator group, at 9.3%, and the broader public sector, at 11.4%.¹⁶³ While, positively, reported levels of intimidation and threats markedly decreased between 2024 and 2025, reported levels of incivility, exclusion/isolation and verbal abuse all strongly increased.¹⁶⁴

Interestingly, while overall reported levels of violence and aggression decreased between 2024 and 2025 from 8.5% to 7%,¹⁶⁵ the types of violent and aggressive behaviours reported showed some inverse trends to bullying behaviours. Under the heading of reported violence and aggression, intimidating behaviours rose, whereas reported abusive language decreased—displaying an opposite pattern to these behaviours reported under bullying.¹⁶⁶ It is possible that overall levels of these behaviours remained similar between 2024 and 2025, and were reported under different parts of the survey. However, threats decreased under both the bullying and violence and aggression headers, which suggests a positive change for the agency.

In its 2022/23 performance review report, the Committee noted that IBAC's 2024 PMS results suggested the agency was making progress in promoting a 'speak up' culture in relation to reporting bullying.¹⁶⁷ As shown in Table 2.7, however, this trend generally appears to have reversed in 2025, with survey participants being less likely than in 2024 to have told a colleague or Human Resources (HR) about the bullying, to have told the person the behaviour was not okay, or to have submitted a formal complaint.¹⁶⁸

¹⁶⁰ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 23; Victorian Public Sector Commission (VPSC), *IBAC: 2024 People matter survey results report*, 2024, <<https://www.vpsc.vic.gov.au/wp-content/uploads/2025/04/Independent-Broad-based-Anti-corruption-Commission-Organisation-results-2024.pdf>> accessed 8 July 2026, p. 23.

¹⁶¹ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 23: in 2019, 14% of respondents had experienced workplace bullying.

¹⁶² VPSC, *IBAC: 2025 People matter survey results report*, 2025, <<https://www.vpsc.vic.gov.au/files/pms-2025/Independent%20Broad-based%20Anti-corruption%20Commission%20-%20Organisation%20results%20-%202025.pdf>> accessed 22 June 2026, p. 23.

¹⁶³ Ibid.

¹⁶⁴ Ibid., p. 24: intimidation and or threats 38% to 19%, exclusion or isolation 41% to 56%, verbal abuse 9% to 13%.

¹⁶⁵ Ibid., p. 23.

¹⁶⁶ Ibid., p. 31: intimidating behaviours rose 78% to 87%, whereas reported abusive language decreased 44% to 33%.

¹⁶⁷ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 23.

¹⁶⁸ VPSC, *IBAC: 2025 People matter survey results report*, p. 25.

Table 2.7 Independent Broad-based Anti-corruption Commission People Matter Survey results 2024 and 2025, options for telling people about bullying

Did participants tell anyone else about the bullying?	2024—% of participants who reported bullying (n=34)	2025—% of participants who reported bullying (n=32)
Told a manager	47%	50%
Told a friend or family member	32%	41%
Told a colleague	38%	34%
Told employee assistance program or peer support	18%	34%
Told human resources	50%	31%
Told someone else	12%	22%
Did not tell anyone about the bullying	15%	13%
Submitted a formal complaint	12%	9%
Told the person the behaviour was not okay	15%	6%

Sources: Victorian Public Service Commission (VPSC), *IBAC: 2024 People matter survey results report*, <<https://www.vpsc.vic.gov.au/wp-content/uploads/2025/04/Independent-Broad-based-Anti-corruption-Commission-Organisation-results-2024.pdf>> accessed 15 July 2026, p. 25; VPSC, *IBAC: 2025 People matter survey results report*, <<https://www.vpsc.vic.gov.au/files/pms-2025/Independent%20Broad-based%20Anti-corruption%20Commission%20-%20Organisation%20results%20-%202025.pdf>> accessed 21 July 2026, p. 25.

However, victims were slightly more likely to have told a manager about the bullying, with this outcome rising from 47% to 50%.¹⁶⁹ Additionally, they were much more likely to have told people outside formal organisational relationships about the bullying, such as the Employee Assistance Program (EAP) or peer support, a friend or family member, or someone else.¹⁷⁰

PMS participants agreeing that IBAC ‘takes steps to eliminate bullying, harassment and discrimination’ rose from 65% in 2024 to 72% in 2025.¹⁷¹ Across 2023/24 and 2024/25 IBAC rolled out several initiatives aimed at improving on incivility, bullying, harassment and discrimination, including:

- enhancing early intervention, including timely EAP access
- leadership development to help identify and address bullying, incivility, discrimination and harassment
- taking reports of inappropriate behaviour seriously
- appropriate behaviours training for all staff.¹⁷²

¹⁶⁹ Ibid.

¹⁷⁰ Ibid.

¹⁷¹ Ibid., p. 40.

¹⁷² IBAC, response to questions on notice, p. 7.

The Committee recognises that IBAC continues to address this area of workplace culture, that ongoing culture change can be challenging, and that the PMS results paint a complex picture. However, the Committee is concerned that confidential reports of bullying continue to be higher than in the comparator group or the broader public sector, and that reporting within formal channels is decreasing. The Committee believes that IBAC should make it an organisational priority to address bullying and recommends that it create internal performance targets which support reduction of rates of bullying, and report on its performance against these targets to IOC.

RECOMMENDATION 3: That the Independent Broad-based Anti-corruption Commission develop and report on an internal key performance target or targets to assess how it is responding to rates of bullying among its staff.

2.4.2 Workplace culture—gender salary gap targets

In both 2023/24 and 2024/25, IBAC included among its ‘Organisational enablement performance targets’ targets related to gender differences in median Victorian Public Service (VPS) salary among staff.¹⁷³ In 2023/24, IBAC included a single target comparing median male and female VPS salaries,¹⁷⁴ while in 2024/25 it included three targets:

- percentage difference in median male and female VPS salary
- percentage difference in median male and self-described gender¹⁷⁵ VPS salary
- percentage difference in median female and self-described gender VPS salary.¹⁷⁶

IBAC’s performance against these targets is depicted in Table 2.8 below.

Table 2.8 Gender salary gap targets and actual performance, 2023/24 to 2024/25

Performance measures	2023/24 target	2023/24 actual	2024/25 target	2024/25 actual
Difference in the median male and female Victorian Public Service (VPS) salary	4.5%	9% (not met)	+/- 5%	10% (not met)
Difference in median male and self-described gender VPS salary	N/A	N/A	+/- 5%	No data
Difference in median female and self-described gender VPS salary	N/A	N/A	+/- 5%	No data

Sources: IBAC, *Annual Report 2023/24*, p. 17; IBAC, *Annual Report 2024/25*, p. 19.

¹⁷³ IBAC, *Annual report 2024/25*, p. 19; IBAC, *Annual report 2023/24*, p. 17.
¹⁷⁴ IBAC, *Annual report 2023/24*, p. 17.
¹⁷⁵ IBAC notes that ‘self-described’ gender includes non-binary genders or people who ‘use a different term’: see note to Table 5, IBAC *Annual report 2024/25*, p. 19.
¹⁷⁶ IBAC, *Annual report 2024/25*, p. 19.

IBAC did not meet its gender pay gap target in either 2023/24 or 2024/25, with the actual gap being double the target in both financial years. In response to questions on notice, IBAC noted that it has, however, reduced 'its gender pay gap from 9.6 per cent in 2023 to 6.5 per cent in 2025', in its mean pay gap and not its median pay gap.¹⁷⁷

IBAC argues that this ongoing gender pay gap is due to 'occupational segregation in certain types of roles and areas of the business', and 'concentration of women in clerical and administrative roles'.¹⁷⁸ Additionally, IBAC notes that its 2025 mean gender pay gaps are well below both the 'national... and Victorian public sector averages'.¹⁷⁹

Further, IBAC has developed a 2026–30 Gender Equality Action Plan, that is 'due to be approved and published by the Commission for Gender Equality in the Public Sector in late 2026' which will commit the agency to a number of actions to monitor, report on, and address staff gender pay gaps.¹⁸⁰ The Committee will continue to monitor the effectiveness of IBAC's initiative to reduce the gender pay gap among its staff.

2.4.3 Workforce capability development

Throughout the 2023/24 and 2024/25 reporting period, IBAC has demonstrated a strong commitment to developing the capability of its workforce, as shown by its introduction of a new people-focused strategic objective in the *IBAC Strategy 2025–28*.¹⁸¹ This objective prioritises investment in staff wellbeing and skill development, building leadership capability, and continuous improvement of IBAC's systems, processes and infrastructure.¹⁸² IBAC has undertaken extensive work to develop and implement a range of strategies and frameworks to support achievement of these priorities, including:

- Health Safety Wellbeing Plan 2025–28
- Mental Health Framework
- Gender Equality Action Plan
- Reconciliation Action Plan
- capability framework for IBAC's Operations Division, with this approach to be applied across all IBAC's divisions.¹⁸³

¹⁷⁷ IBAC, response to questions on notice, p. 6.

¹⁷⁸ Ibid.

¹⁷⁹ Ibid.

¹⁸⁰ Ibid, pp. 6–9.

¹⁸¹ IBAC, response to questions on notice, IOC recommendations updates, p. 7; IBAC, *The IBAC Strategy 2025–28*, Melbourne, 2025, <<https://www.ibac.vic.gov.au/IBAC-strategy-2025-28>> accessed 26 July 2026 p. 4.

¹⁸² The *IBAC Strategy 2025–28*, p. 4.

¹⁸³ IBAC, response to questions on notice, IOC recommendations updates, pp. 6–7.

The Committee acknowledges that all these initiatives are either the result of or support the implementation of previous recommendations from either the IOC or the IOC’s independent audits of IBAC.¹⁸⁴ The Committee is pleased to see IBAC’s progress in implementing its recommendations, as will be discussed more in Section 2.5.2.

2.5 Accountability

2.5.1 Complaints to the IOC about IBAC

The IOC receives complaints about IBAC as part of its performance-monitoring function under s 7(1) of the *PC Act 2003* (Vic). The Committee considers complaints about IBAC to assess whether they raise systemic performance issues—issues that have broader implications for the performance of IBAC’s functions at an agency-wide level.

Under s 7(2) of the *PC Act 2003* (Vic) the IOC is expressly prohibited from reinvestigating matters raised in complaints to IBAC, and from reviewing their findings, recommendations, determinations, or other decisions in relation to complaints, including a decision not to investigate.

In 2023/24 the IOC received six complaints about IBAC within the Committee’s jurisdiction. In 2024/25 there was an increase in the number of complaints received by the Committee, with ten complaints received that were within jurisdiction. For details, see Table 2.9 below.

No complaints about IBAC identified systemic performance issues. However, the complaints did highlight issues for the Committee to monitor. The primary concern for the Committee arising out of complaints received about IBAC in the reporting period, and more recently, is IBAC’s timeliness in allocating complaints for assessment and finalising complaints. The IOC recognises that IBAC has had a significant backlog of complaints, and has been working to reduce this backlog, as has been discussed in more detail in Section 2.2.1.

Table 2.9 Complaints about the Independent Broad-based Anti-corruption Commission processed by the Integrity and Oversight Committee, 2023/24 to 2024/25

	2023/24	2024/25
Complaints received about IBAC that are within the Committee’s jurisdiction	6	10
Complaints finalised in financial year	5	12
Complaints where enquiries were made with IBAC	0	6
Systemic performance issues identified	0	0

Source: Devised from IOC complaints data.

184 Ibid.

2.5.2 IBAC's response to IOC report recommendations

Inquiry into the adequacy of the legislative framework for IBAC

The Committee's report on its *IBAC legislative adequacy inquiry*, tabled in December 2025, made two recommendations to the agency.¹⁸⁵ In June 2026 the Commissioner wrote to the Committee providing an update on the implementation status of the recommendations, as detailed in Table 2.10 below.

Table 2.10 Implementation status of outstanding recommendations (Inquiry into the adequacy of the legislative framework for IBAC)

No.:	Description	Implementation progress
19	Establish a dedicated Police Corruption and Misconduct Division within IBAC	Partially accepted IBAC will not implement the recommended model of police oversight but will 'continue to consider further specialisation' of its operations related to police misconduct.
31	In consultation with Gellung Warl, establish a dedicated Aboriginal Engagement Unit within IBAC	Accepted in principle As of 15 June 2026, IBAC is establishing a Treaty Working Group 'to support the ongoing relationship with Gellung Warl'. Additionally, IBAC has established an identified position within its Engagement team to support engagement with First Nations communities.

Sources: Parliament of Victoria, IOC, *Inquiry into the adequacy of the legislative framework for the IBAC*, Melbourne, December 2025, pp. 105 and 130; Victoria Elliott, Commissioner, IBAC, correspondence, 15 June 2026, pp. 1–2.

2022/23 performance review report

The Committee's report into the *Performance of the Victorian integrity agencies 2022/23*, published in May 2025, directed four recommendations to IBAC.¹⁸⁶ IBAC provided updates on the acceptance and implementation of these recommendations in October 2025¹⁸⁷ and May 2026, as presented in Table 2.11.¹⁸⁸

¹⁸⁵ Parliament of Victoria, IOC, *IBAC legislative adequacy inquiry*, December 2025, pp. 105 and 130.

¹⁸⁶ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, pp. 16, 21, 26 and 101.

¹⁸⁷ Alison Byrne, CEO, IBAC, correspondence, 31 October 2025, attachment, pp. 2–6.

¹⁸⁸ IBAC, response to questions on notice, IOC recommendations updates, pp. 3–5.

Table 2.11 Implementation status of outstanding recommendations (2022/23 performance review report)

No.:	Description	Implementation progress
2	Develop, use and report on performance indicators for assessing complaints and notifications	Accepted, partially implemented IBAC introduced a new BP3 measure for the quality of IBAC's complaint assessments on 1 July 2025. Work is continuing and will take into account the outcomes of IBAC's CAS Optimisation project.
3	Review and report to the Committee on processes for special reporting on investigations and what, if any, legal reforms are needed in this area	Accepted and completed IBAC implemented an External Communication and Reporting Framework for the management of external reports in 2024. Potential legal reforms were identified in IBAC's response to the <i>IBAC legislation inquiry</i> .
4	Report to IOC on key themes in its Cultural Action Plans and Senior Leadership Cultural Action Plans	Accepted and completed Cultural action plans were developed for each IBAC Division and the Senior Leadership Team in 2024. Key themes and actions were identified on the basis of the PMS 2024 results, and implemented in 2024.
12	Consider undertaking a systematic review of Victoria Police's handling of complaints about police, especially managing COIs and risks of PPFV	Accepted and partially implemented In addition to the actions discussed in Section 2.2.6, IBAC is continuing work on its special report on <i>Victoria Police's Handling of PPFV</i> .

Sources: Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, Melbourne, 2023, pp. 16, 21, 26 and 101; Alison Byrne, CEO, IBAC, correspondence, 31 October 2025, attachment, pp. 1–6; IBAC, *Performance of the Victorian integrity agencies 2023/24 and 2024/25*, response to questions on notice received 5 May 2026, IOC recommendations updates, pp. 3–5.

Additionally, while Recommendation 1 from the *Performance of the Victorian integrity agencies 2022/23* was directed to the Victorian Government, IBAC advised the Committee that the agency is undertaking ongoing consultations with the Department of Treasury and Finance (DTF) as part of an annual process for reviewing its Department Performance Statement performance measures.¹⁸⁹

Independent performance auditor's 2022 audit report

The inaugural independent performance audit of IBAC was conducted in 2022 in accordance with ss 170–170A of the *IBAC Act 2011* (Vic). In its report on the audit, the independent performance auditor made 38 recommendations to IBAC.¹⁹⁰ IBAC accepted all but one of the auditor's recommendations.¹⁹¹

A summary of progress towards implementing the auditor's recommendations was presented in the Committee's report on the *Performance of the Victorian integrity*

¹⁸⁹ Alison Byrne, CEO, IBAC, correspondence, 31 October 2025, attachment, p. 1.

¹⁹⁰ Parliament of Victoria, IOC, *The independent performance audits of the Independent Broad-based Anti-corruption Commission and the Victorian Inspectorate*, Melbourne, October 2022, Appendix C (audit of IBAC), pp. 10–23.

¹⁹¹ IBAC, *Performance of the Victorian integrity agencies 2021/22 hearings*, response to questions on notice received 30 June 2023, Tranche 2, pp. 1–4.

agencies 2022/23.¹⁹² IBAC provided further updates on implementation progress in October 2025 and May 2026, with the current status of each recommendation detailed in Table 2.12.

Table 2.12 Implementation status of recommendations (2022 audit report)

No.:	Description	Implementation progress
1.3.2	Implement the intelligence framework	Accepted and completed The Intelligence Framework was introduced in September 2024 and all aspects have now been implemented.
2.2.2	Implement the investigations framework to support better prioritisation and management of investigation activities.	Accepted and completed The Investigations Framework was introduced in September 2023 and reviewed in 2024, with all aspects now being fully implemented.
4.5.1	Implement the recommendations from the mwah report ¹⁹³ to address gaps in workforce planning	Accepted, implementation ongoing The IBAC Strategy 2025–28 includes a people-focused strategic objective informed by feedback from the PMS results and senior leadership. As described in Section 2.4.3, IBAC has several action plans to support implementation of this objective, and will be establishing a workforce plan.
4.6.1	Conduct a training needs analysis for VPS employees	Accepted, implementation ongoing IBAC has developed a capability framework for its Operations Division and intends to extend this framework to its other Divisions.

Source: IBAC, response to questions on notice, IOC recommendations updates, pp. 6–7; Alison Byrne, CEO, IBAC, correspondence, 31 October 2025, attachment.

2.5.3 Victorian Government response to recommendations from the IOC’s *Inquiry into the legislative framework for the IBAC report*

The Government tabled its response to the *Inquiry into the legislative framework for the IBAC* in the Legislative Assembly on 2 June 2026.¹⁹⁴ Notably, 29 of the Committee’s 31 recommendations were directed to the Government, of which:

- 21 are supported in principle
- 8 remain under review.

¹⁹² IOC, *Performance of the Victorian integrity agencies 2022/23*, pp. 32–35.

¹⁹³ The ‘mwah report’ is a report by the workplace consultancy firm mwah (making work absolutely human), who were engaged by IBAC ‘to assist in the preparation of its strategic workforce plan’ in 2019. The report included recommendations for ‘improving IBAC’s “strategic workforce planning”’. See Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2021/22*, p. 63, footnote 293 and attachment: IBAC, *Details of consultancy expenditure in excess of \$10,000 (2018/19)*, <<https://www.ibac.vic.gov.au/media/352/download>> accessed 21 July 2026. See also mwah, *Home of Belonging and the Culture Dashboard. Where the art and science of people & culture collide*, 2026, <<https://mwah.live>> accessed 21 July 2026.

¹⁹⁴ Government of Victoria, *Response to Parliament of Victoria, IOC, Inquiry into the adequacy of the legislative framework for the IBAC*, 2 June 2026, <<https://www.parliament.vic.gov.au/49bdd0/contentassets/ce6cf55c86ab4367b9104bf0c0d1d995/final--government-response---ioc-inquiry-report-010626.pdf>> accessed 26 July 2026.

The response supports several key reforms recommended by the Committee, including:

- expanding the definition of ‘corrupt conduct’ (Recommendation 1)¹⁹⁵
- the provision of follow-the-dollar powers (Recommendations 4 and 5)¹⁹⁶
- stronger investigative powers, including search warrants for digital information and making it an offence to destroy documents related to an investigation (Recommendations 6 and 7).¹⁹⁷

Several recommendations relating to Victoria Police are still under review where the Government wishes to consider reforms from a system-wide perspective and in consideration of ongoing consultations begun after the 2018 IBAC Committee’s *The Inquiry into the external oversight of police corruption and misconduct in Victoria* and in consideration of the *Yoorrook For Justice* report.¹⁹⁸ Recommendations related to Victoria Police include 17, 18, 20, 21, 29, 30.¹⁹⁹ Victoria Police declined to participate in the inquiry into IBAC’s legislative framework.

Other recommendations that have been accepted in principle include recommendations for which legislative reform may not be best placed to achieve their intent. This includes Recommendation 8 which seeks to amend section 117(5) of the *IBAC Act 2011* (Vic), to require IBAC to notify IOV of its intention to hold a public examination prior to issuing the related witness summons,²⁰⁰ as well as Recommendation 27 on prescribing ‘clear and reasonable statutory time frames within which affected individuals must be notified and given an opportunity to respond before the publication of any report that may contain adverse commentary about them’.²⁰¹

According to the Victorian Government’s response, Victoria’s system comprises a number of agencies with interconnected duties and legislation. Any changes to the *IBAC Act 2011* (Vic) following the Committee’s recommendations are likely to have flow-on effects for other Acts and agencies’ resourcing. Due to this complexity, and to what it sees as diversity among stakeholder submissions to the Inquiry, the Government has advised that it will bring together an expert stakeholder reference group to consider implementation of the Committee’s recommendations. The reference group will include IBAC, IOV, the VO and Victoria Police. Other members may be added as relevant. The reference group will consider the complexities of implementation, and will report by May 2027 to the newly re-established Special Minister of State on the implementation of the recommendations supported in principle, and on options to acquit the recommendations under review.²⁰²

¹⁹⁵ Ibid., p. 2.

¹⁹⁶ Ibid., pp. 2–3.

¹⁹⁷ Ibid., p. 3.

¹⁹⁸ Ibid., p. 1.

¹⁹⁹ Ibid., pp. 5–8.

²⁰⁰ Ibid., p. 3.

²⁰¹ Ibid., p. 7.

²⁰² Ibid., p. 1; Premier of Victoria, Hon Jacinta Allan MP, *IBAC Powers To Be Expanded*, 1 June 2026, <<https://www.premier.vic.gov.au/ibac-powers-be-expanded>> accessed 26 July 2026.

2.6 Conclusion

IBAC's broad, complex remit continues to encompass challenging and sensitive matters. The apology at the public hearing of 2 March 2026 to Dr Jana Katerinskaja, who was the subject of IOV's *Emma's report* and a victim-survivor advocate, was a significant milestone towards IBAC's change of course for the future on police-perpetrated violence. This Committee, IBAC and the IOV had extensively discussed IBAC's need to address police-perpetrated violence in previous performance reviews, initiated by the IOV findings in *Emma's report*.

Major achievements or consequences for 2023/24 and 2024/25 include the resulting changes to the integrity system after IBAC's *Operation Watts* report, with the creation of the PWSIC to oversight parliamentary misconduct in December 2024. IBAC has also committed to publicly monitoring progress on implementing recommendations and developing its workforce's capability. The Committee also commends IBAC for its improvements to complaint handling and investigations functions including the CAS Optimisation project, Focused Police Complaints Team, Witness Liaison Team and Investigations Framework. The Committee also acknowledges IBAC's progress on implementing IOC's recommendations related to it.

However, the Committee notes continuing areas of challenges in complaint handling, complaint backlog, PID timeliness, complex investigations and workforce culture. The Committee looks forward to working with IBAC on these areas and continuing its monitoring of future activities.

Chapter 3

Integrity Oversight Victoria

3.1 Introduction

3

Integrity Oversight Victoria (IOV) plays an important role by providing checks and balances in Victoria's integrity system. Its main purpose is to oversight thirteen integrity, accountability or investigatory bodies,¹ including the other four integrity bodies overseen by the Integrity and Oversight Committee (IOC).² However, the degree to which IOV exercises jurisdiction and powers over all thirteen bodies varies.

IOV's core functions relating to oversight of these bodies include:

- the handling and assessment of complaints and public interest disclosures (PIDs)³
- investigations, which develop from complaints or PIDs or are own motion⁴
- inquiries which develop from investigations⁵
- the monitoring of the exercise of coercive or intrusive powers through notifications⁶
- inspections of records and documents of covert, intrusive and extraordinary investigatory powers used by these bodies.⁷

IOV was preceded by the Victorian Inspectorate and prior to that the Office of the Special Investigations Monitor which had operated since 2004.⁸ From this, IOV has grown in complexity: '[d]espite its size, the role of the [Office of the Special Investigations Monitor] steadily expanded as Victoria's integrity framework grew more complex'.⁹ When the Victorian Inspectorate was first established in 2011, and commencing operations in 2013, its legislative framework was largely centred on the

1 *Integrity Oversight Victoria Act 2011* (Vic) ('IOV Act 2011 (Vic)') ss 1, 11; Integrity Oversight Victoria (IOV) currently oversees 13 bodies in total: IOV, *Integrity Oversight Victoria: Integrity together*, 2026, <<https://www.integrityoversight.vic.gov.au>> accessed 16 June 2026.

2 *IOV Act 2011* (Vic) s 11(2), s 11(4), s 11(4A), s 11(5).

3 See, for example, *IOV Act 2011* (Vic) s 11(2)(d), s 11(4)(b), s 11(4A)(b), s 11(5)(b) and s 43; *Public Interest Disclosures Act 2012* (Vic) ('PID Act 2012 (Vic)') ss 31, 56.

4 *IOV Act 2011* (Vic) s 11(2)(e)(j), s 11(3)(c), s 11(4)(c), s 11(4A)(c), s 11(5)(c) and s 44.

5 *IOV Act 2011* (Vic) s 49; IOV, *Annual report 2024/25*, Melbourne, 2025, p. 40.

6 See, for example, *IOV Act 2011* (Vic) ss 40–42F; *IOV Annual report 2024/25*, p. 46.

7 *Crimes (Controlled Operations) Act 2004* (Vic) s 42; *Fisheries Act 1995* (Vic) s 131W; *Surveillance Devices Act 1999* (Vic) s 30P ('SD Act 1999 (Vic)'); *Telecommunications (Interception) (State Provisions) Act 1988* (Vic) ss 11–16; *Wildlife Act 1975* (Vic) ss 74–74SA; *IOV Act 2011* (Vic) ss 11(2)(g)–(h) and 13.

8 Office of the Special Investigations Monitor, *Annual report 2004/2005*, Melbourne, 2005, <<https://www.integrityoversight.vic.gov.au/sites/default/files/2020-01/Annual-Report-2004-05-Office-of-the-Special-Investigations-Monitor.pdf>> accessed 16 June 2026, p. 5; IOV, *Annual reports and plans*, 2026, <<https://www.integrityoversight.vic.gov.au/annual-reports-and-plans>> accessed 16 June 2026.

9 IOV, *Our story: A brief history of Integrity Oversight Victoria*, 2025, <<https://www.integrityoversight.vic.gov.au/our-story>> accessed 16 June 2026.

Independent Broad-based Anti-corruption Commission (IBAC), which was created simultaneously.¹⁰ Since then, its oversight of integrity, accountability, or investigatory bodies has expanded even further, and with greater complexity, as noted in the recent *Inquiry into the adequacy of the annual budget of the Independent Broad-based Anti-corruption Commission, the Victorian Ombudsman and Integrity Oversight Victoria* ('*Budget adequacy inquiry of IBAC, VO and IOV*').¹¹ Renamed the IOV, currently, 'no other Australian jurisdiction has a body with the broad remit of [IOV].'¹² In addition, due to secrecy provisions, records of some of IOV's activities are not publicly available.¹³

Depending on the oversighted body, IOV can receive complaints and initiate investigations on grounds that speak to improper motives and abuses of power (as in the case of IBAC), or more limited grounds of coercive powers and procedural fairness (as in the case of the Victorian Ombudsman (VO)), as will be outlined below.

While the Public Interest Monitor has jurisdiction to 'test the content and sufficiency of the information relied on and the circumstances' of coercive power applications,¹⁴ the IOV monitors coercive and intrusive powers through coercive power notifications and inspections.

