



Annual Report 2024–25

Integrity Together

Integrity Oversight Victoria

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Acknowledgement

Integrity Oversight Victoria acknowledges Aboriginal and Torres Strait Islander people as the Traditional Custodians of Country. We respectfully acknowledge all First Peoples of Victoria and celebrate their enduring connection to land, skies and waters. We thank First Peoples for their care of Country and contributions to Victorian communities. We honour and pay our respects to First Peoples' Elders past and present.

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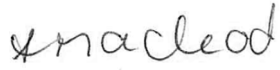
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Declaration by responsible body

In accordance with the *Integrity Oversight Victoria Act 2011*, the *Financial Management Act 1994*, the *Public Interest Disclosures Act 2012*, and the *Major Crime (Investigative Powers) Act 2004*, I am pleased to present Integrity Oversight Victoria's annual report for the year ending 30 June 2025.

A handwritten signature in black ink, appearing to read 'lmacleod'.

Louise Macleod

Chief Integrity Inspector

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Message from the Chief Integrity Inspector

It is my pleasure to present Integrity Oversight Victoria's 2024–25 annual report which places on the public record 11 months of significant change and achievements led by my predecessors before I commenced in May 2025.

The exceptional advocacy and foresight of Inspector Eamonn Moran PSM KC, saw parliament agree to the Victorian Inspectorate becoming Integrity Oversight Victoria – a name better reflecting the important assurance role we provide to the Parliament of Victoria and the community that other integrity, accountability and investigatory bodies use their powers appropriately.

As the newly titled Chief Integrity Inspector, I value the legacy of transparency, fairness and accountability that Eamonn championed across the integrity system. Being the oversight body of other integrity bodies can be challenging. It is only when each integrity body fulfils its unique role with professionalism, an adherence to best practice and a willingness to work together, learn and be accountable, will the integrity system work effectively to meet community expectations.

Over the past 12 months, the enquiries we received, the complaints we assessed, and the investigations and inspections we undertook tell a story about the common issues all integrity bodies we oversee continue to grapple with that can undermine their performance and the confidence the community has in them.

Often it begins with decisions made and actions taken not being documented to help explain, after the fact, the process followed, how conflicts were declared and managed, what was considered, how the rights of an individual were balanced against the public interest, why investigation activity changed or ceased, and what was the outcome.

We hear from complainants and disclosers that they feel unheard, concerned their complaint or disclosure was not treated seriously, uncertain if the correct decision was made, suspicious the wrongdoing or maladministration they reported was not addressed or covered up, and at worst suffering detrimental action and harm for having the courage to speak up in the first place.

As you will see from our account of our work this year, our suggestions and recommendations to integrity bodies continue to highlight the importance of getting the basics right – good record keeping, explaining decisions, giving accurate information about processes, declaring and managing conflicts of interest, procedurally fair handling, assessing and responding to welfare risks, and timely and meaningful communication about outcomes. Some of these basics are required in the legislation integrity agencies must apply, others are discretionary with the potential for best practice.

These suggestions and recommendations are central to achieving transparency, fairness and accountability.

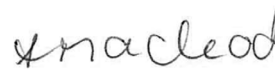
Getting the basics right can save integrity agencies time and effort, reduce confusion and release capacity, leading to more effective decision making and operations that instil public confidence.

Over the next 12 months we will be monitoring IBAC's handling and oversight of complaints about Victoria Police to assess the effectiveness of IBAC's 'referral procedure' implemented in response to our recommendations in the 'Emma' special report.¹ This project includes a focus on recording reasons for referrals, assessing and responding to welfare risks and individual rights, considering conflicts of interest, and communication of outcomes to complainants.

We will increase our proactive engagement with other integrity agencies to promote system improvements and build stronger relationships, including partnering with IBAC to host an integrity leader's forum about the public interest disclosure scheme, its challenges and opportunities for reform. We will also undertake our first stakeholder survey to help us better understand the needs, concerns and expectations of the integrity bodies we oversee and help us better influence improvements.

Ongoing work on our organisational capabilities is also a priority over the next 12 months. Under the expert guidance and leadership of our corporate team we will develop our next 3-year ICT strategy and workforce strategy, implement a cloud-hosted complaint management system, embed an improved information and records management framework and implement a policy review and awareness framework to support staff knowledge management and training.

I look forward to working with the other integrity leaders across Victoria over the next 5 years to achieve a world-class integrity system for the Victorian community. I'm also thoroughly enjoying learning from Cathy Cato, our Chief Executive Officer and General Counsel and the high performing and dedicated team I am privileged to serve at Integrity Oversight Victoria.



Louise Macleod

Chief Integrity Inspector

¹ See IBAC's referral and oversight of Emma's complaints about Victoria Police's response to family violence by a police officer.



Message from the Chief Executive Officer

Change has been a hallmark of 2024–25. Our smooth and successful transition from the Victorian Inspectorate to Integrity Oversight Victoria, and our change of leadership from Eamonn Moran PSM KC to Chief Integrity Inspector Louise Macleod, owe much to the commitment, support and skill of our dedicated staff.

Our remit expanded to oversee the newly established Parliamentary Workplace Standards and Integrity Commission. The legislation that changed our name also contained a range of small improvements to the Victorian integrity system, and we worked with the Department of Justice and Community Safety and relevant integrity bodies to identify, refine and influence further reforms.

Memorandums of Understanding were signed and agreed in principle with the Independent Broad-based Anti-corruption Commission (IBAC) and the Victorian Ombudsman respectively, providing a strong framework for cooperative engagement. IBAC agreed to co-host an integrity forum with us in early 2026, for integrity leaders of bodies investigating public interest disclosures.

To improve our complaints handling we made internal changes. Most significantly, we introduced a secure reporting portal to improve accessibility and outcomes by giving anonymous complainants a 2-way chat option. This increased anonymous complaints from 8% to 12% and allowed us to ask questions, unpack complainant concerns, and provide updates. We also streamlined decision-making through process and delegation changes and engaged a dedicated officer for enquiries, allowing senior complaint officers to focus on complaints. This coming year our case management system will undergo significant enhancements to improve efficiency even more.

To improve the experience for witnesses, we fully implemented our best practice witness welfare framework. Internally, we supported our integrity culture by launching a 'Towards Zero' bullying, harassment and discrimination campaign, supported by a new secure 'Respect@work' portal allowing anonymous staff complaints and 2-way encrypted communication.

With all these changes, I am pleased to report Integrity Oversight Victoria exceeded 5 out of 8 output performance measure targets and met 2 out of 8. Our influence on the agencies we oversee was reflected in 85% of our recommendations being accepted against a target of 75%. We reported 8 systemic improvements by agencies to support compliance including improvements by the Victorian Ombudsman in exercising coercive powers. Despite an increase in the complexity of our complaints, we met one and exceeded 2 out of 4 complaint timeliness measures and both of our investigation timeliness measures. We also met our target of 3 educational activities to improve community access and explain rights, responsibilities and Integrity Oversight Victoria's role.

I record my thanks to Eamonn for his contribution to these achievements, for 7 years leading with integrity, vision and courage and for sharing his legal knowledge and experience across our organisation. Eamonn left a positive and lasting influence on us and on Victoria's integrity system.

Thank you to Cathy Kotsopoulos, our executive assistant, for rising to every challenge and supporting us through this year of change. To Director Integrity Operations and Policy, Alison Lister, and General Manager Corporate Services, Lana Kolyunski, thank you for another year of extraordinary dedication and leadership of your skilled and highly-valued teams. To the Office of the Chief Integrity Inspector and Legal Services, thank you for your innovation across communications and investigations, and your advice and navigation through complex legal issues. To barrister Steven Brnovic, thank you for taking the leap to act as General Counsel and guiding us wisely through this year's transition.

Finally, welcome to Louise Macleod, our Chief Integrity Inspector – Louise brings a wealth of experience to Victoria's integrity system and I look forward to working together to fulfil our 2025–26 annual plan.



Cathy Cato

Chief Executive Officer

Year in numbers: Organisation



Happy birthday!

On 10 February 2025, we celebrated our 13th birthday with a new name! We changed from the Victorian Inspectorate to Integrity Oversight Victoria.



Australasian Reporting Awards

We received a silver medal at the Australasian Reporting Awards for our 2023–24 annual report.



30 Staff

At year end, we had 30 staff (27.5FTE) with most in ongoing and full-time roles.



20 Acts

The *Integrity Oversight Victoria Act 2011* and 19 other Acts establish our jurisdiction and powers.



15 Integrity bodies

The number of bodies we oversee became 15 when the Parliamentary Workplace Standards and Integrity Commission commenced operations on 31 December 2024.



Year in numbers: Operations

ENQUIRIES

 **259**
Enquiries

The number of enquiries we receive continues to rise each year (from 248 last year to 259 this year) but slowed down in 2024–25.

COMPLAINTS

 **130**
Complaints

The number of complaints we receive also continues to grow. This year we received 130 complaints (the largest number of complaints ever received in one year), compared to 119 last year.

 **120**
Closed

We closed 120 complaints this year, compared to 142 last year. Eighty-three of these were received in 2024–25. The complaints closed were more complex this year.

 **275**
Allegations

We assessed 275 allegations contained in the 120 complaints we closed in 2024–25. Twelve allegations were substantiated.

PUBLIC INTEREST DISCLOSURES

 **28**
Disclosures

We received 28 disclosures under the PID Act and completed 24 disclosure assessments in 2024–25, an increase from the 22 received and 17 assessed the previous year.

INVESTIGATIONS

 **6**
Investigations

We conducted 6 investigations in 2024–25 and closed 3. One investigation commenced in 2022–23 and 5 commenced in 2024–25.

INSPECTIONS AND REPORTS

 **14**
Inspections

During 2024–25 we conducted one irregular and 13 regular inspections. The regular inspections were conducted over 33 days, entirely at the premises of the inspected agencies.

 **8**
Inspection reports

We finalised 6 regular inspection reports during the year. Three reports were made to parliament and are available on our website. We also finalised 2 irregular inspection reports.

COERCIVE POWERS NOTIFICATIONS

 **308**
Received

In 2024–25, we received 308 coercive powers notifications, 277 fewer than the 585 received in 2023–24.

 **85**
Reviewed

We completed 85 reviews of summonses, confidentiality notices and recordings of examinations and interviews.

RECOMMENDATIONS AND IMPROVEMENTS

 **13**
Recommendations

We made 13 recommendations of which 11 were accepted. Two were awaiting a response at the end of the financial year.

 **85%**
Accepted

Eighty-five per cent of our recommendations were accepted by integrity agencies, exceeding our target of 75%.

 **8**
Improvements

We reported 8 systemic improvements by agencies to support compliance in Victoria's integrity system.

About Integrity Oversight Victoria

Who we are

Established in 2013 as the Victorian Inspectorate, we changed our name to Integrity Oversight Victoria on 10 February 2025, our 13th birthday. Parliament enabled this change through legislation, to provide greater clarity about our role and purpose.

