RESEARCH

Public sector agency responses to IBAC's recommendations

October 2026

Special report

ibac | Strengthening Victoria's Integrity

Acknowledgement

IBAC acknowledges the Traditional Custodians of the lands on which we work and pays respect to Elders past, present and emerging. We recognise and celebrate the diversity of Aboriginal peoples and their ongoing cultures and connections to the lands and waters of Victoria.

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Letter of Transmittal

To
The Honourable President of the Legislative Council

and
The Honourable Speaker of the Legislative Assembly

Special report on Public sector agency responses to IBAC's recommendations

In accordance with section 162(1) of the *Independent Broad-based Anti-corruption Commission Act 2011*, I present IBAC's special report on *Public sector agency responses to IBAC's recommendations*.

IBAC's findings and recommendations are contained in the report.

Yours sincerely



Victoria Elliott
Commissioner
Independent Broad-based Anti-corruption Commission

1. Executive summary

1.1. Reasons for this report

The Independent Broad-based Anti-corruption Commission (IBAC) has powers under the *Independent Broad-based Anti-Corruption Commission Act 2011* (IBAC Act) that allow IBAC to make recommendations to the Victorian public sector to address and prevent corruption.[1]

This special report is an opportunity to increase the transparency of IBAC's work by highlighting the volume and breadth of recommendations IBAC has made to public sector agencies to address corruption risks.

The report also discusses some of the limitations of the IBAC Act, which determines what IBAC can make recommendations about, when IBAC can publicise recommendations and what agencies' obligations are to respond to IBAC's recommendations.

In developing this special report, IBAC analysed 260 recommendations made to the Victorian public sector following investigations and in research and audit reports between 2014 and 2025. This report examines:

- whether the recommendations were made under IBAC's investigation function or IBAC's education and prevention functions
- which sectors IBAC's recommendations have been directed to
- the systemic corruption issues targeted by IBAC's recommendations
- the types of action or change proposed in IBAC's recommendations
- the proportion of recommendations IBAC made in public and private
- whether public sector agencies implemented IBAC's recommendations
- the timeliness of progress updates from agencies and the time taken for agencies to fully implement IBAC's recommendations.

In December 2023, IBAC published a special report on Victoria Police's responses to IBAC recommendations,[2] but it has not previously published such a broad overview of recommendations made to the public sector. IBAC intends to publish similar reports on a regular basis.

1.2. Key findings about IBAC's recommendations to the public sector

- More than two-thirds of IBAC's public sector investigations have resulted in recommendations to public sector agencies.
- Recommendations were made to address corruption risks across a wide range of sectors, including 40 recommendations about local government and 34 recommendations about corrections.
- The most common corruption risks targeted by IBAC's public sector recommendations were conflicts of interest, internal complaint handling and reporting of corrupt conduct, and procurement processes.
- Between 2021 and 2025, there were almost three times more recommendations made in public than in the seven years prior (2014 to 2020). The number of public recommendations increased substantially following the publication of five special reports across 2022 and 2023.
- Excluding recommendations that are currently in progress or not yet commenced,[3] 168 recommendations, or 84 per cent of IBAC's public sector recommendations, have been fully implemented by agencies, 10 per cent have been partially implemented and six per cent have no implementation planned.
- Public sector bodies usually met agreed timeframes when reporting to IBAC on the acceptance of recommendations. On average, recommendations were fully implemented within 13 months.

1 This includes government departments, agencies, councils, schools, universities, corrections, youth justice, public hospitals, parliament, the judiciary, the Premier's office and ministerial offices.
2 Independent Broad-based Anti-corruption Commission 2023, *Special report on Victoria Police's responses to IBAC's recommendations*, IBAC, Melbourne.
3 This equates to 59 recommendations.

2. Introduction

IBAC is Victoria's independent anti-corruption agency and is responsible for preventing and exposing corruption across the entire Victorian public sector. This includes government departments, agencies, councils, schools, universities, corrections, youth justice, public hospitals, parliament, the judiciary, the Premier's office and ministerial offices. For ease of reference, this report uses the term 'agencies' to describe all of these public sector agencies and bodies.

IBAC is also Victoria's independent police oversight body and has different responsibilities overseeing Victoria Police compared to the rest of the Victorian public sector.[4] Because of this, recommendations made to Victoria Police are not included in the scope of this report.[5]

What is public sector corruption?

Corruption includes a public officer or body dishonestly performing their duties or misusing their public position for personal gain or for the improper gain of others.

Examples include public officers taking or offering bribes, awarding contracts to family or friends, and misusing information gained through their position for personal benefit or the benefit of friends or family.

There are several ways that IBAC meets its responsibilities to prevent and expose corruption in the public sector, including:

- receiving complaints and notifications about public sector corruption
- assessing public sector corruption allegations to determine if they will be investigated by IBAC, referred to another public sector agency for action or dismissed
- investigating and exposing public sector corruption, giving priority to serious and systemic issues
- reviewing the outcomes of public sector investigations to check they have been investigated thoroughly and fairly
- educating the public sector and community about the risks and impacts of corruption, and how to prevent it
- making recommendations to fix systemic vulnerabilities, address organisational misconduct, and reform agency policies exposed during investigations or reviews.

IBAC is Victoria's independent anti-corruption agency and is responsible for preventing and exposing corruption across the entire Victorian public sector.

4 *Independent Broad-based Anti-corruption Commission Act 2011* (Vic), s 15(2)(b) and (c).
5 In December 2023, IBAC published its *Special report on Victoria Police's response to IBAC recommendations*.