As described by IOV, '[c]oercive powers are powers used to compel persons to answer questions or produce documents or things, or to keep specific matters confidential'.¹⁵ That is, they include:

- issuing a summons or notice to a person requiring them to give evidence or to produce documents or things
- issuing a confidentiality notice prohibiting a person from disclosing information about a matter being investigated, or that a summons or notice was issued
- compulsorily examining or questioning a person.¹⁶

10 'The bulk of the Inspectorate's work concerns oversight of IBAC': Parliament of Victoria, Accountability and Oversight Committee, *Report into Victorian oversight agencies 2016–17*, February 2018, <<https://apo.org.au/sites/default/files/resource-files/2018-02/apo-nid134281.pdf>> accessed 16 June 2026, p. 39; Second reading, Victoria, Legislative Assembly, 27 October 2011, Parliamentary debates, Book 17, p. 4974.

11 Parliament of Victoria, Integrity Oversight Committee (IOC), *Inquiry into the Adequacy of the annual budget of the Independent Broad-based Anti-corruption Commission, the Victorian Ombudsman and Integrity Oversight Victoria*, May 2026 (*Budget adequacy inquiry of IBAC, VO and IOV*); IOV, Budget adequacy inquiry of IBAC, VO and IOV hearings, response to questions on notice received 13 April 2026, pp. 3–4.

12 Eamonn Maron, 'Inside look at Integrity Oversight Victoria', *Law Institute Journal*, April 2025, <https://www.liv.asn.au/web/law_institute_journal_and_news/web/lij/year/2025/04april/inside-look-at-integrity-oversight-victoria.aspx> accessed 16 June 2026.

13 IOV, *Our functions: The functions we perform differ for each integrity body we oversee*, 2026, <<https://www.integrityoversight.vic.gov.au/our-functions>> accessed 16 June 2026.

14 *Public Interest Monitor Act 2011* (Vic) ss 3, 14.

15 IOV, *Glossary*, 2026, <<https://www.integrityoversight.vic.gov.au/glossary>> accessed 16 June 2026.

16 *Ibid.*; IOV, *Annual report 2024/25*, p. 46.

Coercive powers ‘limit the freedom and rights of individuals’;¹⁷ thus, the monitoring of such powers is integral to the protection of the individuals connected to investigations, to be balanced with the secrecy and efficacy of those investigations.

IOV can also monitor compliance through legislative and record-keeping requirements and to review certain policies and procedures,¹⁸ make private and public recommendations, and table reports in the Parliament of Victoria.¹⁹

IOV is a relatively small organisation, funded for no more than 27.5 FTE as was noted in the *Budget adequacy inquiry of IBAC, VO and IOV*²⁰ and growing from just six staff overseeing eight bodies, by mid-2024, had 30 staff.²¹ Nevertheless, the Committee monitors how it exercises its functions and powers within its organisational limits and resources, simultaneously noting the observations it makes in relation to the integrity agencies it oversees.

This chapter will summarise IOV’s core functions in turn, as well as related activity in the 2023/24 and 2024/25 financial years.

3.2 Core functions and oversight

3.2.1 Complaints and public interest disclosures about oversight bodies

The IOV has jurisdiction over complaints on the four other bodies oversighted by the Committee including IBAC, the VO, the Office of the Victorian Information Commissioner (OVIC), and the Parliamentary Workplace Standards and Integrity Commission (PWSIC).

¹⁷ IOV, *Annual report 2024/25*, p. 46.

¹⁸ See, for example, *IOV Act 2011* (Vic) s 12A; Victorian Inspectorate (VI), *Annual report 2018–19*, Melbourne, 2019, pp. 10, 14–27; VI, *Inquiry into the performance of Victorian integrity agencies 2017/18–2018/19* hearings, response to questions on notice received 16 January 2020, especially pp. 13–27; the Victorian Inspectorate is the former name of the IOV.

¹⁹ See, for example, *IOV Act 2011* (Vic) Part 7—Recommendations and action on completion of investigation; *SD Act 1999 Act* (Vic), s 30Q; VI, *Annual report 2018–19*, Melbourne, 2019, pp. 10, 14–27; VI, *Inquiry into the performance of Victorian integrity agencies 2017/18–2018/19* hearings, response to questions on notice, especially pp. 13–27.

²⁰ IOV, *Budget adequacy inquiry of IBAC, VO and IOV* hearings, response to questions on notice received 13 April 2026, p. 4.

²¹ IOV, *Our story: A brief history of Integrity Oversight Victoria*, 2026, <<https://www.integrityoversight.vic.gov.au/our-story>> accessed 16 June 2026.

Table 3.1 Grounds for complaints received by Integrity Oversight Victoria on integrity agencies

IBAC	VO	OVIC	PWSIC
About the conduct of the IBAC or IBAC personnel in relation to the: • performance or exercise • failure to perform or exercise • purported performance or purported exercise²² of their duties, functions or powers.	• Coercive powers • Procedural fairness.²³	• Coercive powers • Procedural fairness.²⁴	About the conduct of the PWSIC or PWSIC officer in relation to the: • performance or exercise • purported performance or exercise of any of their duties, functions or powers. • compliance with procedural fairness.²⁵
Where this conduct is: • contrary to law • unreasonable, unjust, oppressive or improperly discriminatory • based on improper motives • an abuse of power or • otherwise improper. This is without limiting the generality of the first grounds listed above.²⁶			

Source: *Integrity Oversight Victoria Act 2011* (Vic) s 43.

The IOV has a broad jurisdiction in relation to complaints about IBAC, as complaints can be accepted ‘about the conduct of the IBAC or IBAC personnel’ in relation to the:

- performance or exercise
- failure to perform or exercise or
- purported performance or purported exercise of their duties, functions or powers.²⁷

Complaints relating to IBAC can also be accepted where this conduct is contrary to law, unreasonable, or abuses of power.²⁸ Complaints received in relation to PWSIC also have a broad basis.²⁹

²² *IOV Act 2011* (Vic) s 43(1).

²³ *IOV Act 2011* (Vic) s 43(5), in compliance with procedural fairness requirements under the *Ombudsman Act 1973* (Vic).

²⁴ *IOV Act 2011* (Vic) s 43(9), including procedural fairness requirements under the *Freedom of Information Act 1982* (Vic) and *Privacy and Data Protection Act 2014* (Vic).

²⁵ *IOV Act 2011* (Vic) s 43 (6A).

²⁶ *IOV Act 2011* (Vic) s 43(2), s 43(6), s 43 (6b), s 43(10); rephrased on the website: IOV, *Make a complaint about a Victorian integrity body*, 2025, <<https://www.integrityoversight.vic.gov.au/make-complaint-about-victorian-integrity-body>> accessed 16 June 2026.

²⁷ *IOV Act 2011* (Vic) s 43(1).

²⁸ *IOV Act 2011* (Vic) s 43(2).

²⁹ *IOV Act 2011* (Vic) ss 43(6A)(6B).

Notably, only complaints about coercive powers and procedural fairness involving the VO and OVIC can be received.³⁰ Determining procedural fairness issues has been described by IOV as ‘complex’.³¹

In terms of volume, across all the bodies that IOV oversees, 119 complaints were received in 2023/24,³² while 130 complaints were received in 2024/25 (the largest amount ever received by IOV).³³ IOV also records ‘enquiries’ which they define as enquiries about:

- the kinds of complaints IOV can receive
- IOV’s role in Victoria’s integrity system
- a concern that is not within IOV’s complaints handling jurisdiction or
- a concern about an integrity body within IOV’s complaints handling jurisdiction that does not meet the threshold of a complaint or disclosure.³⁴

Table 3.2 Total complaints received and closed, and ratio of complaints closed to received, 2021/22 to 2024/25

	2021/22	2022/23	2023/24	2024/25
Total enquiries	163	203	248	259
Total complaints closed	90	136	142	120
Total complaints received	116	119	119	130
Ratio of total complaints closed to received	0.78	1.14	1.19	0.92

Sources: Victorian Inspectorate (VI), *Annual report 2021/22*, Melbourne, 2022, p. 28–29; VI, *Annual report 2022/23*, Melbourne, 2023, p. 23–28; VI, *Annual report 2023/24*, Melbourne, 2024, pp. 30, 32–38; IOV, *Annual report 2024/25*, Melbourne, 2025, pp. 26–32.

³⁰ *IOV Act 2011* (Vic) ss 43(5)(9).

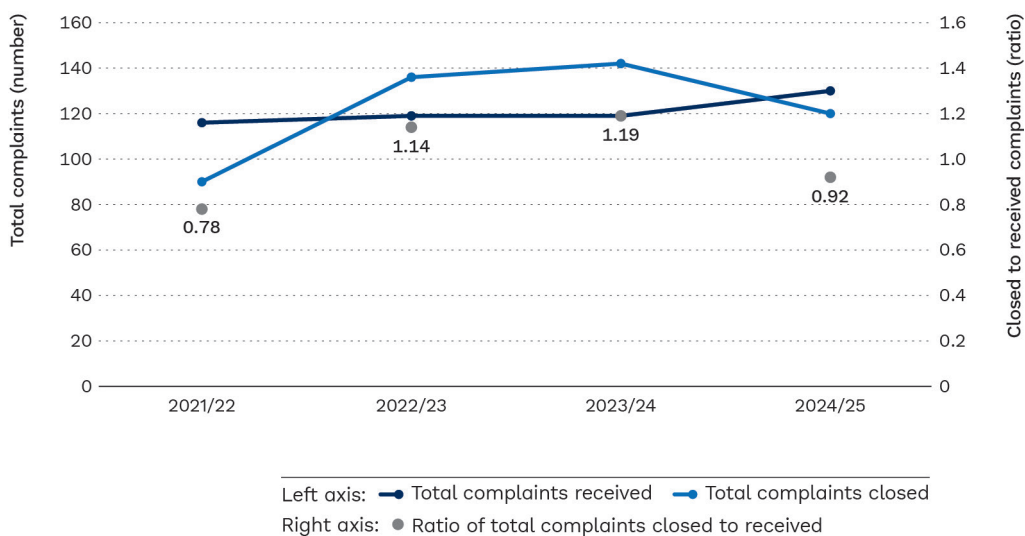
³¹ IOV, Integrity Oversight Victoria: Information about the complaints we can receive, 2025, <https://www.youtube.com/watch?v=5Hfik7_IFCk> accessed 16 June 2026.

³² VI, *Annual report 2023/24*, Melbourne, 2024, p. 35.

³³ IOV, *Annual report 2024/25*, p. 7.

³⁴ IOV, *Annual report 2024/25*, p. 26.

Figure 3.1 Total complaints received and closed, and ratio of complaints closed to received, 2021/22 to 2024/25



Sources: VI, *Annual report 2021/22*, p. 28–29; VI, *Annual report 2022/23*, p. 25–26; VI, *Annual report 2023/24*, pp. 34–35.; IOV, *Annual report 2024/25*, pp. 29–30.

The *Public Interest Disclosures Act 2012* (Vic) ('PID Act 2012 (Vic)') establishes the whistleblowing scheme which creates protections for individuals who come forward to report 'improper conduct' by a public official or body, and may suffer 'detrimental action' in reprisal for those disclosures.³⁵ Generally, PIDs are the provision of information that *shows or tends to show* that improper conduct or detrimental action is taking place or is proposed to take place by a public official or body, as defined by the *PID Act 2012* (Vic).³⁶ IOV can receive PIDs about most public sector officers and bodies.³⁷ IOV started with five active disclosures, four of which were finalised in 2024/25, then received a further 28 disclosures, completing 24 disclosure assessments of those,³⁸ while there were 23 disclosures in 2023/24.³⁹

³⁵ *PID Act 2012* (Vic) s 1; *IOV Act 2011* (Vic) s 4, some examples of 'improper conduct' include corrupt conduct, conduct that is a criminal offence and serious professional misconduct; *IOV Act 2011* (Vic) s 3 'detrimental action' is 'action causing injury, loss or damage', 'intimidation or harassment' or 'discrimination, disadvantage or adverse treatment in relation to a person's employment, career, profession, trade or business, including the taking of disciplinary action'.

³⁶ *PID Act 2012* (Vic) s 9, it can also be information that the person reasonably believes shows or tends to show improper conduct and detrimental action.

³⁷ *PID Act 2012* (Vic) ss 13(2), 14(f), 56(1)(d); '[u]nless required to be made to another entity under s 14 or 17 of the PID Act': IOV, *Annual report 2024/25*, p. 37.

³⁸ IOV, *Annual report 2024/25*, p. 39.

³⁹ VI, *Annual report 2023/24*, p. 43.

Table 3.3 Disclosures under the *Public Interest Disclosures Act 2012 (Vic)*, Integrity Oversight Victoria Annual report 2023/24 versus Annual report 2024/25

	2023/24	2024/25
Active disclosures at beginning of year	1	5 4 finalised ⁴⁰
Further PID disclosures received	22	28
Breakdown of PID disclosures received	13 did not meet the definition of a PID ⁴¹ 4 assessable disclosures ⁴² • of which 3 were determined to be public interest complaints⁴³ • of which 1 was notified to IBAC and determined not to be a public interest complaint 5 yet to be assessed ⁴⁴	13 did not meet the definition of a PID ⁴⁵ 10 assessable disclosures ⁴⁶ 4 yet to be assessed 1 withdrawn within 28 days

Source: VI, *Annual report 2023/24*, p. 43, IOV, *Annual report 2024/25*, p. 39.

It was observed in the *Budget adequacy inquiry of IBAC, VO and IOV*, as detailed in figures 3.2 and 3.3 below, that the number of complaints and public interest complaints received has steadily increased over past years.

⁴⁰ IOV, *Annual report 2024/25*, p. 39: '[o]n the basis they did not meet the definition of a public interest disclosure under section 9 of the PID Act'.

⁴¹ VI, *Annual report 2023/24*, p. 43: 'did not meet the definition of a public interest disclosure under section 9 of the PID Act'.

⁴² VI, *Annual report 2023/24*, p. 43: '[a]ll made directly to the VI'.

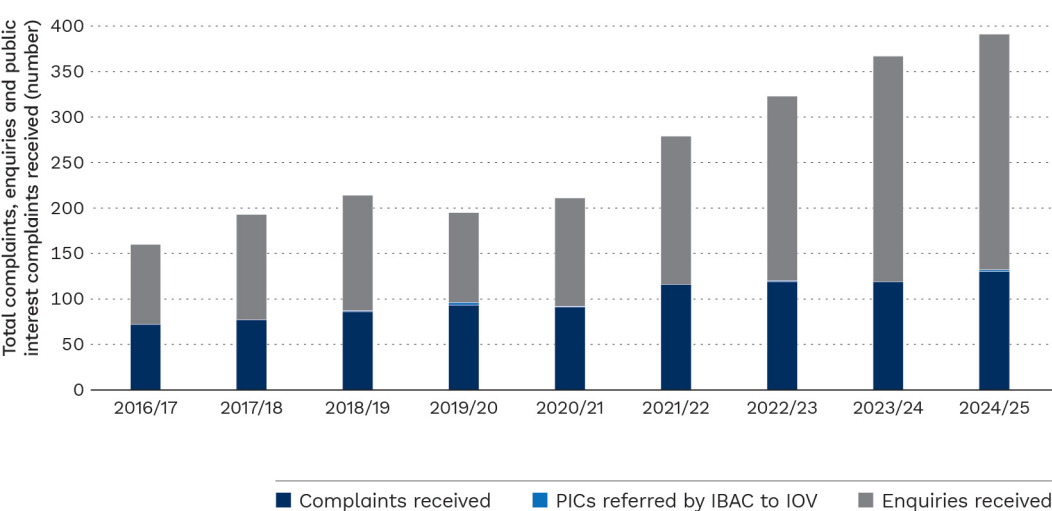
⁴³ VI, *Annual report 2023/24*, p. 43: 'investigation of one of these public interest complaints was commenced and completed within the reporting period', '[t]he investigations of the other 2 public interest complaints had not yet commenced'.

⁴⁴ VI, *Annual report 2023/24*, p. 43: '[a]s of 30 June 2024'.

⁴⁵ IOV, *Annual report 2024/25*, p. 39: '[d]id not meet the definition of a PID'.

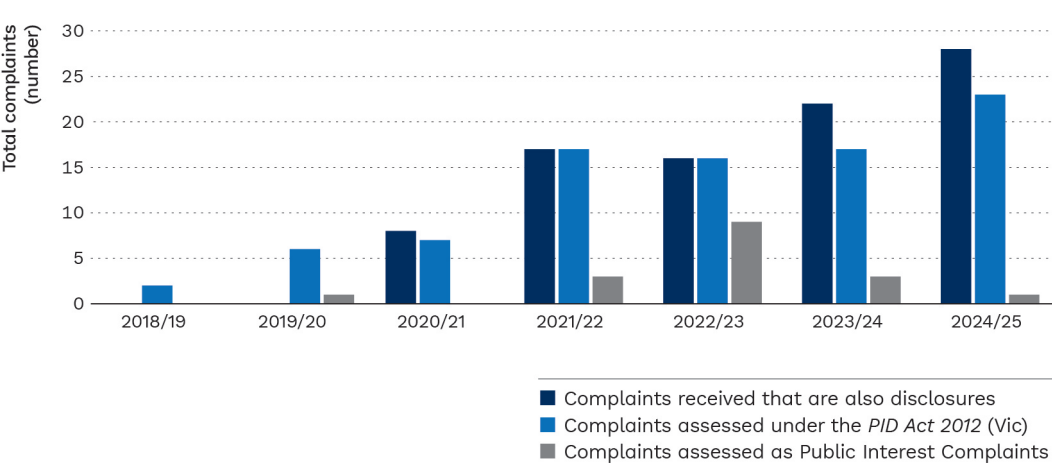
⁴⁶ Further breakdown of the 10 assessable disclosures is provided on p. 39 of the IOV, *Annual report 2024/25*.

Figure 3.2 Integrity Oversight Victoria: Complaints, enquiries and public interest complaints (PICs) received, 2016/17 to 2024/25



Source: Parliament of Victoria, Integrity and Oversight Committee, *Inquiry into the adequacy of the annual budget of the Independent Broad-based Anti-corruption Commission, the Victorian Ombudsman and Integrity Oversight Victoria (Budget adequacy inquiry of IBAC, VO and IOV)*, Melbourne, May 2026, p. 57; IOV, Budget adequacy inquiry of IBAC, VO and IOV hearings, response to questions on notice received 13 April 2026, p. 13.

Figure 3.3 Integrity Oversight Victoria: Complaints assessed under the Public Interest Disclosures Act 2012 (Vic), 2018/19 to 2024/25



Source: Parliament of Victoria, *Budget adequacy inquiry of IBAC, VO and IOV*, p. 57; IOV, Budget adequacy inquiry of IBAC, VO and IOV hearings, response to questions on notice, p. 14.

Timeliness issues had been discussed in the Committee’s 2022/23 performance review;⁴⁷ however, the targets for acknowledging receipt of new complaints within five business days and low complexity complaints completed within two months were met in 2024/25.⁴⁸

⁴⁷ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, May 2025, pp. 38–40.

⁴⁸ Department of Treasury and Finance, *2024/25 Department performance statement*, Melbourne, 2025, <<https://s3.ap-southeast-2.amazonaws.com/budgetfiles202425.budget.vic.gov.au/2024-25+Department+Performance+Statement.pdf>> accessed 23 July 2026, p. 163; Department of Treasury and Finance, *2026/27 Department performance statement*, <<https://s3.ap-southeast-2.amazonaws.com/vicbudgetfiles2026.27vicbudget/2026-27+State+Budget+-+Department+Performance+Statement.pdf>> accessed 23 July 2026, pp. 169–170.

However, it was noted in IOV's 2024/25 annual report that the Department Performance Statement performance measure⁴⁹ of medium complexity complaints completed within five months was not met.⁵⁰ By way of background, the breakdown of complaints and investigation completion rates into low and medium complexity categories was introduced in 2023/24.⁵¹ For medium complexity complaints completed in five months, the 75% target that was set for two years has been changed to 65%.⁵²

Conversely, when it was introduced in 2022/23, the target for standard investigations completed within 12 months was initially at 30%. It was then renamed to 'proportion of low and medium complexity investigations completed within 12 months' and set at 50% and is now 65%.⁵³ The Committee notes there may be leeway in adjusting these targets when first introduced.

In addition, IOV states that its inability to meet the measure for medium complexity is due to an increase in high complexity complaints reducing organisational capacity and hence, the suitability of the target for this measure was reconsidered.⁵⁴ IOV then went on to provide further details of action implemented to address this measure and noted that they:

- 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 their complaints management system.⁵⁵

While the Committee commends the implementation of these measures and looks forward to seeing how these measures impact the processing of medium complexity

⁴⁹ Formerly entitled the Budget Paper 3 (BP3) measure.

⁵⁰ IOV, *Annual report 2024/25*, p. 17.

⁵¹ Department of Treasury and Finance, *Budget paper No. 3: service delivery 2023/24*, Melbourne, 2024, <<https://s3.ap-southeast-2.amazonaws.com/budgetfiles202324.budget.vic.gov.au/2023-24+State+Budget+-+Service+Delivery.pdf>> accessed 23 July 2026, p. 365.

⁵² Department of Treasury and Finance, *Budget paper No. 3: service delivery 2023/24*, p. 365; Department of Treasury and Finance, *2024/25 Department performance statement*, p. 163; Department of Treasury and Finance, *2025/26 Department performance statement*, <<https://s3.ap-southeast-2.amazonaws.com/vicbudgetfiles2025.26budgetvic/2025-26+State+Budget+-+Department+Performance+Statement.pdf>> accessed 23 July 2026, pp. 175–176.

⁵³ Department of Treasury and Finance, *Budget Paper No. 3: service delivery 2022/23*, <<https://s3.ap-southeast-2.amazonaws.com/budgetfiles202223.budget.vic.gov.au/2022-23+State+Budget+-+Service+Delivery.pdf>> accessed 23 July 2026, p. 380; Department of Treasury and Finance, *2024/25 Department performance statement 2024/25*, p. 163; Department of Treasury and Finance, *2026/27 Department performance statement*, <<https://s3.ap-southeast-2.amazonaws.com/vicbudgetfiles2026.27vicbudget/2026-27+State+Budget+-+Department+Performance+Statement.pdf>> accessed 23 July 2026, p. 169.

⁵⁴ IOV, *Performance of the Victorian integrity agencies 2023/24 and 2024/25 hearings*, response to questions on notice received 20 April 2026, p. 3; IOV, *Annual report 2024/25*, p. 19.

⁵⁵ Ibid.

complaints, it will continue to monitor the appropriateness of the current 65% target to the previous 75% for medium complexity complaint measures as well as for issues that indicate that more information on the processing of low, medium and high complexity complaints received and completed should be disclosed to the Committee.

3.2.2 Investigations and inquiries

IOV ‘may investigate a complaint made under section 43 in order to assess the conduct in respect of which the complaint is made or any other conduct relevant to the matter’⁵⁶ and after 2024, has some discretion to investigate a public interest matter.⁵⁷ In the course of performing its functions, IOV may conduct own-motion investigations into the conduct of IBAC personnel in respect of their performance, failure to perform, or purported performance,⁵⁸ the conduct of Ombudsman officers in their exercise or purported exercise of coercive powers or compliance with procedural fairness,⁵⁹ the conduct of PWSIC officers in the performance or exercise, or purported performance or exercise, of any of their duties, functions or powers and compliance with procedural fairness,⁶⁰ and the conduct of OVIC officers in exercise or purported exercise of coercive powers or compliance with procedural fairness.⁶¹

In addition, an inquiry can be made ‘into a matter arising from an investigation’ which then endows IOV with the power ‘to examine witnesses and compel the production of documents and things.’⁶²

Table 3.4 Number of investigations, 2023/24 to 2024/25

	2023/24	2024/25
Investigations	8 investigations	6 investigations
Investigations breakdown	1 ongoing (1 IBAC-related) 7 closed • 3 IBAC-related • 1 VO-related • 3 Office of the Special Investigator-related	3 ongoing • 2 IBAC-related • 1 VO-related 3 closed (3 IBAC-related)

Source: VI, *Annual report 2023/24*, pp. 44–45; IOV, *Annual report 2024/25*, p. 40–41.

A key development in relation to investigations was the discussion of IOV’s new investigation manual, now in its second version form.⁶³ As the IOV stated, the

⁵⁶ *IOV Act 2011* (Vic) s 44(1).
⁵⁷ *IOV Act 2011* (Vic) ss 44(2) and 44A; previously, the IOV had to investigate a public interest matter.
⁵⁸ *IOV Act 2011* (Vic) s 46(1); notably, the wording of ‘personnel’ has been used in relation to IBAC in the legislation, and not officers.
⁵⁹ *IOV Act 2011* (Vic) s 46(3).
⁶⁰ *IOV Act 2011* (Vic) s 46(3A).
⁶¹ *IOV Act 2011* (Vic) s 46(5).
⁶² IOV, *Annual report 2024/25*, p. 40.
⁶³ Cathy Cato, Chief Executive Officer and General Counsel, IOV, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 14.

investigation manual is a ‘detailed process available to anyone that works on [IOV] investigations when they come into the organisation’ which provides ‘step-by-step guidance’ and is available to anyone entering the organisation who will participate in investigations.⁶⁴

In relation to the content of the investigation manual, IOV goes on to elucidate:

There is detail on handling every matter, including how we go about considering human rights; how we go about using coercive powers et cetera; whether or not we would use confidentiality notices and the considerations there; and how we conduct our interviews and examinations et cetera.⁶⁵

Investigations are improved through a combination of the investigation manual and a debriefing process. The debrief includes approximately 20 headings on various aspects of the investigation, and the query of whether IOV could have done better in that category is undertaken for all 20 headings.⁶⁶ Subsequently, ‘[a]ny learnings and action items that come out of that debrief get added into a running sheet, and then that running sheet builds into the next version of the manual and we have a draft version’.⁶⁷ The IOV noted that it is an ‘effective continuous improvement process’.⁶⁸

3.2.3 Public-facing service delivery and complainant and witness welfare

The activities of integrity bodies come with inevitable witness welfare risks. In August 2024, IOV implemented changes to the case management system for automated reporting of welfare risks, which was one of the Committee’s recommendations from its *Performance of the Victorian integrity agencies 2020/21: focus on witness welfare*.⁶⁹ In discussing its system, IOV stated that its process involves a Welfare Governance Officer whose role is comparative to the IBAC’s Witness Liaison Team, but ‘fit for purpose and size for [the IOV], and ... works really effectively’.⁷⁰ They continued to provide further details on the current system:

[the Welfare Governance Officer is] notified of all incidents, and they keep a really detailed register of welfare incidents and the steps that have been taken with respect to managing the risk of any particular person.⁷¹

In addition, during investigations, identified welfare concerns can be searched for both complainants and witnesses.⁷²

⁶⁴ Ibid.

⁶⁵ Ibid.

⁶⁶ Ibid.

⁶⁷ Ibid.

⁶⁸ Ibid.

⁶⁹ Parliament of Victoria, Integrity and Oversight Committee, *Performance of the Victorian integrity agencies 2020/21: focus on witness welfare*, Melbourne, October 2022, p. 138.

⁷⁰ Cathy Cato, *Transcript of evidence*, p. 13.

⁷¹ Ibid.

⁷² Ibid.

