



Integrity
Oversight
Victoria

June 2025

Integrity Oversight Victoria

Annual Plan 2025–26

Integrity Oversight Victoria

Level 8, 565 Bourke Street
Melbourne VIC 3000

Telephone: 1800 518 197
integrityoversight.vic.gov.au

Acknowledgement

Integrity Oversight Victoria 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.

Published by order, or under the authority, of the Parliament of Victoria June 2025.

© Integrity Oversight Victoria 2025



You are free to reuse this work under a Creative Commons Attribution 4.0 Licence provided you credit Integrity Oversight Victoria as author, indicate if changes were made and comply with the other licence terms. The licence does not apply to any third-party material, images or branding including government logos.

Copyright enquiries may be directed to communications@integrityoversight.vic.gov.au.

ISSN 2982-3269 (online)
Published June 2025

If you would like to receive this information in a more accessible format, please call 1800 518 197 or email communications@integrityoversight.vic.gov.au. This document is available at integrityoversight.vic.gov.au.

Contents

Foreword	4
Section 1: Strategic Plan 2025–27	6
Vision	6
Aspirations	6
Values	6
Strategic Priorities	7
Section 2: Core business	8
Complaints	8
Public interest disclosures	8
Investigations	9
Coercive power notification reviews	9
Inspections	9
Compliance monitoring	9
Oversight methodology	10
Strengthening the integrity system	10
Educational activities	10
Section 3: Key focus areas for 2025–26	11
Section 4: Organisation projects for 2025–26	13
Section 5: Integrity system projects for 2025–26	16
Proactive compliance activities	15
Integrity activities	17
Section 6: Performance measures: Budget Paper 3	18
Section 7: Funding	19
2025–26 Budget	19
Appendix A: Bodies overseen by Integrity Oversight Victoria (at 30 June 2025)	20
Appendix B: Strategic risks	21
Shortened forms	23

Foreword

I am pleased to share our first annual plan as Integrity Oversight Victoria, our new name since 10 February 2025. Our new byline, “Integrity Together”, reflects an intention to work together with Victoria’s integrity bodies to build the integrity culture that corruption prevention requires and to play a lead role in improving and strengthening Victoria’s integrity system.

Our core business is to help ensure 15 integrity, accountability and investigatory bodies, including the Independent Broad-based Anti-corruption Commission (IBAC), perform their functions lawfully and properly.

In 2024-25, we addressed most of the challenges described in our 2023-24 annual report. We established an oversight framework for the new Parliamentary Workplace Standards and Integrity Commission (PWSIC), fully embedded our best practice witness welfare framework and identified a suitable cloud hosted solution that meets the security requirements for our complaint workload to help integrate our complaints case management system. This will be implemented in 2025-26. The final 2 recommendations of the independent performance auditor, being the development of a costing model and a stakeholder survey, have been addressed to date with MOU development and updates to 2 costing models. Details of actions have been provided to the Integrity and Oversight Committee.

This annual plan commences with the strategic priorities in our 2025-27 Strategic Plan and describes the implementation activities planned for 2025-26 to help achieve these priorities.

These activities comprise 4 key focus areas, 6 organisation projects and 2 integrity system projects. The activities are also informed by our Budget Paper 3 (BP3) performance measures (see section 6) and our strategic risks. The strategic risks addressed through this annual plan are summarised in Appendix B.

Integrity Oversight Victoria’s commitment to these key focus areas and projects will support and enhance our core business. Delivery will be resource dependant, with priority given to core business.

The 4 key focus areas in section 3 are designed to help enhance our reach and awareness of who we are and what we do and increase our focus on proactive and strategic work to deliver integrity system improvements. They will support strategic priorities 1 and 2.

The 6 organisation projects in section 4 are designed to uplift capacity, increase efficiencies and better empower our staff to perform their roles. Three projects will leverage ICT solutions to enhance efficient, effective and economical delivery of functions without compromising security (strategic priority 3). Three projects will continue to strengthen organisational sustainability, expertise and a positive culture (strategic priority 4).

Section 5 of this plan describes our integrity system projects, which are aimed at improving Victoria's integrity system. They comprise proactive compliance activities that enhance our annual compliance program; and the integrity activities which are aimed at promoting an integrity culture. The priority is to complete the monitoring project commenced in 2024-25 on IBAC's handling and oversight of complaints about Victoria Police, which focusses on complaints referred back to Victoria Police by IBAC. See section 5 for further detail.