2.1. Types of recommendations IBAC can make

The IBAC Act provides IBAC with powers to undertake a range of activities which help IBAC fulfill its role, including conducting investigations into alleged corruption. Through IBAC's prevention and exposure functions, IBAC identifies systemic and organisational risks that have contributed, or could contribute, to public sector corruption. IBAC then develops recommendations in response to those risks. These recommendations can focus on changes to public sector systems, legislation and policy, education and training, as well as recommend disciplinary or management action.

Recommendations made in response to IBAC investigations

When investigating corruption, IBAC assesses the factors that may have contributed to the corrupt conduct. IBAC can make recommendations to agencies to implement changes to prevent or reduce the risk of that behaviour occurring again. The power to make recommendations, which relate specifically to findings from an investigation, are set out in section 159 of the IBAC Act.

The IBAC Act requires agencies to respond to recommendations made under section 159 of the IBAC Act. However, agencies only need to advise IBAC if they intend to adopt the recommendation and, if not, provide IBAC with a reason why.[6] Agencies are not required to accept, implement or publicly report on any of the recommendations IBAC makes.

Recommendations made in response to education and prevention work conducted by IBAC

IBAC has education and prevention functions under section 15 of the IBAC Act, which involves examining legislation, systems and practices, and producing resources that improve the capacity of public sector agencies to identify, manage and prevent corruption. In performing this function, IBAC can publish research and audit reports, which tend to focus on specific systemic or organisational corruption risks. IBAC can include recommendations in these reports to address systemic corruption risks uncovered in its research.

There is no legislated requirement for agencies to respond to recommendations made under section 15 of the IBAC Act.

The IBAC Act limits what IBAC can say publicly about recommendations

IBAC's legislation determines whether IBAC can publicly report on recommendations. Section 159 of the IBAC Act only permits recommendations arising from an investigation that are contained in a special report or annual report to be made in public.[7] Other section 159 recommendations arising from an investigation must be made in private unless there has been a failure to take appropriate action in relation to the recommendation.[8]

Because of this restriction, private recommendations made by IBAC are not quoted or used as case studies in this report; however, they have been used to inform the report's quantitative findings.

In order to provide the public with greater visibility of IBAC's work and allow IBAC to hold agencies to account for their responses to recommendations, IBAC continues to advocate for legislative reform to remove this limitation from the IBAC Act. Until then, IBAC intends to regularly publish reports like this to increase visibility of its work.

6 *Independent Broad-based Anti-corruption Commission Act 2011* (Vic), s 159(6).
7 *Independent Broad-based Anti-corruption Commission Act 2011* (Vic), s 159(2).
8 *Independent Broad-based Anti-corruption Commission Act 2011* (Vic), s 159(5).

3. Findings from IBAC's review

3.1. Most public sector recommendations are made in response to findings from IBAC investigations

Between 2014 and 2025,[9] IBAC made a total of 260 recommendations to address corruption risks across the Victorian public sector.[10] Of these recommendations, 256 (98 per cent) were made under section 159 of the IBAC Act in response to findings from IBAC investigations.

Between 2013 and 2025,[11] more than two-thirds (69 per cent) of IBAC's investigations into public sector corruption resulted in recommendations to agencies,[12] and the average number of recommendations made by IBAC was four per investigation.

The number of recommendations made as a result of an investigation varies based on the complexity of circumstances under consideration and the scope of action or change IBAC considers necessary to prevent the corrupt behaviour from occurring again. Some examples of IBAC public sector investigations and the recommendations arising from these investigations are summarised opposite and on the next page.

Operation Daintree

Operation Daintree investigated allegations that the procurement process and awarding of a contract by the then Department of Health and Human Services to the Health Education Federation for the provision of training to health workers constituted serious corrupt conduct.[13] Operation Daintree found evidence of misconduct and improper influence.[14] It revealed breaches of the duties and obligations of ministers, ministerial advisors, and senior public servants.[15] As a result of Operation Daintree, IBAC made 17 recommendations to address the integrity risks identified by the investigation related to the conduct of ministerial advisors, public servants and affiliated unions.[16]

Operation Watts

Operation Watts was a joint investigation by IBAC and the Victorian Ombudsman into allegations that some members of Parliament were misusing public funds to pursue the interests of the Moderate Labor faction of the Victorian branch of the Australian Labor Party.[17] The *Operation Watts special report* made 21 recommendations to address ongoing corruption risks and promote a culture of integrity across the Victorian Government and the Parliament of Victoria.[18]

9 The first recommendations were made to a public sector agency in October 2014 in IBAC's *Operation Fitzroy special report*.
10 This is a count of primary recommendations only. IBAC annual reports have previously used different counting rules, such as counting both primary and secondary recommendations, which may result in discrepancies in figures. This count excludes recommendations that request that an agency report back to IBAC by a specified date, as these recommendations do not relate to a specific corruption issue or risk. IBAC reviewed the way that it constructs recommendations, and as part of this, the practice of making a standalone recommendation requesting that an agency report back was phased out.
11 While the first recommendation to a public sector agency was made by IBAC in 2014, several investigations were undertaken in 2013, and these have been included in this count.
12 This includes full investigations completed by IBAC between 2013 and 2025. It does not include preliminary inquiries.
13 Independent Broad-based Anti-corruption Commission 2023, *Summary Operation Daintree*, IBAC, Melbourne, p 1.
14 Independent Broad-based Anti-corruption Commission 2023, *Summary Operation Daintree*, IBAC, Melbourne, p 2.
15 Independent Broad-based Anti-corruption Commission 2023, *Summary Operation Daintree*, IBAC, Melbourne, p 2.
16 Independent Broad-based Anti-corruption Commission 2023, *Recommendations Operation Daintree*, IBAC, Melbourne, p 1.
17 Independent Broad-based Anti-corruption Commission and Victorian Ombudsman 2022, *Summary Operation Watts*, IBAC and VO, Melbourne, p 1.
18 Independent Broad-based Anti-corruption Commission and Victorian Ombudsman 2022, *Recommendations Operation Watts*, IBAC and VO, Melbourne, p 1.