Initially established to oversee IBAC, we now oversee 15 Victorian integrity, accountability and investigatory bodies and officers authorised to exercise significant powers (see Appendix A for a full list of the bodies).

The powers these bodies have include:

- requiring or summoning witnesses to give evidence or produce documents
- issuing confidentiality notices to prevent information being disclosed
- publicly reporting on investigation findings
- executing warrants for various intrusive investigatory powers.

Such powers enable bodies to investigate corrupt conduct, improper conduct and maladministration within or affecting the public sector and assist Victoria Police to investigate terrorism and organised crime.

Our purpose

As Victoria's primary integrity agency, we provide parliament and the people of Victoria with independent assurance that the bodies we oversee act lawfully and properly in the performance of their functions. Where we identify non-compliance or other areas for improvement, we work together with the relevant body to strengthen and continuously improve Victoria's integrity system.

The Parliament of Victoria has conferred significant powers on us to carry out our role. We are accountable to parliament, through its Integrity and Oversight Committee, for how we perform our functions and exercise our powers.

What we do

Our jurisdictional remit and powers are established by the *Integrity Oversight Victoria Act 2011* (IOV Act) and 19 other Acts of Parliament (see Appendix B for a full list). Under those Acts, we receive, assess and handle complaints, conduct investigations, monitor the exercise of significant powers and inspect records for compliance. For more information, see the Jurisdiction and functions section of this report.

Due to our secrecy provisions, much of what we do is not obvious to the public. We report publicly by tabling an annual plan and annual report, reports about controlled operations and surveillance devices, reports on the exercise of counter-terrorism powers by Victoria Police, monitoring project reports, and occasionally, special reports on investigations or reviews.

We influence change and improvements, including through private or public recommendations to integrity agencies, but cannot direct action to be taken.² If public recommendations are made, they must be in a report.

Our vision

An integrity system that is robust and trusted

Our aspirations

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

Public confidence and trust 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

Our 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

² Our Integrity response guidelines explain the criteria that guide how we choose to influence change.

Operating environment

Integrity and Oversight Committee

The parliamentary Integrity and Oversight Committee (IOC) monitors and reviews the performance of our duties and functions (except in relation to Victorian Auditor-General's Office (VAGO) officers), and reports to both Houses of Parliament. It examines reports made to parliament (excluding VAGO reports) and has power to veto the appointment of the Chief Integrity Inspector. The IOC receives and assesses public interest disclosures about conduct by, or in, Integrity Oversight Victoria.

In accordance with Part 7, Division 2 of the *Integrity Oversight Victoria Act 2011* (IOV Act), Integrity Oversight Victoria submits a draft annual plan each year to the IOC for consideration and feedback prior to tabling. Integrity Oversight Victoria's budget is determined in consultation with the IOC concurrently with the annual plan.

Every 4 years, an independent performance auditor must conduct a performance audit of Integrity Oversight Victoria. Parliament may appoint an auditor, on the recommendation of the IOC, other than the Auditor-General or a VAGO officer.

Public Accounts and Estimates Committee

The parliamentary Public Accounts and Estimates Committee (PAEC) reviews the performance of Integrity Oversight Victoria's duties and functions, and examines any reports made to Parliament, in relation to VAGO officers.

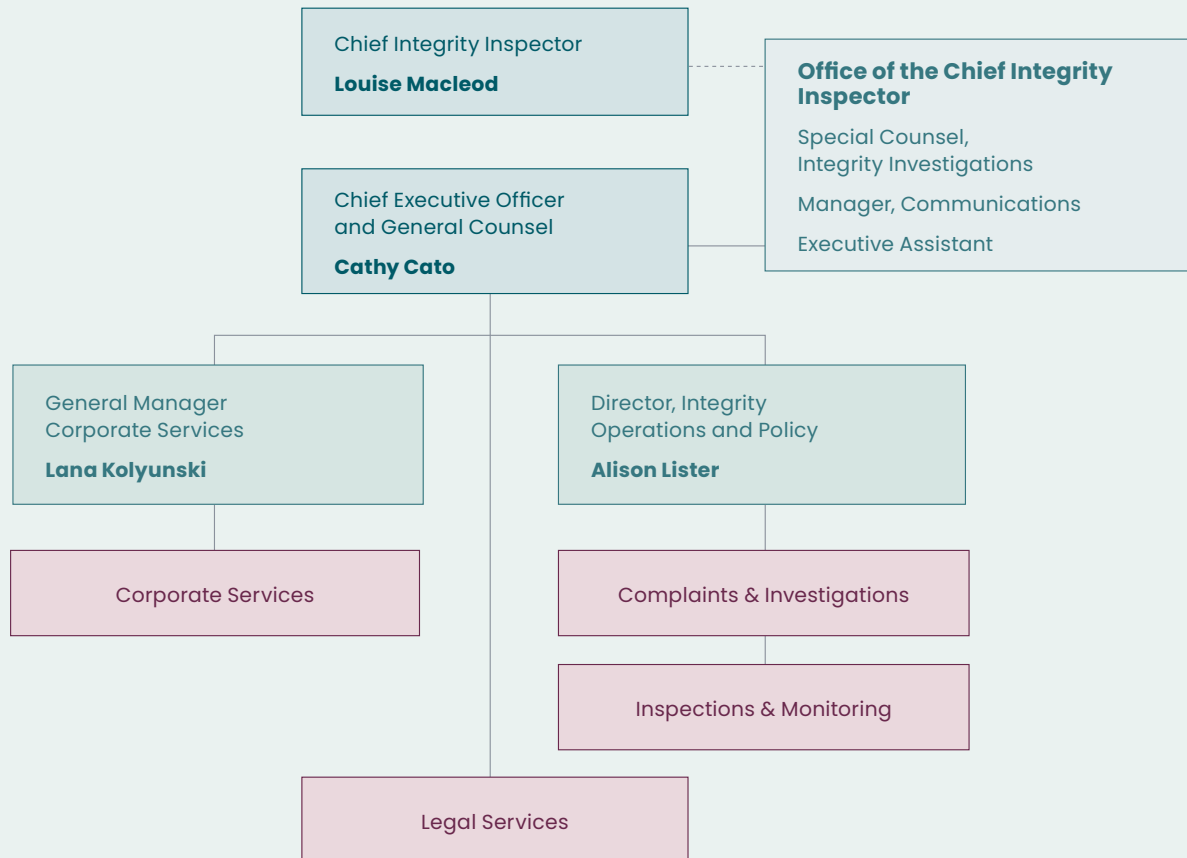
To ensure our independence, the *Parliamentary Committees Act 2003* prescribes that the IOC or PAEC cannot investigate a matter relating to an Integrity Oversight Victoria report, or review any of our decisions, findings or recommendations.

Minister

The Hon Sonya Kilkenney MP was appointed as the Attorney-General of Victoria in December 2024. The Attorney-General is the responsible minister for Integrity Oversight Victoria and in this role is supported by the Department of Justice and Community Safety. We are an independent special body not subject to the direction or control of the Attorney-General in respect of the performance of our duties and functions and the exercise of our powers.

Organisational structure

Figure 1: Integrity Oversight Victoria's organisational structure



From left to right:
Lana Kolyunski, Cathy Cato,
Louise Macleod, Alison Lister

Chief Integrity Inspector

Louise Macleod commenced her appointment as Chief Integrity Inspector on 21 May 2025 for a 5-year term. The Chief Integrity Inspector is an independent officer of the Parliament of Victoria.

Louise is responsible for the strategic leadership of Integrity Oversight Victoria. She is also our public service body head and has the duties, functions and powers delegated by Integrity Oversight Victoria, or conferred by the *Integrity Oversight Victoria Act 2011* (IOV Act) or any other Act. On 30 June 2025, the Chief Integrity Inspector was supported by 30 staff (27.5 FTE).

Louise's 27-year public service career spans state and commonwealth jurisdictions and includes roles as the Aged Care Complaints Commissioner, Assistant Secretary of Policy, Regulation and Legal at the Office of the National Data Commissioner, and acting Deputy Commonwealth Ombudsman.

Before this, Louise was responsible for Complaints Management and Education and the Defence Abuse Response Program at the Office of the Commonwealth Ombudsman and was seconded to the Department of the Prime Minister and Cabinet supporting the Review of the Parliamentary Workplace: Responding to Serious Incidents. Earlier in her career, Louise was the ACT District Registrar for the Administrative Appeals Tribunal overseeing registry operations and conducting conciliations and case management conferences, and an investigator at the Australian Competition and Consumer Commission.

Louise has extensive experience in administrative law, integrity and oversight, investigations, enforcement and compliance monitoring, trauma-informed dispute resolution and restorative justice.

Louise began her public service as an officer in the Australian Army and has a Bachelor of Laws and a Bachelor of Arts and is admitted to practice as a solicitor of the Supreme Court.

Former Inspector

Eamonn Moran PSM KC resigned on 12 January 2025 after 7 years as Inspector of the Victorian Inspectorate. Our name change to Integrity Oversight Victoria stemmed from Eamonn's committed advocacy for a name that more clearly reflected our role. During Eamonn's term, we grew from an organisation of 14 staff overseeing 10 bodies, to an organisation of 30 with a strong integrity culture overseeing 15 bodies. Eamonn's legacy includes contributions to law reform and 4 special reports that have influenced issues such as protecting witness welfare across the integrity system.

CEO and General Counsel

Cathy Cato has led our legal, corporate, integrity operations and policy functions since 2018. As General Counsel, Cathy is supported by Dheepna Benoit who leads the legal team as Manager, Legal Services.

Cathy was acting Inspector/Chief Integrity Inspector from 13 January to 20 May 2025 following Eamonn's departure. Leading administrative law barrister Steven Brnovic was appointed acting General Counsel during this period.

Cathy brings executive, legal, regulatory management and compliance experience from a 30-year career in the commonwealth and state public sectors – as a senior lawyer at the Australian Government Solicitor, senior executive at the Department of Treasury and Finance, and as a lawyer, national manager and deputy commissioner at a commonwealth regulatory body.

She has represented the commonwealth in civil litigation and prosecutions, developed and advised on policy, and appeared as an examiner and counsel assisting in coercive hearings.

Cathy has 13 years of senior executive experience as a leader and deputy leader of state and national bodies, and as a public speaker educating and influencing government, company and agency stakeholders about legislative and policy requirements.

Cathy has served on several committees, including the Australian Radiation Protection and Nuclear Safety Agency's Strategic Management Committee as an external member, and Victoria's Construction Contracts Advisory Panel as chair.

Office of the Chief Integrity Inspector

The Chief Integrity Inspector and CEO are assisted by Manager, Communications Tracey Matters; Special Counsel, Integrity Investigations Rai Small; and Executive Assistant Cathy Kotsopoulos. Cathy provides executive and administrative support and ensures the office runs smoothly.