Louise Macleod
Chief Integrity Inspector

Section 1:

Strategic Plan 2025–27

Underpinned by our vision, aspirations and values, our strategic plan has 5 strategic priorities.

Vision

An integrity system that is robust and trusted

Aspirations

Public confidence in Victoria’s integrity system

- The right checks and balances are in place
- Participants understand rights and responsibilities in the integrity system
- The community knows when to come to Integrity Oversight Victoria to protect their rights

A robust Victorian integrity system

- Parliament and integrity agencies have confidence in Integrity Oversight Victoria
- Integrity Oversight Victoria is positively influencing integrity agencies
- Intrusive and coercive powers are exercised lawfully
- The public sector is being held to account

Values

We act with integrity in everything we do

We demonstrate professional courage, leadership and persistence

We are dedicated to delivering work to the highest possible standard

We work collaboratively and respectfully with each other and with integrity bodies

We promote and uphold the Charter of Human Rights

Strategic Priorities

1. Enhance reach and awareness of who we are and what we do.
2. Increase focus on proactive and strategic work to deliver integrity system improvements.
3. Leverage ICT solutions to enhance efficient, effective and economical delivery of functions without compromising security.
4. Continue to strengthen organisational sustainability, expertise and a positive culture.
5. Help build a network to promote integrity across the Victorian Public Service.

Section 2:

Core Business

Integrity Oversight Victoria's role is to oversee the Independent Broad-based Anti-corruption Commission (IBAC), the Victorian Ombudsman (VO) and 13 other integrity, accountability and investigatory bodies and their officers (bodies we oversee). We help to ensure they perform their functions lawfully and properly.

By overseeing a range of bodies, we can apply learnings and take a leadership role across the Victorian integrity system. Our functions are driven by our governing legislation.

Statistics on our input and output across each legislative function are published in our annual report.

Our [key functions table](#) on our website provides an overview of the differing functions we undertake for each body we oversee. The functions are explained below.

Complaints

We assess each complaint under the *Integrity Oversight Victoria Act 2011* (IOV Act) and respond to each complaint with written reasons. Most complaints are assessed and responded to without requiring an investigation. The assessment process includes, where appropriate, obtaining further material from the complainant and/or the relevant body.

Public interest disclosures

We assess each complaint under the *Public Interest Disclosures Act 2012* (PID Act). If the complaint is an assessable disclosure and it relates to IBAC or a Public Interest Monitor, we assess whether it is a public interest complaint (PIC). All other assessable disclosures that meet the relevant threshold are referred to IBAC. If IBAC decides an assessable disclosure is a PIC, IBAC may investigate it, or refer it to another organisation or back to us for investigation.

Investigations

Subject to limited exceptions, we must investigate public interest complaints. Less frequently, we will investigate a complaint under the IOV Act or commence an own motion investigation.

Coercive power notification reviews

The agencies we oversee must notify us each time they exercise coercive powers (coercive power notifications).

We triage and review notifications according to criteria in a risk-based model. We provide oversight bodies regular reports on notification review findings to help identify thematic issues and encourage systemic responses that reduce future issues. These reports and their outcomes are summarised in annual reports, or, as appropriate, brought to Parliament's attention through a special report.

Inspections

For bodies we oversee that use covert powers, such as surveillance devices, telecommunication interceptions, controlled operations and counter-terrorism activities, we inspect the records that relate to their use to establish whether compliance obligations were met by the body. Our inspections methodologies also address emerging compliance risks and draw out systemic or serious compliance issues.

Compliance monitoring

We monitor IBAC's compliance with the *Independent Broad-based Anti-corruption Commission Act 2011* and other laws. For IBAC and some other bodies we oversee we also have a specific role reviewing public interest disclosure procedures, and procedures relating to procedural fairness and their exercise of coercive powers.

Oversight methodology

Through our Integrity Operations Management Committee and related governance policy, we ensure operational decision-making is consistent, fully informed by risk assessments and legal advice, and properly documented. Risk assessment includes consideration of witness and complainant welfare. Our committee ensures that decisions to initiate new work are carefully considered, and that progress on existing work is monitored for resource shortfalls or delays.