Operation Betka

Operation Betka investigated allegations that a contracted project manager at the then-Department of Education and Training (DET) used their position to provide business opportunities to a company they owned.[19] The investigation identified issues with DET's policies, systems and controls which failed to detect and prevent the project manager's activities.[20] IBAC made two recommendations to DET to strengthen controls around the engagement and oversight of contractors.[21]

Corruption risks associated with donations and lobbying

In 2022, IBAC made four recommendations under its education and prevention functions[22] in the *Special report on corruption risks associated with donations and lobbying*.[23] These recommendations were based on IBAC's analysis of Victoria's donation and lobbying framework and research into regulations of other Australian and comparable international jurisdictions. The report was published ahead of an independent review of the 2018 amendments to the *Electoral Act 2002* and parliamentary consideration of related reforms, which IBAC considered when determining whether to exercise its education and prevention function to make recommendations setting out options for reform.

3.2. IBAC has made recommendations to a range of sectors

The IBAC Act permits IBAC to make recommendations related to an investigation to the relevant principal officer (for example, the Secretary of a government department or Chief Executive Officer (CEO) of a council), the responsible Minister or the Premier.[24]

IBAC determines who it makes recommendations to depending on the authority required to implement the recommended change. This means that recommendations may be made to a central government department or minister, rather than the specific sector or agency that was the subject of the IBAC investigation.

For example, IBAC's 2021 *Special report on corrections* included a recommendation to amend section 22 of the *Corrections Act 1986* (Vic) to introduce a statutory obligation on corrections officers to report to the prison governor or to IBAC if they have a reasonable belief that another officer has engaged in corrupt conduct.[25] Although this recommendation was made in response to findings from IBAC's investigations into the corrections sector and is intended to alter the behaviour of corrections officers, it was addressed to the Victorian Government to action the recommended legislative change.

Of the recommendations made by IBAC between 2014 and 2025, the highest proportion of recommendations (15 per cent) related to local government, followed by corrections (13 per cent), education and training (eight per cent) and ministerial offices (eight per cent) (see Table 1).

19 Independent Broad-based Anti-corruption Commission 2021, *Operation Betka special report*, IBAC, Melbourne, p 5.
20 Independent Broad-based Anti-corruption Commission 2021, *Operation Betka special report*, IBAC, Melbourne, p 19.
21 Independent Broad-based Anti-corruption Commission 2021, *Operation Betka special report*, IBAC, Melbourne p 29
22 *Independent Broad-based Anti-corruption Commission Act 2011* (Vic), s 15.
23 Independent Broad-based Anti-corruption Commission 2022, *Special report on corruption risks associated with donations and lobbying*, IBAC, Melbourne.
24 *Independent Broad-based Anti-corruption Commission Act 2011* (Vic), s 159(1).
25 Independent Broad-based Anti-corruption Commission 2021, *Special report on corrections*, IBAC, Melbourne, p 15.

Table 1: IBAC recommendations made between 2014 and 2025 by sector they relate to

Sector recommendation related to	Number of IBAC recommendations	Proportion of all recommendations[(a)]
Local government	40	15%
Corrections	34	13%
Education and training	22	8%
Ministerial offices	20	8%
Emergency Services	16	6%
Health	16	6%
Planning, environment and land management	16	6%
Parliament	13	5%
Transport	12	5%
Human Services	11	4%
Departments[(b)]	10	4%
Electorate Offices	9	3%
Courts, legal, judiciary and dispute resolution	9	3%
Regulators	7	3%
Other – Boards/Committees of management	6	2%
Political parties and members of Parliament	5	2%
Construction, manufacturing and major projects	4	2%
Waste management	2	1%
Other[(c)]	8	3%

Notes:
(a) Percentages are rounded and may not add up to 100 per cent.
(b) Departments include all recommendations directed towards central Victorian departmental offices. It excludes recommendations related to portfolio agencies and any organisations involved in the provision of broader public services as these recommendations are captured under the relevant sector in the table.
(c) Other includes recommendations directed towards other groups/areas such as community grants, lobbying and public sector employees broadly.

Source: IBAC

Further detail is provided in section 3.3 on the most common recommendations made to different sectors to address particular corruption risks and issues.

3.3. IBAC recommends changes to address a broad range of corruption risks and issues

IBAC recommendations aim to deter and prevent corruption by strengthening the systems and controls that protect public sector agencies. Each recommendation may include multiple actions.

Of the 260 recommendations made by IBAC, IBAC recommended that public sector agencies:

- update or review their policies, procedures and frameworks. This action was recommended in **51 per cent** of recommendations (133 recommendations).
- improve or review training and staff awareness regarding a particular issue. This action was recommended in **23 per cent** of recommendations (60 recommendations).
- undertake an audit or implement a risk management strategy. This action was recommended in **20 per cent** of recommendations (52 recommendations).
- amend or review legislative or regulatory frameworks. This action was recommended in **18 per cent** of recommendations (46 recommendations).
- consider taking disciplinary or management action against an individual or third party. This was recommended in **eight per cent** of recommendations (22 recommendations).

Across almost all sectors, the most common theme for recommended actions related to updating or reviewing policies, procedures and frameworks. The exceptions were for the planning, environment and land management sector, ministerial offices, and Parliament where the most common theme related to actions to amend or review legislative or regulatory frameworks.