Director, Integrity Operations and Policy

Alison Lister commenced her role in May 2021. Alison's background includes senior leadership roles in commonwealth agencies, and leading modernisation work internationally working with governments and international organisations to strengthen public institutions responsible for revenue collection and border management in line with the United Nations Sustainable Development Goals.

Alison leads the integrity operations and policy team in its delivery of the full range of oversight functions – inspections, coercive powers notification reviews, monitoring, complaints, and investigations. Alison manages our investigators, works closely with Special Counsel, Integrity Investigations, and is supported in leading the other operational functions by the Manager, Inspections and Monitoring, and Anna Mitchell as Manager, Complaints. Both managers bring a high level of technical expertise and substantial professional experience to their roles.

With a strong focus on integrity, effective regulation and compliance management, Alison has delivered programs in Australia and abroad to reduce corruption, counter fraud, build capacity, and to improve productivity, outcomes, accountability, and integrity in government agencies.

General Manager, Corporate Services

Led by General Manager Lana Kolyunski, the corporate services team provides corporate support services to Integrity Oversight Victoria, including finance, corporate governance, procurement management and reporting, human resources, records management and support, information technology management and building and facilities management.

When Lana joined the Victorian Inspectorate as General Manager, Corporate Services in August 2019 she brought with her an eclectic background. Lana's career kicked off in human resources before she moved into social justice roles delivering employment services and programs targeting the disadvantaged unemployed, establishing an employment program for people with physical disabilities, and managing disability services. For 12 years Lana worked as an advisor to senior executives and project managed a number of strategic and sensitive projects in the Department of Justice and Community Services. She was the Community Engagement Manager to the 2009 Victorian Bushfires Royal Commission, 2014 Hazelwood Mine Fire Inquiry, and 2016 Family Violence Royal Commission.

Lana received an IPAA Victoria International Women's Day 2010 Honour Roll Legend of Service Delivery award in recognition of her exceptional contribution to the workplace and people of Victoria for her work with the Victorian Bushfires Royal Commission.

Audit and Risk Committee

Integrity Oversight Victoria's Audit and Risk Committee meets at least 4 times each year to review our financial performance and procedures and general risk management. Throughout 2024–25, the Audit and Risk Committee comprised:

- Terry Moran AC³
- Taryn Rulton⁴
- Joh Kirby
- Niraj Pau.⁵

The main responsibilities of the Audit and Risk Committee are to:

- review and report independently to the Chief Integrity Inspector on the financial statements published in the annual report and other financial information

- assist the Chief Integrity Inspector in reviewing the effectiveness of our internal control environment
- determine the scope of the internal audit function and ensure its resources are adequate and used effectively, including coordination with external auditors
- maintain effective communication with external auditors
- consider recommendations made by internal and external auditors and review the implementation of actions to resolve issues raised
- oversee the effective operation of the risk management framework.

Legislative updates on our jurisdiction and Victoria's integrity system

The Parliamentary Workplace Standards and Integrity Bill 2024 and the Justice Legislation Amendment (Integrity, Defamation and Other Matters) Bill 2024 were passed in 2024–25, resulting in the following reforms to Victoria's integrity system.

Parliamentary Workplace Standards and Integrity Commission established

Victoria's integrity system gained the Parliamentary Workplace Standards and Integrity Commission (PWSIC) as a new integrity body on 31 December 2024. PWSIC investigates allegations of misconduct of members of parliament, ministers and parliamentary secretaries.

As foreshadowed in our last annual report, establishing this body was a key recommendation in IBAC's Operation Watts investigation. Passed on 20 August 2024, the *Parliamentary Workplace Standards and Integrity Act 2024* also gives Integrity Oversight Victoria oversight of PWSIC:

- monitoring the use of coercive powers such as confidentiality notices and investigation requests
- ensuring PWSIC and its officers comply with procedural fairness requirements
- receiving complaints about and investigating their conduct
- reporting and making recommendations related to our oversight functions.

Victorian Inspectorate renamed Integrity Oversight Victoria

To bring greater clarity to our integrity oversight role and purpose, parliament passed legislation to rename the Victorian Inspectorate as 'Integrity Oversight Victoria', and the Inspector as 'Chief Integrity Inspector'. The *Victorian Inspectorate Act 2011* also became the *Integrity Oversight Victoria Act 2011* (IOV Act).

³ Chair from 1 July 2024 to 30 September 2024; resigned on 30 September 2024.

⁴ Chair from 1 October 2024.

⁵ Joined as a member 1 November 2024.

The Department of Justice and Community Safety (DJCS) consulted with affected agencies on an appropriate commencement date. Our proposed date of 10 February 2025 was proclaimed, enabling us to launch our new name on our 13th birthday.

These name changes were made in the *Justice Legislation Amendment (Defamation, Integrity and Other Matters) Act 2024* (JLA Act)⁶ alongside other integrity reforms.

Other integrity reforms in the JLA Act

Other integrity reforms in the JLA Act included these key changes to the IOV Act:

- giving Integrity Oversight Victoria discretion to refuse to investigate a public interest complaint in certain circumstances
- creating an offence for a complainant or other person to disclose certain information or advice from Integrity Oversight Victoria without authorisation. An amendment during the Bill's passage enshrined their right to complain to the Integrity and Oversight Committee
- clarifying our role includes monitoring the Office of the Victorian Information Commissioner's (OVIC's) power to vary or revoke a notice to produce and confidentiality notices
- allowing us to disclose information to royal commissions and other like bodies⁷
- requiring us to provide an advance copy of a special report to the Attorney-General, the Premier, and their departmental secretaries, if appropriate in all the circumstances
- allowing us to provide information about the commencement, conduct or results of an investigation to the responsible minister or the Premier, subject to many exceptions.

Integrity Oversight Victoria Regulations 2023

After the JLA Act commenced, DJCS consulted with us on related changes to the Integrity Oversight Victoria Regulations 2023 (formerly the Victorian Inspectorate Regulations 2023). The key change ensures those prevented from disclosing advice or information about a complaint or investigation can access the same support services as those currently available to individuals subject to a confidentiality notice.

Human Source Management Regulations 2024

The *Human Source Management Act 2023* (HSM Act) was passed in May 2023 and commenced in September 2024. The HSM Act provides a process for registration, use and management of Victoria Police's human sources, establishing an external oversight model in which IBAC and the Public Interest Monitor oversee Victoria Police. Under that model, they can direct Victoria Police to give evidence. Integrity Oversight Victoria's role is to monitor the exercise of this power.

The Human Source Management Regulations 2024 (HSM Regulations) also commenced on in September 2024. We engaged with DJCS through its development, providing comprehensive feedback about the form of the regulations and requirements for those agencies when transmitting, disposing, storing and returning documents or information.

We engaged with the Public Interest Monitor to provide feedback on its procedures for managing documents and information in accordance with the HSM Regulations and HSM Act.

Major Crime (Investigative Powers) Regulations 2025

In this reporting period, we comprehensively engaged with DJCS on the re-making of the Major Crime (Investigative Powers) Regulations 2015, which were expiring in June 2025. The regulations were re-made on 18 June 2025 and commenced operation on 22 June 2025.

⁶ The JLA Act passed on 10 September 2024, with all but the name changes commencing a day after Royal Assent.

⁷ Subject to exceptions relating to assessable disclosures under the PID Act s 36A.

Performance, achievements and priorities

This section outlines our operational performance against output performance measures, progress against recommendations to Integrity Oversight Victoria and progress against our 2023–24 annual plan.

We highlight the key focus areas, organisation projects and integrity system projects identified in our 2025–26 annual plan, which are linked to our strategic risks and strategic priorities.

Operational performance against output performance measures

Integrity Oversight Victoria had 8 output performance measures in 2024–25. Our Budget Paper No. 3 (BP3) measures, targets and outputs are represented in Table 2.⁸ We exceeded 5 targets, met 2 targets and fell short of one target.

⁸ See 2024–25 Department Performance Statement in support of Service Delivery Budget Paper No. 3 –Victorian Budget 2024–25. We are referred to as Victorian Inspectorate, our name prior 10 February 2025.

Table 2: Output performance against BP3 measures

Performance measure	Target	Actual	Result	Achieved
Quality				
Systemic improvements by agencies to support compliance in the integrity system	7	8	Exceeded	
Quantity				
Integrity Oversight Victoria's recommendations accepted by oversighted agencies	75%	85%	Exceeded	
Reasons for decisions provided to complainants within one month of complaint outcome	100%	100%	Met	
Educational activities to improve community access and explain rights, responsibilities and Integrity Oversight Victoria's role	3	3	Met	
Timeliness				
Acknowledge receipt of new complaints within 5 business days	95	98	Exceeded	
Proportion of low complexity complaints completed within 2 months	75	88	Exceeded	
Proportion of medium complexity complaints completed within 5 months	75	69	Not met	
Proportion of low and medium complexity investigations completed within 12 months	50	100	Exceeded	

Systemic improvements by agencies

This qualitative performance measure reflects our focus on strengthening trust in the integrity system. The 8 systemic improvements are:

1. Improvements to warrant processes under the *Telecommunications (Interception and Access) Act 1979* (Cth).
2. IBAC improvements to applying the *Independent Broad-based Anti-corruption Commission Act 2011* in complex areas.
3. BAC improvements to decision-making and communication, record keeping, natural justice process for reports, and public examination notifications to IOV following an investigation.
4. IBAC improvements to address non-compliant execution of covert search warrant.
5. Various agencies' improvements relating to the exercise of coercive and covert powers.
6. Victorian Ombudsman improvements to exercise of coercive powers arising from summons review.
7. IBAC improvement to address allegations of detrimental action under the *Public Interest Disclosures Act 2012* arising from complaint.
8. IBAC improvements relating to police oversight arising from complaint.

For details, including an index to relevant sections, see appendix C.

Number of recommendations accepted by agencies

As making a recommendation to take particular action is our most powerful tool to influence compliance, we set a quantitative performance measure that oversighted agencies accept Integrity Oversight Victoria's recommendations. Recommendations are for action to prevent specified conduct from continuing to occur or occurring in the future, or to remedy any harm or loss arising from the conduct of the body or officer.

We generally make recommendations under Part 7 of the *Integrity Oversight Victoria Act 2011* (IOV Act), which specifies they must be made in private unless contained in a report. A report provides a person or body that is adversely named an opportunity to respond before the report is made public (natural justice process).

We set a target that 75% of recommendations are accepted. This target encourages a high standard of compliance whilst recognising the need to make recommendations a body is not yet prepared to accept, as they influence future compliance.

In 2024–25, Integrity Oversight Victoria made 13 recommendations. On 30 June 2025, 11 of 13 recommendations (85%) were accepted. Two were awaiting a response as the recommendations were made 29 May 2025. Eleven recommendations were made privately. Two were made in the surveillance devices inspection report tabled in 2024–25.⁹ The recommendations are detailed in each agency's chapter, with details including an index, at appendix D.