When queried whether there had been any technical difficulties or challenges, IOV noted that slight improvements had been introduced each year, since they did not have a dedicated resource to make changes to their case management system, with several relevant elements introduced over the last three years. IOV noted that it had the ability to run reports regularly, building towards a monthly reporting cycle, with the witness welfare report generated approximately 19 times to date and the complaint welfare report approximately 91 times.⁷³

The issue of continued data-informed and trauma-informed communications and engagement strategies was also discussed at the public hearing,⁷⁴ another important matter for complainants and witness welfare as the Committee had previously heard the importance of trauma-informed communications to complainants.⁷⁵

More specifically, IOV stated that they:

- invited agencies they oversee to participate in a 'trust in IOV' survey
- held a number of presentations between IBAC and IOV, presenting current work, trying to set up similar presentation with the Ombudsman⁷⁶
- participated in 'cultural awareness training and white privilege sessions across the past three months to improve [IOV's] understanding of cultural safety and how to approach data'
- identified through work that there can be some 'adverse consequences for assuming vulnerability of different groups in some environments'⁷⁷
- implemented trauma-informed practice training for the entire organisation, to observe IOV language and in real time communication and ensure that IOV meets 'those principles of focusing on safety, collaboration, trust and empowerment'.⁷⁸

The Committee had previously described the evidence on '[t]he importance of understanding the impact of investigative processes on witnesses' including trauma responses, and outlined several possible welfare supports.⁷⁹ Understanding that there will continue to be a need to identify where complainant and witness welfare can be enhanced, the Committee commends IOV's ongoing work in this area.

⁷³ Ibid.

⁷⁴ Louise Macleod, Chief Integrity Inspector, IOV, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 14.

⁷⁵ Chapter 6 on Police-perpetrated violence: Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, pp. 91-106.

⁷⁶ Louise Macleod, Chief Integrity Inspector, IOV, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 14; 'and it is all about getting a better understanding of the context and the challenges that those organisations work in to then inform our own risk-based proportionate oversight'.

⁷⁷ Ibid., '[w]hat we have learned out of that is that it is really important to be very sensitive and allow the option of opting out when it comes to data collection and having a rationale and allowing people to make an active choice as to whether or not they share information with us'.

⁷⁸ Ibid.

⁷⁹ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2020/21: focus on witness welfare*, pp. 30-41, especially p. 30.

3.2.4 Monitoring projects

An important issue of concern for the Committee had been police-perpetrated family violence, which is ‘family violence involving members of Victoria Police’⁸⁰ as outlined in the IOC’s 2022/23 performance review report⁸¹ and in IOV’s *IBAC’s referral and oversight of Emma’s complaints about Victoria Police’s response to family violence by a police officer* (‘Emma’s report’).⁸² IBAC’s handling and oversight of complaints about Victoria Police more generally has also been addressed by this Committee in the *Inquiry into the external oversight of police corruption and misconduct in Victoria*,⁸³ and the *Inquiry into the adequacy of the legislative framework for the Independent Broad-based Anti-corruption Commission (IBAC legislative adequacy inquiry)*.⁸⁴

The purpose of IOV’s monitoring project into IBAC’s handling and oversight of complaints about Victoria Police, ‘is to gain insight into specific areas of IBAC’s practices beyond isolated complaint assessments’ and ‘consider how IBAC’s policies and procedures have been applied’ as well as the ‘consistency of decision-making and practices’.⁸⁵ Previous work that forms the foundation of this project include the *Monitoring Project on IBAC: Police Misconduct Complaints from 2019*⁸⁶ and IOV’s recommendations in *Emma’s report*, which were accepted by IBAC.⁸⁷ IOV noted that its current Police oversight monitoring project was up to phase four of seven phases⁸⁸ which by their description is the collation and ‘analysing findings’ stage. The prior steps of policies, procedures and guidelines review, the revisiting scope and timeframe as well as the audit of sample cases has thus been concluded.

An update was also given on the PWSIC, which is still in its early stages of establishment. Background to the PWSIC is provided in Chapter 5 of this report.

IOV’s oversight functions of the PWSIC include:

- monitoring the PWSIC’s use of coercive powers and compliance with procedural fairness
- receiving and assessing complaints about the conduct of the PWSIC and its officers
- investigating the conduct of the PWSIC and its officers.⁸⁹

⁸⁰ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 92.

⁸¹ See also *Ibid.*, Chapter 6, pp. 91–106.

⁸² VI, *Special report: IBAC’s referral and oversight of Emma’s complaints about Victoria Police’s response to family violence by a police officer* (‘Emma’s report’), Melbourne, 2022, <<https://www.integrityoversight.vic.gov.au/sites/default/files/2024-03/Special-report-IBAC%27s-referral-and-oversight-of-Emma%27s-complaints.pdf>> accessed 23 July 2026.

⁸³ See, for example, Parliament of Victoria, IBAC Committee, *Inquiry into the external oversight of police corruption and misconduct in Victoria*, September 2018, <<https://apo.org.au/sites/default/files/resource-files/2018-09/apo-nid190261.pdf>> accessed 23 July 2026.

⁸⁴ Parliament of Victoria, IOC, *Inquiry into the adequacy of the legislative framework for the Independent Broad-based Anti-corruption Commission (IBAC legislative adequacy inquiry)*, December 2025, Chapter 6, pp. 93–112.

⁸⁵ IOV, response to questions on notice, p. 4.

⁸⁶ VI, *Monitoring Project on IBAC: Police Misconduct Complaints*, Melbourne, 2019, <<https://www.integrityoversight.vic.gov.au/sites/default/files/2020-07/Integrity%20Report-Monitoring%20Project%20on%20IBAC%20-%20Police%20Misconduct%20Complaints%20copy%202.pdf>> accessed 10 July 2026.

⁸⁷ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 103.

⁸⁸ IOV, response to questions on notice, p. 4.

⁸⁹ *Ibid.*, p. 5.

Despite the infancy of the PWSIC, IOV noted that it has provided a guidance document to the PWSIC ‘to create a framework to lawfully exercise powers’ and alongside the PWSIC’s notification requirements to IOV, the document sets out the following matters for consideration by the PWSIC when determining how to use its powers:

- witness welfare
- confidentiality notices
- human rights
- procedural fairness information to assist witnesses when making investigation requests
- the utility of scripts for issues relate to each interview.⁹⁰

In relation to ongoing interaction with the PWSIC, IOV noted that:

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.⁹¹

In relation to the PWSIC’s investigation, the *Matter involving the Member for Western Victoria Region and the Member for Warrandyte District* report, IOV noted a technical issue that may cause ambiguity with respect to the investigation request notices, in that while the requests were approved by a Commissioner, the request notices were issued by Commission staff.⁹² PWSIC, among other actions, subsequently reviewed and updated the PWSIC’s investigation procedure and associated templates to specify that a Commissioner must sign any investigation request.⁹³

The IOC had made Recommendations 2–4 in its 2020/21 performance review in relation to the Victorian Government consulting with IOV to require IBAC to develop procedural guidelines on the holding of public examinations.⁹⁴ The ‘Guide for witnesses appearing in IBAC public examinations’ was published on the IBAC website in March 2026.⁹⁵ In the lead-up to publishing, IOV worked with IBAC: the latter provided a draft, followed by a meeting between representatives, then IOV provided written feedback with IBAC making revisions.⁹⁶ The Committee commends IOV for its work with other integrity agencies to improve processes.

⁹⁰ Ibid.

⁹¹ Ibid.

⁹² PWSIC, *Matter involving the Member for Western Victoria Region and the Member for Warrandyte District*, Melbourne, 2025, <<https://www.pwsic.vic.gov.au/sites/default/files/2025-09/PWSIC-Investigation-Report-Matter-involving-the-Member-for-Western-Victoria-Region-and-the-Member-for-Warrandyte-District.pdf>> accessed 23 July 2026, p. 1.

⁹³ PWSIC, Performance of the Victorian integrity agencies 2023/24 and 2024/25 hearings, response to questions on notice received 13 April 2026, p. 5.

⁹⁴ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2020/21: focus on witness welfare*, pp. 76–77.

⁹⁵ IOV, response to questions on notice, p. 13; IBAC, *IBAC public examinations: a guide for witnesses*, 2026 <<https://www.ibac.vic.gov.au/IBAC-public-examinations-guide-for-witnesses>> accessed 16 June 2026.

⁹⁶ IOV, response to questions on notice, p. 13.

3.2.5 Coercive powers notifications and inspections

As stated above in this chapter's introduction, coercive powers 'limit the freedom and rights of individuals',⁹⁷ and can include a summons or notice to produce evidence, confidentiality notices or compulsorily examining or questioning a person.⁹⁸ IOV noted that '[i]n 2024–25, we received 308 coercive powers notifications, 277 fewer than the 585 received in 2023–24.'⁹⁹ Notifications were made by IBAC, VO, OVIC and PWSIC as well as the Office of Chief Examiner, with no notifications on coercive powers made by the Wage Inspectorate Victoria, the Victoria's Auditor-General's Office, or the Judicial Commission.¹⁰⁰

There are currently eight organisations that must notify IOV when using coercive powers, including the four relevant integrity agencies oversighted by this Committee.¹⁰¹ However, with each organisation involving different notification requirements, not all coercive powers need to be reported.¹⁰²

As IOV notes:

The requirement for bodies to provide documents to us arises both from the legislation governing the relevant body and 'standing requests' that we make where appropriate under the [*Integrity Oversight Victoria*] Act.¹⁰³

IOV also reviews examinations and interviews (including those undertaken by IBAC), with a '[r]isk profile of notifications received' included in the annual report and essential practices for coercive powers described therein.¹⁰⁴ IOV also noted that since their special report on the VO's use of coercive powers, which was aimed at raising awareness of the standards of using coercive powers and the 'need to adequately resource an internal quality assurance function' within bodies, there had been implementation and clear improvements.¹⁰⁵ It was also noted in that report that earlier IOV feedback had led to clear improvements within the VO's practice.¹⁰⁶

One of IOV's other functions is the 'physical [inspection] of records and documents associated with the use of covert, intrusive and extraordinary investigatory powers'.¹⁰⁷

⁹⁷ IOV, *Annual report 2024/25*, p. 46.

⁹⁸ Ibid.

⁹⁹ Ibid., p. 47.

¹⁰⁰ Ibid.

¹⁰¹ Ibid., p. 46.

¹⁰² Ibid.

¹⁰³ Ibid., p. 46, footnote 59.

¹⁰⁴ Ibid., pp. 48–51.

¹⁰⁵ The special report was aimed at raising awareness across all integrity agencies of the standards of using coercive powers and the 'need to adequately resource an internal quality assurance function': VI, *Special report: A compliance case study on the use and oversight of coercive powers*, Melbourne, 2024, <<https://www.integrityoversight.vic.gov.au/sites/default/files/2024-03/Compliance-case-study-on-the-use-and-oversight-of-coercive-powers.pdf>> accessed 16 June 2026, p. 3; Louise Macleod, *Transcript of evidence*, p. 13.

¹⁰⁶ IOV, *Special report: A compliance case study on the use and oversight of coercive powers*, p. 3.

¹⁰⁷ IOV, *Annual report 2024/25* p. 43.

Notably, during 2024/25 there were 13 regular inspections and six inspection reports,¹⁰⁸ while in 2023/24, there were 16 regular inspections,¹⁰⁹ with eight inspection reports.¹¹⁰

Inspections involve covert, intrusive and extraordinary investigatory powers related to the following:

- Surveillance devices
- Controlled operations
- Counter-terrorism
- Telecommunications
- Public Interest Monitor records.¹¹¹

Reports are tabled annually or biannually,¹¹² with mention of Victoria Police and IBAC included in the *Controlled Operations Inspection Report*¹¹³ and *Surveillance Devices Inspection Reports*.¹¹⁴ In its report on irregular inspection of IBAC surveillance device records in May–June 2023, IOV noted four recommendations that were accepted by IBAC related to the need to disclose where material relied on in surveillance device warrant applications is affected by compliance issues as well as other ways to record compliance issues.¹¹⁵

Victoria Police was also mentioned in *The permanent installation of listening devices in prisons and their use by Victoria Police*.¹¹⁶ Victoria Police had permanently installed at least 115 listening devices between 2000 and 2018 in several Victorian prisons without the authority of a warrant issued under the *Surveillance Devices Act 1999* (Vic).¹¹⁷ As stated in the report, '[m]any of these installations occurred when the prison was undergoing construction or renovation'.¹¹⁸ This was revealed in 2023

¹⁰⁸ Ibid, pp. 43–44.

¹⁰⁹ VI, *Annual report 2023/24*, p. 49.

¹¹⁰ Ibid.

¹¹¹ IOV, *Annual report 2024/25*, p. 43; see, for example, *SD Act 1999* (Vic) ss 30P–30Q, *Crimes (Controlled Operations) Act 2004* (Vic) s 42.

¹¹² IOV, *Annual report 2024/25*, p. 43; telecommunications interception inspections are also reported annually but not tabled in parliament or made public.

¹¹³ IOV, *Controlled operations annual report 2023/24*, Melbourne, 2026, <<https://www.integrityoversight.vic.gov.au/sites/default/files/2026-03/Controlled-Operations-Annual-Report-2023-24.pdf>> accessed 16 June 2026, pp. 10, 12–22.

¹¹⁴ IOV, *Surveillance devices inspection report: report by Integrity Oversight Victoria on its inspections of surveillance device records during the period 1 January 2024 to 30 June 2024*, Melbourne, 2025, <https://www.integrityoversight.vic.gov.au/sites/default/files/2025-11/Surveillance-Devices-Report-No-2-for-2023-24-%E2%80%93-All-agencies_1.pdf> accessed 16 June 2026, pp. 12–14, 21–24; IOV, *Surveillance devices inspection report: report by Integrity Oversight Victoria on its inspections of surveillance device records during the period 1 July 2023 to 31 December 2023*, Melbourne, 2025, <<https://www.integrityoversight.vic.gov.au/sites/default/files/2025-11/Surveillance-Devices-Report-No-1-for-2023-23-All-agencies.pdf>> accessed 17 June 2026, pp. 10–15, 18–23.

¹¹⁵ IOV, *Report on irregular inspection of IBAC surveillance device records by the Victorian Inspectorate in May–June 2023*, IOV, Melbourne, 2024, <<https://www.integrityoversight.vic.gov.au/sites/default/files/2024-10/Surveillance-Devices-Report-May-June-2023-IBAC.pdf>> accessed 16 June 2026, especially pp. 8, 10, and 11.

¹¹⁶ IOV, *The permanent installation of listening devices in prisons and their use by Victoria Police*, IOV Melbourne, 2025, <<https://www.integrityoversight.vic.gov.au/sites/default/files/2025-11/Permanent-installation-of-listening-devices-in-prisons-and-their-use-by-Victoria-Police.pdf>> accessed 16 June 2026.

¹¹⁷ Ibid., p. 1.

¹¹⁸ Ibid.

in response to questions by IOV.¹¹⁹ IOV acknowledged and balanced considerations of the effective investigation of serious crimes and the right to privacy.¹²⁰ The eight recommendations by IOV were accepted by Victoria Police and included notifying the Supreme Court of certain omissions, more transparency of installation methods where they are non-traditional, updating of surveillance device policies and improved record keeping.¹²¹ In the Counter-Terrorism Powers Inspection Reports, there were no recommendations for Victoria Police in April 2024 and October 2024.¹²² The Committee looks forward to IOV's continued monitoring in this area.

3.3 Consultation on legislative reform

IOV provided an update to the Committee on legislative reforms it was discussing with the Department of Justice and Community Safety; however, they also cautioned that '[s]haring information about the timing and progress of reforms is limited by Cabinet-in-confidence'.¹²³ In addition, IOV noted that for 'complex matters with broader consequences,' there is corresponding engagement with relevant bodies on the proposed reforms.¹²⁴ Notably,

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.¹²⁵

Proposed reforms relevant to the integrity agencies include:

- amending s 163 of the *Independent Broad-based Anti-corruption Commission Act 2011* (Vic) ('IBAC Act 2011 (Vic)'), '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', since this section is ambiguous on this power
- aspects of the PID scheme including technical amendments that could simplify the *PID Act 2012* (Vic) for complainants and agencies, or consideration of whether a more decentralised model would be an advancement
- several technical amendments to improve operational efficiency and clarify the scope of IOV oversight under the *Integrity Oversight Victoria Act* (Vic) ('IOV Act 2011 (Vic)')

¹¹⁹ Ibid.

¹²⁰ Ibid., p. 3.

¹²¹ Ibid., pp. 4–6.

¹²² IOV, *Counter-Terrorism powers inspection report: report by Integrity Oversight Victoria on its inspection of Victoria Police records under the Terrorism (Community Protection) Act 2003 in April 2024*, Melbourne, 2025, <<https://www.integrityoversight.vic.gov.au/sites/default/files/2026-05/Counter-terrorism-powers-report-for-April-2024-Victoria-Police.pdf>> accessed 16 June 2026, p. 4; IOV, *Counter-Terrorism powers inspection report: report by Integrity Oversight Victoria on its inspection of Victoria Police records under the Terrorism (Community Protection) Act 2003 in October 2024*, Melbourne, 2025, <<https://www.integrityoversight.vic.gov.au/sites/default/files/2026-05/Counter-terrorism-powers-report-for-October-2024-Victoria-Police.pdf>> accessed 16 June 2026, p. 4.

¹²³ IOV, response to questions on notice, p. 6.

¹²⁴ Ibid.

¹²⁵ Ibid.

- amending s 92 of the *IOV Act 2011* (Vic) to not make it an offence for IOV to provide any additional material to the recipient of a draft report as part of a procedural fairness process
- amending s 97AA(4) of the *IOV Act 2011* (Vic) to expressly permit IOV to authorise disclosure, to support witness welfare in other appropriate circumstances, such as where a person does not have a spouse.¹²⁶

In relation to embargoed reports, since a query was made on that issue in the 2023 public hearings of the Committee's 2021/22 performance review, the IOV and IBAC have engaged in relation to the interpretation of s 166 of the *IBAC Act 2011* (Vic) and 'raised amendment of the provision with DJCS', noting that the section is ambiguous.¹²⁷ In addition:

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 that it has not relied on the provision to provide embargoed reports to the media since 11 November 2024.¹²⁸

3.4 Governance and workplace

The Committee notes that the 2025 People Matter Survey (PMS) was overall positive, either roughly aligning with or above comparators in many areas.¹²⁹ However, the two biggest differences to the comparator group was that IOV staff were less likely to state that hybrid work improves productivity and that workgroups across the organisation willingly share information with each other.¹³⁰

The Committee also notes that according to the 2024 PMS, there was a sharp downward trend from 2022 to 2024 in levels of violence or aggression against staff.¹³¹ The Committee queried what had worked in decreasing levels of violence or aggression against staff. In response to questions on notice, IOV clarified that it is a small organisation and the survey results were disproportionately skewed due to the presence of one specific incident in 2022 with a complainant 'who attended the office without an appointment and behaved in an aggressive manner towards staff'.¹³²

¹²⁶ IOV, response to questions on notice, pp. 6, 7.

¹²⁷ IOV, response to questions on notice, p. 10.

¹²⁸ Ibid.; see also IOV, response to questions on notice, p. 6; see also Louise Macleod, *Transcript of evidence*, p. 15; see also Parliament of Victoria, *Performance of the Victorian integrity agencies 2021/22*, November 2023, pp. 50–53.

¹²⁹ Victorian Public Sector Commission (VPSC), *IOV: 2025 people matter survey results report*, 2025, <<https://www.vpsc.vic.gov.au/files/pms-2025/Integrity%20Oversight%20Victoria%20-%20Organisation%20results%20-%202025.pdf>> accessed 16 June 2026.

¹³⁰ Ibid., p. 35.

¹³¹ VPSC, *IOV: 2024 people matter survey results report*, 2024, <<https://www.vpsc.vic.gov.au/wp-content/uploads/2025/04/Office-of-the-Victorian-Inspectorate-Organisation-results-2024.pdf>> accessed 23 June 2026, p. 23.

¹³² IOV, response to questions on notice, p. 1.

IOV will continue to monitor future PMS results,¹³³ however, in the interim, IOV has implemented the following measures:

- visitor checklists
- a call back service for complaints¹³⁴
- Towards Zero awareness campaign and annual training
- Respect@Work platform
- Managing unreasonable client behaviour—a policy document.¹³⁵

The visitor checklists, for example, are put in place so that ‘all staff are aware of the process for safely managing unexpected visitors’ and also include ‘escalation to senior managers in the event of the unexpected visitor demonstrating violent, aggressive or concerning behaviours’.¹³⁶ The call back service, consistent with advice from IOV’s mental health service provider, was due to numerous examples of ‘inappropriate and aggressive behaviours’ experienced by staff during calls and according to IOV, ‘successfully lowered the instances of inappropriate and aggressive behaviour towards our staff’.¹³⁷

It has been a year since the VI was renamed as IOV, which was chosen to better reflect the entity and its activities.¹³⁸ While IOV acknowledges the similarity between the Committee’s and IOV’s name, with the ‘commonality of purpose’ being oversight, IOV reported that the name has been able to ‘give people a sense’ of what IOV actually does and there had been no apparent confusion with this Committee. Rather, the new name has helped distinguish IOV from the Wage Inspectorate and Local Government Inspectorate, with the previous name, the Victorian Inspectorate, resulting in confused enquiries and communications.¹³⁹

IOV was also asked about the extension of Memoranda of Understanding (MoUs) beyond those currently entered into with IBAC and the VO.¹⁴⁰ IOV stated that the possibility of entering MoUs with the PWSIC, OVIC and the Chief Examiner was discussed briefly, but not progressed due to insufficient resources, impacted by the independent performance audit.¹⁴¹ As IOV explained previously, resource allocation was particularly strained at the time as it is a small organisation, and several obligations had coincided such as responding to questions on notice on three IOC inquiries since the end of last year and the independent performance audit.¹⁴²

¹³³ Ibid.

¹³⁴ Ibid., ‘consistent with advice from ... mental health service provider’.

¹³⁵ IOV, response to questions on notice, p. 2.

¹³⁶ Ibid.

¹³⁷ Ibid.

¹³⁸ Louise Macleod, *Transcript of evidence*, p. 11.

¹³⁹ Ibid., p. 13.

¹⁴⁰ IOV, response to questions on notice, p. 11; ‘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’.

¹⁴¹ IOV, response to questions on notice, p. 11.

¹⁴² IOV, Budget adequacy inquiry of IBAC, VO and IOV hearings, response to questions on notice, p. 8.

3.5 Accountability

3.5.1 Complaints to the IOC about IOV

The IOC can receive and consider complaints about IOV as part of its performance-monitoring function under s 7(1) of the *Parliamentary Committees Act 2003* (Vic) ('*PC Act 2003* (Vic)'). The Committee considers complaints about IOV to assess whether they raise systemic performance issues—issues that have broader implications for the performance of IOV’s functions at an agency-wide level.

Under s 7(2) of the *PC Act 2003* (Vic), the IOC is expressly prohibited from reinvestigating matters raised in complaints to IOV, and from reviewing their findings, recommendations, determinations, or other decisions in relation to complaints, including a decision not to investigate.

The IOC received 14 complaints about IOV in 2023/24 that were within the Committee’s jurisdiction. Similarly, in 2024/25 the IOC received 12 complaints within the Committee’s jurisdiction. For further information, see Table 3.5. Themes across the complaints included the dismissal of complaints, the decision not to investigate a complaint and timeliness in assessing and finalising complaints.

The Committee did not identify any systemic performance issues from the complaints made about IOV. However, in response to complaints, the Committee did decide to monitor processes implemented by IOV to improve its timeliness.

The Committee also receives PIDs about IOV under the *PID Act 2012* (Vic). The Committee did not receive any complaints that met the criteria for a PID during the reporting period.

Table 3.5 Complaints about Integrity Oversight Victoria processed by the Committee, 2023/24 to 2024/25

	2023/24	2024/25
Complaints received in financial year about IOV that are within the Committee’s jurisdiction	14	12
Complaints finalised in financial year	12	15
Complaints where enquiries were made with IOV	7	4
Systemic performance issues identified	0	0

Source: Devised from IOC complaints data.

3.5.2 IOV's response to IOC report recommendations

A summary of the status and implementation of IOV's recommendations can be found in the Committee's 2022/23 performance review.¹⁴³

2022/23 performance review report

One recommendation was addressed to IOV in the *Performance of the Victorian integrity agencies 2022/23 Inquiry*:

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.¹⁴⁴

In questions on notice, IOV noted that it has accepted the recommendation and provided an update on the police oversight monitoring project,¹⁴⁵ as described in the section above.

2020/21 performance review report

There were three recommendations directed to the Victorian Government that the IOV had played a role in implementing through working with IBAC, aimed at developing procedural guidelines on examinations.¹⁴⁶ Notably, IBAC has published 'Guide for witnesses appearing in IBAC public examinations' on the IBAC website in March 2026¹⁴⁷ and further information on that process has been described above.

Independent performance auditor's 2022 audit report

The inaugural independent performance audit of IOV was conducted in 2022 in accordance with ss 90D–90E of the *IOV Act 2011* (Vic). Another independent performance audit is being conducted in 2026.

On the recommendation on developing 'a stakeholder survey with the agencies that IOV oversights to enable deeper and consistent feedback', IOV had noted that implementation was well underway in performance review 2022/23.¹⁴⁸ Since then,

¹⁴³ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, pp. 44–48.

¹⁴⁴ Ibid., p. 106.

¹⁴⁵ IOV, response to questions on notice, pp. 4, 12.

¹⁴⁶ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 46; Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2020/21: focus on witness welfare*, Melbourne, October 2022, pp. 76–77.

¹⁴⁷ IOV, response to questions on notice, p. 13; IBAC, *IBAC public examinations: a guide for witnesses*, 2026, <<https://www.ibac.vic.gov.au/IBAC-public-examinations-guide-for-witnesses>> accessed 16 June 2026.

¹⁴⁸ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2022/23*, p. 48.

IOV has signed a Memorandum of Understanding (MoU) with IBAC in June 2025 and agreed in principle to a MoU with VO, and noted a survey was planned for 2025/26.¹⁴⁹

IOV noted that it had also completed the recommendation relating to ‘a function-based costing model, capturing the salary, external legal, consultant and systems costs allocated to each function’.¹⁵⁰

3.6 Conclusion

IOV has had two productive years of change, including a year of operation with the new name change.

IOV continues to oversight its integrity, accountability or investigatory bodies and produces notable projects and improvements on its processes. A handful of these notable milestones includes measures to improve the handling of medium-complexity complaints, the further development of the investigation manual, and the ongoing monitoring project of IBAC’s handling of police complaints. IOV’s remit continues to cover many important areas related to integrity including the monitoring of coercive powers and legislative reform advocacy, with its oversight remit being expanded with increasing complexity.

The Committee commends IOV’s participation in the *IBAC legislative adequacy inquiry*¹⁵¹ and *Budget adequacy inquiry of IBAC, VO and IOV*,¹⁵² its cooperation in the 2026 *Independent performance audits of the Independent Broad-based Anti-corruption Commission and Integrity Oversight Victoria*,¹⁵³ as well as its participation in the public hearings and questions on notice as part of this year’s performance review.

¹⁴⁹ IOV, *Annual report 2024/25*, pp. 19, 56.

¹⁵⁰ *Ibid.*, p. 19.

¹⁵¹ See, for example, IOV, IBAC legislative adequacy inquiry hearings, response to questions on notice received 23 October 2025.

¹⁵² IOV, Budget adequacy inquiry of IBAC, VO and IOV hearings, response to questions on notice.

¹⁵³ Due August 2026: see, for example, Parliament of Victoria, IOC, *Appointment of a person to conduct the independent performance audits of the Independent Broad-based Anti-corruption Commission and Integrity Oversight Victoria*, December 2025, p. 5.

Chapter 4

Office of the Victorian Information Commissioner

4.1 Introduction

4.1.1 The role of the Office of the Victorian Information Commissioner

The Office of the Victorian Information Commissioner (OVIC) ‘provides independent oversight of the Victorian public sector’s collection, use and disclosure of public sector information’.¹ The functions of OVIC are set out in the *Freedom of Information Act 1982* (Vic) (‘*FOI Act 1982* (Vic)’) and the *Privacy and Data Protection Act 2014* (Vic) (‘*PDP Act 2014* (Vic)’).