The frequency by which these types of different actions were recommended varied across sectors. For example:

- recommendations related to policies, procedures and frameworks were highest for the local government (27 recommendations) and corrections (18 recommendations) sectors
- recommendations related to training and staff awareness were highest for the local government (11 recommendations) and corrections (nine recommendations) sectors
- recommendations related to audits and risk management strategies were highest for the education and training and local government sectors (eight recommendations respectively)
- recommendations related to legislative or regulatory frameworks were highest for ministerial offices and the planning, environment and land management sector (10 recommendations respectively)
- recommendations related to disciplinary or management action were highest for the corrections sector (five recommendations).

Recommendations made by IBAC between 2014 and 2025 have related to issues as varied as drug use, recruitment practices and staff supervision (see Table 2). The most common corruption risk associated with IBAC's recommendations to public sector agencies was conflict of interest management. IBAC made 77 recommendations related to the reporting or management of actual, potential or perceived conflicts between an employee or contractor's public duties and their private interests. A further 53 recommendations related to the way agencies handled complaints about suspected corrupt conduct, while 47 recommendations addressed issues with procurement and contract management practices.

Table 2: Systemic and organisational corruption risks and vulnerabilities most commonly associated with IBAC's recommendations

Corruption risks and vulnerabilities[a]	Definition	Number of IBAC recommendations[b]
Conflicts of interest and declarable associations	The reporting and management of actual, potential or perceived conflicts between an individual's public duties and private interest.	77
Complaint handling, internal investigations and reporting of corruption	Internal handling of complaints against employees and contractors and reporting of suspected corruption.	53
Procurement and contract management	End-to-end process of purchasing goods, services or other works from an external source, including agreeing to contractual terms and delivery of products/services.	47
Information management, security and record keeping	Policies, procedures and principles used to record and protect information, and the use of information for authorised or official purposes.	42
Oversight of funded agencies, entities, contractors and suppliers	Central agency oversight of funded agencies, entities, contractors and suppliers.	41
Vetting, probity and recruitment	Checks undertaken to verify the identity, integrity and credentials of prospective employees and appointees, as well as ongoing vetting of employees.	31
Staff supervision	Appropriate supervision of employees, particularly those in high-risk positions.	21
Gifts, benefits and hospitality	Free or discounted items or services, preferential treatment, privileged access, favours or other advantage offered to an individual.	20
Organisational culture	Values and beliefs that guide how members of an organisation approach their work and interact with each other, as modelled by the organisation's leadership.	17
Use of resources (labour and equipment)	Use of equipment, resources and staff as intended/ for official purposes.	15
Drugs	Conduct involving the use, theft, trafficking or smuggling of illicit drugs or drugs of dependence.	5
Use of force	Use of force in custodial settings.	5
Physical and technical security	The physical security of premises and technical security and surveillance (for example, body-worn cameras and CCTV in custodial settings).	4

Notes:
(a) This table does not include all identified systemic and organisational corruption risks.
(b) One recommendation can relate to multiple systemic and organisational corruption risks.

Source: IBAC

Conflicts of interest was the corruption risk most commonly associated with IBAC recommendations across the majority of sectors (10 sectors). For the health and education and training sectors, procurement was the most common corruption risk associated with IBAC recommendations made to these sectors. By comparison, oversight of funded agencies, entities, contractors and suppliers was the most common corruption risk associated with IBAC recommendations made to the human services sector. All recommendations made in relation to use of force related to the corrections sector.

The following examples are presented chronologically to further demonstrate the breadth of corruption issues IBAC has made recommendations about between 2014 and 2025, and the types of changes that agencies have implemented in response to IBAC's recommendations.

Strengthening the organisational culture at the Department of Education

IBAC's Operation Ord focused on allegations that senior departmental officers at the then DET misappropriated funds through false and inflated invoicing and arranging payment of inappropriate expenses, such as excessive hospitality, travel and personal items. A special report was tabled in Parliament in April 2016.[26]

IBAC made several recommendations to strengthen systems and the culture of integrity within DET's corporate workplaces and schools, including that executives set the right tone at the top. In response to the recommendations, DET implemented an integrity reform program. Examples of some of the actions undertaken include:

- all executives signed a leadership charter, holding them accountable to new standards for ethical leadership
- a 'speak up' campaign and service was introduced, which addressed one of the biggest workplace issues – the fear of raising concerns
- the establishment of new programs, including five integrity leadership groups, a pathways program to bring school leaders into corporate roles, and an executive rotation program where executives participate in short-term placements in areas outside their role (an evaluation by DET revealed very high satisfaction with the program)
- DET embraced the public sector values as DET's values.

In response to a related but separate recommendation made to the Department of Premier and Cabinet (DPC), the Victorian chapter of the Institute of Public Administration Australia – with the support of the Victorian Secretaries' Board and the Victorian Public Sector Commission – developed a program on integrity and ethics for public sector senior executives. The program is called the Integrity and Ethical Leadership Program.[27] The program helps to equip executives and public sector managers with frameworks to navigate complex integrity dilemmas, build trust and foster transparent organisational cultures.

Improving Ambulance Victoria's drug testing regime

IBAC's Operation Tone investigated allegations that Ambulance Victoria (AV) paramedics engaged in serious corrupt conduct, namely the theft, trafficking and use of drugs of dependence, and misappropriation of audiovisual equipment. A special report was tabled in Parliament in September 2017.[28]

When IBAC commenced Operation Tone in November 2015, AV's capacity to initially identify and expose at-risk paramedics was limited. IBAC made two recommendations intended as next steps on the path to a robust framework for preventing and detecting illicit drug use and misuse of drugs of dependence within a critical Victorian emergency service organisation.[29]

26 Independent Broad-based Anti-corruption Commission 2016, *Operation Ord special report*, IBAC, Melbourne p 107.
27 Department of Premier and Cabinet 2018, DPC update in response to *Operation Ord recommendations*, July 2018, IBAC, Melbourne.
28 Independent Broad-based Anti-corruption Commission 2017, *Operation Tone special report*, IBAC, Melbourne, p 5.
29 Independent Broad-based Anti-corruption Commission 2017, *Operation Tone special report*, IBAC, Melbourne, p 30.