Reasons for decisions to complainants

We achieved our 100% target for this quantitative performance measure to provide reasons for decisions to all complainants within one month of providing the outcome. Reasons give complainants a transparent, evidence-based rationale for decisions. Integrity Oversight Victoria aims to provide reasons demonstrating an understanding of their complaint journey, as many complainants go through a complaint process with one or 2 public sector bodies before making their complaint to us. Case studies of complaint outcomes are in the IBAC and VO chapters.

Educational activities

Our third quantitative performance measure is to deliver educational activities to improve community access and explain rights, responsibilities and Integrity Oversight Victoria's role. In 2024–25, we met our target of 3 educational activities as set out below.

Australian Public Sector Anti-Corruption Conference

At the Australian Public Sector Anti-Corruption Conference in Darwin in July 2024, the former Inspector, Eamon Moran PSM KC joined fellow inspectors in a presentation, *Working Together in the fight against corruption: Why we need Parliamentary Inspectors*. Co-presenters were Gail Furness SC, Inspector of the NSW Independent Commission Against Corruption (NSW ICAC) and Inspector of the National Anti-Corruption Commission, and Bruce McClintock SC, Inspector of the Law Enforcement Conduct Commission, Inspector of the Independent Commissioner Against Corruption (NT) and the former Inspector of NSW ICAC.

Former Inspector Moran touched on 2 themes: that inspectors work with the agency they oversee towards the same objective; and that inspectors are a necessary part of the integrity landscape.

Law Week 2025

To promote our new name and brand to Victoria's community, Integrity Oversight Victoria sponsored the Victorian Law Foundation's Law Week in May 2025. Victorian Law Week events help people to understand their rights, find answers to questions, know what help is available and learn how our legal system works. Acting Chief Integrity Inspector, Cathy Cato's promotional video for the Victorian Law Foundation and Law Week reached a wide audience.

We also produced a series of short videos for Law Week about how to make a complaint to Integrity Oversight Victoria. These videos are available on our website.

Publications and presentations about Integrity Oversight Victoria

To help a broad audience understand our role within Victoria's integrity system we promoted our new name and brand through an article in *The Mandarin*.¹⁰

⁹ See Surveillance Devices Report No. 1 for 2023–24 All agencies

¹⁰ See Integrity Oversight Victoria gets down to business, 12 March 2025.

A detailed article, *Inside look at Integrity Oversight Victoria*, by Eamonn Moran PSM KC was published in the April 2025 edition of the Law Institute Journal.

As acting Chief Integrity Inspector, Cathy Cato helped launch the Department of Justice and Community Safety’s 2025 Everyday Integrity seminar series with a presentation about Integrity Oversight Victoria in February 2025. Cathy also presented on integrity as the keynote speaker at the welcome session of the IPAA Senior Leadership Program in May 2025.

Complaints timeliness

We have 4 timeliness performance measures, 3 related to complaints.

We exceeded our target of acknowledging complaints within 5 business days (98% against a target of 95%). We also exceeded our timeliness measure for low complexity complaints, by completing 88% within 2 months against a target of 75%.

We fell short of our target for medium complexity complaints, completing 69% within 5 months against a target of 75%. The outcome is lower than the target due to an increase of high complexity complaints which reduced capacity to meet the target for medium complexity complaints. Due to the ongoing increase in high complexity complaints, we reduced our target for this measure to 65% in 2025–26.

For more information, refer to the Complaints chapter and the glossary that defines low, medium and high complexity complaints.

Investigations timeliness

In 2024–25, we increased our target for low and medium complexity investigations completed within 12 months from 35% to 50%.

We exceeded the 50% target by closing 2 out of 2 (100%) low and medium complexity investigations within 12 months.

As we exceeded our target for the third year in a row, we increased the target from 50% to 65% for 2025–26.

Progress against recommendations to Integrity Oversight Victoria

In August 2024, by finalising changes to our case management system for automated reporting of welfare risks, we fully implemented the Integrity and Oversight Committee’s witness welfare recommendations.¹¹

We reported in our 2023–24 annual report that we were completing most of the independent performance auditor’s recommendations from October 2022.¹² This year, we progressed the final 2 recommendations. See Table 3 for details.

Table 3: Progress on final recommendations of independent performance auditor

Report reference	Description of recommendation	Actions	Status
10.7	Develop stakeholder survey for agencies overseen	MoUs were signed and agreed in principle with IBAC and the VO respectively. A stakeholder survey of agencies we oversee is planned for 2025–26.	In progress
11.3	Begin measuring costs of activities, particularly core functions.	Finalised a function-based costing model, capturing the salary, external legal, consultant and systems costs allocated to each function.	Complete

11 See recommendations in Performance of the Victorian integrity agencies 2020/21: focus on witness welfare.
12 The independent performance auditor was appointed by parliament under s 90D of the VI Act to undertake a 4-yearly performance audit of the VI/IOV. Their report was tabled by the Integrity and Oversight Committee in October 2022: The independent performance audits of IBAC and the Victorian Inspectorate.

Achievements against 2024–25 annual plan and 2025–26 priorities

Integrity Oversight Victoria’s strategic framework comprises a 3-year strategic plan, supported by an annual plan. Each annual plan is tabled in parliament consistent with sections 90B and 90C of the IOV Act following consultation with the Integrity and Oversight Committee¹³ and published on our website.

We commenced this reporting period with a new 2025–27 strategic plan with 5 strategic priorities:

- 9. Enhance reach and awareness of who we are and what we do.
- 10. Increase focus on proactive and strategic work to deliver integrity system improvements.
- 11. Leverage ICT solutions to enhance efficient, effective and economical delivery of functions without compromising security.

- 12. Continue to strengthen organisational sustainability, expertise and a positive culture.
- 13. Help build a network to promote integrity across the Victorian Public Service.

Our 2024–25 annual plan contains 21 planned activities to start addressing our strategic priorities.¹⁴ Our achievements against the annual plan are in Table 4. The projects and activities ‘In progress’ are part of our 2025–26 annual plan.

We tabled our 2025–26 annual plan in June 2025. The plan includes our strategic priorities for 2025–27 and our key focus areas, organisation projects, and integrity system projects for 2025–26.

Table 4: Achievements against 2024–25 annual plan

Strategic Priority 1: Enhance reach and awareness of who we are and what we do

Activity	Completed	In progress
Increase awareness through a new name and brand supported by promotional activities including increased online presence, a video and an inaugural integrity conference	‘Integrity Oversight Victoria’ successfully launched on 10 February 2025. A new look website was introduced and a series of videos created and launched during Law Week 2025	Planning is underway for scoping activities, leading to an integrity forum in early 2026 (co-hosted with IBAC)
Ensure external information is in plain English to increase understanding of rights and expectations	PID guidelines and integrity response guidelines written in plain English and published on our website	Continuing plain English updates of public information
Improve data collection to better understand communication needs of target audiences	New secure reporting portal with anonymity capability introduced and monitored	Developing data-informed and trauma-informed communications and engagement strategies
Increase structured stakeholder engagement through MoUs with key oversight agencies that outline functions and powers, communication principles and oversight methodology and governance	MoU with IBAC signed; MoU with VO agreed in principle	Possible MoUs with PWSIC, Chief Examiner and OVIC

13 Annual plan is drafted and tabled before financial year end.

14 See Integrity Oversight Victoria annual plan 2024–25..

Strategic Priority 2:**Increase focus on proactive and strategic work to deliver integrity system improvements**

Activity	Completed	In progress
Deliver monitoring project(s) on an identified priority compliance issue or monitoring function	Reports for 2023–24 monitoring project ¹⁵	Monitoring project into IBAC's handling and oversight of police complaints
Share, and facilitate sharing of, expertise and knowledge across integrity agencies to support better practice	Communicated to IBAC our view on scope of procedural fairness obligations in complaint handling, and shared view with VO	Producing guidance notes on procedural fairness and conflicts of interest obligations
Develop balanced and transparent agency compliance plans for proactive work	Delivered agency-specific compliance plans to IBAC and VO	Developing proactive work plans for IBAC and VO
Continue to pursue proposed law reform to enhance integrity system	Contributed to enhancements to IOV Act ¹⁶ Met monthly with DJCS on technical reforms to enhance integrity system	Continuing to pursue law reform to enhance the integrity system
Streamline decision making for low and medium complexity complaints to improve efficiency, supported by an internal review process	Updated complaint-handling framework and delegations to improve efficiency ¹⁷	Identifying ways to focus oversight activities on risk areas Building complaint-handling efficiency to create resources for proactive oversight

Strategic Priority 3: Leverage ICT solutions to enhance efficient, effective and economical delivery of functions without compromising security

Activity	Completed	In progress
Explore options to integrate ICT systems for complaint case management to improve timeliness	Identified complaint case management solution and provider and commenced design phase	Delivering an integrated solution
Embed document review system across operations to help manage matters	Complete	Further training to optimise use of functionality
Review the VI/IOV's security framework, including ICT, information and cybersecurity risks	Complete	
Map permission and access controls across the secure network, including the case management system	Complete	

¹⁵ See Surveillance Devices Report No 1 for 2023–24. The telecommunications interception report is not published.

¹⁶ See Legislative updates on our jurisdiction and Victoria's integrity system chapter.

¹⁷ Internal review process explored and not pursued.

Strategic Priority 3: Leverage ICT solutions to enhance efficient, effective and economical delivery of functions without compromising security

Activity	Completed	In progress
Explore options to integrate ICT systems for complaint case management to improve timeliness	Identified complaint case management solution and provider and commenced design phase	Delivering an integrated solution
Embed document review system across operations to help manage matters	Complete	Further training to optimise use of functionality
Review the VI/IOV's security framework, including ICT, information and cybersecurity risks	Complete	
Map permission and access controls across the secure network, including the case management system	Complete	
Implement a secure change governance process for the case management system	Complete	
Identify more efficient information-sharing platforms/opportunities for information exchange with agencies that maintain security of information	Implemented file-transfer platform to share information with agencies	
Build the VI/IOV's understanding of artificial intelligence risks and opportunities	Created intranet hub to share AI learnings throughout organisation Engaged with Victorian public sector bodies to identify and explore future-use opportunities Built in-house capability through training	Exploring secure 'closed loop' AI

Strategic Priority 4:**Continue to strengthen organisational sustainability, expertise and a positive culture**

Activity	Completed	In progress
Maintain a flexible, engaged, positive work environment for a united and safe VI/IOV by responding to feedback in the People Matter Survey	Launched a 'Towards Zero' bullying, harassment and discrimination campaign, supported by a new secure communication platform allowing anonymous staff complaints and communication ¹⁸	Developing an information and records management framework to address staff feedback
Continue to strive to be an exemplar organisation by supporting a structured learning and development program with a gap analysis of skills and expertise critical to the organisation's increasingly complex functions	Identified and implemented functions-based learning and development program	Conducting a skills gaps analysis in 2025–26
Build skills internally to address identified gaps in expertise	Built skills in line with learning and development program	Continue building skills
Develop and implement a coordinated policy framework across corporate and operational policies/procedures/guidelines, including documenting the policies leveraged from other bodies	Commenced drafting a policy review and awareness framework	Working towards completing and implementing framework

Strategic Priority 5:**Help build a network to promote integrity across the Victorian Public Service**

Activity	Completed	In progress
Establish an inaugural conference to provide a platform for presentations that will promote integrity across the Victorian Public Service	IBAC agreed to co-host with Integrity Oversight Victoria an integrity forum for integrity leaders of agencies investigating public interest disclosures	Planning is underway for scoping activities, leading to an integrity forum in early 2026

¹⁸ We undertook an interim survey to test progress. Our 2025 PMS survey had an 85% response rate and showed improved results.