OVIC’s functions under the *FOI Act 1982* (Vic) include to:

- promote understanding and acceptance of the *FOI Act 1982* (Vic)²
- conduct reviews of decisions made by agencies and Ministers under the *FOI Act 1982* (Vic)³
- handle complaints made under the *FOI Act 1982* (Vic)⁴
- develop professional standards and monitor compliance with the standards⁵
- provide advice and education to agencies and the public in relation to OVIC’s functions and compliance with professional standards.⁶

Under the *PDP Act 2014* (Vic) OVIC’s primary functions are to:

- promote awareness and understanding of the Information Privacy Principles (IPPs)⁷
- receive privacy complaints relating to the IPPs⁸
- conduct audits to assess compliance with the IPPs⁹

1 Office of the Victorian Information Commissioner (OVIC), *Our purpose, functions, and activities*, <<https://ovic.vic.gov.au/about-us/purpose-functions-and-activities>> accessed 21 May 2026.

2 *Freedom of Information Act 1982* (Vic) (‘*FOI Act 1982* (Vic)’) s 6I(2)(a).

3 *FOI Act 1982* (Vic) s 6I(2)(d).

4 *FOI Act 1982* (Vic) s 6I(2)(e).

5 *FOI Act 1982* (Vic) ss 6I(1)(b), 6I(2)(c).

6 *FOI Act 1982* (Vic) s 6I(2)(b) and (f).

7 *Privacy and Data Protection Act 2014* (Vic) (‘*PDP Act 2014* (Vic)’) s 8C(2)(a).

8 *PDP Act 2014* (Vic) s 57.

9 *PDP Act 2014* (Vic) s 8C(2)(f).

- undertake research and issue reports and guidelines relating to information privacy¹⁰
- develop the Victorian Protective Data Security Framework (VPDSF)¹¹
- issue protective data security standards and promote their use within the Victorian public sector¹²
- assess compliance with the protective data security standards through monitoring and assurance activities¹³
- undertake research and issue reports and guidelines relating to protective data security and law enforcement data security functions.¹⁴

4.1.2 Oversight of OVIC

The Integrity and Oversight Committee (IOC) is responsible for independent oversight of OVIC under the *Parliamentary Committees Act 2003* (Vic) ('*PC Act 2003* (Vic)'). The Committee's functions in respect of OVIC include monitoring and reviewing the Information Commissioner's exercise of powers and performance of functions.¹⁵ The Committee also has the legislated remit to receive complaints regarding the Information Commissioner and OVIC's operations; however, the Committee cannot reconsider any decision or recommendation made by the Information Commissioner.¹⁶

The Committee is required to report to both Houses of Parliament on matters requiring attention in relation to the performance of the Information Commissioner and any complaint concerning the Information Commissioner and OVIC's operations.¹⁷ Additionally, the Committee has the function of examining the annual report and any other report of the Information Commissioner, and report to Parliament in respect of these reports as it sees fit.¹⁸

Integrity Oversight Victoria (IOV) also has oversight functions in respect of OVIC officers.¹⁹ IOV's functions include to monitor OVIC's use of coercive powers and to monitor whether OVIC has complied with procedural fairness processes.²⁰ IOV can also receive complaints about OVIC in respect of these functions,²¹ and can investigate,

¹⁰ *PDP Act 2014* (Vic) ss 8C(1)(g)-(i).

¹¹ *PDP Act 2014* (Vic) s 8D(1)(b).

¹² *PDP Act 2014* (Vic) ss 8D(1)(a), 8D(2)(a).

¹³ *PDP Act 2014* (Vic) s 8D(2)(b).

¹⁴ *PDP Act 2014* (Vic) ss 8D(1)(d)-(f).

¹⁵ *Parliamentary Committees Act 2003* (Vic) ('*PC Act 2003* (Vic)') s 7(1)(a).

¹⁶ *PC Act 2003* (Vic) ss 7(1)(b), 7(2)(a)-(e).

¹⁷ *PC Act 2003* (Vic) s 7(1)(c).

¹⁸ *PC Act 2003* (Vic) s 7(1)(d).

¹⁹ Integrity Oversight Victoria (IOV), *Who we oversee*, February 2026, <<https://www.integrityoversight.vic.gov.au/who-we-oversee>> accessed 21 May 2026.

²⁰ *Integrity Oversight Victoria Act 2011* (Vic) ('*IOV Act 2011* (Vic)') s 11(5)(a).

²¹ *IOV Act 2011* (Vic) s 11(5)(b).

assess and report on the conduct of OVIC officers in accordance with the *Integrity Oversight Victoria Act 2011* (Vic).²²

4.2 Freedom of Information

4.2.1 Complaints and reviews under the *FOI Act 1982* (Vic)

Increase in the number of complaints and reviews received

Under the *FOI Act 1982* (Vic) a complaint can be made to OVIC about:

- an action taken or failed to be taken that is required under the *FOI Act 1982* (Vic)
- certain decisions made by a Minister
- or a failure by a Minister to comply with Ministerial professional standards.²³

In the 2023/24 financial year OVIC experienced a 19.4% increase in the number of freedom of information (FOI) complaints it received compared with the previous year.²⁴ In the 2024/25 financial year, OVIC experienced a further 8% increase in the number of FOI complaints it received.²⁵

OVIC also accepts FOI review applications under the *FOI Act 1982* (Vic), in which an applicant can apply for the Information Commissioner to review a decision made by an agency or Minister under the Act.²⁶ The number of review applications received by OVIC has seen year-on-year increases, with a 7.3% increase in 2023/24 and a 19.4% increase in 2024/25.²⁷

The Committee recognises the challenges presented by the increase in demand experienced by OVIC. The Committee also notes that OVIC has worked to meet this demand and has consistently increased the number of FOI complaints and review applications it has finalised.²⁸

²² *IOV Act 2011* (Vic) s 11(5)(c)-(d).

²³ *FOI Act 1982* (Vic) s 61A(1).

²⁴ OVIC, *2023-24 Annual Report*, Melbourne, 2024, p. 83.

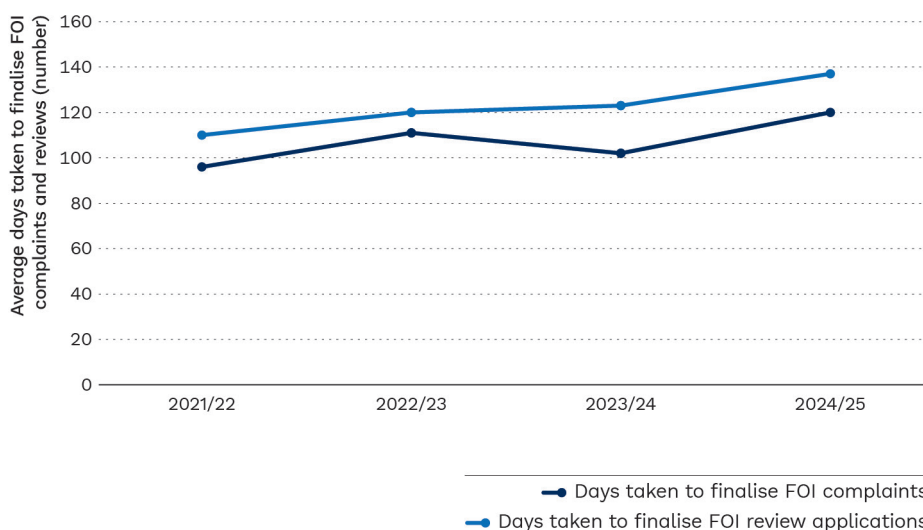
²⁵ OVIC, *Annual Report 2024-25*, Melbourne, 2025, p. 11.

²⁶ *FOI Act 1982* (Vic) s 49A.

²⁷ OVIC, *2023-24 Annual Report*, Melbourne, 2024, p. 68; OVIC, *Annual Report 2024-25*, Melbourne, 2025, p. 7.

²⁸ OVIC, *Annual Report 2024-25*, Melbourne, 2025, pp. 7, 11.

Figure 4.1 Average days taken for the Office of the Victorian Information Commissioner to finalise Freedom of Information complaints and reviews, 2021/22 to 2024/25



Source: OVIC, *2022–23 Annual Report*, Melbourne, 2023, p. 87; OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 68; OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 7.

However, the increase in demand has seen an increase in the number of days taken for OVIC to finalise FOI complaints and review applications.²⁹ As shown in Figure 4.1, in 2023/24 OVIC took an average of 123 days to finalise review applications, and in 2024/25 it took an average of 137 days.³⁰ By comparison, it took 110 and 120 days in the 2021/22 and 2022/23 financial years.³¹ FOI complaints have also seen an increase in time taken for finalisation; while the average time taken reduced to 102 days in 2023/24, it increased by 17.6% between 2023/24 and 2024/25 to 120 days.³² Additionally, concerns regarding OVIC’s timeliness have been increasingly present in complaints to the Committee.

In September 2024 the Committee tabled the report of its Inquiry into the *Operation of the Freedom of Information Act 1982 (Vic) (FOI inquiry)*,³³ comprising a comprehensive review into the effectiveness and fitness for purpose of the *FOI Act 1982 (Vic)*. Evidence was received during the FOI Inquiry that, every year, OVIC experiences an increasing volume of reviews and complaints.³⁴ The FOI Inquiry found that Victoria’s FOI regime is ‘straining under the weight of a complex legislative framework’, and recommended that Victoria move to a system better ‘reflecting international standards and best

²⁹ Ibid.

³⁰ Ibid., p. 7.

³¹ Ibid.

³² Ibid., p. 11.

³³ Parliament of Victoria, Integrity and Oversight Committee (IOC), *The operation of the Freedom of Information Act 1982 (Vic)*, September 2024.

³⁴ OVIC, submission to Integrity and Oversight Committee, Inquiry into the operation of the Freedom of Information Act 1982, received 15 January 2024, pp. 34–35.

practice'.³⁵ The Committee recognises that legislative reform is the most important part of resolving concerns regarding OVIC's timeliness in handling complaints.

Informal resolution of FOI reviews and complaints

OVIC is proactively working to utilise informal resolution for FOI reviews and complaints where appropriate.³⁶ This is consistent with the legislative requirements for the Information Commissioner to perform functions with as little formality as possible,³⁷ and for the Information Commissioner to take reasonable steps to resolve FOI reviews informally when it is reasonably possible.³⁸

The Committee recognises that informal resolution is one of the strategies being employed by OVIC to manage increasing demand, and considers this to be a good step for ensuring FOI complaints and reviews are being effectively managed.³⁹ However, the Committee also recognises that there are both advantages and disadvantages to utilising informal resolution. For example, while informal resolution can save time for all parties, if informal resolution fails it can cause additional time to be spent on the matter, as the informal resolution process occurs first, and then the formal process must occur if informal resolution fails.⁴⁰ Additionally, less complex decisions—for example, relating to types of reviews where OVIC regularly make decisions—can be more time efficient than informal resolution; however, informal resolution can restore relationships between parties.⁴¹

In 2023/24 OVIC finalised 25.7% of its FOI review applications and 50.4% of FOI complaints through informal resolution.⁴² In 2024/25 this remained consistent, with 25% for FOI review applications, and 54.6% for FOI complaints.⁴³ The Committee acknowledges the work OVIC is continuing to do to utilise informal resolution to manage increasing workloads, and to provide the best outcomes for parties.

Measuring OVIC's performance regarding FOI reviews and complaints

OVIC's performance is measured through Department Performance Statement performance measures. OVIC has a measure to close 950 FOI complaints and reviews in the financial year, and in both reporting years OVIC exceeded this measure by more than 50%.⁴⁴ OVIC has noted that 'the actual [number] is higher than the target

³⁵ Parliament of Victoria, IOC, *The operation of the FOI Act 1982 (Vic)*, p. 105.

³⁶ Mr Sean Morrison, Information Commissioner, OVIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 6; OVIC, response to questions on notice, received 13 April 2026, pp. 14–15.

³⁷ *FOI Act 1982 (Vic)* s 6G(2).

³⁸ *FOI Act 1982 (Vic)* s 49N(1).

³⁹ OVIC, response to questions on notice, received 13 April 2026, p. 14.

⁴⁰ *Ibid.*, pp. 15–16.

⁴¹ *Ibid.*, pp. 14–15.

⁴² OVIC, *2023–24 Annual Report*, Melbourne, 2024, pp. 73, 88.

⁴³ OVIC, *Annual Report 2024–25*, Melbourne, 2025 pp. 12, 26.

⁴⁴ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 13; OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 25.

due to OVIC's continued focus on meeting community demand for its services.⁴⁵ The Committee questions whether this target, and the associated funding is adequate, given the discrepancy between the target and the demand OVIC is experiencing.

OVIC's timeliness is measured through the Department Performance Statement performance measure of 'FOI reviews completed within timelines agreed with applicant'.⁴⁶ While OVIC has consistently met this measure, the Committee notes that the target changed from 60% in 2023/24 to 50% in 2024/25.⁴⁷ Information Commissioner Sean Morrison has advised the Committee that OVIC is seeking to change this metric, as what applicants agree to does not always provide a consistent comparison.⁴⁸ Instead, Mr Morrison proposes a measure of days taken to complete an FOI review.⁴⁹ The Committee supports this proposed change to OVIC's Department Performance Statement measures, and would also support a measure of days taken to finalise FOI complaints.

4.2.2 Review of the FOI Professional Standards

Under the *FOI Act 1982* (Vic) OVIC may develop professional standards regarding the administration of the Act and the conduct of agencies in performing functions under the Act.⁵⁰ The FOI Professional Standards were issued on 2 December 2019,⁵¹ and under the *FOI Act 1982* (Vic) the Professional Standards must be reviewed at least once every four years.⁵²

In 2023 the then Acting Information Commissioner wrote to the Committee to advise that following significant budget cuts OVIC did not have sufficient budget to undertake a review of the Professional Standards.⁵³ The Committee is concerned that budget cuts have limited OVIC's capacity to fulfil its legislative obligations.

In 2024, through reprioritisation, OVIC was able to allocate funds to engage an external consultant to undertake an independent review of the Professional Standards, and KPMG was engaged in April 2024.⁵⁴ KPMG published its report on the Professional Standards Review in August 2024, and made 27 recommendations for OVIC to amend the Professional Standards after identifying a range of issues in the administration of

⁴⁵ OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 25.

⁴⁶ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 14; OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 26.

⁴⁷ Ibid.

⁴⁸ Mr Sean Morrison, Information Commissioner, OVIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 3.

⁴⁹ Ibid.

⁵⁰ *FOI Act 1982* (Vic) s 6U(1).

⁵¹ OVIC, *Review of Professional Standards by KPMG*, <<https://ovic.vic.gov.au/freedom-of-information/review-of-professional-standards-by-kpmg>> accessed 27 May 2026.

⁵² *FOI Act 1982* (Vic) s 6X(1).

⁵³ Ms Rachel Dixon, Acting Information Commissioner, OVIC, correspondence, 29 August 2023.

⁵⁴ OVIC, *Review of Professional Standards by KPMG*, <<https://ovic.vic.gov.au/freedom-of-information/review-of-professional-standards-by-kpmg>> accessed 27 May 2026; OVIC, *Performance of the Victorian integrity agencies 2023/24 and 2024/25* hearings, response to questions on notice, received 20 April 2026, pp. 16–17.

the *FOI Act 1982* (Vic).⁵⁵ OVIC published its response to KPMG's report, and supported the majority of the recommendations made.⁵⁶ OVIC then undertook work to update the Professional Standards and consult with the Public Agency Reference Group and with the broader public on the draft updated Professional Standards.⁵⁷ The Committee supports OVIC's work to review and improve the existing Professional Standards, and looks forward to the implementation of the updated Professional Standards later this year.

4.3 Privacy and Information Security

4.3.1 Privacy complaints under the *PDP Act 2014* (Vic)

Under the *PDP Act 2014* (Vic) individuals can make a complaint to the Information Commissioner about an act or practice of an organisation that has held the individual's personal information.⁵⁸ OVIC's role in relation to privacy complaints is to use conciliation to resolve the complaint by agreement.⁵⁹ When a complaint cannot be resolved through conciliation, it can be referred to the Victorian Civil and Administrative Tribunal (VCAT) to determine an outcome.⁶⁰

Increase in the number of privacy complaints received

In 2023/24 OVIC received 106 privacy complaints, which is a 25% increase on the previous year.⁶¹ In 2024/25 this increased again to a total of 162 privacy complaints, which is a 52.8% increase.⁶² This represents a considerable increase in workload for OVIC's conciliators.

In 2023/24 OVIC finalised 113 privacy complaints, increasing to 127 in 2024/25.⁶³ While OVIC should be commended for continuing to increase its capacity in response to demand, it is notable that there is a growing number of complaints still active at the end of each financial year. This demonstrates the ongoing trend of higher demand, and the challenges this presents for OVIC going forward.

The Committee notes that the time taken to finalise a privacy complaint increased in 2023/24 to an average of 123 days, compared with 111 days in 2022/23.⁶⁴ Conversely,

⁵⁵ KPMG, *Office of the Victorian Information Commissioner: Freedom of Information (FOI) Professional Standards Review*, August 2024, pp. 2–12.

⁵⁶ OVIC, *Professional Standards review – OVIC's response to the recommendations made in KPMG's report*, <<https://ovic.vic.gov.au/wp-content/uploads/2024/11/Professional-Standards-review-OVICs-response-to-the-recommendations-made-in-KPMGs-report-003.pdf>> accessed 27 May 2026.

⁵⁷ OVIC, response to questions on notice, received 13 April 2026, p. 17.

⁵⁸ *PDP Act 2014* (Vic) s 57(1).

⁵⁹ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 27.

⁶⁰ Ibid.

⁶¹ Ibid.

⁶² OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 14.

⁶³ Ibid.

⁶⁴ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 26.

OVIC improved its privacy complaints timeliness in 2024/25, returning to 2022/23 levels, with an average of 115 days.⁶⁵ The Committee recognises this consistency in the face of increasing demand.

4.3.2 Victorian Protective Data Security Framework and Standards

Under the *PDP Act 1982* (Vic), the Information Commissioner has the function of developing the Victorian Protective Data Security Framework, and may also issue Protective Data Security Standards.⁶⁶ The Framework and Standards were released in 2016, and updated by OVIC in September 2023.⁶⁷

Audits of Victorian Protective Data Security Standards

As part of its regulatory actions, OVIC routinely completes audits of individual Victorian Protective Data Security Standards to assess VPS organisations' adherence to the Standards. In 2023/24 OVIC completed an audit of Standard 10 (Personal Security)⁶⁸ for four VPS organisations, namely the Commission for Children and Young People, the Department of Premier and Cabinet, Victorian Funds Management Corporation and the Victorian Managed Insurance Authority.⁶⁹ The report on the audit was published in April 2024, and made 10 recommendations to the organisations.⁷⁰ The recommendations made were accepted by the audited organisations, and utilised to improve their practices.⁷¹

Information Security Incident Notification Scheme

Under Standard 9 of the Victorian Protective Data Security Standards, VPS organisations should notify OVIC of any adverse impact on the confidentiality, integrity or availability of public sector information.⁷² OVIC utilises its Incident Notification Scheme to enable organisations to make notifications to OVIC, and for OVIC to respond to incidents and learn from them.⁷³

⁶⁵ OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 14.

⁶⁶ *PDP Act 2014* (Vic) ss 85(1), 86(1).

⁶⁷ OVIC, *Victorian Protective Data Security Framework*, September 2023, <<https://ovic.vic.gov.au/information-security/framework-vpdsf>> accessed 28 May 2026.

⁶⁸ The full standard is: An organisation establishes, implements and maintains personnel security controls addressing all persons continuing eligibility and suitability to access public sector information.

⁶⁹ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 10; OVIC, *Standard 10 of the Victorian Protective Data Security Standards: Audit of the pre-engagement phase of personnel security and section 8D(2)(b) of the Privacy and Data Protection Act 2014* (Vic), April 2024.

⁷⁰ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 10; OVIC, *Standard 10 of the Victorian Protective Data Security Standards: Audit of the pre-engagement phase of personnel security and section 8D(2)(b) of the Privacy and Data Protection Act 2014* (Vic), April 2024, pp. 12–14.

⁷¹ OVIC, *Standard 10 of the Victorian Protective Data Security Standards: Audit of the pre-engagement phase of personnel security and section 8D(2)(b) of the Privacy and Data Protection Act 2014* (Vic), April 2024, pp. 67–70.

⁷² OVIC, *Victorian Protective Data Security Standards Version 2.0: Implementation Guidance*, February 2025, <<https://ovic.vic.gov.au/wp-content/uploads/2024/02/VPDSS-V2.0-Implementation-Guidance-V2.3-web-version.pdf>> accessed 29 May 2026, p. 25.

⁷³ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 49.

In 2023/24 OVIC received 726 incident notifications,⁷⁴ and in 2024/25 OVIC received 1094 incident notifications.⁷⁵ This is a 50% increase between the financial years, and is reflective of the growth trend in incident notifications received by OVIC over time.⁷⁶ The majority of incident notifications relate to electronic information that is confidential personal information,⁷⁷ and this demonstrates the importance of OVIC's work in this area as the public sector continues to rely heavily on electronic information.

OVIC publishes Incident Insight Reports biennially, providing information obtained through incident notifications.⁷⁸ OVIC encourages organisations to use these reports to inform their information security risk assessments.⁷⁹ The Committee considers this work to be integral to the VPS in the current technology-driven workplace.

4.3.3 Information Privacy Principles (IPPs)

The IPPs are set out in schedule 1 of the *PDP Act 2014* (Vic), and there are ten principles outlining the requirements for organisations that obtain and store personal information.⁸⁰ Additionally, OVIC has the function of promoting understanding and acceptance of the IPPs under the Act, and to conduct or commission audits of records of personal information to find out if the records kept by organisations comply with the IPPs or applicable codes of practice.⁸¹ OVIC also has the function of conducting audits to assess compliance with IPPs.⁸²

Guidance on application of the IPPs

OVIC's Privacy Guidance and Dispute Resolution Team provides guidance to VPS organisations regarding information security incidents.⁸³ In 2023/24 there was a spike in incidents requiring privacy guidance, with 186 incidents, compared with 119 incidents in the year prior.⁸⁴ In 2024/25 OVIC provided privacy guidance to VPS organisations 128 times.⁸⁵ Despite the increase in the 2023/24 financial year, the average duration to complete the guidance was 23 days,⁸⁶ and OVIC should be commended for maintaining its timeliness in this area in the face of increased demand.

⁷⁴ Ibid.

⁷⁵ OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 56.

⁷⁶ Ibid.; OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 49.

⁷⁷ Ibid.

⁷⁸ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 47; OVIC, *Security Insights*, March 2026, <<https://ovic.vic.gov.au/information-security/security-insights/#2025>> accessed 29 May 2026.

⁷⁹ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 47.

⁸⁰ *PDP Act 2014* (Vic) sch 1.

⁸¹ *PDP Act 2014* (Vic) s 8C(2)(a) and (f).

⁸² OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 8.

⁸³ Ibid., p. 31.

⁸⁴ Ibid.

⁸⁵ OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 38.

⁸⁶ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 31.

Updating the Privacy Impact Assessment (PIA) Guide

OVIC provides a PIA Guide and Template for organisations to use to assess their programs against the IPPs, and ensure they are aware of the privacy impacts of their work.⁸⁷ OVIC has conducted internal consultation and targeted consultation with VPS organisations to consider what updates and improvements should be made to its PIA resources.⁸⁸ OVIC proposes to make a number of changes to these resources, notably developing an Excel version of the PIA Template to provide greater choice to organisations.⁸⁹ The Committee looks forward to the introduction of the updated resource in the 2026/27 financial year.

4.3.4 Victoria Police, privacy and information security

OVIC has had long-term engagement with Victoria Police regarding information security due to the sensitive nature of information being held, and potential consequences of information security incidents. The Committee has monitored this engagement since its Inquiry into the *Performance of Victorian integrity agencies 2017/18–2018/19*.⁹⁰

OVIC has been working with Victoria Police to implement recommendations made by OVIC's predecessors regarding information security, which had created an accumulated 271 recommendations, with 16 outstanding recommendations.⁹¹ In its previous Inquiry into the *Performance of the Victorian integrity agencies 2022/23*, the Committee heard that Victoria Police had submitted responses to OVIC for 15 of the outstanding recommendations, and OVIC was assessing the responses.⁹²

OVIC and Victoria Police have now finalised 11 of the remaining 16 recommendations to Victoria Police, and have a commitment from Victoria Police to address the final five recommendations in the 2025/26 financial year.⁹³

OVIC published a report into its examination of Victoria Police's privacy and information handling on 15 August 2022.⁹⁴ OVIC made three recommendations to Victoria Police to improve its processes, including regarding the allocation of resources, training for sworn members, and implementing a system requiring all

⁸⁷ OVIC, *Privacy Impact Assessment Guide*, <<https://ovic.vic.gov.au/privacy/resources-for-organisations/privacy-impact-assessment/#what-is-a-pia>> accessed 1 June 2026.

⁸⁸ OVIC, response to questions on notice, received 13 April 2026, p. 4.

⁸⁹ Ibid.

⁹⁰ Parliament of Victoria, IOC, *Inquiry into the performance of Victorian integrity agencies 2017/18–2018/19*, December 2020, pp. 65–68.

⁹¹ Mr Anthony Corso, Acting Deputy Commissioner, OVIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 6; OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 58.

⁹² OVIC, *Performance of the Victorian integrity agencies 2022/23* hearings, response to questions on notice, 14 January 2025, p. 13; Parliament of Victoria, IOC, *Inquiry into the performance of Victorian integrity agencies 2022/23*, May 2025, p. 62.

⁹³ Mr Anthony Corso, Acting Deputy Commissioner, OVIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 6.

⁹⁴ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 64.

privacy complaints received by Victoria Police be reported to its Privacy unit.⁹⁵ In its 2023/24 annual report OVIC stated that it is monitoring the implementation of these recommendations, and that Victoria Police has met recommendation one and partly met recommendations two and three.⁹⁶

Statistics of Victoria Police information security incidents show an increase in incidents of unauthorised release or disclosure of information in 2023/24.⁹⁷ The data for the 2024/25 period is not comparable to the previous years' data as incidents between 5 September 2024 and 30 January 2025 were excluded from OVIC's data due to industrial action.⁹⁸ OVIC has advised the Committee that the increase in reported incidents in 2023/24 'may not necessarily reflect an upwards trend in an underlying issue, but rather an improvement in Victoria Police's internal monitoring and reporting practices.'⁹⁹ Additionally, OVIC has noted that due to the voluntary nature of the Information Security Incident Notification Scheme it is difficult to observe trends and themes across reporting cycles.¹⁰⁰ Noting these factors, OVIC has advised the Committee that Victoria Police has continued to work with OVIC regarding information security, including being subject to OVIC's monitoring functions such as preliminary inquiries.¹⁰¹

The Committee commends OVIC on its ongoing commitment to work with Victoria Police.

4.3.5 Fire Rescue Victoria (FRV) and Information Security

Recommendation 2 of IBAC's Operation Turton report, previously discussed in Section 2.2.4, recommended that FRV address the information and communication technology security vulnerabilities identified in the report.¹⁰² Part (c) of the recommendation provides for FRV to consult with OVIC on the adequacy of its information security, and how it is addressing any identified shortfalls.¹⁰³ OVIC has advised the Committee that on 10 October 2024 FRV contacted the Information Commissioner regarding the release of the Operation Turton report.¹⁰⁴

OVIC has informed the Committee that FRV and OVIC had an initial meeting in December 2024, and met throughout 2025 when FRV provided OVIC with updates regarding its process.¹⁰⁵ In March 2025 OVIC provided a Protective Data Security Plan playback session (tailored information session) to FRV, including particular

⁹⁵ Ibid.

⁹⁶ Ibid.

⁹⁷ Ibid., p. 54.

⁹⁸ OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 57.

⁹⁹ OVIC, response to questions on notice, received 13 April 2026, p. 5.

¹⁰⁰ Ibid.