During and since IBAC's investigation, AV has introduced new policies and practices to minimise opportunities for the possession, use and misappropriation of drugs of dependence and misappropriation of audiovisual equipment. AV developed an approach to random testing informed by industry best practice and commenced random testing of staff in January 2018. Between January and September 2018, 1281 staff were randomly tested for alcohol and other drugs. AV committed to continuing the random testing regime on an ongoing basis and publishing the results in its annual report.[30] An alcohol and other drugs specialist was also appointed to support staff and volunteers with a welfare-based approach to identified drug and alcohol misuse.[31]

Ensuring adequate conflict of interest controls during procurement

In September 2019, IBAC published its *Special report on corruption risks associated with procurement in local government: Operations Dorset, Royston and others*. The report presented specific findings from two investigations by IBAC into allegations of corrupt conduct involving procurement in the Victorian local government sector – namely Operation Dorset and Operation Royston – and discusses general conclusions that may be drawn from these and a number of other investigations.

The report highlighted vulnerabilities in council policies, practices and systems that contributed to the conduct, and raised concerns about procurement procedures and controls in the local government sector more broadly.[32] In response to recommendations made by IBAC, the councils that were investigated implemented a range of reforms, including amending processes to ensure that council officers who obtain quotes are not also responsible for authorising payments, even if the amount was within their financial delegation, and adopting a revised procurement policy.[33] Local Government Victoria developed and implemented a supplier code of conduct that sets out the minimum standards of conduct when conducting business with councils.[34]

Strengthening oversight by funding agencies

IBAC's Operation Meroo investigated allegations that the former CEO of a Victorian regional health service misused their position and engaged in corrupt conduct, which included subverting procurement processes and failing to declare and manage conflicts of interest. A special report was tabled in Parliament in April 2021.[35]

In that report, IBAC also identified issues with the oversight of the health service by the then-Department of Health and Human Services (DHHS). IBAC also raised concerns that DHHS failed to take sufficient action despite red flags regarding the conduct of the former CEO.

In response to a recommendation made by IBAC, DHHS undertook a review of existing systems and information storage capabilities used to monitor the performance of public health services and public hospitals. It introduced a number of improved practices,[36] including:

- shifting to a shared internal records system to enable teams to record and access information regarding the performance of health services
- developing shared resources to support consistent practice in performance monitoring across services
- establishing regular meetings across the eight performance teams to share information and ensure greater consistency across the performance teams
- strengthening guidance material and reinforcing expectations in relation to the role of boards in the performance management of CEOs of health services.

30 Ambulance Victoria 2018, *Ambulance Victoria's final report to IBAC*, IBAC, Melbourne, p 3.
31 Ambulance Victoria 2018, *Ambulance Victoria's final report to IBAC*, IBAC, Melbourne, p 5.
32 Independent Broad-based Anti-corruption Commission 2019, *Special report on corruption risks associated with procurement in local government: Operations Dorset, Royston and others*, IBAC, Melbourne, p 6.
33 City of Ballarat Council 2020, *City of Ballarat Council response to IBAC*, IBAC, Melbourne, pp 3–4.
34 Department of Jobs, Precincts and Regions 2021, *Department of Jobs, Precincts and Regions response to IBAC*, IBAC, Melbourne, p1.
35 Independent Broad-based Anti-corruption Commission 2021, *Operation Meroo special report*, IBAC, Melbourne.
36 Department of Health 2022 and 2023, *Operation Meroo: Response to IBAC recommendation 2 and 3*, IBAC, Melbourne.

Establishment of a Parliamentary Integrity Commission

Operation Watts was a joint investigation with the Victorian Ombudsman that looked into branch stacking in the Australian Labor Party and how it resulted in the alleged misuse of public funds for political purposes. A special report was tabled in Parliament in July 2022.

In May 2024, the Victorian Government introduced the Parliamentary Workplace Standards and Integrity Bill 2024 (Vic), which responds to some of the major recommendations from Operation Watts.[37] The Parliamentary Workplace Standards and Integrity Commission was established on 31 December 2024 by the *Parliamentary Workplace Standards and Integrity Act 2024* (Vic) to investigate allegations of misconduct involving Victorian members of Parliament, ministers and parliamentary secretaries.[38] The Act also introduced a parliamentary ethics committee to promote ethical practices by members of the Victorian Parliament.

3.4. More recommendations were made in public than in private in the past five years

There are a range of factors IBAC considers when deciding whether to produce a special report and include recommendations, such as whether publishing the findings of an investigation is in the public interest and whether the recommendations offer broader education and corruption prevention opportunities. There are also limitations on what IBAC can make public when prosecutions or legal action is in progress. As a result, many standard operational recommendations resulting from investigations with private examinations are delivered confidentially to the relevant agency or department rather than released through a public special report.

Overall, IBAC made 125 recommendations (48 per cent) to public sector agencies in special reports to Parliament and 135 recommendations (52 per cent) in private.

The proportion of recommendations made in private compared to those made in public varied significantly from year to year (see Figure 1). For example, in 2019 IBAC made 34 recommendations in private and three recommendations in public in its *Special report on corruption risks associated with procurement in local government: Operations Dorset, Royston and others*.[39] In contrast, in 2023, IBAC made eight recommendations in private, while 55 recommendations were made in public through three separate special reports to Parliament.[40]

That said, in the past five years (2021 to 2025), there were almost three times more recommendations made in public than in the seven years prior (2014 to 2020).[41] From 2021 to 2025, IBAC made 91 recommendations in public (71 per cent)[42] and 38 recommendations in private (29 per cent). From 2014 to 2020, IBAC made 34 recommendations in public (26 per cent)[43] and 97 recommendations in private (74 per cent). Table 3 provides a breakdown of the number of recommendations made in public compared to private between 2014 and 2025 and identifies the number of special reports published in each year.