Jurisdiction and functions

Jurisdiction

Integrity Oversight Victoria oversees 15 integrity, accountability and investigatory bodies (integrity bodies) including the Independent Broad-based Anti-corruption Commission (IBAC), the Victorian Ombudsman (VO), the Public Interest Monitor (PIM), the Victorian Auditor-General's Office (VAGO), the Office of the Victorian Information Commissioner (OVIC), the Parliamentary Workplace Standards and Integrity Commission (PWSIC), Wage Inspectorate Victoria (WIV), the Judicial Commission of Victoria, the Chief Examiner and Victoria Police.¹⁹ (For a complete list, see appendix A).

The functions we perform differ for each body we oversee. Our oversight covers a broad range of compliance activities including complaints assessments, investigations, inspections, coercive powers notification reviews and monitoring. Our duties, functions and powers are outlined in the *Integrity Oversight Victoria Act 2011* (IOV Act) and 12 other pieces of legislation. An additional 7 Acts set out further obligations of the agencies we oversee. For a complete list of the Acts that relate to our work see appendix B. A diagram showing the functions we undertake for each body is at appendix E.

¹⁹ To a limited extent.

Functions overview

We assure integrity bodies act lawfully and properly through our functions and compliance activities.

We receive complaints and public interest disclosures. Providing written reasons for all complaint outcomes builds trust in our decisions.

The bodies we oversee that exercise coercive powers (powers to compel people to answer questions or produce documents or to keep certain matters confidential) must notify us when they use those powers. We review notifications to identify when powers are used unlawfully, or without consideration of human rights. The notification requirement is an important protection for those against whom the powers are used.

We review policies and procedures to ensure systems and processes support compliant use of powers.

Some bodies have intrusive and extraordinary investigatory powers that can, in certain circumstances, be used covertly. These powers allow the use of telecommunications interceptions, surveillance devices, the conduct of controlled operations and police counter-terrorism activities. To oversee these bodies, we regularly inspect records and report to the relevant minister and, where permitted, the Victorian Parliament.

Another important role is to support Victoria's public interest disclosure scheme under the *Public Interest Disclosures Act 2012* (PID Act). We assess disclosures about IBAC or a Public Interest Monitor and investigate if they meet the public interest complaint threshold, unless an exception applies. Otherwise, we notify disclosures about other bodies to IBAC. IBAC decides whether disclosures are public interest complaints, and may dismiss, refer, or investigate them. IBAC refers public interest complaints to us if IBAC considers it more appropriate that we investigate, for example a public interest complaint about a body we oversee, like the Victorian Ombudsman.

Integrity responses

When our compliance activities identify non-compliance or other issues for improvement, we provide feedback. Our 'integrity response guidelines' help us determine what level of engagement and feedback is required to ensure we are transparent and consistently respond to integrity agencies.²⁰

Although we are empowered to issue reports and make recommendations, they are not our primary goal. We more frequently respond to non-compliance and identify issues for improvement through informal liaison and private engagement, feedback letters, compliance warning letters and general guidance material with the bodies we oversee.

Where issues are systemic and have relevance to other bodies, it may be appropriate for us to publish educational information or guidance.

Sometimes, if issues are particularly serious, or if there is resistance to feedback and further incentives are required to deter future non-compliant action, it may be appropriate for us to make recommendations. Recommendations can be private or public, but if they are public, they must be included in a report.²¹

Public reporting ensures our position is communicated to all stakeholders. It guides bodies exercising similar powers or undertaking similar functions and informs the public of their rights when interacting with integrity, accountability and investigatory bodies.

We communicate transparently and in accordance with procedural fairness requirements before publishing any adverse comments, whether in public reports or in our annual report.

One of our public performance measures is a qualitative measure of improvements to the integrity system. See Operational performance against output performance measures chapter for the improvements reported in 2024–25.

²⁰ See our integrity response guidelines.

²¹ The inspections program of records relating to the use of covert powers requires reports to ministers and parliament. We may also publish special reports on any matter relating to performing our duties and function; see s 87 IOV Act.

Enquiries

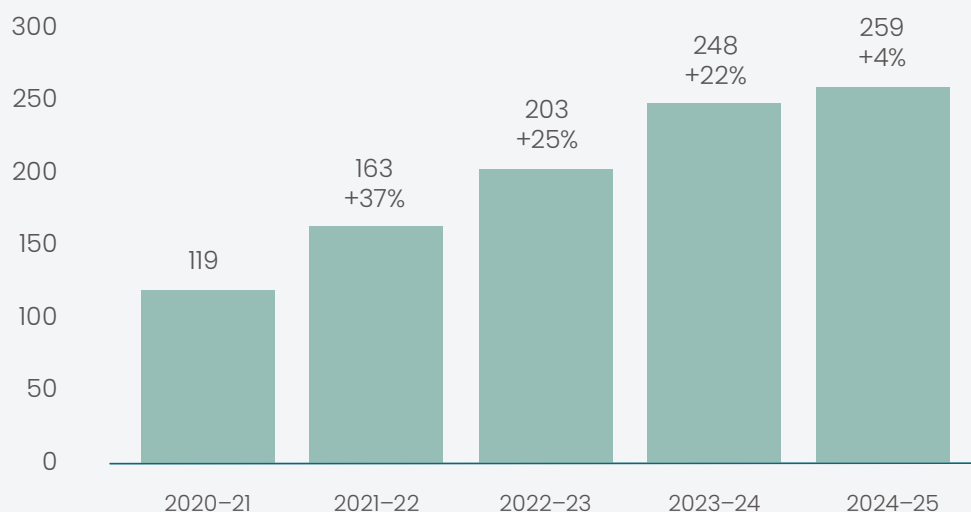
Enquiries are handled by our enquiries officer, a member of the complaints team. An enquiry is made when a person contacts Integrity Oversight Victoria about:

- the complaints we can receive or our role in Victoria's integrity system
- a concern they have about an organisation that is not within our complaints handling jurisdiction

- a concern they have about an integrity body within our complaints handling jurisdiction that does not meet the threshold of a complaint or disclosure.

In 2024–25 we received 259 enquiries and carried over 9 enquiries from the previous reporting period.²²

Figure 2: Number of enquiries received, 2020–21 to 2024–25



For the past 5 years, the number of enquiries has continued to increase. This year saw the lowest percentage increase from the previous reporting year (4%) which indicates this workload may be stabilising.

In 2024–25, we closed 264 enquiries, an increase of 6% from 2023–24 (246) and had 4 enquiries open at the end of the reporting period.

Our case-handling effectiveness was positively impacted by the addition of an enquiries officer who contributes strategies to reduce the number of enquiries unrelated to our statutory role.

How we receive enquiries

Integrity Oversight Victoria receives enquiries in several ways including by email, our online portal, telephone, mail and in person

Due to our small size, we operate a call-back service, which allows people phoning us to leave a message. We aim to return their call within one business day. This helps us plan and use our limited resources efficiently. This arrangement has not impacted accessibility; people calling with enquiries is the second most common way they reach us.

²² Our 2023–24 annual report incorrectly reported a carry-over of 8 rather than 9 enquiries.

Figure 3: How enquiries are received, 2024–25

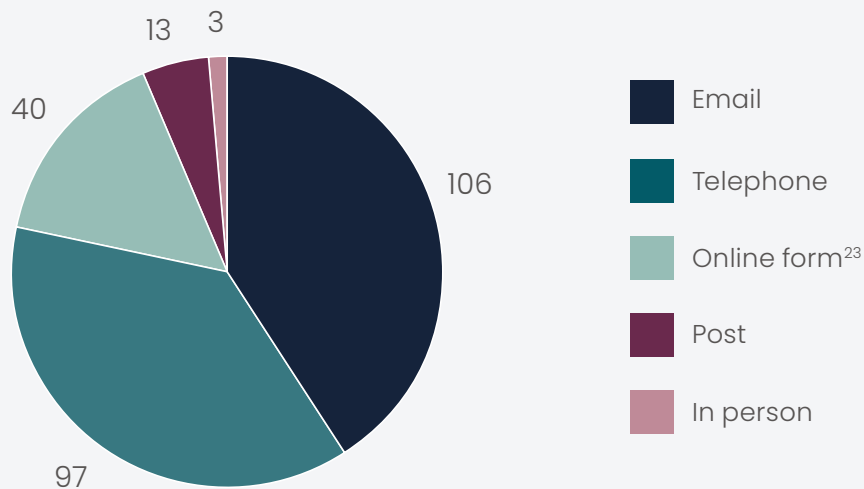
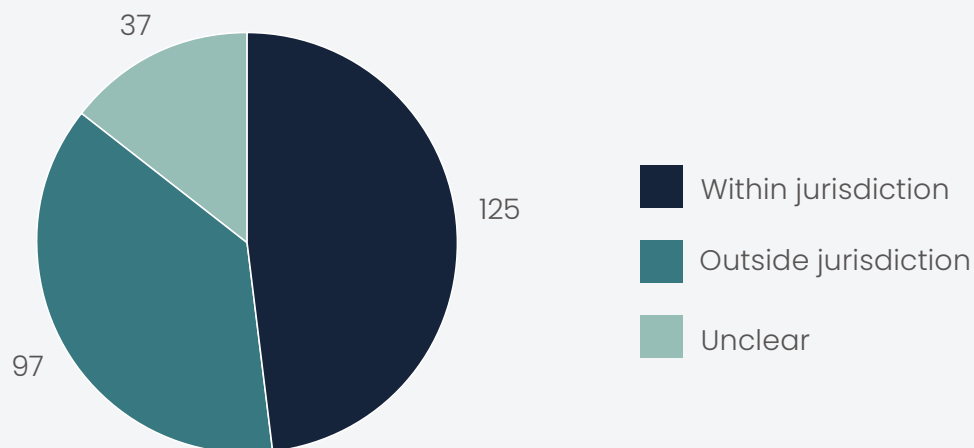


Figure 4: Category of enquiries received, 2024–25



Unclear enquiries

In 2023–24, we introduced the ‘unclear’ category of enquiries to capture the large number of enquiries we receive that are difficult to understand and cannot be clarified despite attempting to do so with the person lodging the enquiry.

Our review showed 14% (37 out of 259) of enquiries received in 2024–25 fell into this category. This is consistent with the percentage of unclear enquiries in 2023–24, also representing 14% (34 out of 248) of enquiries received.