¹⁰¹ Ibid.

¹⁰² IBAC, *Operation Turton special report*, Melbourne, 2024, p. 9.

¹⁰³ Ibid.

¹⁰⁴ OVIC, response to questions on notice, received 13 April 2026, p. 7.

¹⁰⁵ Ibid., p. 8.

insights relevant to FRV and opportunities for FRV to ask questions.¹⁰⁶ Additionally, after FRV presented an *Information Security Manual Compliance Re-Assessment* report to OVIC in March 2025, OVIC requested updates from FRV in November 2025 and April 2026 on the progress of 'the report of the independent person engaged to review FRV's information security infrastructure, policy and procedures in line with recommendation 2(b)'.¹⁰⁷

The Committee recognises that OVIC also met with IBAC in 2025 for IBAC to provide OVIC with insights into IBAC's Operation Turton report and the intention of recommendation 2.¹⁰⁸ OVIC also provided IBAC with an interim update on the work it has done with FRV.¹⁰⁹

The Committee commends OVIC on the work it has done to communicate with IBAC about the Operation Turton report. The Committee is also encouraged by the progress made thus far in OVIC's engagement with FRV to assist FRV to improve its information security practices.

4.3.6 Artificial intelligence (AI) and privacy

The Committee has heard that 'OVIC was the first information integrity agency in Australia to publish guidance on the use of publicly available and enterprise generative AI [artificial intelligence] tools'.¹¹⁰ With increasing use of AI, OVIC has continued to develop resources for using AI in the public sector.¹¹¹ Notably, OVIC's online resource on AI and privacy received 63,000 hits in the 2024/25 financial year, proving resources about AI are in high demand.¹¹²

OVIC has also provided guidance on the use of generative AI in the VPS, which provides information about the IPPs and how they interact with using generative AI,¹¹³ and a resource on understanding privacy obligations when using AI.¹¹⁴ For the general public, OVIC has recently produced a resource with basic information about AI.¹¹⁵

¹⁰⁶ Ibid.

¹⁰⁷ Ibid.

¹⁰⁸ Ibid.

¹⁰⁹ Ibid.

¹¹⁰ Mr Sean Morrison, Information Commissioner, OVIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 2.

¹¹¹ OVIC, *Privacy resources for organisations*, <<https://ovic.vic.gov.au/privacy/resources-for-organisations>> accessed 1 June 2026.

¹¹² Mr Sean Morrison, Information Commissioner, OVIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 2; OVIC, *Artificial Intelligence and Privacy – Issues and Challenges*, <<https://ovic.vic.gov.au/privacy/resources-for-organisations/artificial-intelligence-and-privacy-issues-and-challenges>> accessed 1 June 2026.

¹¹³ OVIC, *Use of Generative AI tools in the Victorian public sector*, <<https://ovic.vic.gov.au/privacy/resources-for-organisations/use-of-enterprise-generative-ai-tools-in-the-victorian-public-sector>> accessed 1 June 2026.

¹¹⁴ OVIC, *Use of personal information with publicly available Generative AI tools in the Victorian public sector*, <<https://ovic.vic.gov.au/privacy/resources-for-organisations/use-of-personal-information-with-publicly-available-generative-ai-tools-in-the-victorian-public-sector>> accessed 1 June 2026.

¹¹⁵ OVIC, *Before you rely on AI: what to know*, <<https://ovic.vic.gov.au/privacy/for-the-public/before-you-rely-on-ai-what-to-know>> accessed 1 June 2026.

OVIC has also been instrumental in the development of the Victorian Government's *Administrative Guideline for the safe and responsible use of Generative Artificial Intelligence in the Victorian Public Sector*, through its work in identifying privacy risks in using different types of generative AI tools.¹¹⁶ Through requesting information in 2024, OVIC has identified that generative AI is being used across the public sector through project-based use and individual staff use.¹¹⁷ OVIC has stated that organisations could improve their governance of individual staff use due to a current lack of visibility in this area.¹¹⁸

OVIC partnered with the Australian Research Council Centre of Excellence for Automated Decision-Making and Society in 2024 to sponsor qualitative research into the procurement of AI technologies in the VPS, with a view to informing future educational events and resources.¹¹⁹ The Committee recognises OVIC's ongoing work regarding the use of AI, and OVIC should be commended for continuing to be at the forefront of considering the use of AI and how it applies to privacy in the public sector.

4.4 Education and guidance

4.4.1 FOI education and guidance

The Information Commissioner and Public Access Deputy Commissioner both have the function to provide advice, education and guidance to agencies and the public regarding OVIC's functions and compliance with the professional standards.¹²⁰ OVIC utilises education and informal action to resolve minor non-compliance incidents regarding the Professional Standards.¹²¹ In 2023/24 65.5% of Professional Standard engagements with agencies were resolved informally,¹²² while that grew to 74.7% in 2024/25.¹²³ The Committee recognises the work OVIC has done to engage with agencies informally, and to use education processes to improve compliance and engagement with FOI requirements.

OVIC finalised its FOI guidelines project in 2024, with the chapters published on a rolling basis.¹²⁴ OVIC also undertook public engagement through its website and Engage Victoria as it developed the draft guidelines, to ensure that the guidelines would be fit-for-purpose.¹²⁵ The FOI guidelines provide information in plain language for the public and for agencies about the *FOI Act 1982* (Vic) and the *Freedom of*

¹¹⁶ OVIC, response to questions on notice, received 13 April 2026, p. 9.

¹¹⁷ Ibid.

¹¹⁸ Ibid., pp. 9–10.

¹¹⁹ Ibid., p. 11.

¹²⁰ *FOI Act 1982* (Vic) ss 61(2)(b), 61(2)(f).

¹²¹ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 96.

¹²² Ibid.

¹²³ OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 54.

¹²⁴ Ms Penny Eastman, Public Access Deputy Commissioner, OVIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, pp. 2–3.

¹²⁵ Ibid.

Information (Access Charges) Regulations 2025 (Vic).¹²⁶ The Information Commissioner has advised the Committee that OVIC's FOI guidelines webpage has had 27,000 hits in the reporting period.¹²⁷ The Committee recognises that the FOI guidelines are a highly utilised resource for the public, and commends OVIC on completing this project.

OVIC also runs a formal training session on Administering the Freedom of Information Act five times each financial year, and eLearning modules for developing knowledge about the *FOI Act 1982* (Vic).¹²⁸ These ongoing initiatives are continuing to support OVIC's FOI education work.

4.4.2 Privacy and information security education and guidance

As noted in Section 4.3.6, OVIC has been actively working in the education space regarding AI and privacy. OVIC has also continued its educative work more broadly during the reporting period. OVIC continued to host a biannual Privacy Roundtable in 2023/24 and 2024/25 with representatives from across the Victorian government sector, to facilitate an ongoing exchange of information.¹²⁹ Additionally, since its establishment in 2018, the Victorian Privacy Network has grown to more than 2,000 members,¹³⁰ and OVIC has continued to host virtual events for the Network.¹³¹

OVIC also celebrates Privacy Awareness Week each year with education events.¹³² In both reporting years, OVIC held in-person launch events, lightning talks and panel discussions as part of Privacy Awareness Week.¹³³ OVIC also makes these and many other discussions available online as resources for later use.¹³⁴

Youth Advisory Group

In January 2024, OVIC retired its Youth Advisory Group due to budget reductions causing resourcing constraints.¹³⁵ The purpose of the Youth Advisory Group was to raise awareness of privacy concerns among young people.¹³⁶ OVIC continues to engage with young people through other means, such as presentations at universities, presentations at Law Weeks each year, and speaking at the upcoming Victorian Schools Parliamentary Program's Secondary School Parliamentary Convention.¹³⁷ The Committee recognises that OVIC has a commitment to engaging with young

¹²⁶ OVIC, *Freedom of Information Guidelines*, <<https://ovic.vic.gov.au/freedom-of-information/foi-guidelines>> accessed 27 May 2026.

¹²⁷ Mr Sean Morrison, Information Commissioner, OVIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 2.

¹²⁸ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 22; OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 33.

¹²⁹ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 35; OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 41.

¹³⁰ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 35.

¹³¹ Ibid.; OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 41.

¹³² OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 38; OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 42.

¹³³ Ibid.

¹³⁴ OVIC, *Speeches and presentations*, <<https://ovic.vic.gov.au/events-and-education/#presentations>> accessed 1 June 2026.

¹³⁵ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 37.

¹³⁶ Ibid.

¹³⁷ OVIC, response to questions on notice, received 13 April 2026, p. 6.

people about privacy in new ways that improve efficiency. The Committee will continue to monitor OVIC's engagement with young people as it continues to develop new processes.

Engagement with Community Legal Centres (CLCs)

OVIC has advised the Committee that it has commenced a new initiative in the 2025/26 financial year, engaging with CLCs as a way of reaching members of the public.¹³⁸ In March 2026 OVIC provided a survey to CLCs seeking feedback on current engagement with OVIC's resources, barriers for CLC clients regarding their privacy rights, and how OVIC can best engage with their sector.¹³⁹ The Committee looks forward to hearing more about this initiative as it develops.

4.4.3 Internal measures of education initiatives

In July 2025 OVIC's Education Evaluation Strategy was implemented.¹⁴⁰ The strategy utilises data collected across multiple areas including enquiries received, event feedback, website visits, resource downloads, resource reviews and complaint and review statistics.¹⁴¹ The intention of the strategy is to improve resource accessibility and consistency by responding to feedback and identified trends.¹⁴²

OVIC has provided the Committee with initial trends from its mid-cycle data tracking, which showed a high level of stakeholder satisfaction with privacy and FOI event content and presenters, that OVIC's AI content is among the most popular pages on its website, and that there has been a surge in people accessing the biometrics and privacy resource.¹⁴³ While privacy training attendees reported feeling confident applying the knowledge they have learnt, FOI training attendees continue to find some complex concepts difficult.¹⁴⁴

The Committee welcomes OVIC's Education Evaluation Strategy, and awaits further information as implementation of the strategy progresses.

4.5 Regulatory action

4.5.1 Increased use of preliminary inquiries

OVIC has advised the Committee that it has made a change to its regulatory action approach to 'make greater use of preliminary inquiries as a regulatory tool'.¹⁴⁵ This

¹³⁸ Ibid.

¹³⁹ Ibid.

¹⁴⁰ Ibid.

¹⁴¹ Ibid.

¹⁴² Ibid.

¹⁴³ Ibid., p. 7.

¹⁴⁴ Ibid.

¹⁴⁵ Mr Sean Morrison, Information Commissioner, OVIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 2.

approach has helped OVIC to engage with agencies without needing to use formal tools such as examinations and investigations.¹⁴⁶ The Information Commissioner has advised the Committee that this approach has enabled OVIC to undertake a greater number of regulatory actions, which will be evidenced in the 2025/26 annual report.¹⁴⁷ Additionally, the Information Commissioner has stated that this approach enables agencies to admit non-compliance and rectify issues without the need for OVIC to issue compliance notices.¹⁴⁸

Proactively using preliminary inquiries aligns with the legislative requirement for the Information Commissioner to perform FOI functions with as little formality as possible.¹⁴⁹ It also aligns with OVIC's approach to informal resolution of complaints and reviews, as discussed in Section 4.2.1. The Committee welcomes this approach taken by OVIC as a means for efficiently engaging with organisations to improve their processes without the need for formal processes.

4.5.2 Investigations and use of coercive powers

In the 2024/25 financial year OVIC made eight notifications to IOV regarding its use of coercive powers.¹⁵⁰ IOV completes a risk-based triage process to assess which notifications to review, and decided to review six of OVIC's notifications as OVIC had not exercised its coercive powers for some time.¹⁵¹ IOV has noted that it 'did not issue a feedback report to OVIC as [it] did not identify any reportable or notable issues from our review of these notifications'.¹⁵²

The Information Commissioner has told the Committee that OVIC works very closely with IOV to ensure that OVIC upholds its obligations.¹⁵³ He also noted that OVIC follows all processes that it is 'statute-bound by' regarding making notifications to IOV.¹⁵⁴

4.6 Funding and independence

4.6.1 Reductions in OVIC's funding

The Committee notes that OVIC has been experiencing reductions in appropriations over time. As shown in Figure 4.2 below, in 2024/25 OVIC's appropriation was \$9,312,300, while in 2023/24 it was \$9,677,500.¹⁵⁵ In comparison, OVIC's total

¹⁴⁶ Ibid.

¹⁴⁷ Ibid., p. 7.

¹⁴⁸ Ibid.

¹⁴⁹ *FOI Act 1982 (Vic)* s 6G(2).

¹⁵⁰ IOV, *Annual Report 2024-25: Integrity Together*, Melbourne, 2025, p. 47.

¹⁵¹ Ibid., pp. 48-49.

¹⁵² Ibid., p. 82.

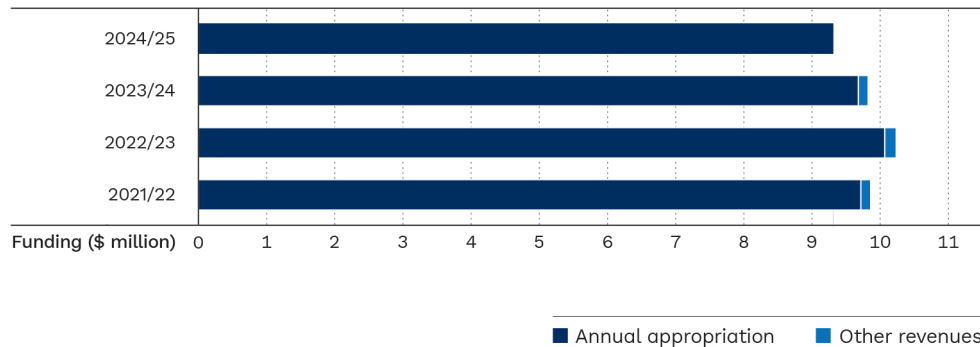
¹⁵³ Mr Sean Morrison, Information Commissioner, OVIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 7.

¹⁵⁴ Ibid.

¹⁵⁵ OVIC, *Annual Report 2024-25*, Melbourne, 2025, p. 23.

appropriation was \$10,066,100 in 2022/23 and \$9,713,052 in 2021/22.¹⁵⁶ Additionally, while OVIC has previously had other revenue under the *Financial Management Act 1994* (Vic) ('FMA Act 1994 (Vic)'), in 2024/25 OVIC recorded no other revenue.¹⁵⁷

Figure 4.2 Funding for the Office of the Victorian Information Commissioner, 2021/22 to 2024/25



Source: OVIC, *2022–23 Annual Report*, Melbourne, 2023, p. 11; OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 11; OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 23.

As stated in Section 4.2.2, in August 2023, OVIC notified the Committee that due to funding changes it would not meet its statutory obligation to conduct a review of the FOI Professional Standards by 2 December 2023.¹⁵⁸ In correspondence, OVIC advised the Committee that its base funding was reduced by \$500,000 in 2023/24 and a further \$460,000 in 2024/25.¹⁵⁹ OVIC was able to reprioritise funds to engage KPMG to undertake an independent review of the FOI Professional Standards in April 2024.¹⁶⁰ However, the Committee remains concerned that eroding OVIC's funding over time will affect OVIC's ability to fulfil its legislated remit and perform at an optimal level.

OVIC has noted that it has changed its operational model and focused on creating efficiencies to continue to deliver core services within its remit.¹⁶¹ Additionally, OVIC has noted that it continues to adapt to its funding environment to effectively perform its functions.¹⁶² Notably, the current funding environment has impacted 'OVIC's ability to modernise service delivery through the application of technology'.¹⁶³

The Committee considers it imperative that OVIC is adequately funded to perform its functions, and to maintain up-to-date service delivery for the Victorian community.

¹⁵⁶ OVIC, *2022–23 Annual Report*, Melbourne, 2023, p. 11; OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 11.

¹⁵⁷ OVIC, *2022–23 Annual Report*, Melbourne, 2023, p. 11; OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 11; OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 23.

¹⁵⁸ Ms Rachel Dixon, Acting Information Commissioner, OVIC, to Dr Tim Read MP, Chair, Integrity and Oversight Committee, correspondence, 29 August 2023.

¹⁵⁹ Ms Rachel Dixon, Acting Information Commissioner, OVIC, to Dr Tim Read MP, Chair, Integrity and Oversight Committee, correspondence, 13 October 2023, pp. 5–6.

¹⁶⁰ OVIC, response to questions on notice, received 13 April 2026, pp. 16–17.

¹⁶¹ *Ibid.*, p. 18.

¹⁶² *Ibid.*

¹⁶³ *Ibid.*

4.6.2 Budget independence

OVIC is funded through the Department of Justice and Community Safety under section 53(1)(b) of the *Financial Management Act 1994* (Vic).¹⁶⁴ OVIC's funding arrangement differs from that of the other agencies the Committee oversees. IBAC, IOV, and the Victorian Ombudsman (VO), alongside the Victorian Auditor-General's Office, are funded as Officers of the Parliament, and their budgets are legislated through the annual Appropriations (Parliament) Bill.¹⁶⁵ The Committee has had ongoing discussions with OVIC about the merits of OVIC having budget independence alongside these agencies, and OVIC has previously advised the Committee that it holds 'a strong view that OVIC should perform its functions independently of government'.¹⁶⁶

OVIC has stated that while it 'appreciates the funding demands facing the Victorian government', 'OVIC does not support the current funding arrangements'.¹⁶⁷ OVIC's position is that funding OVIC independently would emphasise OVIC's operational independence for the wider community.¹⁶⁸ Additionally, if OVIC is funded independently it would enable OVIC to have direct opportunities to make budget bids and justify the funding needed for it to maintain its operational independence, without being considered alongside departmental requests.¹⁶⁹

The Committee has previously recommended that the Victorian Government consider whether it is desirable and feasible for OVIC to be funded through the annual Appropriations (Parliament) Bill.¹⁷⁰ The Committee recognises that the Government advised the Committee it does not support the recommendation, noting that 'it does not consider changes are required to OVIC's funding model at this time'.¹⁷¹

The Committee recognises the complexities of considering the appropriate funding arrangements for agencies, particularly of OVIC. The Committee considers it integral for the funding arrangements for OVIC to be reviewed to ensure funding arrangements support OVIC to function at an optimal level. The Committee, therefore, strengthens Recommendation 8 of the report on the *Performance of the Victorian integrity agencies 2022/23*.¹⁷²

¹⁶⁴ Department of Justice and Community Safety, *2024–25 Annual Report: financial statements*, 2025, p. 77.

¹⁶⁵ *Appropriation (Parliament 2025–26) Act 2025* (Vic).

¹⁶⁶ OVIC, *Performance of the Victorian integrity agencies 2022/23*, response to questions on notice, 14 January 2025, p. 16.

¹⁶⁷ OVIC, response to questions on notice, received 13 April 2026, p. 17.

¹⁶⁸ *Ibid.*, pp. 17–18.

¹⁶⁹ *Ibid.*

¹⁷⁰ Parliament of Victoria, Integrity and Oversight Committee, *Performance of the Victorian integrity agencies 2022/23*, May 2025, p. 66.

¹⁷¹ Government of Victoria, Response to Parliament of Victoria, Integrity and Oversight Committee, *Performance of the Victorian integrity agencies 2022/23*, 1 December 2025, p. 2.

¹⁷² Parliament of Victoria, Integrity and Oversight Committee, *Performance of the Victorian integrity agencies 2022/23*, May 2025, p. 66.

RECOMMENDATION 4: That the Victorian Government directly fund the Office of the Victorian Information Commissioner through Parliament's appropriation, similar to the funding arrangements for the Independent Broad-based Anti-corruption Commission, Integrity Oversight Victoria and the Victorian Ombudsman.

4.7 Governance, workplace and accountability

4.7.1 Governance

OVIC reported no breaches of the Code of Conduct for Victorian Public Sector Employees of Special Bodies in the reporting period.¹⁷³ Additionally, no time was lost due to workplace injuries across 2023/24 and 2024/25, and no industrial relations issues were registered in the reporting period.¹⁷⁴

In 2023/24 OVIC engaged two consultancies that were over \$10,000.¹⁷⁵ The consultancies were for a Microsoft Azure Security Assessment, and for the legislated review of the FOI Professional Standards and totalled \$143,521.¹⁷⁶ In 2024/25 OVIC undertook three consultancies totalling \$104,386.¹⁷⁷ These consultancies included a business continuity planning exercise, information management strategy and roadmap development, and process mapping and guideline development.¹⁷⁸

4.7.2 Workplace wellbeing

Staff wellbeing at OVIC was in a positive position during the reporting period. In 2024 50% of staff at OVIC responded to the Victorian Public Sector Commission's People Matter Survey, improving significantly to 83% in 2025.¹⁷⁹ Of the survey respondents, 87% would recommend OVIC as a good place to work in both 2024 and 2025.¹⁸⁰ While there was a reduction between years, the survey results also showed a high level of organisational pride among respondents, with 91% agreeing that 'I am proud to tell others I work for my organisation' in 2024, and 79% in 2025.¹⁸¹

OVIC has advised the Committee that it identified areas for improvement from the People Matter Survey (PMS) based on measures that showed the most decline and

¹⁷³ OVIC, *2023-24 Annual Report*, Melbourne, 2024, p. 15; OVIC, *Annual Report 2024-25*, Melbourne, 2025, p. 27.

¹⁷⁴ Ibid.

¹⁷⁵ OVIC, *2023-24 Annual Report*, Melbourne, 2024, p. 12.

¹⁷⁶ Ibid.

¹⁷⁷ OVIC, *Annual Report 2024-25*, Melbourne, 2025, p. 24.

¹⁷⁸ Ibid.

¹⁷⁹ Victorian Public Sector Commission, *Office of the Victorian Information Commissioner 2025 people matter survey results report*, n.d., <<https://www.vpsc.vic.gov.au/files/pms-2025/Office%20of%20the%20Victorian%20Information%20Commissioner%20-%20Organisation%20results%20-%202025.pdf>> accessed 12 June 2026, p. 7.

¹⁸⁰ Ibid., p. 10.

¹⁸¹ Ibid.

measures that showed low results.¹⁸² OVIC has identified six areas for improvement.¹⁸³ Two of the areas for improvement are in progress, while four of the areas for improvements are complete.¹⁸⁴ The Committee recognises the work OVIC has done, and continues to do, to respond to the PMS results. The Committee is particularly pleased that OVIC has worked to address career development for its staff through establishing an intranet page for staff to access webinars and workshops.¹⁸⁵

The Committee looks forward to receiving ongoing updates from OVIC regarding its progress in addressing the identified areas for improvement.

4.7.3 Gender Equality Action Plan

In the 2023/24 financial year, OVIC continued to implement its Gender Equality Action Plan as per requirements under the *Gender Equality Act 2020* (Vic).¹⁸⁶ The actions completed in this period include delivering training for leaders in responding to family violence, and amending leader position descriptions to include expectations regarding gender equality.¹⁸⁷

In 2024/25 OVIC no longer met the legislated threshold to require a Gender Equality Action Plan due to its staffing profile.¹⁸⁸ It has, therefore, not provided a progress report since June 2023.¹⁸⁹ Despite this, OVIC has continued to implement its existing Gender Equality Action Plan. In 2024/25 actions taken included training for applying an intersectional gender lens to policies and procedures, and workshops and training including cross-cultural awareness for conflict resolution.¹⁹⁰

OVIC has also advised the Committee that it has developed a guide for leaders responding to workplace disclosures of family violence, and introduced gendered performance and development goals for leaders.¹⁹¹ The Committee welcomes OVIC's ongoing work in implementing its Gender Equality Action Plan.

4.7.4 Complaints about OVIC

The Committee can receive and consider complaints about OVIC as part of its functions under section 7 of the *PC Act 2003* (Vic). The Committee considers complaints to assess whether they raise any systemic issues regarding OVIC's performance.

¹⁸² OVIC, response to questions on notice, received 13 April 2026, p. 2.

¹⁸³ Ibid., pp. 2–3.

¹⁸⁴ Ibid.

¹⁸⁵ Ibid.

¹⁸⁶ OVIC, *2023–24 Annual Report*, Melbourne, 2024, p. 9; OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 27.

¹⁸⁷ Ibid.

¹⁸⁸ OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 20; OVIC, response to questions on notice, received 13 April 2026, p. 2.

¹⁸⁹ OVIC, response to questions on notice, received 13 April 2026, p. 2.

¹⁹⁰ OVIC, *Annual Report 2024–25*, Melbourne, 2025, p. 20.

¹⁹¹ OVIC, response to questions on notice, received 13 April 2026, p. 1.

In 2023/24, the Committee received four complaints about OVIC within the Committee's jurisdiction, and finalised five complaints. Similarly, in 2024/25, the Committee received and finalised three complaints about OVIC that were within the Committee's jurisdiction. For more information, see Table 4.1 below.

The Committee has also processed complaints in the 2025/26 financial year which raise concerns about OVIC's performance during the reporting period. Data for these complaints is not available at this time.

Complaints relevant to the reporting period related to OVIC's delay in finalising complaints and reviews, and OVIC's handling and dismissal of complaints.

Table 4.1 Complaints about the Office of the Victorian Information Commissioner processed by the Integrity and Oversight Committee, 2023/24 to 2024/25

	2023/24	2024/25
Complaints received in financial year about OVIC that are within the Committee's jurisdiction	4	3
Complaints finalised in financial year	5	3
Complaints where enquiries were made with OVIC	3	1
Systemic performance issues identified	0	0

Source: Devised from IOC complaints data.

4.8 Conclusion

The Committee recognises the important role of OVIC in overseeing freedom of information, privacy, and data security across the Victorian public sector, and in promoting transparency and accountability under the *FOI Act 1982* (Vic) and the *PDP Act 2014* (Vic). OVIC has continued to deliver the breadth of functions within its remit, including handling complaints and reviews, providing guidance and education, and monitoring compliance with professional and data security standards. The Committee acknowledges OVIC's ongoing efforts to adapt its practices and respond to emerging issues, including the increasing use of artificial intelligence and the growing importance of information security across government.

The Committee acknowledges that there has been a clear and sustained increase in demand for OVIC's services across both FOI and privacy functions. Complaints, review applications and incident notifications have all risen significantly over the reporting period, placing pressure on OVIC's resources and contributing to longer timeframes for finalising matters. While OVIC has improved its output and continued to meet or exceed performance targets, the Committee notes that timeliness remains a concern and has been reflected in complaints received about OVIC's performance. The Committee supports OVIC's efforts to manage demand through informal resolution, revised performance measures, and greater use of preliminary inquiries, while recognising the limits of these approaches in the face of ongoing growth.

The Committee also recognises OVIC's strong contribution to improving information management practices across the public sector through its audits, guidance materials and engagement with agencies. This includes its leadership in areas such as AI and privacy, updates to the Victorian Protective Data Security Framework, and its ongoing collaboration with major entities such as Victoria Police and Fire Rescue Victoria to implement recommendations to improve their practices. OVIC's education and outreach activities, including FOI guidelines, training programs and stakeholder engagement initiatives, have been widely used and support better compliance and understanding across the sector.

However, the Committee remains concerned about the impact of declining funding on OVIC's ability to meet its legislated obligations and maintain effective service delivery. Budget constraints have previously delayed the legislated requirement to conduct a review of the FOI Professional Standards, and may limit OVIC's capacity to modernise its systems and respond to increasing demand. The Committee reiterates the importance of ensuring that OVIC is adequately funded and resourced, and considers that a review of its funding arrangements is necessary to support its independence and enable it to operate effectively into the future.

Chapter 5

Parliamentary Workplace Standards and Integrity Commission

5.1 Introduction

The Parliamentary Workplace Standards and Integrity Commission (PWSIC) was established through the *Parliamentary Workplace Standards and Integrity Act 2024* (Vic) ('*PWSI Act 2024* (Vic)')¹ and commenced operations on 31 December 2024.²

This chapter examines the establishment of the PWSIC and the first six months of its operation to 30 June 2025.