The criteria in the [Integrity Response Guidelines](#) published on our website help us decide how to influence change including in response to any non-compliance by integrity agencies we oversee. Criteria include the readiness of the body we oversee to comply, the need for accountability, and prevention of harm to individuals and the integrity system.

Where appropriate, we take a cooperative approach, and in our annual report, acknowledge good compliance processes, procedures and activity by agencies.

As we are not a court, we do not have the power to overturn a decision or remake a decision of another organisation.

Where it is in the public interest, we make public recommendations in special reports that are tabled in Parliament and published on our website.

Strengthening the integrity system

To help improve the practice of bodies we oversee and strengthen the integrity system, we also make observations, suggestions and provide feedback.

Educational activities

We also undertake education activities to support compliance, improve access to, and understanding of, the integrity system and promote integrity. Activities include publishing guidance materials to share lessons learned.

Section 3:

Key focus areas for 2025–26

The 4 key focus areas (KFA) for 2025–26 support strategic priorities 1 and 2.

KFA1 – Create and begin implementing a new external communication and stakeholder engagement strategy that includes:

- continuing plain English update of public information
- improving communications with vulnerable complainants through developing data-informed and trauma-informed communications and engagement strategies.

Strategic plan priority 1	Strategic Risk	BP3 Measure	Target completion date
Enhance reach and awareness of who we are and what we do	Stakeholder engagement	Educational activities	Strategy by 30 June 2026, then implementation ongoing

KFA2 – Share expertise and knowledge across integrity agencies to support better practice.

Strategic plan priority 2	Strategic Risk	BP3 Measure	Target completion date
Increase focus on proactive and strategic work to deliver integrity system improvements	Stakeholder engagement	Educational activities	Ongoing

KFA3 – Continue to pursue proposed law reform to enhance the integrity system.

Strategic plan priority 2	Strategic Risk	BP3 Measure	Target completion date
Increase focus on proactive and strategic work to deliver integrity system improvements	Legislative improvement	N/A	Ongoing

KFA4 – Identify ways to focus oversight activities on areas of greatest risk to the integrity system.

Strategic plan priority 2	Strategic Risk	BP3 Measure	Target completion date
Increase focus on proactive and strategic work to deliver integrity system improvements	Financial resourcing	Systemic improvements by agency	Ongoing

Section 4:

Organisation projects for 2025–26

Organisation projects uplift capacity, increase efficiencies and better empower our staff to perform their roles. Once completed, most are incorporated into business-as-usual activities.

The 6 organisation projects (**OP**) planned for 2025–26 support strategic priorities 3 and 4 by leveraging ICT solutions to enhance efficient and economical delivery of functions and continuing to strengthen organisational sustainability, expertise and a positive culture. They address a range of strategic risks and will help improve the BP3 measures relating to investigation and complaint timeliness. They also address a new challenge identified through staff consultation during the strategic planning process of the need to improve records and knowledge management.

Project OP1 is developing the next iteration of our ICT strategy. OP2 is implementing a cloud hosted case management system for our complaint workload. OP3 is exploring the suitability of closed loop AI tools.

As we are a small agency of approximately 30 staff, limited career progression impacts retention of expert staff over long periods. Staff turnover through natural attrition, together with low staffing numbers spread across a broad range of functions, heightens our risk of losing organisational knowledge. Project OP4 to address identified skills gaps will help mitigate the risk of only having 1–2 experts for many functions. OP5 to develop an overarching Information & Records Management Framework will help with knowledge management by clearly documenting record keeping processes across different systems and platforms and providing greater guidance to staff. OP6 to implement a Policy Review and Awareness Framework will reduce reliance on individual's corporate knowledge and tracking systems to ensure policy reviews and training stay up to date.