Enquiries outside our jurisdiction

In 2024–25, 37% (97 out of 259) of enquiries were outside our jurisdiction, an improvement from 42% (105 out of 248) in 2023–24. This 5% reduction increases the time we can work on matters relating to our role in the integrity system.

Of the enquiries outside our jurisdiction, we saw a decrease (from 10 enquiries in 2023–24 to 3 enquiries in 2024–25) in the number of people mistaking us for the Wage Inspectorate Victoria. Only one enquiry was received about the Wage Inspectorate Victoria after our name change in February 2025.

²³ Where a person’s online complaint form does not provide sufficient information to identify the matter is within our complaint jurisdiction, we open an enquiry to engage and better understand their concerns.

We received numerous enquiries about people wanting to make complaints about local councils (12 enquiries) and mistaking us for the Local Government Inspectorate (7 enquiries). However, no enquiries were received about the Local Government Inspectorate after our name change.

Victoria Police comprised 20% (19 out of 97) of non-jurisdictional enquiries received in 2024–25, down from 34% of non-jurisdictional enquiries in 2023–24. Across both reporting periods, Victoria Police remained the key organisation about which we receive enquiries outside our scope to address.

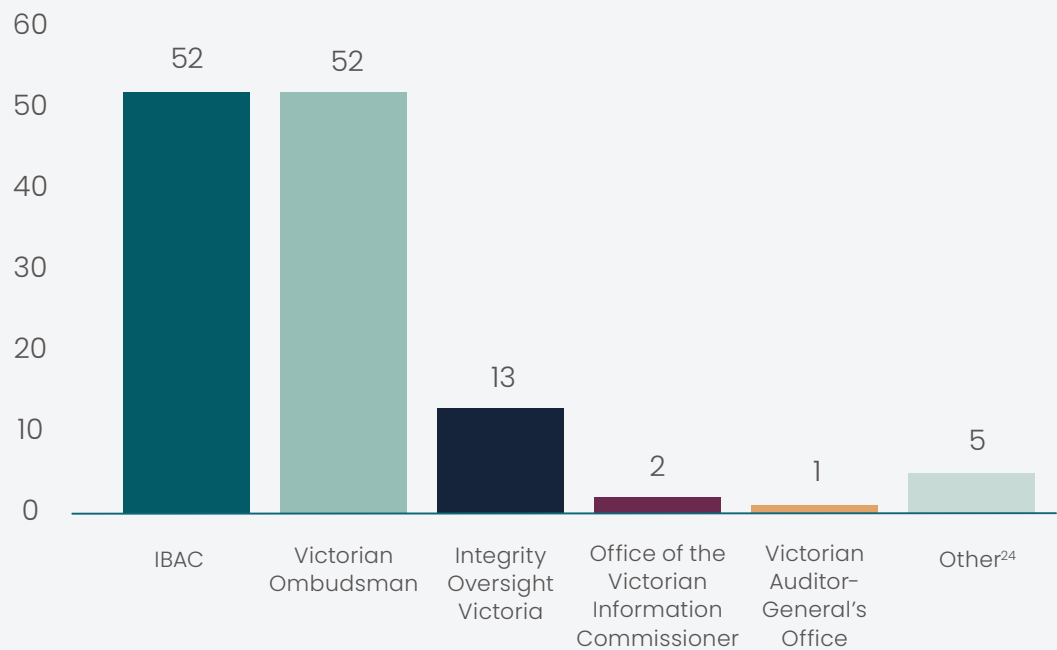
We consider our name change from the Victorian Inspectorate to Integrity Oversight Victoria an important factor in the decrease of non-jurisdictional enquiries and are committed to continually improving communications so community members can raise their concerns with the correct organisation in the first instance.

In all cases where we were mistaken for another body or a person has not known what concerns we can address, we made relevant referrals to the appropriate organisations.

Enquiries within our jurisdiction

In 2024–25, 48% (125 out of 259) of all enquiries were relevant to our complaints-handling jurisdiction. Most jurisdictional enquiries received in 2024–25 related to IBAC at 42% (52 of 125) and the Victorian Ombudsman at 42% (52 of 125). Enquiries about Integrity Oversight Victoria (and the Victorian Inspectorate) decreased from 16% of last year’s total (17 out of 109) to 10% of this year’s jurisdictional enquiries (13 out of 125).

Figure 5: Number of enquiries within jurisdiction according to body, 2024–25



Time taken to close enquiries

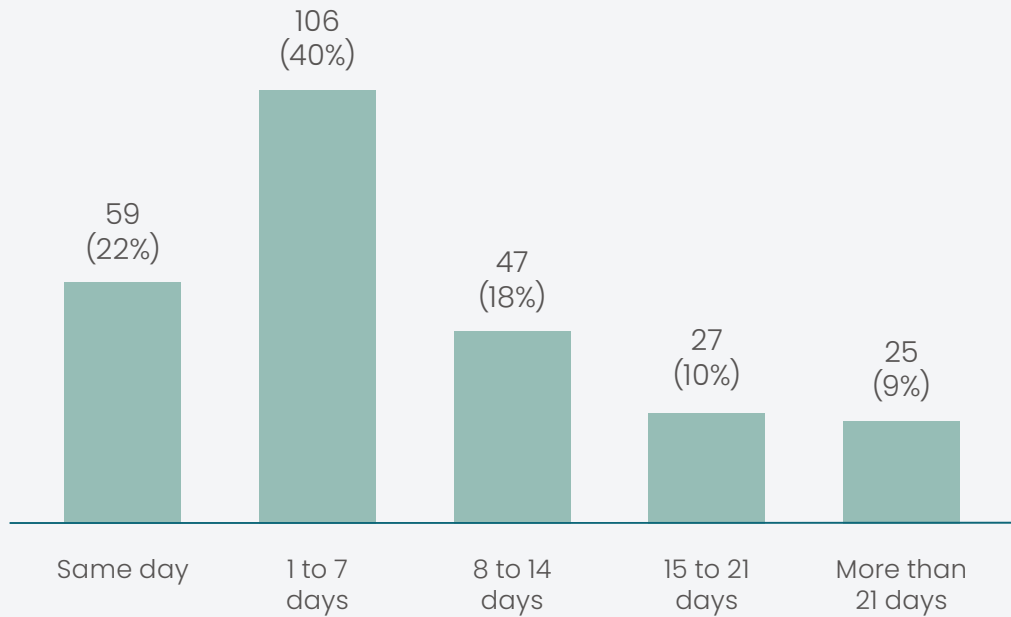
With the addition of a dedicated enquiries officer, we introduced an internal KPI to respond to all enquiries within 5 business days.

We closed 62% of enquiries (165 out of 259) within 7 calendar days, of which 22% (59) were closed the same day.²⁵ This is a notable achievement and shows the positive impact made by our enquiries officer.

24 Includes local councils (2), unspecified agency (1), State Revenue Office (1) and DJCS (1). Although these bodies are not within our complaint jurisdiction, they were categorised as in jurisdiction because they related to PID enquiries.

25 Calendar days.

Figure 6: Time taken to close enquiries, 2024–25



Complaints

During 2024–25, we experienced 2 key changes to our complaints-handling jurisdiction. After 2 August 2024, people could no longer complain to us about the former Office of the Special Investigator. From 31 December 2024, people could lodge complaints with us about the new Parliamentary Workplace Standards and Integrity Commission.

At the end of 2024–25, people could make a complaint to Integrity Oversight Victoria about different aspects of the conduct of:

- IBAC or IBAC personnel
- Victorian Ombudsman officers
- Parliamentary Workplace Standards and Integrity Commission or officers
- Chief Examiner or Examiners
- Office of the Victorian Information Commissioner officers
- Victorian Auditor-General's Office officers.²⁶

Ability to communicate with anonymous complainants

In June 2024, Integrity Oversight Victoria introduced new online forms accessed through a secure reporting portal on our website. The portal provides people with the option of sharing their name and contact details or remaining anonymous when they lodge a complaint with us.

Through the portal, people who choose to lodge a complaint anonymously can:

- communicate with us using secure 2-way encrypted messaging
- upload further supporting information for us to consider.

In 2024–25, anonymous complaints increased from 8% to 12% of all complaints received:

Throughout the year we experienced the value of this portal. It provided assurance to people who otherwise may have felt too vulnerable to reach out to us to share their concerns, such as whistleblower complainants making disclosures under the *Public Interest Disclosures Act 2012*. The portal allowed us to ask questions, unpack complainant concerns

²⁶ See Make a complaint about a Victorian integrity body on our website for more information, including explanatory videos.

and provide them updates using the messaging function. This was not possible previously with anonymous complainants whose complaints were assessed based on the information provided when the complaint was made. We were previously unable to provide an outcome to these complainants, but this is now possible through the portal.

This capability was a key improvement to our service in 2024–25.

Complaints received

In 2024–25, we received 130 complaints. This is the largest number of complaints received in any reporting period. Figure 7 shows the increase in complaints received and the percent increase as compared to the previous reporting period. Figure 8 shows the number of complaints received about each body.

Figure 7: Complaints received, 2020–21 to 2024–25

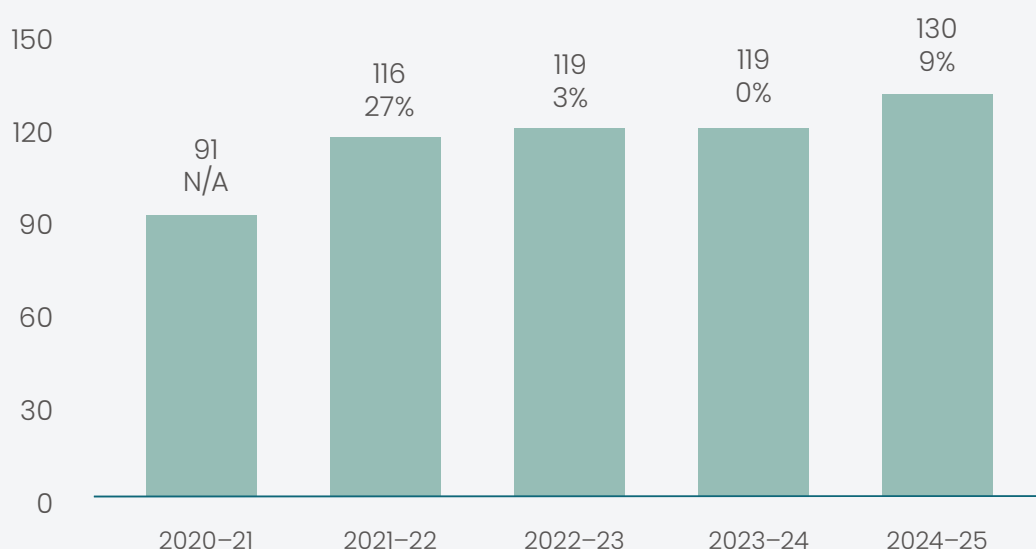
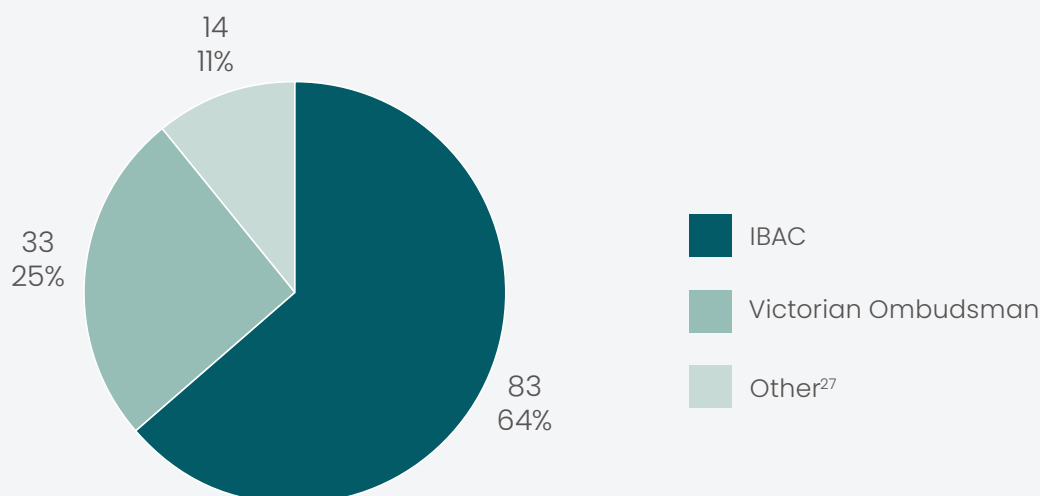