5.1.1 The role of the PWSIC

The *PWSI Act 2024* (Vic) established the PWSIC alongside the introduction of the Parliamentary Ethics Committee (PEC) and legislating for the Parliamentary Integrity Adviser.³ The Commission receives and deals with referrals about parliamentary misconduct, including public interest disclosures about current and former Parliamentary Members, Ministers and Secretaries.⁴ The PWSIC may conduct an investigation into the subject of a referral if it assesses it is appropriate to do so.⁵ In conducting an investigation, the PWSIC may request a person provide it with information or attend to be interviewed.⁶

The PWSIC can also impose sanctions on the Premier or a Member of Parliament when a finding of parliamentary misconduct is made,⁷ and recommend sanctions where a finding of improper conduct or detrimental action is made in relation to a public interest complaint.⁸

The PWSIC is required to report to either the Premier or the Privileges Committee of the applicable House at the conclusion of an investigation into a public interest complaint

¹ *Parliamentary Workplace Standards and Integrity Act 2024* (Vic) ('*PWSI Act 2024* (Vic)') Pt 3.

² Parliamentary Workplace Standards and Integrity Commission (PWSIC), *Annual Report 2024/25: Supporting the integrity of the Victorian Parliament and promoting respectful and safe parliamentary workplaces*, Melbourne, 2025, p. 4.

³ *PWSI Act 2024* (Vic) s 1.

⁴ *PWSI Act 2024* (Vic) ss 4(a), 45; PWSIC, *About Us*, March 2025, <<https://www.pwsic.vic.gov.au/about-pwsic>> accessed 26 March 2026.

⁵ *PWSI Act 2024* (Vic) s 21.

⁶ *PWSI Act 2024* (Vic) ss 22, 24.

⁷ *PWSI Act 2024* (Vic) s 30.

⁸ *PWSI Act 2024* (Vic) s 37.

or referral.⁹ The PWSIC is also required to report the outcome of appropriate dispute resolution to the Premier or applicable Privileges Committee, unless it is not in the public interest to do so.¹⁰

The PWSIC has a responsibility to prevent parliamentary misconduct through education, training and guidance,¹¹ and to support the Parliamentary Integrity Adviser in providing guidance and training to current and former Parliamentary Members, Ministers and Secretaries.¹² The PWSIC is also required to assist the PEC in reviewing the Members Statement of Values and Members Code of Conduct and preparing guidance on integrity and ethical issues,¹³ and assist the clerks of each House to monitor the Members Register of Interests.¹⁴

5.1.2 Oversight of the PWSIC

The Integrity and Oversight Committee is responsible for the independent oversight of the PWSIC. Under the *Parliamentary Committees Act 2003* (Vic), the Committee's functions are to monitor and review the performance of the duties and functions of the PWSIC, and to report to both Houses of the Parliament on any matter connected with the PWSIC's performance.¹⁵ The Committee considers complaints about the PWSIC's referral processes as part of its monitoring and reviewing functions.¹⁶ The Committee has not received any complaints about the PWSIC.

Further, the Committee may examine any reports made by the PWSIC to this Committee, as well as PWSIC's annual reports.¹⁷ Lastly, this Committee may consider any proposed appointment of a Commissioner following referral from the responsible Minister, and may decide whether to support the proposed appointment.¹⁸

Integrity Oversight Victoria (IOV) also has oversight functions in relation to the PWSIC. These functions include receiving and assessing complaints about the conduct of PWSIC officers, and investigating conduct where it considers it necessary.¹⁹ IOV also monitors the PWSIC's use of coercive powers and compliance with procedural fairness obligations.²⁰ Additionally, IOV monitors the PWSIC's issuing of confidentiality notices and issuing, variation or withdrawal of investigation requests.²¹

⁹ *PWSI Act 2024* (Vic) ss 28, 36.

¹⁰ *PWSI Act 2024* (Vic) s 20.

¹¹ *PWSI Act 2024* (Vic) s 45(i).

¹² *PWSI Act 2024* (Vic) s 45(f).

¹³ *PWSI Act 2024* (Vic) s 45(g).

¹⁴ *PWSI Act 2024* (Vic) s 45(h).

¹⁵ *Parliamentary Committees Act 2003* (Vic) ('*PC Act 2003* (Vic)') ss 7(1)(ma), (mb).

¹⁶ Integrity and Oversight Committee, *Information for complainants*, May 2025, <https://www.parliament.vic.gov.au/4992a5/contentassets/f6fcfe3fe8634673b04e36e325a4b6b2/ioc_info-for-complainants.pdf> accessed 21 May 2026.

¹⁷ *PC Act 2003* (Vic) s 7(1)(mc).

¹⁸ *PC Act 2003* (Vic) s 7(1)(md); *PWSI Act 2024* (Vic) s 52.

¹⁹ *Integrity Oversight Victoria Act 2011* (Vic) ('*IOV Act 2011* (Vic)') ss 11(4A)(b), (c).

²⁰ *IOV Act 2011* (Vic) s 11(4A)(a)(iii).

²¹ *IOV Act 2011* (Vic) s 11(4A)(a).

5.1.3 Background

The PWSIC was established, in part, in response to recommendations made by the Independent Broad-based Anti-corruption Commission (IBAC) and the Victorian Ombudsman (VO) in their joint *Operation Watts* report, previously discussed in Section 2.2.4.²² Recommendation 2 of the report proposed the establishment of a Parliamentary Integrity Commissioner, responsible for receiving and investigating complaints about non-criminal breaches of parliamentary ethical obligations, resolving minor complaints, and submitting findings and recommendations on more serious complaints.²³ The report also recommended that a PEC be established as a joint investigatory committee of the Victorian Parliament to work with the proposed Commissioner in carrying out its functions, and to ensure the effectiveness of the Members of Parliament Statement of Values and Code of Conduct.²⁴

Since its establishment, the PWSIC's operations have been informed by the *Operation Watts* report and the Australian Human Rights Commission's *Set the Standard: Report on the Independent Review into Commonwealth Parliamentary Workplaces*.²⁵ This review was conducted by the Australian Human Rights Commission and outlined the instances of bullying, sexual harassment, and sexual assault in Commonwealth parliamentary workplaces, and proposed a framework for action characterised by principles of standards, reporting, accountability, and safety and wellbeing.²⁶

5.2 Workplace, funding and governance

5.2.1 Workplace structure and staffing

Under the *PWSI Act 2024* (Vic), the PWSIC comprises a commissioner appointed as Chair, and up to two additional commissioners as deemed necessary by the Minister.²⁷ The Chair and any additional commissioners are independent officers of the Parliament.²⁸

At the commencement of the PWSIC, Commissioner and Chair, Mr David Wolf, and one additional Commissioner, Ms Natasha de Silva had been appointed.²⁹ Additionally, the PWSIC had employed 5.7 full-time equivalent employees in the organisation as

²² Independent Broad-based Anti-corruption Commission (IBAC) and the Victorian Ombudsman (VO), *Operation Watts Special Report*, Melbourne, 2022.

²³ Ibid., pp. 167, 189.

²⁴ Ibid., p. 176.

²⁵ PWSIC, *Annual Report 2024/25: Supporting the integrity of the Victorian Parliament and promoting respectful and safe parliamentary workplaces*, p. 2.

²⁶ Ibid pp. 16–18, 24–27.

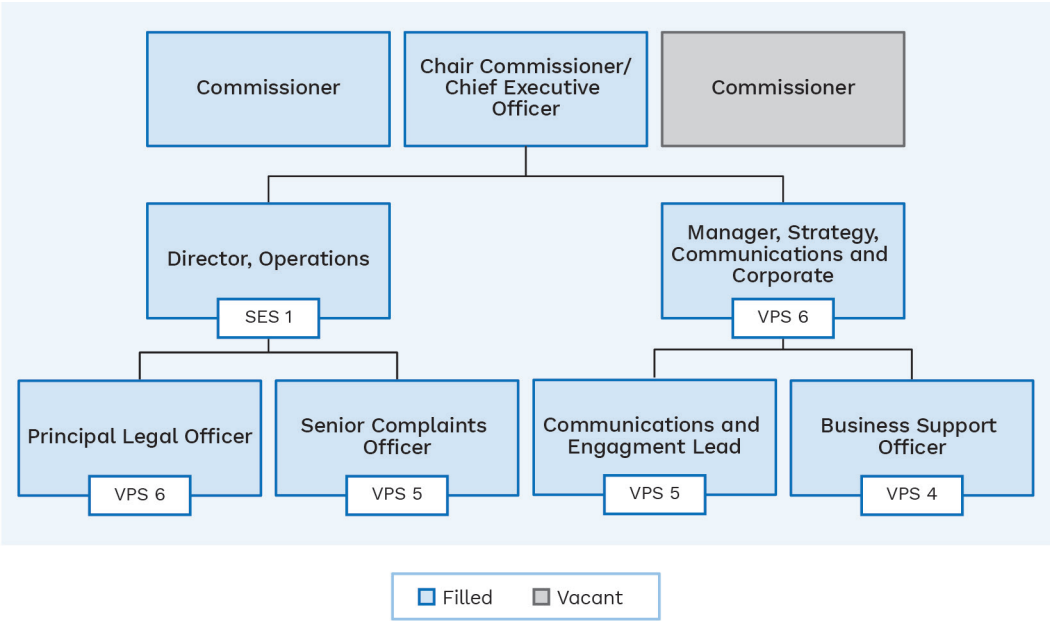
²⁷ *PWSI Act 2024* (Vic) s 47.

²⁸ Ibid., s 48(1).

²⁹ PWSIC, *Performance of the Victorian integrity agencies 2023/24 and 2024/25 hearings*, response to questions on notice, received 13 April 2026, pp. 1–2.

of 30 June 2025.³⁰ As stated by the Commissioner, a key component of developing the PWSIC's structure was to ensure the staff make-up would serve the purposes of the Commission's legislative remit, and with a small team this requires staff that can move between reactive and proactive operations and business support areas.³¹ The organisational structure can be seen in Figure 5.1.

Figure 5.1 Parliamentary Workplace Standards and Integrity Commission organisation chart



Source: PWSIC, response to questions on notice, received 13 April 2026, p. 6.

Additionally, a decision was made ‘not to employ specialist investigative and dispute resolution resources’, due to the unknown volume of reactive work the PWSIC would experience going forward.³² Therefore, the PWSIC will employ specialist resources on an as-needed basis via contract,³³ with this approach enabling ‘the Commission to retain a lean and sustainable staffing profile, while drawing on additional expertise and resources for specific operations or peak workload periods’.³⁴ Specialist resources could be employed for dispute resolution processes or to manage an investigation.³⁵

The PWSIC has a procurement process in place that requires:

- adherence to all PWSIC policies, delegations, and confidentiality obligations
- proof of a baseline national security clearance and/or an active police check

³⁰ Ibid., p. 2; David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 8; Department of Premier and Cabinet, *Annual Report 2024–25*, p. 154.

³¹ Ibid.

³² David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 9.

³³ Ibid., pp. 9–10.

³⁴ PWSIC, response to questions on notice, received 13 April 2026, p. 4.

³⁵ David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, pp. 9–10.

- adherence to strict information security policies and systems
- completion of conflict-of-interest declarations, including screening for potential political bias
- relevant sector expertise for the specialist area sought.³⁶

The Committee supports this approach to resourcing for the PWSIC, considering the reactive nature of the PWSIC's work. The Committee notes that the PWSIC may need to reassess its resourcing requirements over time, and whether contracted work is the most beneficial approach. The Committee welcomes further discussion about resourcing for the PWSIC as it becomes more established.

As it was in the process of being established, the PWSIC did not participate in the People Matter Survey for 2025. The People Matter Survey results will be considered by the Committee in future performance reviews.

5.2.2 Funding

For the 2024/25 financial year the PWSIC was considered an entity of the Department of Premier and Cabinet (DPC), including for funding allocations.³⁷ As stated by the Commissioner, the budget was committed prior to the PWSIC's commencement and DPC maintained carriage of the PWSIC's budget for the 6-month period of establishment, providing time for corporate function processes to be determined.³⁸ DPC utilised '[u]nappplied appropriations carried over from 2023–24 into 2024–25 to complete deliverables for the Parliamentary Workplace Standards and Integrity Commission'³⁹ and incorporated the PWSIC into its overall budget information in its annual report.⁴⁰

In evidence given to the Victorian Parliament's Public Accounts and Estimates Committee, DPC stated that \$2.3 million of funding was allocated and utilised for the establishment and operational costs of the PWSIC.⁴¹ The total expenditure for this period was \$2.27 million, including establishment costs, and \$0.6 million was carried over to 2025/26.⁴²

From the 2026/27 financial year the PWSIC will be funded as a separate entity, under the umbrella of Parliament alongside other integrity agencies,⁴³ noting that it is a special body established under the *Public Administration Act 2004* (Vic) ('PA Act

³⁶ PWSIC, response to questions on notice, received 13 April 2026, p. 4.

³⁷ Department of Premier and Cabinet, *Annual Report 2024–25*, p. 11.

³⁸ David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 8.

³⁹ Department of Premier and Cabinet, *Annual Report 2024–25*, p. 52.

⁴⁰ Ibid., p. 52.

⁴¹ Department of Premier and Cabinet, Financial and performance outcomes questionnaire submission to, Public Accounts and Estimates Committee, Inquiry into the 2024–25 financial and performance outcomes, 13 November 2025, pp. 29, 82.

⁴² PWSIC, response to questions on notice, received 13 April 2026, p. 1.

⁴³ *Appropriation (Parliament 2026–2027) Bill 2026* (Vic) sch 1.

2004 (Vic)').⁴⁴ The PWSIC will, therefore, report on its budget in its Annual Report from the 2026/27 financial year,⁴⁵ and this will enable the Committee to have a higher level of oversight of the PWSIC's funding arrangements going forward, as part of the Committee's monitoring functions.

For the 2026/27 financial year the base funding established for the PWSIC is \$3,005,000.⁴⁶ The PWSIC has also established that it will purchase corporate services from the Department of Parliamentary Services.⁴⁷

5.2.3 Measuring the performance of the PWSIC

Across the Victorian Government, Department Performance Statement performance measures⁴⁸ are developed as a benchmark of service delivery in the budget processes for government bodies. BP3 measures were not established for the PWSIC in the 2024/25 financial year, given its recent establishment. The PWSIC is currently developing its BP3 measures with the Department of Treasury and Finance, for reporting in the 2026/27 financial year.⁴⁹ The proposed BP3 measures will relate to timeliness and service quality in the reactive aspects of the PWSIC's remit, and education and engagement in the proactive aspects of its work.⁵⁰

The PWSIC does not have a legislative responsibility to consult with the Committee on the development of its BP3 measures. However, given the Committee's legislative functions for monitoring the PWSIC,⁵¹ it is best practice for the Committee to be consulted on the draft BP3 measures. The PWSIC has advised the Committee that it is 'working with the Department of Treasury and Finance on its 2026/27 Budget Paper 3 (BP3) measures, which have been approved by the Treasurer and will be provided to the Committee separately.'⁵² The Committee recognises the progression in developing the PWSIC's Department Performance Statement performance measures since it heard from the PWSIC at hearings in February 2026, and that the Treasurer has now approved the drafted measures.

The PWSIC is in the process of developing internal measures to assess the effectiveness of its education initiatives.⁵³ This will enable the PWSIC to identify emerging focus areas and refine its educational content.⁵⁴ Additionally, the PWSIC seeks feedback

⁴⁴ *Public Administration Act 2004* (Vic) s 6 ('PA Act 2004 (Vic)'); David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 9.

⁴⁵ David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 9.

⁴⁶ *Appropriation (Parliament 2026–2027) Bill 2026* (Vic) Sch 1.

⁴⁷ David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 9.

⁴⁸ Formerly Budget Paper 3 (BP3) measures, and referred to as such in the transcripts of the IOC's public hearings.

⁴⁹ David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 9.

⁵⁰ *Ibid.*

⁵¹ *PC Act 2003* (Vic) s 7.

⁵² PWSIC, response to questions on notice received 13 April 2026, p. 4.

⁵³ *Ibid.*, p. 3.

⁵⁴ *Ibid.*

from Members, the PEC, Parliamentary Integrity Adviser and education session participants to assist it in improving its processes.⁵⁵

The Committee awaits further information from the PWSIC in this area as it further develops both Department Performance Statement performance measures and internal measures for their activities. The Committee will continue to monitor the PWSIC's performance measures going forward.

5.3 Education and guidance

5.3.1 Stakeholder engagement

Under the *PWSI Act 2024* (Vic), the PWSIC has the function of conducting education and training for the purpose of preventing parliamentary misconduct.⁵⁶ As the PWSIC was being established during the reporting period, it prioritised engagement with stakeholders to educate them about its functions. As stated by the Commissioner:

In terms of the engagement activity, we prioritised the key cohort at the start, which was Members of Parliament, so we sought information from a vast number of Members, which was really illuminating. And then we connected with the people that work in the parliamentary precinct, so the workforce that operate this building and the building across the road. Again, that was quite useful for us. And the next cohort were the electoral office staff—a little bit more difficult for us to reach out to given the broad regional locations, but we did that through a number of forums and sought some information and provided information about what we do.⁵⁷

The PWSIC prioritised different key cohorts in its engagement processes, beginning with Members of Parliament, and then people who work in the parliamentary precinct and electorate officers.⁵⁸ PWSIC engaged with Members of Parliament through information sessions delivered with the Parliamentary Integrity Adviser and the PEC, written guidance and physical mailouts.⁵⁹ The PWSIC engaged with Parliamentary Precinct staff through presentations at departmental meetings, and online content published internally for staff.⁶⁰ Electoral office staff were provided with town hall sessions and written materials, and the PWSIC also undertook three in-person electorate office visits by invitation.⁶¹ The Committee recognises the engagement processes the PWSIC utilised during its establishment phase. The Committee also anticipates that the PWSIC will establish ongoing engagement practices going forward, particularly for newly appointed Members and Parliamentary staff.

⁵⁵ Ibid.

⁵⁶ *PWSI Act 2024* (Vic) s 45(i).

⁵⁷ David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 13.

⁵⁸ Ibid.

⁵⁹ PWSIC, response to questions on notice, received 13 April 2026, p. 2.

⁶⁰ Ibid.

⁶¹ Ibid.

The PWSIC has also engaged with other integrity agencies in Victoria to share information to gauge where the agencies' work and processes crossover and how they can inform each other's practices.⁶²

IOV has specific oversight powers in respect of the PWSIC, and the PWSIC engaged with IOV about its use of coercive powers, as will be explored in greater detail in Section 5.4.2.⁶³

The next steps for the PWSIC in its education activities is to engage with employees in the Victorian Public Service (VPS), particularly employees whose work involves contact with Members of Parliament.⁶⁴ The PWSIC has thus far worked to engage collaboratively with specific organisations within the VPS regarding jurisdictional boundaries, referral pathways and to ensure guidance is consistent.⁶⁵ The PWSIC has stated it is doing ongoing work in this area.⁶⁶

The primary engagement for members of the public is online guidance materials published on the PWSIC website.⁶⁷ The Committee understands that the PWSIC will be prioritising engagement with members of the public in the 2026/27 financial year.⁶⁸

5.3.2 Guidance

The PWSIC has a legislative remit to issue guidance for the purpose of preventing parliamentary misconduct.⁶⁹ Additionally, it has the function of assisting the PEC to prepare guidance on integrity and ethical issues, and to support the Parliamentary Integrity Adviser to provide guidance and training on integrity and ethical issues.⁷⁰

The Commissioner has noted that the PEC has been a key body for the PWSIC to build a relationship with.⁷¹ The Committee anticipates that the PWSIC will do more work with the PEC in the future regarding reviewing the Members Statement of Values and Code of Conduct.

The Parliamentary Integrity Adviser is established as a special body under the *PA Act 2024* (Vic),⁷² and although the role is occupied by a single person it is constituted as a public board within the Department of Premier and Cabinet.⁷³ The Parliamentary Integrity Adviser provides confidential advice to current and former Parliamentary

⁶² David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 13.

⁶³ IOV, *Annual Report 2024-25: Integrity Together*, Melbourne, 2025, p. 92.

⁶⁴ David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 13.

⁶⁵ PWSIC, response to questions on notice, received 13 April 2026, p. 3.

⁶⁶ Ibid.

⁶⁷ Ibid.

⁶⁸ Ibid.

⁶⁹ *PWSI Act 2024* (Vic) s 45(i).

⁷⁰ *PWSI Act 2024* (Vic) s 45(f)-(g).

⁷¹ David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 13.

⁷² *PA Act 2004* (Vic), s 6(1)(aabb); *PWSI Act 2024* (Vic), note to s 86.

⁷³ Victorian Government, *Parliamentary Integrity Adviser*, July 2025, <<https://www.boards.vic.gov.au/parliamentary-integrity-adviser>> accessed 1 April 2026.

Members, Ministers and Secretaries.⁷⁴ The PWSIC can work with the Parliamentary Integrity Adviser to assist in providing guidance. Due to the confidential nature of this advice the Committee has not sought further information from the PWSIC regarding this.

5.3.3 Education resources

In the early stages of its development the PWSIC has focused on developing resources to assist stakeholders with understanding its jurisdiction and processes. The Committee notes the PWSIC currently has fact sheets available on its website on:

- Rights and responsibilities. Interview requests
- Rights and responsibilities. Information requests
- Providing information voluntarily
- Information for people under investigation.⁷⁵

The PWSIC has also developed a frequently asked questions webpage, which provides extensive, plain-language information about the Commission and processes for reporting parliamentary misconduct.⁷⁶ In January 2026 the PWSIC published its Service Charter on its website, which provides clear expectations of how the PWSIC will interact with referrers and other individuals.⁷⁷ The Commissioner has noted that the decision to develop a service charter came after consulting with other Victorian integrity agencies about the documents they have available.⁷⁸ The Committee welcomes the introduction of the PWSIC's service charter, which provides transparent information and expectations of how the PWSIC will communicate with individuals and provide a service to the public.

5.4 Regulatory action

5.4.1 Referrals and public interest complaints

The PWSIC has a legislative remit to receive referrals alleging that a current or former Member, Minister or Parliamentary Secretary has engaged in parliamentary misconduct.⁷⁹ In the 2024/25 financial year the PWSIC received 13 referrals, and dismissed seven referrals.⁸⁰ In the 2025/26 financial year PWSIC had received

⁷⁴ Ibid.

⁷⁵ PWSIC, *Fact Sheets*, February 2026, <<https://www.pwsic.vic.gov.au/fact-sheets>> accessed 1 April 2026.

⁷⁶ PWSIC, *Frequently Asked Questions*, February 2026, <<https://www.pwsic.vic.gov.au/frequently-asked-questions#support-and-complaints>> accessed 1 April 2026.

⁷⁷ PWSIC, *What to expect from us*, February 2026, <<https://www.pwsic.vic.gov.au/what-expect-us#service-charter>> accessed 1 April 2026; David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 11.

⁷⁸ David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 11.

⁷⁹ *PWSI Act 2024* (Vic) s 8.

⁸⁰ PWSIC, *Annual Report 2024/25: Supporting the integrity of the Victorian Parliament and promoting respectful and safe parliamentary workplaces*, Melbourne, 2025, p. 3.

an additional 17 referrals as of 16 February 2026.⁸¹ The PWSIC has also received 19 enquiries that require attention, but do not fall within the PWSIC’s referral jurisdiction.⁸² The PWSIC’s referral process is outlined in Table 5.1 below.

The PWSIC has a legislated requirement to investigate public interest complaints (PICs) referred to it by IBAC, provided the PIC is within the PWSIC’s jurisdiction.⁸³ The PWSIC did not receive any PICs for investigation from IBAC in the 2024/25 financial year.⁸⁴ The Committee has been advised that the PWSIC has since received referrals from IBAC, particularly considering the ‘no wrong door’ approach within the Victorian integrity system.⁸⁵

The Commissioner has noted that the PWSIC has consulted with IBAC during its establishment regarding its policies and procedures for PICs.⁸⁶ He has also recognised that the definition of improper conduct in the *Public Interest Disclosures Act 2012* (Vic) and the definition of parliamentary misconduct in the *PWSI Act 2024* (Vic) have considerable crossover, and this requires referrers to be informed of the options available to them.⁸⁷

Table 5.1 Parliamentary Workplace Standards and Integrity Commission referral process

Process step	What happens at this stage
The referral is received	A person or body contacts the PWSIC to make a referral of alleged parliamentary misconduct. A referral can be made by email, phone or using the secure Elker portal accessed online. The Elker portal allows for referrals to be made anonymously, including the use of the two-way encrypted anonymous chat function.
Acknowledgement and initial contact	A Senior Complaints Officer makes direct contact with the referrer within 5 business days. The PWSIC uses the contact method chosen by the referrer.
Preliminary communication with the referrer	The Senior Complaints Officer clarifies the allegations with the referrer.
Request for further information	A formal request may be made for the referrer to provide additional information. The referrer is given up to 90 days to provide the requested information. The PWSIC may request information from other relevant organisations such as seeking procedural or administrative information from parliamentary clerks. The PWSIC is prohibited under legislation from requesting information from the person who is the subject of the referral at this stage.

81 Kate O'Neill, Director, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 10.

82 Ibid.

83 *PWSI Act 2024* (Vic) s 33.

84 PWSIC, *Annual Report 2024/25: Supporting the integrity of the Victorian Parliament and promoting respectful and safe parliamentary workplaces*, Melbourne, 2025, p. 3.

85 David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 12.

86 Ibid.

87 Ibid., pp. 12–13.

Process step	What happens at this stage
Assessment of referral	A full assessment of the referral is conducted, including detailed consideration of parliamentary misconduct definitions and multiple legislative and policy frameworks. The decision is made by the Commissioner. Most matters go to a Commissioner meeting due to the organisation being a relatively new entity with limited precedent.
Outcome	After a decision is made, the referrer and the subject of the referral are provided with the outcome of the referral. Decisions available to the Commissioner regarding a referral include to: • Dismiss • Proceed with dispute resolution • Investigate or • Redirect. The PWSIC can also defer the decision if it is being investigated by another agency. The PWSIC aims to provide an outcome within 45 days of the referral being made.

Source: Kate O'Neill, Director, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, pp. 10–11; PWSIC, *What to expect from us*, February 2026, <<https://www.pwsic.vic.gov.au/what-expect-us#service-charter>> accessed 20 May 2026.

5.4.2 Investigations

Under section 21 of the *PWSI Act 2024* (Vic), the PWSIC can conduct an investigation in relation to a referral if it considers it appropriate to do so.⁸⁸ In the 2024/25 financial year the PWSIC did not investigate any of the referrals it received.⁸⁹

Establishment of investigation processes

In September 2025 the PWSIC investigation report into a *Matter involving the Member for Western Victoria Region and the Member for Warrandyte District* was published.⁹⁰ The report stated:

During the investigation the Commission became aware of a technical issue that may cause ambiguity with respect to the investigation request notices. While the requests were approved by a Commissioner, the request notices were issued by Commission staff.⁹¹

The Committee recognises the importance of preventing technical issues from delaying the PWSIC’s investigation processes. Commissioner Wolf advised the Committee that the procedural issue raised was whether an investigation request notice can be issued by Commission staff or must be issued by a Commissioner under the Act,

88 *PWSI Act 2024* (Vic) s 21.

89 PWSIC, *Annual Report 2024/25: Supporting the integrity of the Victorian Parliament and promoting respectful and safe parliamentary workplaces*, Melbourne, 2025, p. 3.

90 PWSIC, *Matter involving the Member for Western Victoria Region and the Member for Warrandyte District*, September 2025.