37 Parliament of Victoria 2024, Parliamentary Workplace Standards and Integrity Bill 2024 (Vic), p 2.
38 Parliamentary Workplace Standards and Integrity Commission 2026, 'About us', web page, Melbourne, www.pwsic.vic.gov.au/about-pwsic.
39 Independent Broad-based Anti-corruption Commission 2019, *Special report on corruption risks associated with procurement in local government: Operations Dorset, Royston and others*, IBAC, Melbourne, p 47.; Recommendation 1 recommends that the CEOs of Darebin City Council and the City of Ballarat Council separately report to IBAC to advise how they have strengthened their council's procurement policies, systems and practices to address the corruption vulnerabilities identified by IBAC. As this recommendation requests actions from two separate public sector bodies, it has been counted as two different recommendations.
40 This includes in the *Operation Clara special report*, *Operation Sandon special report* and *Operation Daintree special report*.
41 The periods 2014 to 2020 and 2021 to 2025 are shown as a comparable number of recommendations made during each period.
42 The proportion of recommendations made between 2021 and 2025 that were made in public.
43 The proportion of recommendations made between 2014 and 2020 that were made in public.

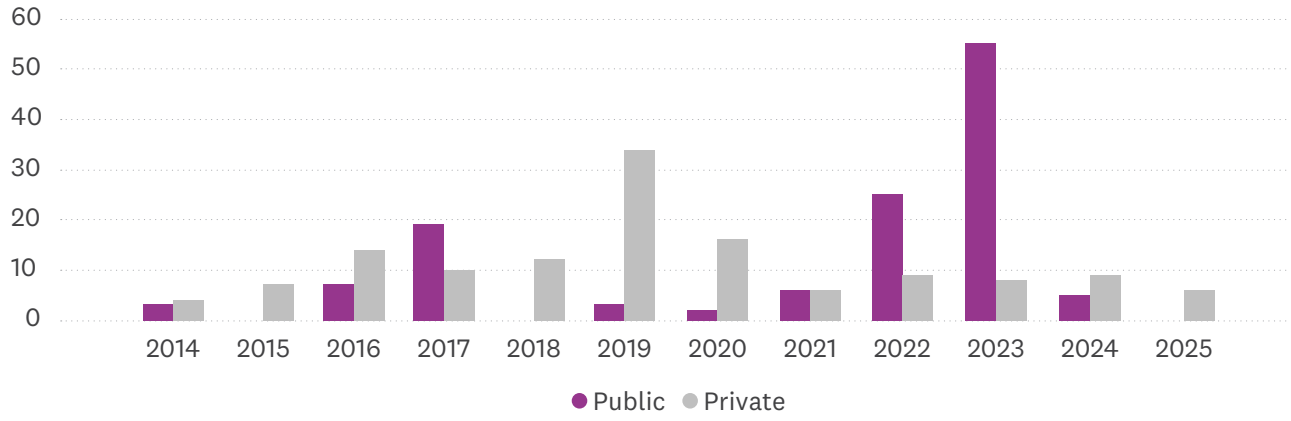
Table 3: Number of IBAC recommendations made to public sector agencies between 2014 and 2025

Year recommendation was made by IBAC	Recommendations made in private	Recommendations made in public	Special reports to Parliament[(a)]
2014	4	3	1
2015	7	–	–
2016	14	7	2
2017	10	19	5
2018	12	-	-
2019	34	3	1
2020	16	2	1
2021	6	6	2
2022	9	25	2
2023	8	55	3
2024	9	5	2
2025	6	–	–
Total	**135**	**125**	**19**

Note:
(a) This is a count of special reports to Parliament which include recommendations to public sector agencies.

Source: IBAC

Figure 1: Number of recommendations made in public compared to private



Source: IBAC

There were some differences across sectors in relation to the frequency of recommendations being made in public compared to private. For example:

- all recommendations made to regulators and to human services, and almost all recommendations made to the corrections sector (29 of 34 recommendations) were made in private
- the majority of recommendations made in relation to planning, environment and land management were made in public (13 of 16 recommendations). This is similar for recommendations relating to health (11 of 16 recommendations), ministerial offices (18 of 20 recommendations) and Parliament (12 of 13 recommendations).
- the number of recommendations made to the local government and education and training sectors was evenly split across private and public recommendations.

3.5. Public sector agencies implement most of IBAC's recommendations

Recommendations are classified in IBAC's system based on progress updates provided by agencies. The implementation status of recommendations is categorised as 'not yet commenced', 'in planning', 'no implementation planned', 'implemented to a minor extent', 'implemented to a moderate extent' and 'fully implemented' based on the actions that an agency has taken in relation to the recommendation.

Table 4 provides a breakdown of the implementation status of IBAC recommendations made to public sector agencies between 2014 and 2025. Excluding recommendations that are in planning or to be commenced,[44] 84 per cent of IBAC's recommendations have been fully implemented by agencies, 10 per cent have been partially implemented and six per cent have no implementation planned.

44 This equates to 59 recommendations.

Table 4: Implementation status of IBAC recommendations made between 2014 and 2025[(a)]

Fully implemented	Partially implemented[(b)]	In planning	Not yet commenced	No implementation planned
168	21	37	22	12

Notes:
(a) Implementation status of recommendations made between 2014 and 2025 at June 2026.
(b) Includes 'implemented to a minor extent' and 'implemented to a moderate extent'.