OP1 – Develop ICT strategy for the next 3 years

Strategic plan priority 3	Strategic Risks	BP3 Measure	Target completion date
Leverage ICT solutions to enhance efficient, effective and economical delivery of functions without compromising security	<ul style="list-style-type: none"> • Security – IT • Critical infrastructure asset management • Records management 	Complaint timeliness	30 June 2026

OP2 – Integrate ICT systems for complaint case management

Strategic plan priority 3	Strategic Risks	BP3 Measure	Target completion date
Leverage ICT solutions to enhance efficient, effective and economical delivery of functions without compromising security	<ul style="list-style-type: none"> • Security – IT • Records management 	Complaint timeliness	31 December 2025

OP3 – Explore secure closed loop AI tools

Strategic plan priority 3	Strategic Risks	BP3 Measure	Target completion date
Leverage ICT solutions to enhance efficient, effective and economical delivery of functions without compromising security	<ul style="list-style-type: none"> • Staff retention and capability • Security – IT 	Investigation and complaint timeliness	31 March 2026

OP4 - Address identified skills gaps with targeted learning and development

Strategic plan priority 4	Strategic Risk	BP3 Measure	Target completion date
Continue to strengthen organisational sustainability, expertise and a positive culture	<ul style="list-style-type: none"> Staff retention and capability 	N/A	30 June 2026

OP5 - Develop an overarching Information & Records Management Framework and action plan

Strategic plan priority 4	Strategic Risks	BP3 Measure	Target completion date
Continue to strengthen organisational sustainability, expertise and a positive culture	<ul style="list-style-type: none"> Records management Staff wellbeing Staff retention and capability 	N/A	30 June 2026

OP6 - Develop and implement Policy Review and Awareness Framework

Strategic plan priority 4	Strategic Risks	BP3 Measure	Target completion date
Continue to strengthen organisational sustainability, expertise and a positive culture	<ul style="list-style-type: none"> Records management Staff wellbeing Staff retention and capability 	N/A	30 March 2026

Section 5: Integrity system projects for 2025–26

Integrity system projects (SPs) are aimed at improving the Victorian integrity system

Proactive compliance activities

Proactive compliance activities support improvements to the Victorian integrity system by enhancing our annual compliance program.

In 2025–26, we will deliver the following monitoring project commenced in late 2024–25:

SPI – Deliver monitoring project on IBAC’s handling and oversight of complaints about Victoria Police

For complaints referred to Victoria Police, the project will focus on complaints referred after IBAC’s ‘Referral (s73) Procedure’ came into effect in response to our recommendations in the [‘Emma Special Report’](#).

Strategic plan priority 2	Strategic Risk	BP3 Measure	Target completion date
Increase focus on proactive and strategic work to deliver integrity system improvements	Stakeholder engagement	Systemic improvements by agency	30 June 2026

If resources allow, we will undertake further activities, including an activity to discharge our function under section 11(2)(b) of the IOV Act to oversee the performance by IBAC of its functions under the *Public Interest Disclosures Act 2012*.

Integrity activities

Integrity activities are activities aimed at promoting integrity across the VPS in order to build an integrity culture and prevent corruption.

In 2025–26, Integrity Oversight Victoria plans to host an inaugural integrity forum that explores ways to strengthen Victoria’s integrity system. Planning for the forum, including a co-host and the subject matter, is well underway.

SP2 – Host an annual integrity forum that explores ways to strengthen Victoria’s integrity system

Strategic plan priority 5	Strategic Risk	BP3 Measure	Target completion date
Help build a network to promote integrity across the VPS	Stakeholder Engagement	Educational activities	30 September 2025

Section 6:

Performance measures:

Budget Paper 3

We are accountable to the public, through the Victorian Parliament, to fulfil our purpose and undertake our statutory functions in an efficient, effective and economical way. One way in which this is assessed is through the performance targets as set out in the State Budget Paper No. 3 (BP3).

Below are our BP3 performance measures and the associated targets for 2025–26.

Performance measure	2025–26 Target
Recommendations of Integrity Oversight Victoria accepted by agencies	75%
Reasons for decisions provided to complainants within one month of complaint outcomes	100%
Educational activities to improve community access and explain rights, responsibilities and Integrity Oversight Victoria's role	3
Systemic improvements by agencies to support compliance in the integrity system*	7
Proportion of low and medium complexity investigations completed within 12 months	65%
Acknowledge receipt of new complaints within 5 business days	95%
Proportion of low complexity complaints completed within 2 months	75%
Proportion of medium complexity complaints completed within 5 months	65%

*A systemic improvement is recorded when we can measure a demonstrable change to the conduct and compliance of any of the bodies we oversee after identifying non-compliance or other issues.

After identifying non-compliance and opportunities for systemic improvement whilst undertaking our functions, we respond proportionately through the framework of our published integrity response guidelines.