91 *Ibid.*, p. 1.

when considering the PWSIC's powers and functions.⁹² The ambiguity was raised by IOV during its usual monitoring processes, and while it had 'no material effect on the investigation', the PWSIC changed its processes to ensure this does not create procedural issues in the future.⁹³ The steps taken by the PWSIC after the ambiguity was identified included to:

- Review and update the PWSIC's investigation procedure and associated templates to specify that a Commissioner must sign any investigation request
- Undertake a full review of the relevant instrument of delegation and supporting staff guidance to ensure clarity of authority, consistency of practice, and ongoing legal compliance.⁹⁴

The Committee recognises that the PWSIC has worked with IOV in reviewing and updating its processes as it became established, and that this demonstrates IOV's monitoring functions working effectively. The Commissioner has advised the Committee that the PWSIC's investigation processes are now settled and in line with the legislation.⁹⁵

Procedural fairness processes

The PWSIC is bound by the rules of procedural fairness in conducting an investigation,⁹⁶ and has instituted procedural fairness processes in respect of reports on investigations of referrals when a report contains an adverse finding.⁹⁷

Where the Commission intends to make an adverse finding about a person, the Commission must provide that person with either the full draft investigation report or a redacted version, containing sufficient information for them to understand the proposed finding and the evidence supporting it. The person is given a minimum of seven calendar days to respond, with extensions provided if required.⁹⁸

The PWSIC ensures it considers all responses from a person who may be the subject of an adverse finding, and provides the response in the investigation report against the relevant finding.⁹⁹ The PWSIC has advised the Committee that procedural fairness is also 'embedded throughout the Commission's investigation processes'.¹⁰⁰

⁹² David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 14.

⁹³ Ibid.

⁹⁴ PWSIC, response to questions on notice, received 13 April 2026, p. 5.

⁹⁵ David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 14.

⁹⁶ *PWSI Act 2024* (Vic) ss 21(4)(b), 33(7)(b).

⁹⁷ PWSIC, response to questions on notice, received 13 April 2026, p. 3.

⁹⁸ Ibid.

⁹⁹ Ibid.

¹⁰⁰ Ibid.

Additionally, IOV can accept complaints about whether the PWSIC has complied with procedural fairness requirements in performing functions under its establishing legislation.¹⁰¹

5.4.3 Witness welfare

The PWSIC recognises that the referral process and investigations can be difficult for referrers and subjects of referrals, and the welfare of people who come into contact with them is one of their key considerations.¹⁰² It has, therefore, developed a safety and wellbeing policy that guides the Commission's work, and collaborated with IOV to seek feedback in the development of the policy.¹⁰³

The PWSIC utilises a trauma-informed approach to its work, which recognises that people who have experienced trauma may respond in ways that are unexpected.¹⁰⁴ Additionally, it has developed processes to provide as much transparency as possible throughout the referral process, and to provide information that is 'consumable' to referrers and subjects of referrals.¹⁰⁵ This has been described as approaching interactions with people with 'equal parts empathy and clarity'.¹⁰⁶

The PWSIC's establishing legislation provides personal agency to referrers by allowing them to withdraw their referral at any time during the referral process, unless it has been assessed to be a PIC by IBAC, in which case it cannot be withdrawn.¹⁰⁷ The PWSIC ensures referrers are informed of this option, and are given agency and control over their matter, which enables referrers to make informed decisions about what is in their own interest.¹⁰⁸

In applying its coercive powers, the PWSIC has formal processes in place to consider the welfare of individuals. This includes conducting 'a full safety and wellbeing assessment and a Charter of Human Rights assessment before the application of any coercive powers'.¹⁰⁹ There are also legislated functions for IOV to monitor the PWSIC's coercive powers, as outlined in Section 5.1.2.

5.5 Conclusion

In the PWSIC's initial six months of operation it has focused on establishing its organisational structure, governance arrangements and operational processes. Foundational work has included developing education and engagement strategies,

¹⁰¹ *IOV Act 2011* (Vic) s 43(6A).

¹⁰² David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 12.

¹⁰³ Kate O'Neill, Director, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 12.

¹⁰⁴ *Ibid.*

¹⁰⁵ *Ibid.*, p. 11; David Wolf, Commissioner, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 11.

¹⁰⁶ Kate O'Neill, Director, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 12.

¹⁰⁷ *PWSI Act 2024* (Vic) s 9.

¹⁰⁸ Kate O'Neill, Director, PWSIC, Public hearing, Melbourne, 16 February 2026, *Transcript of evidence*, p. 12.

¹⁰⁹ *Ibid.*

issuing guidance materials, and implementing referral and investigation procedures. The PWSIC has prioritised stakeholder engagement across Members of Parliament, parliamentary staff and integrity agencies during its establishment phase, and the Committee looks forward to seeing the PWSIC's further development in its education processes.

The PWSIC has seen a steady increase in the number of referrals and enquiries it has received since it commenced, and has developed a sound process for handling referrals. The Commission has also demonstrated a commitment to procedural fairness, transparency and a trauma-informed approach to its work, embedding safeguards to support the welfare of all participants.

Overall, while still in an establishment phase, the PWSIC has made meaningful progress in developing processes to perform its legislative functions, and building the systems necessary to support a robust integrity framework. The Committee looks forward to seeing the PWSIC continue to develop its processes, including the development of its performance measures, and expanding public engagement. As the PWSIC transitions to an independent funding and reporting model, the Committee will monitor the performance of its functions and its funding levels in respect of this.

Chapter 6

Victorian Ombudsman

6.1 Introduction

The Victorian Ombudsman (VO) is an independent officer of the Parliament established under the *Ombudsman Act 1973* (Vic) ('VO Act 1973 (Vic)'). The VO's core functions include enquiring into and investigating administrative actions taken by or in Victorian government departments, statutory authorities, local councils and other public bodies within jurisdiction. The VO may also investigate certain matters on referral from the Parliament.¹

The VO also has important functions under Victoria's public interest disclosure (PID) and human rights frameworks. Under the *Public Interest Disclosures Act 2012* (Vic) ('PID Act 2012 (Vic)'), the VO may investigate public interest complaints (PICs) referred to it by the Independent Broad-based Anti-corruption Commission (IBAC). The VO is also empowered to enquire into or investigate whether an administrative action is incompatible with the *Charter of Human Rights and Responsibilities Act 2006* (Vic), or whether a public authority has failed to give proper consideration to a relevant human right.²

The VO describes its purpose as working to 'ensure fairness for people in their dealings with the Victorian public sector and improve public administration' through complaint handling, investigations and preventive activities.³ Its Strategic Plan 2025–29 frames this work around the vision that 'Victoria is fair', supported by four strategic themes: prevention; oversight; communities; and people and systems.⁴

The 2023/24 and 2024/25 financial years were a period of significant transition and renewal for the VO. The 2023/24 year covered the final months of Dr Deborah Glass OBE's term as Ombudsman and the first three months of Ms Marlo Baragwanath's term.⁵ In 2024/25, the VO developed and launched its Strategic Plan 2025–29, formed a new executive team and introduced new governance structures, while continuing its core complaint handling and investigation work.⁶ It also engaged positively with the performance audit, in which the independent performance auditor, O'Connor Marsden (hereafter referred to as the 'Independent Auditor'), concluded that the VO achieved

1 *Ombudsman Act 1973* (Vic) ('VO Act 1973 (Vic)') ss 13, 16.

2 *Public Interest Disclosures Act 2012* (Vic) pt 6; *VO Act 1973* (Vic) s 13; *Charter of Human Rights and Responsibilities Act 2006* (Vic) s 38.

3 VO, *Annual Report 2024/25*, Melbourne, 2025, p. 7.

4 VO, *Strategic Plan 2025–29*, Melbourne, 2025, pp. 1, 10–11.

5 VO, *Annual Report 2023/24*, Melbourne, 2024, p. 6.

6 VO, *Annual Report 2024/25*, Melbourne, 2025, pp. 4–5.

the objectives of the *VO Act 1973* (Vic) in all material respects during the audit period.⁷ The Independent Auditor's work is referred to throughout this chapter.

The VO's role is both reactive and preventive. It receives and handles complaints from members of the public, conducts enquiries and formal investigations, conciliates complaints, makes recommendations for remedial action and systemic improvement, and provides education and guidance to improve public administration and complaint handling across the Victorian public sector.⁸

This chapter reviews the VO's performance in the 2023/24 and 2024/25 financial years. It considers the VO's complaint handling and investigations; engagement, education and prevention work; governance, workplace, funding and technology; and accountability. Where appropriate, the chapter considers trends across both financial years, including whether issues identified in previous Committee reviews have persisted, improved or changed.

6.2 Complaint handling and investigations

6.2.1 Complaint handling and performance

Complaint handling remained central to the VO's work in 2023/24 and 2024/25. The VO's day-to-day work includes taking complaints about the actions and decisions of public organisations, making enquiries and resolving complaints informally where possible, including by conciliation, and investigating matters where needed.⁹ In 2023/24, the VO received 18,031 complaints within jurisdiction, enquired into 4,842 complaints and dealt with 94% of complaints within 30 days.¹⁰ Poor or delayed communication was the most complained about issue, and local government was the most complained about portfolio.¹¹

In 2024/25, the VO received 16,943 complaints within jurisdiction and enquired into 4,305 complaints.¹² It also exceeded its Department Performance Statement timeliness target,¹³ closing 95% of complaints within 30 days against a target of 90%.¹⁴

⁷ Note, the audit period ended on 30 June 2023 and therefore predates the two financial years under review, although it is still an important resource in understanding the VO's general performance and continued efforts to improve various aspects of its statutory and strategic functions.

⁸ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 7; VO, *Strategic Plan 2025–29*, Melbourne, 2025, pp. 3–5.

⁹ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 7.

¹⁰ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 4.

¹¹ Ibid., p. 5.

¹² VO, *Annual Report 2024/25*, Melbourne, 2025, p. 6.

¹³ Referred to by the VO in its Annual Report as Budget Paper 3 (BP3) measures.

¹⁴ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 11.

Table 6.1 Victorian Ombudsman’s performance measures, 2023/24 to 2024/25

Measure	2023/24	2024/25
Complaints received within jurisdiction	18,031	16,943
Complaints enquired into	4,842	4,305
Complaints closed within 30 days — BP3 result	97%	95%
BP3 target	90%	90%

Source: VO, *Annual Report 2023/24*, Melbourne, 2024, pp. 4, 61; VO, *Annual Report 2024/25*, Melbourne, 2025, pp. 6, 11.

While the number of jurisdictional complaints decreased from the previous year, the VO reported that complaint complexity continued to increase, with more than 22,000 distinct issues raised.¹⁵ The Ombudsman similarly told the Committee that the reduction in complaint numbers in 2024/25 was accompanied by ‘marked increases in the complexity of issues raised’, and that the VO had ‘since seen a rebound in the complaint numbers’.¹⁶

The Committee considers that the VO’s timeliness in complaint handling remains strong. Across the two years under review, the VO continued to finalise a very high proportion of complaints within 30 days, notwithstanding continuing demand and complexity.¹⁷ This is consistent with the Committee’s previous observations that the VO has generally performed strongly in early resolution and complaint handling.¹⁸

However, complaint satisfaction remains a concern. In 2023/24, the VO recorded 51% complaint service satisfaction against a target of 60%.¹⁹ The VO attributed this result to lower satisfaction levels among online complainants compared to those who submitted complaints by phone, and stated that it would continue to review and refine its processes and systems to ensure online interactions better met complainants’ needs and expectations.²⁰ The agency may, for example, provide better data in respect of whether its online interactions with individuals have improved or worsened. In 2024/25, complaint service satisfaction fell slightly further to 50% against the same target of 60%.²¹ The VO stated that its complainant satisfaction data reflected a broader decline in satisfaction with government services and was ‘generally consistent with the results of other Parliamentary Ombudsman’.²²

15 Ibid., p. 16
16 Marlo Baragwanath, Ombudsman, VO, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 16.
17 VO, *Annual Report 2023/24*, Melbourne, 2024, p. 4; VO, *Annual Report 2024/25*, Melbourne, 2025, pp. 11, 16.
18 Integrity and Oversight Committee, *Performance of the Victorian integrity agencies 2021/22*, Melbourne, 2023, pp. 136–37; Integrity and Oversight Committee, *Performance of the Victorian integrity agencies 2022/23*, Melbourne, 2025, pp. 70–74, 86–87.
19 VO, *Annual Report 2023/24*, Melbourne, 2024, p. 61.
20 Ibid.
21 VO, *Annual Report 2024/25*, Melbourne, 2025, p. 11.
22 Ibid.

Table 6.2 Complaint service satisfaction against Department Performance Statement performance measure (formerly BP3) target, 2023/24 to 2024/25

Measure	2023/24	2024/25
Complaint service satisfaction	51%	50%
BP3 target	60%	60%
Variance from target	–9 percentage points	–10 percentage points

Source: Victorian Ombudsman, *Annual Report 2023/24*, p. 61; Victorian Ombudsman, *Annual Report 2024/25*, p. 11.

The Committee acknowledges that complaint service satisfaction is a complex measure. Complainants may be dissatisfied because, as highlighted by the VO, it cannot always investigate a complaint, it may be outside jurisdiction, produce an unfavourable outcome, or someone may disagree with the relevant public body’s decision.²³ Nevertheless, the persistence of complaint service satisfaction results below target suggests a concerning gap between the VO’s strong timeliness performance and complainants’ experience of the service.²⁴ This is particularly important for an agency whose purpose is to help people navigate the inherent power imbalance between individuals and public bodies.²⁵

The VO is also limited in its current capacity to understand complainant experiences across different cohorts.²⁶ The VO has advised that, while it can compare some experiences of the general community and people in prison, it does not collect or report disaggregated service outcomes and satisfaction by cultural or racial background or by postcode.²⁷ The VO suggested that future proxy indicators could include interpreter usage, language assistance access, and complaints relating to cultural rights, discrimination or service barriers due to religious beliefs.²⁸

The Committee considers this a material issue for consideration for future performance reporting. The VO’s Strategic Plan 2025–29 identifies ‘Our communities’ as a strategic theme, including increasing engagement with communities experiencing marginalisation, tailoring assistance for people who need the most help, and making it easier to access and navigate the complaint system.²⁹ Moreover, the VO has established a specialised closed environment stream within its Complaints group for complaints from prisons and youth justice centres, established a First Nations team and commenced development of a First Nations complaint handling strategy.³⁰

²³ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 61; Integrity and Oversight Committee, *Performance of the Victorian integrity agencies 2022/23*, Melbourne, 2025, pp. 86–87.

²⁴ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 61; VO, *Annual Report 2024/25*, Melbourne, 2025, p. 11.

²⁵ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 7; VO, *Strategic Plan 2025–29*, Melbourne, 2025, pp. 1, 3.

²⁶ VO, Response to Integrity and Oversight Committee questions on notice, 30 April 2026, p. 15.

²⁷ Ibid.

²⁸ Ibid.

²⁹ VO, *Strategic Plan 2025–29*, Melbourne, 2025, pp. 10–11, 16–17.

³⁰ VO, Response to Integrity and Oversight Committee questions on notice, 30 April 2026, p. 15.

These initiatives are welcome. However, without more granular data, it will be difficult for the VO, the Committee and the Parliament to assess whether these reforms are improving access, fairness and satisfaction for people who may face particular barriers when dealing with public bodies.³¹

RECOMMENDATION 5: That the Victorian Ombudsman develop safe and appropriate ways to gather and analyse information about whether people from communities that face barriers can access its services, how they experience those services, and what outcomes they achieve, while protecting privacy and ensuring individuals cannot be identified.

6.2.2 Investigation timeliness and complexity

The VO's investigations function remained a significant part of its performance during the review period. The VO defines an investigation as a formal investigation notified to an authority under s 17 of the *VO Act 1973* (Vic), in which the Ombudsman is able to exercise coercive powers.³² These include Royal Commission-style powers, such as compelling a person to attend an interview on oath or affirmation, requiring production of documents and inspecting premises of a public organisation.³³

In 2023/24, the VO completed 19 formal investigations, tabled nine reports in Parliament and reported that agencies accepted 17 of 19 investigation recommendations.³⁴ The VO tabled reports including *Investigation into healthcare provision for Aboriginal people in Victorian prisons*, *Investigation into a Building Permit complaint*, *Investigation into the Department of Transport and Planning's implementation of the zero and low emission vehicle charge*, and *Investigation of a matter referred from the Legislative Council on 9 February 2022 – Part 2* (regarding the alleged politicisation of the public service).³⁵ In September 2023 the VO, along with IBAC, released a progress report monitoring implementation of the recommendations of the *Operation Watts* investigation.³⁶ Section 2.2.4 of this report discusses the major changes to Victoria's integrity system arising from the implementation of the *Operation Watts* recommendations.

In 2024/25, the VO's performance in this respect continued to improve (noting its already strong work outputs). During this period, the VO finalised 23 formal investigations and reported that agencies accepted 100% of its recommendations.³⁷

³¹ Ibid; VO, *Strategic Plan 2025–29*, Melbourne, 2025, pp. 16–17.

³² VO, *Annual Report 2023/24*, Melbourne, 2024, p. 112.

³³ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 40.

³⁴ Ibid., p. 5.

³⁵ Ibid., p. 40.

³⁶ Independent Broad-based Anti-corruption Commission and the VO, *Operation Watts: Progress report*, Melbourne, September 2023.

³⁷ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 6.

It tabled 10 reports during the period under review, agencies 'largely accepted' its recommendations and the VO continued to monitor their implementation.³⁸

Table 6.3 Victorian Ombudsman reports tabled in Parliament, 2023/24 to 2024/25

Financial year	Month tabled	Report
2023/24	August 2023	<i>Misconduct in public organisations: A casebook</i>
2023/24	September 2023	<i>Operation Watts Progress report</i>
2023/24	September 2023	<i>Investigation into the Department of Transport and Planning's implementation of the zero and low emission vehicle charge</i>
2023/24	October 2023	<i>Watchdog for the people: 50 years of the Victorian Ombudsman</i>
2023/24	November 2023	<i>Investigation into a Building Permit complaint</i>
2023/24	December 2023	<i>Investigation of a matter referred from the Legislative Council on 9 February 2022—Part 2</i>
2023/24	March 2024	<i>Investigation into healthcare provision for Aboriginal people in Victorian prisons</i>
2023/24	March 2024	<i>Social Housing complaint handling—progress report</i>
2023/24	March 2024	<i>Reflections on 10 years</i>
2024/25	February 2025	<i>Support when children are sexually abused at school: The Department of Education's response to abuse in a Victorian primary school</i>

Source: Victorian Ombudsman, *Annual Report 2023/24*, p. 40; Victorian Ombudsman, *Annual Report 2024/25*, pp. 22–23.

However, investigation timeliness remains a significant performance issue for the VO. In 2023/24, it closed 37% of investigations within 12 months against a target of 80%.³⁹ The VO stated that this result was affected by the parliamentary referral relating to alleged politicisation of the public sector, which 'absorbed significant resources', as well as welfare issues, sensitive subject matter and delays in receiving material from bodies under investigation.⁴⁰

In 2024/25, the VO's performance improved, but remained below target, with 47% of investigations closed within 12 months against a target of 75%.⁴¹ The target had been reduced from 80% in 2023/24, although the published performance material does not explain the reason for this change. The VO attributed this result to the closure of aged investigations—which reduce the timeliness rate because those matters are already open for longer than 12 months when finalised—and the temporary diversion of investigative resources in response to parliamentary complaints.⁴²

³⁸ Marlo Baragwanath, Ombudsman, VO, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 16.

³⁹ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 61.

⁴⁰ Ibid.

⁴¹ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 11.

⁴² Ibid.

The Committee acknowledges that investigation timeliness must be assessed in light of complexity. In response to the Committee's questions on notice, the VO stated that investigation timeliness is 'significantly impacted by case complexity', including multiple and complex allegations, technical or sensitive subject matter, related disclosures or complaints requiring concurrent investigation, complex stakeholder welfare issues, lengthy procedural fairness processes, and the use of coercive powers to obtain evidence and manage confidentiality.⁴³ The Ombudsman similarly told the Committee that a 12-month target for all investigations is 'a bit of a blunt instrument' because investigations vary in complexity and scale.⁴⁴

At the same time, the persistence of below-target results suggests that investigation timeliness should remain a focus of Committee oversight. The former BP3 measure—now subsumed by the Department Performance Statement framework—provides a useful high-level indicator of timeliness, but it does not distinguish between investigations of different scale, complexity or public interest significance.⁴⁵ This limits the extent to which the Committee and Parliament can assess whether delays reflect avoidable inefficiency, appropriate procedural fairness, unavoidable complexity, or the prioritisation of urgent matters such as parliamentary referrals.

The Committee considers that future performance reporting would be strengthened by utilising differentiated measures or supporting commentary for standard investigations, complex investigations, parliamentary referrals and PICs. Any differentiated approach should be supported by clear and publicly reported definitions, consistent classification criteria and data showing the volume of investigations under each category. This would improve transparency and compatibility, while recognising that revised performance measures, alone, would not address the broader resource pressures created by complex or externally initiated investigations.

RECOMMENDATION 6: That the Victorian Ombudsman, as part of its review of its Department Performance Statement performance measures, develop differentiated measures or reporting on the timeliness of standard investigations, complex investigations, parliamentary referrals and public interest complaint investigations. Any differentiated approach should include clear definitions, transparent and consistent classification criteria, and the number of investigations for each category.

The Committee notes the VO is investing in capability to manage investigation complexity. The VO identified several measures, including fortnightly internal investigations training, a Certificate IV in Government Investigations for a group of staff in 2025/26, external training and support in welfare management, new procedures and training on coercive powers, increased legal support and the use of external

⁴³ VO, Response to Integrity and Oversight Committee questions on notice, 30 April 2026, p. 1.

⁴⁴ Marlo Baragwanath, Ombudsman, VO, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 18.

⁴⁵ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 61; VO, *Annual Report 2024/25*, Melbourne, 2025, p. 11; Marlo Baragwanath, Ombudsman, VO, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 18.

technical subject-matter experts where needed.⁴⁶ These measures appear responsive to the main drivers of complexity identified by the VO, particularly procedural fairness, coercive powers, sensitive subject matter and welfare-related risks.⁴⁷

6.2.3 Impact of parliamentary referrals and PICs on the VO's other priorities

Parliamentary referrals and PICs remained significant drivers of the VO's investigation workload during the review period. Under s 16 of the *VO Act 1973* (Vic), the Victorian Parliament may refer 'any matter' to the Ombudsman to investigate.⁴⁸ The VO also investigates PICs referred to it by IBAC under Victoria's public interest disclosure scheme.⁴⁹

In 2023/24, the VO completed one parliamentary referral investigation and received two new parliamentary complaints.⁵⁰ In 2024/25, the VO completed significant work on two referrals from Parliament, which the Ombudsman said underscored the VO's role as 'a trusted and independent source of insight on matters of acute public interest'.⁵¹

The Committee recognises that parliamentary referrals are an important mechanism for independent investigation of matters of public concern. The Ombudsman accepted that many referrals concern matters that Parliament considers to be of public interest and that 'of course we should be required to look into those'.⁵² However, referrals appear to materially affect the VO's ability to progress other investigation work. The Ombudsman explained that, for a small agency with a relatively small investigation team, there is 'a lag' when a referral arrives, because the VO must reorganise resources and investigate 'forthwith—so, pretty quickly'.⁵³ She said this means 'other investigations can slow down' while the VO attempts to backfill investigators assigned to parliamentary referrals.⁵⁴

This evidence is consistent with the VO's reported investigation timeliness results – as highlighted above. In 2023/24, the VO attributed its below-target performance partly to the parliamentary referral concerning alleged politicisation of the public sector, which 'absorbed significant resources'.⁵⁵ In 2024/25, the VO again linked its below-target investigation timeliness result to the temporary diversion of investigative resources in response to parliamentary complaints.⁵⁶

⁴⁶ VO, Response to Integrity and Oversight Committee questions on notice, 30 April 2026, p. 1.

⁴⁷ Ibid.

⁴⁸ *VO Act 1973* (Vic) s 16; VO, *Annual Report 2023/24*, Melbourne, 2024, p. 40.

⁴⁹ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 23.

⁵⁰ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 40.

⁵¹ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 5.

⁵² Marlo Baragwanath, Ombudsman, VO, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 18.

⁵³ Ibid.

⁵⁴ Ibid.

⁵⁵ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 61.

⁵⁶ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 11.

PICs present a related but distinct operational challenge. In 2023/24, IBAC referred 102 PICs to the VO, involving 240 allegations.⁵⁷ The VO finalised 99 PIC cases involving 235 allegations, including 14 PIC investigations involving 23 allegations.⁵⁸ In 2024/25, IBAC again referred 102 PICs to the VO, involving 229 allegations; the VO finalised 90 PIC cases involving 208 allegations, including 22 PIC investigations involving 49 allegations.⁵⁹ While the PID scheme is intended to protect whistleblowers, the Ombudsman told the Committee that ‘it remains overly complex’ and that reform is needed to ‘better support disclosers and use integrity resources more efficiently’.⁶⁰

Table 6.4 Public interest complaints (PICs) referred and finalised, 2023/24 to 2024/25

Measure	2023/24	2024/25
PIC cases referred by IBAC	102	102
Allegations referred	240	229
PIC cases finalised by the VO	99	90
Allegations finalised	235	208
PIC investigations finalised	14	22
Allegations finalised through PIC investigations	23	49

Source: Victorian Ombudsman, *Annual Report 2023/24*, p. 44; Victorian Ombudsman, *Annual Report 2024/25*, p. 23.

The Deputy Ombudsman, Operations, Mr Nicholson, similarly emphasised the effect of PICs on the VO’s control over its investigation workload. He told the Committee that the VO receives ‘a very high volume of public interest complaints’ and has ‘limited discretion in how to deal with those complaints’, meaning it must open a significant number of investigations and has ‘quite limited control over the types of matters’ it investigates.⁶¹

This has been an enduring issue. The Committee has previously noted the VO’s concern that limited discretion in investigating PICs can divert ‘a disproportionate amount of resources to low-level Public Interest Complaints which often have scant detail and limited systemic implications’.⁶² The Committee consequently recommended that the Victorian Government seek amendment of the *VO Act 1973* (Vic) to grant the VO greater powers and flexibility to decide how it handles PICs.⁶³

⁵⁷ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 44.

⁵⁸ Ibid.

⁵⁹ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 23.

⁶⁰ Marlo Baragwanath, Ombudsman, VO, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 17.

⁶¹ Dan Nicholson, Deputy Ombudsman, Operations, VO, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 18.

⁶² Integrity and Oversight Committee, *Performance of the Victorian integrity agencies 2022/23*, Melbourne, 2025, p. 76.

⁶³ Ibid., p. 77.

The Government supported this recommendation in principle,⁶⁴ however the issue remains. As such, the Committee reiterates its view that reform is warranted. Parliamentary referrals and PICs are important accountability mechanisms, but the evidence makes clear they constrain the VO's capacity to determine and pursue its own priorities. This is particularly significant given the VO's stated desire to build its prevention function and undertake more systemic, intelligence-led work.⁶⁵ Allowing greater discretion in how the VO handles PICs would help it focus its investigations on the most significant integrity and public interest matters, while still protecting whistleblowers and ensuring public sector misconduct remains subject to oversight.

RECOMMENDATION 7: That the Victorian Government seek to amend the *Ombudsman Act 1973* (Vic) to provide the Victorian Ombudsman with greater flexibility to determine how public interest complaints referred by the Independent Broad-based Anti-corruption Commission are dealt with, including the discretion to respond proportionately to matters according to their seriousness, evidentiary basis and systemic significance, while preserving appropriate protections for disclosers.