Figure 8: Complaints received according to body, 2024–25



²⁷ These disclosures were considered under the PID Act. See Public interest disclosures chapter for more information.

How we receive complaints

We provide an accessible service and receive complaints in several ways. We received most complaints via our secure reporting portal this year, which supports people by asking structured questions and seeking necessary declarations that guide how we manage the complaint.

In 2024–25, 36% (47 out of 130) of complaints were received via our secure reporting portal. We will continue to work on our communication strategies throughout 2025–26 to increase the proportion of people who lodge their complaints through our secure reporting portal.

Most complaints (91% or 118 out of 130) were made directly to Integrity Oversight Victoria by a complainant, with 12 complaints notified by IBAC.²⁸

Primary issues of concern in complaints

We classify each complaint with a primary issue of concern so we can evaluate themes, inform our understanding of why people lodge complaints with us and identify systemic issues. In 2024–25, most complainants raised one of 4 key issues:

- incorrect decision
- procedural fairness not met
- poor service from body
- improper conduct.

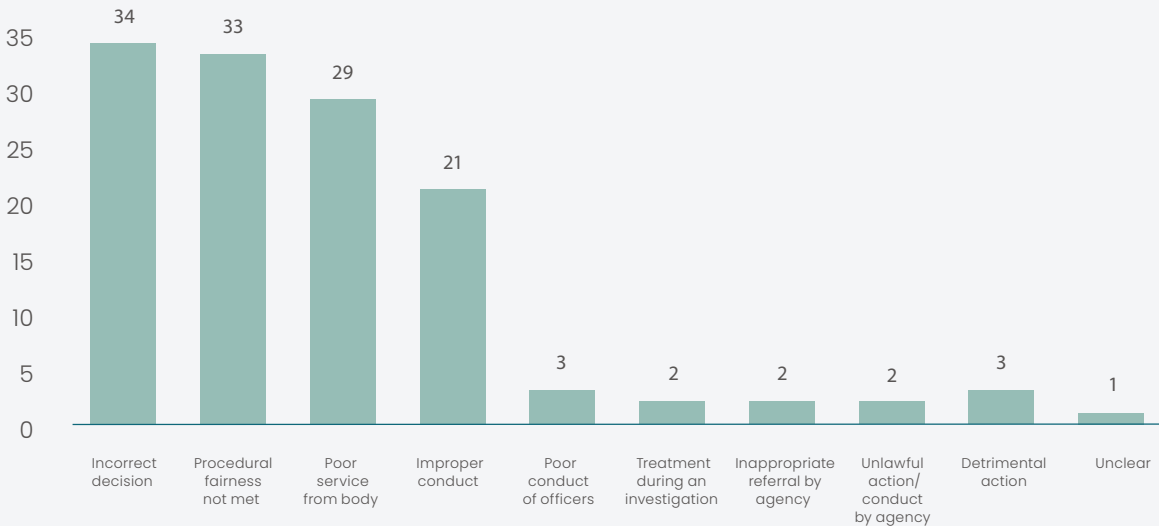
See Figure 9 for more detail.

We continued to experience a high proportion of people who lodged complaints with us because they viewed the decision of an integrity body as incorrect (26% or 34 out of 130).

As we cannot reconsider a decision of another body, we must often clarify our role with complainants. Unless there is a deficiency in the application of the law or in the process undertaken by the integrity body complained about, there is no role for Integrity Oversight Victoria.

A further 25% of people (33 out of 130) complained to us because they felt they were not afforded procedural fairness. Twenty-two per cent of complainants (29 out of 130) raised poor service as their primary issue. This year saw a slight increase in the number of complaints involving improper conduct as the key issue of concern, 21 this year compared to 18 last year.

Figure 9: Primary issues of concern in complaints received, 2024–25



28 Section 71 of the IBAC Act requires IBAC to notify us of a complaint or notification to IBAC about the conduct of IBAC or an IBAC Officer.

Assessment process

When we receive a complaint, we review the information provided and acknowledge the complaint within 5 business days.

During our complaints handling we also:

- engage with complainants to confirm their concerns, which we refer to as ‘allegations’²⁹
- clarify the outcome sought and explain whether we have the power to facilitate that outcome
- seek the complainant’s consent to inform the integrity body of their complaint
- request any further information from the complainant or the integrity body. Depending on the concerns raised, we may already have relevant information due to our oversight role
- assess the information available to determine whether the concerns raised are substantiated
- update complainants throughout the life of the complaint
- provide natural justice to an integrity body or integrity body personnel, if our preliminary assessment indicates that a substantiated finding might be warranted
- decide the outcome and whether any further action is warranted
- provide written reasons to the complainant explaining our decision
- provide a written outcome to the integrity body if they were contacted for information during the complaint handling.

Complaints closed

We closed 120 complaints, including 69% of complaints received in 2024–25:

- one complaint from 2021–22³⁰
- 3 complaints from 2022–23
- 33 complaints from 2023–24
- 83 complaints from 2024–25.

Complaints can span financial years due to a range of factors including the level of engagement with integrity bodies through natural justice processes and the higher complexity of the complaints we are addressing.

At the end of the reporting period, 62 complaints remained open comprising:

- 2 complaints from 2021–22
- 5 complaints from 2022–23
- 8 complaints from 2023–24
- 47 complaints from 2024–25.

²⁹ A complainant may raise several allegations in one complaint.

³⁰ See Henry’s case study about this complex complaint.

Figure 10: Complaints received and closed, 2020–21 to 2024–25



Complexity of closed complaints

Several factors inform whether a complaint is considered low, medium or high complexity including:

- the number of issues raised
- whether legal advice is required
- the volume of information or records to be considered.

Other factors that can impact complexity are the vulnerability of a complainant, any welfare concerns and a complainant presenting with challenging behaviours. The complexity of a complaint may change as a complaint is assessed.

Of the 120 complaints closed in 2024–25:

- 48% (58) were low complexity
- 37% (44) were medium complexity
- 15% (18) were high complexity.

This contrasts with the complaints closed in 2023–24 which were 59% low complexity, 25% medium complexity and 16% high complexity.

Figure 11: Complexity of complaints, 2023–24 and 2024–25

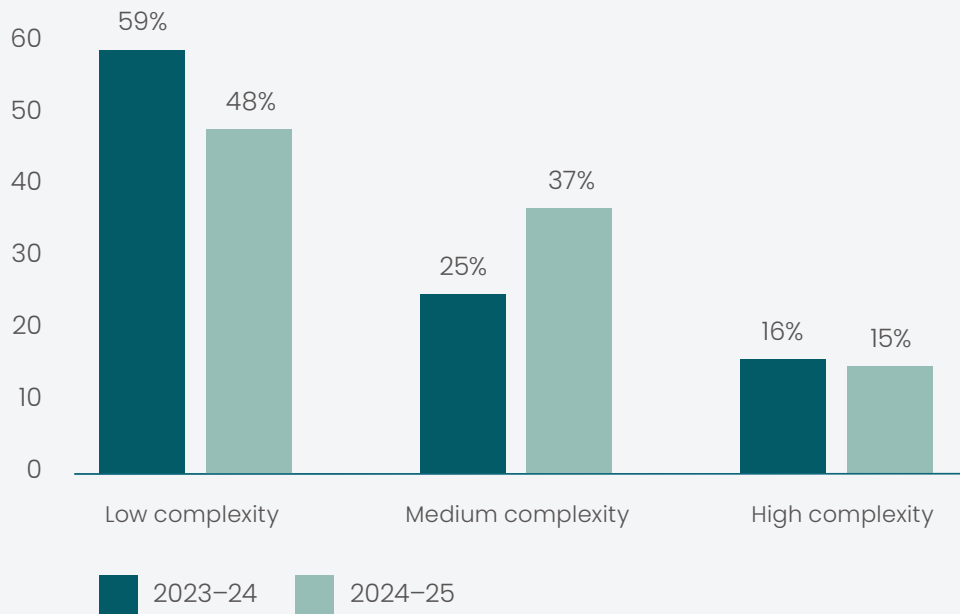
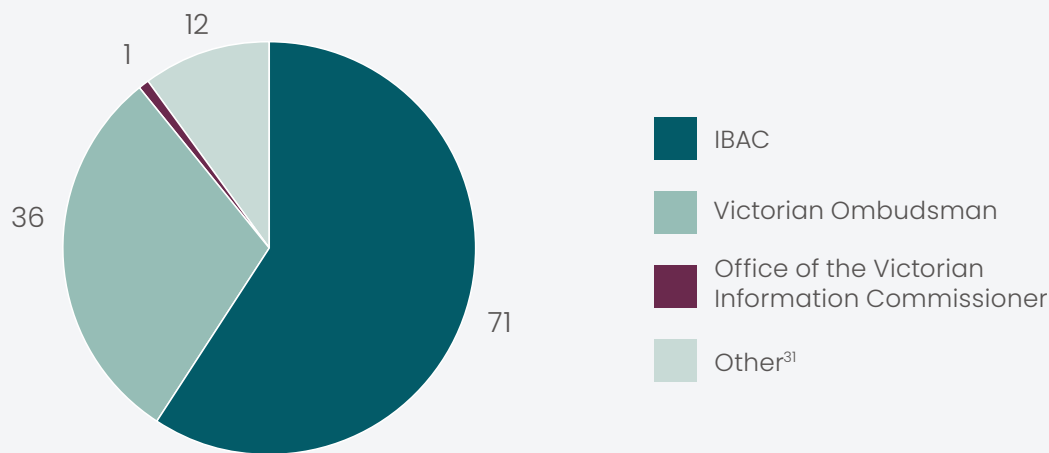


Figure 12: Complaints closed according to body, 2024–25



Timeliness of complaints handling

The service delivery expectations for our complaints handling timeliness are reflected in our public performance reporting. See Operational performance against output performance measures chapter for more information.