Source: IBAC

IBAC assessed 168 recommendations as fully implemented, meaning IBAC is satisfied with the responses provided by agencies to demonstrate how the recommendations have been implemented.

A number of factors are likely contributing to the high implementation rate:

- IBAC consults with public sector agencies (usually as part of the natural justice process) on draft recommendations and may take feedback into consideration prior to issuing the recommendation in public or private.
- The willingness of agencies to undertake work to remedy the issues identified by IBAC.
- IBAC keeps recommendations open until a satisfactory outcome is reached and provides agencies with ongoing advice to reduce the identified corruption risks.

IBAC assessed 21 recommendations as partially implemented, which means the agency has actioned some elements of the recommendation but does not intend to action the recommendation in full. There are a variety of reasons for an organisation not actioning a recommendation in full, such as feasibility, budget constraints, dependencies on other projects or because an agency considers that the current policy settings are appropriate. Of these 21 recommendations, 18 were implemented to a moderate extent and three were implemented to a minor extent.

An additional 37 recommendations were in planning.[45] These are recommendations where the agency has accepted the recommendation and IBAC is waiting for the agency to provide additional information or complete an activity, such as implementing a change of policy, conducting an audit or undertaking disciplinary action. These recommendations include:

- twenty-five of the 34 recommendations made in July 2023 in the *Operation Sandon special report*[46]
- six recommendations made in private to the corrections, courts and legal sector
- four of the 21 recommendations made in July 2022 in the *Operation Watts special report*[47]
- one of the four recommendations made in February 2023 in the *Operation Clara special report*[48]
- one of the 17 recommendations made in April 2023 in the *Operation Daintree special report*.[49]

Implementation has not commenced on 22 recommendations, noting 11 of these are recommendations to amend or review legislative or regulatory frameworks. The recommendations not commenced include:

- fourteen of the 21 recommendations made in July 2022 in the *Operation Watts special report*[50]
- all four recommendations made in October 2022 in the *Special report on corruption risks associated with donations and lobbying*[51]

45 These were based on recommendations made between 2014 and 2025 and where the status was noted as 'in planning' at June 2026.
46 Independent Broad-based Anti-corruption Commission 2023, *Operation Sandon special report*, IBAC, Melbourne; Victorian Government 2023, *Government IBAC Operation Sandon response*, Vic Gov, Melbourne.
47 Independent Broad-based Anti-corruption Commission and Victorian Ombudsman 2022, *Operation Watts special report*, IBAC and VO, Melbourne, pp 164–212.
48 Independent Broad-based Anti-corruption Commission 2023, *Operation Clara special report*, IBAC, Melbourne, p 31.
49 Independent Broad-based Anti-corruption Commission 2023, *Operation Daintree special report*, IBAC, Melbourne, p 9.
50 Independent Broad-based Anti-corruption Commission and Victorian Ombudsman 2022, *Operation Watts special report*, IBAC, Melbourne, pp 164-212.
51 Independent Broad-based Anti-corruption Commission 2022, *Special report on corruption risks associated with donations and lobbying*, IBAC, Melbourne; While IBAC has not received a formal response to these recommendations, the *Electoral Further Amendment Act 2026* (Vic) passed by Parliament in June 2026, reintroduced Part 12 of the *Electoral Act 2002* (Vic), with amendments that may address some aspects of Recommendation 1.

- two recommendations made in November 2025 in private relating to ministerial offices
- one recommendation made in May 2024 in private relating to registered political parties
- one of the 34 recommendations made in July 2023 in the *Operation Sandon special report*.[52]

Of the 12 recommendations classified as 'no implementation planned', six are under review by the government, three were superseded by more recent recommendations, one was considered a matter for Parliament, one was rejected and one could not be implemented. These recommendations include:

- ten of the 17 recommendations made in April 2023 in the *Operation Daintree special report*.[53] Two of these 10 recommendations were superseded, and one was not supported.
- one of the three recommendations made in June 2021 in the *Special report on corrections*[54]
- one recommendation made in November 2020 in private was superseded by a recommendation in the *Operation Watts special report*,[55] which was implemented to a moderate extent.

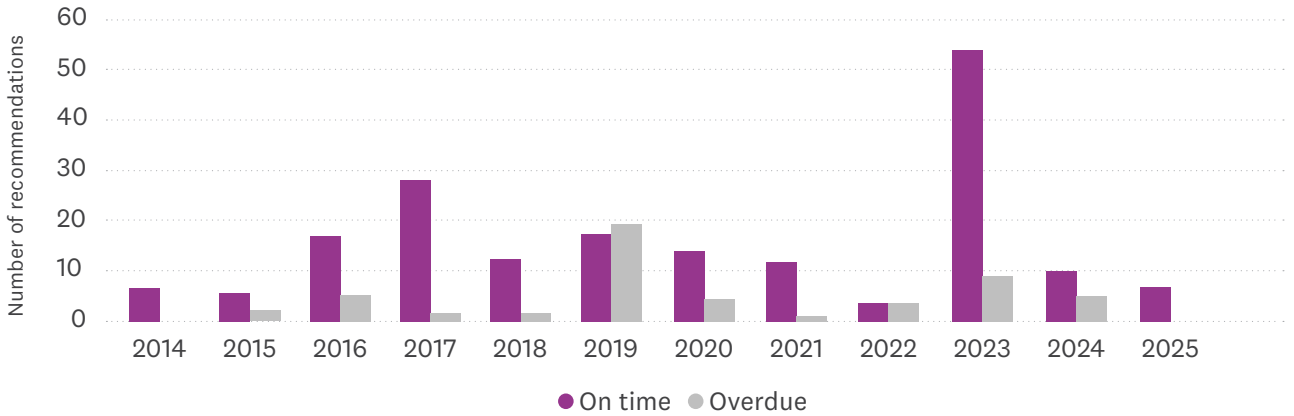
3.6. Most public sector agencies responded to recommendations on time

The IBAC Act requires agencies to report to IBAC and advise whether they intend to implement recommendations made under section 159 of the IBAC Act. In the interest of ensuring corruption risks are addressed, IBAC usually requests that agencies report back on the implementation status of recommendations within six to 12 months of the recommendation being made. While legislative reform is required to strengthen the obligations for agencies responding to IBAC recommendations, most agencies have genuinely engaged with IBAC to reduce the identified risks.