6.3 Engagement and education

6.3.1 Education and community engagement

The VO's engagement and education work developed further during the review period, particularly through the creation of a more structured prevention function in 2024/25. In 2023/24, the VO continued to focus its engagement efforts on building relationships with peak bodies working with First Nations communities, social housing tenants and culturally and linguistically diverse communities. Its activities included meetings with Aboriginal Community Controlled Organisations, regional engagement in locations including Warrnambool, Bendigo, Shepparton, Sale, Bairnsdale and Morwell, and participation in the Midsumma Festival and Victorian Law Week.⁶⁶

In 2024/25, the VO reported that helping the community understand their rights and navigate complaint pathways remained the focus of its community engagement program.⁶⁷ It engaged with more than 2,500 community members across Victoria, working with neighbourhood houses, community centres, community legal centres, Aboriginal community-controlled organisations, local libraries and financial counsellors.⁶⁸

⁶⁴ Government of Victoria, Response to Parliament of Victoria, Integrity and Oversight Committee, *Response to the recommendations made to the Victorian Government by the Integrity and Oversight Committee in its Inquiry into the performance of the Victorian integrity agencies 2022/23*, 1 December 2025.

⁶⁵ VO, *Annual Report 2024/25*, Melbourne, 2025, pp. 5, 13; VO, *Strategic Plan 2025–29*, Melbourne, 2025, pp. 12–15.

⁶⁶ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 50.

⁶⁷ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 25.

⁶⁸ Ibid.

The VO's education work also remained well regarded, although the number of formal workshops decreased between the two years under review. In 2023/24, the VO delivered 70 workshops to 1,059 attendees, with participant satisfaction of 97%.⁶⁹ In 2024/25, it delivered 32 workshops to 484 attendees, with participant satisfaction of 93.1%.⁷⁰ The VO stated that this reduction was likely to reflect 'a tighter financial outlook across the public sector and limited budgets for outsourced training'.⁷¹

The Committee notes that the VO has begun to move beyond participant satisfaction as the main measure of education quality. In 2024/25, the VO reported results from independent research into the impact of its training, including that 98% of surveyed participants said the training changed the way they approached their role, and 93% reported a broader shift in how they thought about their public-service responsibilities.⁷² This is consistent with the Committee's previous view that integrity agencies should develop more systematic and evidence-based ways to measure the quality and impact of education and prevention initiatives.⁷³

6.3.2 Prevention

Prevention became a priority for the VO in 2024/25. The agency created a new Prevention team, bringing together education, engagement, communications and policy, and developed a Prevention Framework to guide work to identify risks, engage meaningfully, educate with impact, partner on solutions and inform the public and sector with clarity.⁷⁴ The Ombudsman told the Committee that 'a proactive approach to improving fairness, integrity and human rights in public sector administration is pivotal' to achieving the VO's vision, while also noting that the VO's capacity to do this work 'is limited'.⁷⁵

The Committee welcomes the VO's more structured approach to prevention, including its updated Good Practice Guide on complaint handling and its developing intelligence function.⁷⁶ However, the Committee also notes that this remains an emerging area of work. The independent performance audit found that the VO only partially met the indicator concerning active engagement with diverse groups and needed to implement systems and processes to mature this function.⁷⁷ The Committee therefore encourages the VO to continue developing its prevention function, while reporting clearly on its reach, impact and any barriers to further expanding this work. This work would align with Recommendation 5 above, which is directed at ensuring that complainants from different communities experience comparable levels of access, fairness and satisfaction.

⁶⁹ VO, *Annual Report 2023/24*, Melbourne, 2024, pp. 48–49.

⁷⁰ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 14.

⁷¹ Ibid.

⁷² Ibid.

⁷³ Parliament of Victoria, IOC, *Performance of the Victorian integrity agencies 2021/22*, Melbourne, 2023, pp. 158–59; Parliament of Victoria, IOC, *Inquiry into the education and prevention functions of Victoria's integrity agencies*, Melbourne, 2022.

⁷⁴ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 13.

⁷⁵ Marlo Baragwanath, Ombudsman, VO, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, p. 17.

⁷⁶ VO, *Annual Report 2024/25*, Melbourne, 2025, pp. 13–15.

⁷⁷ Parliament of Victoria, IOC, *The independent performance audit of the Victorian Ombudsman*, Melbourne, 2024, p. 29.

6.4 Governance, workplace and funding

6.4.1 Governance

The VO's governance arrangements continued to evolve during the review period, particularly following the commencement of Ms Baragwanath as Ombudsman and the development of the VO's Strategic Plan 2025–29. In 2023/24, the VO reported that work supporting the development of its governance framework included public annual planning, published performance targets, parliamentary review of its annual plan, public hearings before the Committee, internal review and complaint processes, performance criteria for staff, a service charter, and internal audit arrangements.⁷⁸

In 2024/25, the VO introduced further governance changes as part of a broader organisational renewal. The Ombudsman reported that the VO formed a new executive team, including Deputy Ombudsmen for Prevention, Operations and Corporate Services, and introduced new governance structures involving more of the senior leadership team in strategic decision-making.⁷⁹ The Deputy Ombudsman, Corporate, Ms Ellis, stated that the VO had strengthened corporate governance by 'establishing new committees that bring more voices to the table',⁸⁰ while also refreshing compliance frameworks and mapping future-state technology and innovation needs.⁸¹

The Committee welcomes these governance developments. They appear responsive to the VO's transition in leadership and the implementation of its Strategic Plan 2025–29, including the need to support a stronger prevention function,⁸² manage increasingly complex work,⁸³ and involve a broader group of senior leaders in strategic and risk-based decision making.⁸⁴

6.4.2 Workplace

The VO's workplace results were generally positive during 2023 and 2024, although more recent PMS results indicate emerging issues. The VO's employee engagement index was 75 in both 2023 and 2024, above the comparator group and public sector results in both years.⁸⁵ In 2024, the VO recorded an inclusion result of 80.8%, broadly consistent with its comparator group and above the public sector result.⁸⁶ However, some workforce pressure was evident: in 2023, 29% of staff reported high to severe

⁷⁸ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 68.

⁷⁹ VO, *Annual Report 2024/25*, Melbourne, 2025, pp. 4–5.

⁸⁰ Ibid., p. 25.

⁸¹ Ibid., p. 26.

⁸² Ibid., pp. 4–5, 25–26.

⁸³ VO, Response to Integrity and Oversight Committee questions on notice, 30 April 2026, p. 1.

⁸⁴ VO, *Annual Report 2024/25*, Melbourne, 2025, pp. 4–5, 26.

⁸⁵ Victorian Public Sector Commission (VPSC), *Office of the Ombudsman Victoria 2023 People Matter Survey results report*, Melbourne, 2023 ('VO 2023 PMS results'), p. 10; VPSC, *Office of the Ombudsman Victoria 2024 People Matter Survey results report*, Melbourne, 2024 ('VO 2024 PMS results'), p. 9.

⁸⁶ VPSC, *VO 2024 PMS results*, Melbourne, 2024, p. 12.

work-related stress, compared with 23% for the comparator group and 25% for the public sector.⁸⁷

The VO's employee engagement index fell from 75 in 2024 to 70 in 2025, and agreement that the organisation motivates staff to help achieve its objectives fell from 79% to 64%.⁸⁸ Agreement that senior leaders demonstrate honesty and integrity also fell from 85% in 2024 to 67% in 2025.⁸⁹ Based on these results, the Committee will continue to monitor the agency's performance in this respect.

The VO has begun work on a new people strategy to support leadership development, staff safety and wellbeing, and future workforce capability.⁹⁰ The Committee welcomes this work and encourages the VO to report clearly on how its people strategy responds to PMS results, including engagement, stress, workload, intention to stay and staff confidence in senior leadership.

6.4.3 Technology

Technology is an increasingly important aspect for Victoria's integrity agencies, including the VO.⁹¹ In 2024/25, the VO reported that work to develop a future-focused blueprint for its case and complaint management systems was 50% complete, with a case-management review, staff survey, workshops and requirements-gathering underway. It also progressed work to enhance its network capability and cybersecurity posture.⁹²

These initiatives respond to the independent performance audit, which found that the VO only partially met the indicator relating to future capability planning. Specifically, the Independent Auditor observed that the complaints management system was a legacy system that would be difficult to replace at once, and recommended that the VO develop technology roadmaps for its key systems, particularly the complaints management system.⁹³

Positively, since, the VO has commenced developing a holistic ICT Strategy and Roadmap, supported by an assessment of its current architecture, infrastructure and application lifecycles.⁹⁴ The roadmap is intended to prioritise technology, data, digital, cybersecurity, process and workforce initiatives, and is scheduled for completion in the second quarter of 2026/27. The VO has also approved development of an aligned Information Management Strategy.⁹⁵

⁸⁷ VPSC, *VO 2023 PMS results*, Melbourne, 2023, p. 15.

⁸⁸ VPSC, *Office of the Ombudsman Victoria 2025 People Matter Survey results report*, Melbourne, 2025, pp. 9–10.

⁸⁹ *Ibid.*, p. 40.

⁹⁰ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 26.

⁹¹ VO, *Strategic Plan 2025–29*, Melbourne, 2025, p. 8.

⁹² VO, *Annual Report 2024/25*, Melbourne, 2025, p. 10.

⁹³ Parliament of Victoria, IOC, *The independent performance audit of the Victorian Ombudsman*, Melbourne, 2024, p. 42.

⁹⁴ VO, Response to Integrity and Oversight Committee questions on notice, 30 April 2026, p. 2.

⁹⁵ *Ibid.*

The Committee welcomes this progress. The VO has advised that various risks remain, including in respect of cybersecurity, information management, data management and legacy systems, and that it is taking a ‘best efforts and risk-based approach’ within existing resources while seeking additional funding to address critical risks.⁹⁶ The Ombudsman stated the VO had sought funding for ‘some of our IT issues’ but that inadequate recurrent funding makes it difficult to plan sustainably for investments such as ‘IT case management systems’.⁹⁷ Nevertheless, given the centrality of reliable technology to complaint handling, data analysis and information security, the Committee considers that completion and implementation of the ICT and information-management roadmaps should remain a priority.

6.5 Accountability

6.5.1 Operational improvements

Building on the discussion of the VO’s approach to complaint handling above, the Committee notes that the VO has mechanisms for implementing feedback about its complaint handling service into operational improvements. The VO draws on external surveys of complainants and respondent agencies, direct responses to complaint outcomes, complaints about service delivery and decisions, and the outcomes of complaints assessed by Integrity Oversight Victoria.⁹⁸

Where survey results indicate a possible systemic concern, the VO may undertake a thematic audit of a sample of complaints. These audits can result in additional guidance and training for complaint handlers or changes to procedures where existing practices are not meeting community needs or expectations. Following implementation, the VO may review subsequent satisfaction survey results or conduct a follow-up thematic audit to assess whether practice has improved.⁹⁹ These processes provide a structured basis for translating feedback into quality assurance, organisational learning and procedural change. However, there remains scope for the VO to better understand which complainants experience its service positively, which do not, and the reasons for these differences.¹⁰⁰

The independent performance audit provides further context. The Independent Auditor found that complainants with disability were more likely than those without disability to make multiple attempts to contact the VO when lodging a complaint and to report difficulty having their complaint considered.¹⁰¹ The Independent Auditor therefore recommended that the VO obtain feedback from complainants with disability to

⁹⁶ Ibid.

⁹⁷ Marlo Baragwanath, Ombudsman, VO, public hearing, Melbourne, 2 March 2026, *Transcript of evidence*, pp. 21–22.

⁹⁸ VO, Response to Integrity and Oversight Committee questions on notice, 30 April 2026, p. 3.

⁹⁹ Ibid., pp. 3–4.

¹⁰⁰ Ibid., p. 15.

¹⁰¹ Parliament of Victoria, IOC, *The independent performance audit of the Victorian Ombudsman*, Melbourne, 2024, p. 30.

continue improving the accessibility and responsiveness of its complaint handling systems.¹⁰²

The Committee welcomes the VO's proactive approach to improving its quality assurance processes. Their effectiveness will ultimately depend on whether the VO can demonstrate that identified problems lead to measurable and sustained improvements in complainant experience, including for people who may face additional barriers in accessing its services. Recommendations in this respect are made further above.

Table 6.5 Performance against Department Performance Statement performance measures, 2023/24 to 2024/25

Performance measure	2023/24	2024/25
Number of jurisdictional cases opened	Met or exceeded	Not met
Jurisdictional cases selected for enquiry or investigation	Met or exceeded	Met or exceeded
Education and training participants	Met or exceeded	Not met
Jurisdictional cases leading to an agreed improvement	Met or exceeded	Met or exceeded
Public sector education program satisfaction	Met or exceeded	Met or exceeded
Complaints closed within 30 days	Met or exceeded	Met or exceeded
Complaint service satisfaction	Not met	Not met
Investigations closed within 12 months	Not met	Not met
Total output cost	Not met	Met or exceeded
Total measures met or exceeded	6 of 9	5 of 9

Source: VO, *Annual Report 2023–24*, p. 61; VO, *Annual Report 2024–25*, p. 11

The Committee has considered the VO's complaint service satisfaction and investigation timeliness results earlier in this chapter. Of the remaining measures, education and training participation varied substantially. In 2023/24, the VO recorded 1,059 participants against a target of 580; in 2024/25, participation fell to 484 against a higher target of 750.¹⁰³ The VO attributed the 2024/25 result to public sector budget pressures affecting learning and development enrolments, while noting that speeches, seminars and other engagement activities were not counted under the Department Performance Statement measure.¹⁰⁴

The quality measures were more consistent. Jurisdictional cases leading to an agreed improvement substantially exceeded the 55% target in both years, with results of 78% in 2023/24 and 77% in 2024/25. Public sector education program satisfaction also remained above or within target, at 97% in 2023/24 and 93% in 2024/25.¹⁰⁵ These

¹⁰² Ibid., pp. 2, 31.

¹⁰³ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 61; VO, *Annual Report 2024/25*, Melbourne, 2025, p. 11.

¹⁰⁴ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 11.

¹⁰⁵ VO, *Annual Report 2023/24*, Melbourne, 2024, p. 61; VO, *Annual Report 2024/25*, Melbourne, 2025, p. 11.

results indicate that, notwithstanding the variation in education participation, the VO continued to obtain positive outcomes from matters within jurisdiction and maintain high satisfaction with its formal education programs.

The Committee notes, however, that several existing measures are influenced by factors outside the VO's direct control. The number of jurisdictional cases opened depends on the volume of complaints received, while education participation is affected by demand and the training budgets of public sector bodies.¹⁰⁶ Further, participant numbers and satisfaction provide limited information about whether education activities lead to sustained improvements in public administration.

The independent performance audit found that the VO's Department Performance Statement measures covered key aspects of quantity, quality and timeliness, but recommended that it revise targets where appropriate and develop stronger outcomes-based performance measures.¹⁰⁷ The VO subsequently advised that it was reviewing its Department Performance Statement output measures, developing a logic model linking outputs to short-, medium- and long-term outcomes, and broadening its performance criteria to include accessibility, equity and effectiveness.¹⁰⁸

The Committee welcomes this work. Revised measures should retain sufficient continuity to support comparison across reporting periods, while providing a clearer account of the accessibility, quality and longer-term impact of the VO's work.

6.5.2 Complaints and disclosures about the VO received by the IOC

The IOC receives and considers complaints about the VO as part of its performance-monitoring functions under s 26H(1) of the *VO Act 1973* (Vic). The Committee considers complaints about the VO to assess whether they raise any systemic performance issues, or issues that require further monitoring by the Committee.

Under s 26H(2) of the *VO Act 1973* (Vic) the Committee is expressly prohibited from reinvestigating matters raised in complaints to the VO, and from reviewing their findings, recommendations, determinations, or other decisions in relation to complaints, including a decision not to investigate.

In 2023/24 the IOC received six complaints about the VO that were within the Committee's jurisdiction, and in 2024/25 the IOC received two complaints about the VO within jurisdiction. The Committee did not identify any systemic performance issues from the complaints made about the VO. For details, see Table 6.6.

¹⁰⁶ VO, *Annual Report 2024/25*, Melbourne, 2025, p. 11.

¹⁰⁷ Parliament of Victoria, IOC, *The independent performance audit of the Victorian Ombudsman*, Melbourne, 2024, pp. 31–34.

¹⁰⁸ VO, Response to Integrity and Oversight Committee questions on notice, 30 April 2026, p. 6.

Complaints relevant to the reporting period related to the VO’s decision to dismiss complaints, decision not to investigate complaints, and delays in responding to complainants’ correspondence.

Table 6.6 Complaints about the Victorian Ombudsman processed by the Integrity and Oversight Committee, 2023/24 to 2024/25

	2023/24	2024/25
Complaints received in financial year about the VO that are within the Committee’s jurisdiction	6	2
Complaints finalised in financial year	6	3
Complaints where enquiries were made with the VO	2	1
Systemic performance issues identified	0	0

Source: Devised from IOC complaints data.

6.6 Conclusion

The Committee considers that the VO generally performed its functions effectively during 2023/24 and 2024/25, notwithstanding a period of significant organisational transition and continuing demand for its services. The VO maintained strong complaint handling timeliness, completed a substantial body of investigation work and achieved high levels of acceptance of its recommendations. Its work continued to identify maladministration, protect human rights and promote improvements in Victorian public administration.

There are, however, areas requiring continued attention. Complaint service satisfaction remained below target in both years, and the VO’s existing data provides only limited insight into how people from different backgrounds and circumstances experience its services. Investigation timeliness also remained substantially below target, although the Committee acknowledges the effect of complex matters, parliamentary referrals and PIC investigations on these results. The Committee continues to support legislative reform that would give the VO greater flexibility to deal proportionately with PICs.

The Committee welcomes the VO’s more structured approach to prevention, its governance and workforce initiatives, and its work to strengthen performance measurement and develop ICT and information-management roadmaps. These reforms are at varying stages of implementation, and their effectiveness will depend on whether they produce measurable improvements in accessibility, complainant experience, investigation performance and organisational capability. The Committee looks forward to monitoring the VO’s progress in implementing these initiatives and the recommendations arising from this review.

Chapter 7

Conclusion

7.1 Introduction

Victoria's integrity agencies operated during 2023/24 and 2024/25 in an environment of increasing demand, greater case complexity and significant institutional change. Across the system, the Committee observed agencies adapting their practices, structures and priorities to respond to evolving community expectations, technological risks and expanding statutory responsibilities. There was a welcome emphasis on complainant and witness welfare, trauma-informed practice, prevention and education, and improved governance. At the same time, recurring pressures relating to timeliness, resourcing, performance measurement and organisational capability demonstrate that maintaining an effective integrity system requires more than the formal acquittal of performing functions. Agencies must also have the systems, resources and institutional settings necessary to discharge those functions effectively.

A summary of the key issues for each agency, as explored in previous chapters, is as follows.

7.2 IBAC

The Independent Broad-based Anti-corruption Commission (IBAC) continued to undertake important reforms across its complaint-handling, investigative and preventive functions. The Committee welcomes the development of more trauma-informed and complainant-centred practices, particularly through the Focused Police Complaints initiative, the Witness Liaison Team and the continuing optimisation of IBAC's complaints and assessment processes. IBAC also continued to undertake significant investigative and follow-up work with broader implications for Victoria's integrity regime. Its contribution to the reforms arising from Operation Watts, together with its strong prevention and education work, demonstrates the substantial systemic impact that an effective anti-corruption body can have beyond individual investigations.

However, the Committee remains concerned that these reforms have not yet translated into consistently timely performance across all areas of IBAC's work. IBAC continues to experience a significant backlog of complaints, and persistent delays in assessing public interest disclosures and completing complex investigations. Further, limitations in the public reporting of complaint complexity make it difficult to determine whether current pressures arise principally from demand, complexity, resourcing or processes. IBAC should continue developing transparent and meaningful measures capable of demonstrating whether its reforms produce sustained improvements in timeliness and

complainant experience. The Committee will also continue to monitor investigation performance and workplace culture, recognising that IBAC's effectiveness depends on both its external work and the strength of its internal systems.

7.3 IOV

Integrity Oversight Victoria (IOV) continued to perform a distinctive role as the body responsible for overseeing a broad and increasingly complex range of integrity, accountability and investigatory agencies. Its work in handling complaints, conducting investigations, monitoring coercive powers and inspecting the use of covert and intrusive powers provides an important safeguard against the misuse of exceptional statutory authority. The Committee particularly welcomes IOV's continuing focus on witness welfare, procedural fairness and the development of detailed investigative guidance. Its monitoring of IBAC's handling of police complaints, including police-perpetrated family violence matters, also illustrates the value of moving beyond individual complaint assessments to examine the consistency and systemic adequacy of agency practices.

The breadth of IOV's remit nevertheless creates significant operational pressures for a relatively small organisation. Increasing complaints and disclosures, the complexity of matters before it and the addition of new oversight responsibilities have affected timeliness and require careful prioritisation of resources. The Committee did not identify systemic performance issues from complaints made about IOV during the review period, but will continue to monitor measures introduced to improve complaint finalisation and transparency. IOV's future effectiveness will depend on its ability to maintain rigorous oversight while preserving procedural fairness, witness welfare and the quality of its investigations and inspections as its responsibilities continue to expand.

7.4 OVIC

The Office of the Victorian Information Commission (OVIC) continued to perform important functions across freedom of information (FOI), privacy and information security during a period of rapidly increasing demand and technological change. The Committee recognises OVIC's efforts to increase the number of complaints and reviews it finalises, use informal resolution where appropriate, review the FOI Professional Standards and improve the performance measures used to describe its work. OVIC also continued to perform an important regulatory and educative role in relation to public-sector information security. Its guidance on artificial intelligence and privacy demonstrates the importance of an information regulator that can respond proactively as government agencies adopt new technologies and increasingly rely on digital information.

However, OVIC's increasing workload has contributed to longer finalisation times and growing pressure across its core functions. Existing performance measures do not always provide a clear or consistent account of timeliness, demand or the outcomes

achieved through OVIC's work. The Committee is particularly concerned that OVIC's funding declined while its workload and technological responsibilities continued to grow, affecting its capacity to modernise systems and, at one point, to undertake a legislatively required review. OVIC's capacity to protect information rights, privacy and public-sector data will increasingly depend on resourcing and institutional arrangements that reflect the scale and independence of its functions. The Committee therefore considers that both the adequacy of OVIC's funding and the desirability and feasibility of direct parliamentary funding warrant continued attention. Additionally, the Committee recognises the need for legislative reform that is fundamental to improving Victoria's freedom of information framework, including OVIC's timeliness in handling complaints, as reported in its Inquiry into *The operation of the Freedom of Information Act 1982* (Vic).¹

7.5 PWSIC

The establishment of the Parliamentary Workplace Standards and Integrity Commission (PWSIC) was a significant development in Victoria's parliamentary integrity framework and gave effect to an important reform arising from Operation Watts.² During its first six months of operation, the PWSIC appropriately focused on establishing its governance, staffing and operational arrangements; developing referral, dispute-resolution and investigation processes; and building awareness of its role across parliamentary workplaces. The Committee welcomes the PWSIC's early emphasis on procedural fairness, trauma-informed practice and participant welfare, as well as its engagement with IOV and other integrity institutions. These foundations will be essential to building confidence in a body responsible both for responding to parliamentary misconduct and promoting safer and more respectful parliamentary workplaces.

It is nevertheless too early to reach firm conclusions about the PWSIC's effectiveness or efficiency. As the Commission moves beyond its establishment phase, it will need to demonstrate how both its reactive and preventive functions produce meaningful outcomes. Robust performance measures, accessible referral pathways, sustained stakeholder and public engagement, and effective coordination with other parliamentary and integrity bodies will be central to this task. The Committee will also monitor whether the PWSIC's staffing and contracting arrangements remain appropriate as the volume and complexity of its work become clearer. The transition to a more independent funding and reporting model should improve transparency and provide a stronger basis for future parliamentary oversight.

1 Parliament of Victoria, Integrity and Oversight Committee, *The operation of the Freedom of Information Act 1982* (Vic), September 2024.

2 Hon Jacinta Allen MP, Premier of Victoria, *Parliamentary Integrity Commission Consultation Begins*, 17 October 2023, <<https://www.premier.vic.gov.au/parliamentary-integrity-commission-consultation-begins>> accessed 25 July 2026; Ellie Florence and Annie Wright, *Parliamentary Workplace Standards and Integrity Bill 2024*, Parliament of Victoria, Bill Brief no. 7, Parliamentary Library & Information Service, July 2024, p. 4.

7.6 VO

The Victorian Ombudsman (VO) generally performed its statutory functions effectively while navigating significant leadership and organisational transition. It maintained strong complaint-handling timeliness, completed a substantial body of investigative work and continued to achieve high levels of acceptance of its recommendations. The Committee also welcomes the development of the VO's *Strategic Plan 2025–29*, revised governance arrangements and a more structured approach to prevention, community engagement and organisational capability. These developments provide a sound basis for the VO to continue identifying maladministration, protecting human rights and improving the fairness and quality of public administration in Victoria. The Committee also acknowledges the VO's contribution to the major reforms to Victoria's integrity system resulting from recommendations made in the *Operation Watts* report.

There are, however, persistent areas requiring attention. Complaint service satisfaction remained below target in both years, revealing a potential gap between efficient complaint processing and the experience of people using the service. The VO's limited disaggregated data also makes it difficult to determine whether people from different communities experience comparable levels of access, fairness and satisfaction. Investigation timeliness remained substantially below target, although the Committee acknowledges the effect of case complexity, procedural fairness, parliamentary referrals and public interest complaint (PIC) investigations. The Committee continues to support legislative reform that would allow the VO to respond to PICs more proportionately, while preserving appropriate protections for disclosers. The effectiveness of the VO's current reforms will ultimately depend on whether they produce measurable improvements in accessibility, complainant experience, investigation performance, workforce capability and technological resilience.

7.7 Concluding observations

Taken together, the findings of this review demonstrate that Victoria's integrity system remains active, capable and responsive. The agencies oversighted by the Committee are not uniform: they exercise different powers, serve different communities and face different operational risks. Nevertheless, several common priorities emerge.

Agencies require performance measures that explain not only the volume of work completed, but also its timeliness, quality, accessibility and systemic impact. They must continue strengthening the experience and welfare of complainants, witnesses and other people affected by integrity processes. Above all, the effectiveness of the system depends on each agency being sufficiently accountable and capable of performing its role, while working constructively with the other stakeholders that are a part of Victoria's integrity framework.

Adopted by the Integrity and Oversight Committee
55 St Andrews Place, East Melbourne
3 August 2026

Appendix A

About the Inquiry

A.1 Public hearings

Monday, 16 February 2026

55 St Andrews Place, East Melbourne

Name	Position	Organisation
Sean Morrison	Information Commissioner	Office of the Victorian Information Commissioner
Penny Eastman	Deputy Commissioner, Public Access	Office of the Victorian Information Commissioner
Anthony Corso	Acting Privacy and Data Protection Deputy Commissioner	Office of the Victorian Information Commissioner
David Wolf	Commissioner	Parliamentary Workplace Standards and Integrity Commission
Kate O'Neill	Director	Parliamentary Workplace Standards and Integrity Commission

Monday, 2 March 2026

55 St Andrews Place, East Melbourne

Name	Position	Organisation
Victoria Elliott	Commissioner	Independent Broad-based Anti-corruption Commission
Alison Byrne	Chief Executive Officer	Independent Broad-based Anti-corruption Commission
Anna Higgs	Executive Director—Corporate Services	Independent Broad-based Anti-corruption Commission
Louise Macleod	Chief Integrity Inspector	Integrity Oversight Victoria
Cathy Cato	Chief Executive Officer and General Counsel	Integrity Oversight Victoria
Alison Lister	Director Integrity Operations and Policy	Integrity Oversight Victoria
Marlo Baragwanath	Ombudsman	Victorian Ombudsman
Kerryn Ellis	Deputy Ombudsman, Corporate	Victorian Ombudsman
Dan Nicholson	Deputy Ombudsman, Operations	Victorian Ombudsman