When our response has demonstrably influenced a systemic improvement that helps prevent future non-compliance by a body we oversee, we describe it in our annual report and identify whether it is an improvement or one of a group of small improvements.

Examples include:

- accepting Integrity Oversight Victoria recommendation(s)
- establishing new procedures to prevent systemic recurrence of non-compliance
- a body we oversee changing its application of the law on an identified issue.

Progress made against each of our performance measures will be included in our annual report.

Section 7: Funding

2025–26 Budget

Recurrent base operating funding	\$7,483,100
Depreciation funding	\$1,173,800
Total Operating	\$8,656,900
Total Budget	\$8,656,900

Appendix A: Bodies overseen by Integrity Oversight Victoria (at 30 June 2025)

- Chief Examiner
- Department of Energy, Environment and Climate Action
- Environment Protection Authority Victoria
- Game Management Authority
- Independent Broad-based Anti-corruption Commission
- Judicial Commission of Victoria
- Former Office of the Special Investigator (Victoria) (until February 2026)
- Office of the Victorian Information Commissioner
- Parliamentary Workplace Standards and Integrity Commission
- Public Interest Monitor
- Victorian Auditor-General's Office
- Victorian Fisheries Authority
- Victorian Ombudsman
- Victoria Police
- Wage Inspectorate Victoria

Appendix B: Strategic risks

We maintain a strategic risk register in accordance with the Victorian Government Risk Management Framework, and actively monitor and manage strategic risks through mitigation activities until the residual risk level is within our defined risk appetite.

The challenges addressed in the 2025–26 annual plan are captured in our strategic risk register and summarised below. They do not reflect our entire risk register.

The current rating reflects the rating in our strategic risk register at 30 June 2025. The forecast residual rating represents the anticipated residual risk rating after implementing the key focus areas (KFAs), organisation projects (OPs) and integrity system projects (SPs) detailed in this annual plan, should all other factors remain the same.

Risk Category	Risk title	Summary of risk	Current rating	Related KFAs, OPs and SPs	Forecast residual rating
Reputation and influence	Stakeholder engagement	Failure to maintain influential relationships with the bodies that we oversee, reducing our ability to influence change within the Victorian integrity system.	Moderate (5)	KFA1 KFA2 SP1 SP2	Low (4)
	Legislative improvements ¹	Failure to assign adequate resources and efforts to influencing legislation that impacts the Victorian integrity system.	Low (3)	KFA3	Low (3)
Personnel	Staff retention and capability	Inadequate steps to develop staff capability and support professional development, resulting in reduced staff retention levels.	Moderate (5)	OP3 OP4 OP5 OP6	Low (4)
	Staff wellbeing	Failure to protect the physical and mental health of staff, leading to reduced levels of workplace psychological safety and wellbeing and increased work-related stress.	Low (4)	OP5 OP6	Low (4)

¹This strategic risk was closed at 30 June 2025 as the endorsed risk rating was within our defined risk appetite.

Risk Category	Risk title	Summary of risk	Current rating	Related KFAs, OPs and SPs	Forecast residual rating
Finance	Financial resourcing	Failure of government to provide adequate resources, impacting on the ability to deliver statutory obligations and to meet compliance obligations.	Moderate (5)	KFA4	Moderate (5)
	Critical infrastructure asset management	Failure to maintain critical assets resulting in compromised or non-functioning systems.	Low (4)	OP1	Low (4)
Security	Security - IT	Failure to take adequate steps to prevent the loss of data due to system failures or to prevent, or to reduce the impact of, cyber incidents.	Moderate (5)	OP1 OP2 OP3	Low (4)
Organisational	Records management	Failure to manage records in a manner that makes records and information readily accessible to staff.	Moderate (5)	OP1 OP2 OP5 OP6	Low (3)

Shortened forms

BP3	Budget Paper 3
IBAC	Independent Broad-based Anti-Corruption Commission
IBAC Act	<i>Independent Broad-based Anti-Corruption Commission Act 2011</i>
IOV Act	<i>Integrity Oversight Victoria Act 2011</i>
SP	Integrity system project
KFA	Key focus area
PID Act	<i>Public Interest Disclosures Act 2012</i>
OP	Organisation project
VO	Victorian Ombudsman



Integrity
Oversight
Victoria

June 2025