Between 2014 and 2025, implementation reports for 78 per cent of recommendations were received by IBAC early or on time, while implementation reports for 22 per cent of recommendations were received late.

Figure 2 illustrates the timeliness of initial implementation reports provided to IBAC by public sector agencies between 2014 and 2025.

Figure 2: Timeliness of initial implementation report to IBAC between 2014 and 2025



Source: IBAC

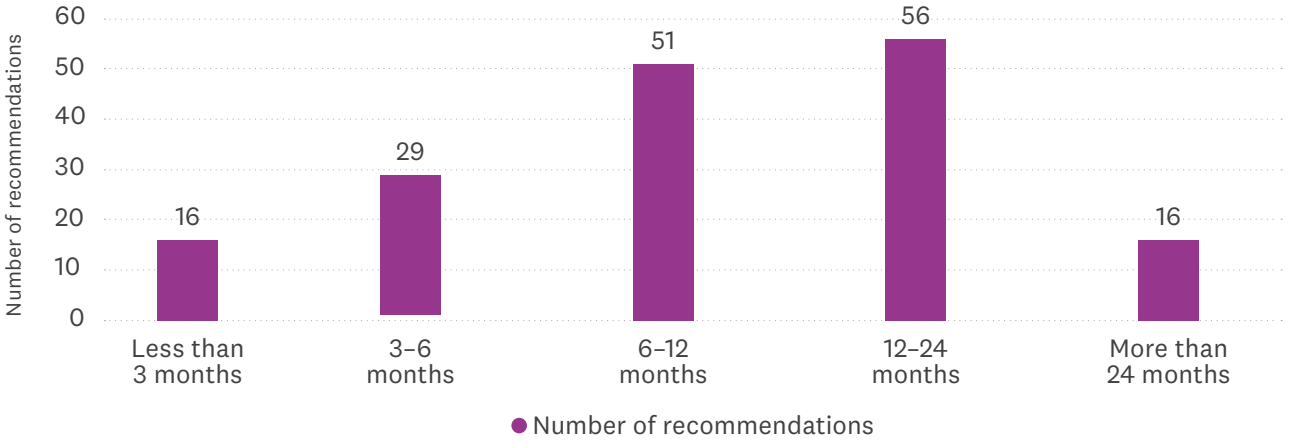
52 Independent Broad-based Anti-corruption Commission 2023, *Operation Sandon special report*, IBAC, Melbourne; Victorian Government 2023, *Government IBAC Operation Sandon response*, Vic Gov, Melbourne.
53 Independent Broad-based Anti-corruption Commission 2023, *Operation Daintree special report*, IBAC, Melbourne, p 9.
54 Independent Broad-based Anti-corruption Commission 2021, *Special report on corrections*, IBAC, Melbourne, p 97
55 Independent Broad-based Anti-corruption Commission and Victorian Ombudsman 2022, *Operation Watts special report*, IBAC and VO, Melbourne, pp 164–212.

After receiving an implementation report, IBAC assesses whether the actions undertaken by the agency meet the intent of the recommendation. If IBAC is satisfied that a recommendation is fully implemented, IBAC advises the agency and formally closes the recommendation. If IBAC considers that more work or additional information is required, IBAC requests that the agency provide a further progress report by a specified date. Of the recommendations that were fully implemented by agencies, 66 per cent of recommendations were assessed as implemented based on the first report received, while IBAC requested additional information or work be undertaken in relation to 34 per cent of recommendations.

Figure 3 provides a breakdown of the time taken to fully implement IBAC's recommendations based on recommendations implemented between 2014 and 2025. The largest proportion of recommendations took between 12 and 24 months to fully implement (56 out of 168 recommendations). The median time taken for agencies to fully implement IBAC's recommendations was 13 months.

The time taken for recommendations to be implemented depends on a range of factors, including the number of changes or actions included in the recommendation, whether legislative change is needed, the type of action requested, and if additional resources or funding are required to undertake the recommended action. Given the complexity of many of the issues IBAC's recommendations intend to address, IBAC is broadly satisfied with the speed at which agencies implement recommendations.

Figure 3: Time taken to fully implement IBAC's recommendations



Source: IBAC

4. Conclusion

IBAC's recommendations can lead to ongoing real-world impacts that improve how an agency functions long after an IBAC investigation or research project is complete. When recommendations are made public, they can also assist other agencies who face similar corruption risks.

IBAC's recommendations have led to several process improvements to address a broad range of corruption issues across the public sector, such as the implementation of a fit-for-purpose drug testing regime, improved conflict of interest and procurement controls at councils, the strengthening of organisational culture across the education sector, and the establishment of the Parliamentary Workplace Standards and Integrity Commission.

IBAC's recommendations signal to the Victorian community that corruption risks in the public sector are investigated and addressed. IBAC is committed to improving public access to information about its work and will continue to seek legislative change to enable IBAC to publish recommendations outside of a special report to increase the visibility of the recommendations it makes to agencies. This change will also improve IBAC's ability to hold agencies to account for the timeliness and accuracy of their responses to IBAC's recommendations.

IBAC's recommendations signal to the Victorian community that corruption risks in the public sector are investigated and addressed.

ibac | Strengthening Victoria's Integrity

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