³¹ This figure relates to a variety of bodies about which we received disclosures under the PID Act.

Allegations

To the extent possible, we engage with complainants to understand their concerns, which we describe as allegations. A person may raise several allegations as part of their complaint. We usually assess and make a finding for each allegation. See Table 5 for the range of findings for an allegation.

Table 5: Range of findings for an allegation

Finding	We consider
Not substantiated	There is insufficient evidence to support the complainant's concerns
Substantiated	There is a likely non-compliance with the law or a deficiency in the integrity body's processes
To be determined by investigations	That either of the following is warranted: • a preliminary inquiry to determine if an investigation should proceed • an investigation
Notify under the PID Act to the appropriate body	The complaint, or part of the complaint, is an assessable disclosure that must be notified to another body, most commonly to IBAC
Unable to assess	The complaint cannot or should not be assessed. This can arise for a variety of reasons. For example, if the complainant withdraws their complaint or there is insufficient supporting information or clarity to evaluate their concerns despite requests for further information.

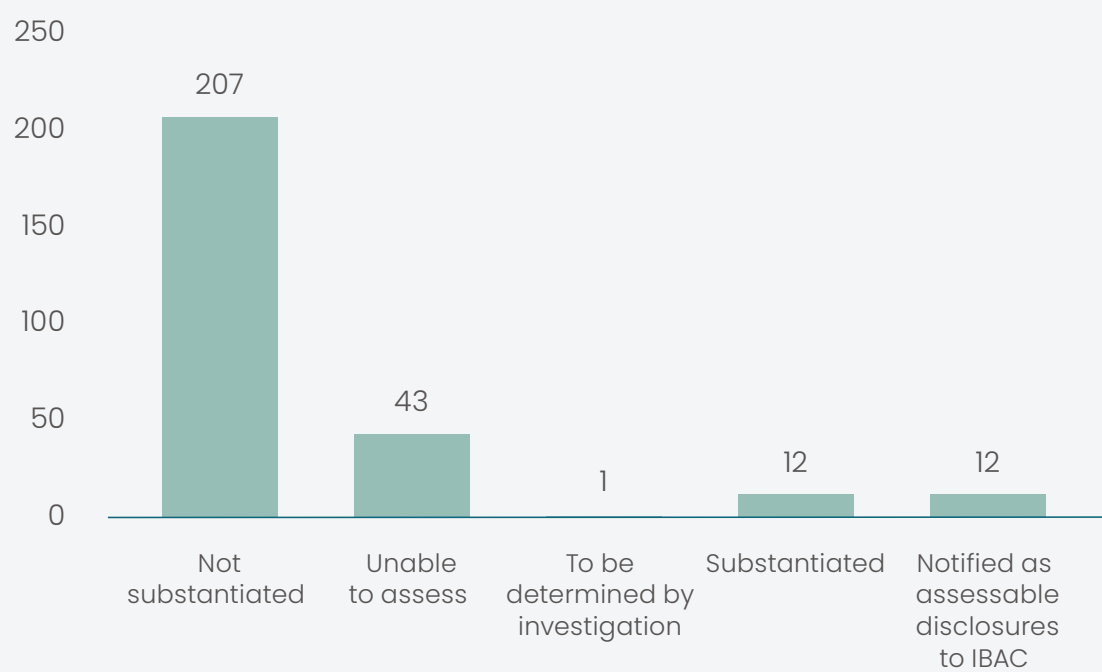
Allegations closed

We assessed 275 allegations for the 120 complaints closed in 2024–25. Most allegations were not substantiated.

Twelve of the allegations assessed this reporting period were found to be substantiated. These findings related to 9 complaints.

Seven of the substantiated allegations relate to IBAC and 5 relate to the Victorian Ombudsman. These findings are explored further in each agency’s chapter.

Figure 13: Outcomes of closed allegations, 2024–25



When appropriate, we engage with integrity bodies to share observations about potential areas for improvement identified during our complaint assessments. These include observations on issues that fall outside our jurisdiction, which we provide for information and consideration by the integrity body.

Public interest disclosures

Complaints to Integrity Oversight Victoria about improper conduct or detrimental action, if made under the *Public Interest Disclosures Act 2012* (Vic) (PID Act), are called public interest disclosures.

The PID Act establishes a whistleblowing framework for individuals to report improper conduct by a person, public official or public body, or detrimental action by a public official or a public body.³²

This is important to maintain the integrity of the Victorian Public Sector as it enables corruption and other types of improper conduct to be identified, interrupted, investigated, addressed and prevented in the future.

It takes courage to speak up and make a disclosure about improper conduct. For the scheme to be effective, those who shine a light on wrongdoing in public life need to be confident they will be protected from reprisal for doing so. The PID Act protects them from civil proceedings and other actions relating to making their disclosure unless a false disclosure is made.³³

We can receive disclosures about most public sector officers and bodies.³⁴ Disclosures are made by phone, email, post or via our secure reporting portal. The online form on our portal prompts people to provide the information we need to undertake an assessment.

Anonymous disclosures

Public interest disclosures can be submitted anonymously through our secure reporting portal. People making an anonymous public interest disclosure can continue to receive updates from us, add further information or answer any clarifying questions we may have without impacting their anonymity.

Disclosures we assess and investigate

The PID Act imposes obligations on us to assess and properly handle disclosures. When we receive a disclosure, we consider whether we are the appropriate body to handle it or whether the disclosure needs notifying to IBAC.

During 2024–25, Integrity Oversight Victoria was the appropriate body for disclosures about:

- IBAC or IBAC Officers
- a Public Interest Monitor
- the former Office of the Special Investigator (OSI) or an OSI officer.³⁵

If we decide a disclosure about these bodies or officers shows or tends to show³⁶ improper conduct or detrimental action, it will be a public interest complaint (PIC) requiring investigation. The discloser's identity will be kept confidential, as will the content of their disclosure.³⁷

From 11 September 2024, an amendment to the IOV Act gave Integrity Oversight Victoria a discretion not to investigate PICs if we consider one of the following applies:

- the subject matter is trivial or the complaint frivolous, vexatious or lacks substance or credibility
- the disclosure was not made genuinely or was made for a mischievous purpose
- the alleged conduct does not amount to improper conduct or detrimental action within the meaning of the PID Act
- the investigation would prejudice any criminal proceedings or investigations.

Integrity Oversight Victoria can also refuse to investigate if the disclosure was made more than 12 months after the discloser became aware of the matters and did not give a satisfactory explanation for the delay in making the disclosure.

If the disclosure is not a PIC, we consider whether we can treat it as a complaint under the IOV Act.

³² 'Improper conduct' and 'detrimental action' are defined under the PID Act.

³³ For detail on the types of protections, see Pt 6 of the PID Act, or the Public interest disclosure guidelines on our website.

³⁴ Unless required to be made to another entity under s 14 or 17 of the PID Act.

³⁵ The SIR Act abolished the OSI but provided for public interest disclosures about the OSI or an OSI officer to be made to us until 2 August 2024.

³⁶ Or the discloser believes on reasonable grounds that the information disclosed shows or tends to show.

³⁷ See Pt 7 of the PID Act. There are exceptions, such as the discloser giving permission for their identity to be disclosed.

Disclosures we notify to IBAC

If the disclosure relates to any other public body such as the Victorian Ombudsman, Victoria Police or local councils, we assess whether the discloser has provided enough supporting information for us to notify IBAC of the disclosure.³⁸ IBAC will then decide whether the disclosure is a PIC and whether it will be dismissed, investigated by IBAC or referred to another more appropriate body for investigation³⁹, such as ourselves, the VO or Victoria Police.⁴⁰

Our procedures on how to make a PID and how we handle PIDs are published on our website.⁴¹

Investigating public interest complaints

During an investigation of a public interest complaint, we take all reasonable steps to protect disclosers from detrimental action in reprisal for making their disclosure. We also ensure the subject of the disclosure is provided natural justice.

During 2024–25, we concluded one PIC investigation commenced in 2022–23, and commenced 5 PIC investigations, 2 of which concluded during the reporting period. At the end of the reporting period, we had 3 ongoing PIC investigations, each commenced in 2024–25. One of the PIC investigations open at 30 June 2025 also contained matters being investigated on our own motion. See the Investigations and inquiries chapter for more information.

Oversight and monitoring

We also have the following monitoring and oversight functions relating to public interest disclosures:

- overseeing IBAC's performance of its functions under the PID Act, including its compliance with the PID Act
- reviewing the procedures established by IBAC, the Judicial Commission and the Ombudsman under Part 9 of the PID Act and the implementation of those procedures.

In 2024–25, we engaged with the Judicial Commission on finalising their PID procedures and provided our final feedback. The Judicial Commission incorporated our feedback including feedback provided from previous years and published updated PID procedures that also captured IBAC's new power to refer PICs to the Judicial Commission.⁴²

We did not review the PID procedures of IBAC, or the Ombudsman in 2024–25.

Promoting the purposes of the PID Act

Our functions under the PID Act include promoting the purposes of the PID Act.⁴³ This reporting period, we published a simplified version of our PID guidelines and updated our website to reflect the integrity reforms made because of the *Justice Legislation Amendment (Defamation, Integrity and Other Matters) Act 2024* (Vic).

To support our engagement with integrity system participants we attended IBAC's Public Interest Disclosure Consultative Group to discuss issues relating to the interpretation and implementation of the PID Act with other members of the group. Our last annual report foreshadowed engagement between IBAC, the VO and us on some complex issues of interpretation about the PID Act. These interpretation issues are reflected in our updated PID guidelines.

We invited IBAC to co-host a private integrity forum with integrity leaders to discuss challenges with and opportunities for improving the public interest disclosure scheme. This forum will take place in 2025–26.

38 Under s 21 of the PID Act, we must notify a disclosure to IBAC if we consider the disclosure may be a disclosure that shows or tends to show, or that the person making the disclosure believes on reasonable grounds shows or tends to show, that a person, public officer or public body has engaged, is engaging or proposes to engage in improper conduct or a public officer or public body has taken, is taking or proposes to take detrimental action against a person in contravention of s 45 of the PID Act.

39 For example, IBAC must refer a public interest complaint to Integrity Oversight Victoria if it considers that its subject matter is relevant to the performance of our duties and functions, or the exercise of our powers, and it would be more appropriate for it to be investigated by Integrity Oversight Victoria rather than by IBAC.

40 See s 73(3), (4) and 73A for the bodies to whom IBAC may refer a public interest complaint.

41 See Public interest disclosure guidelines on our website.

42 See Judicial Commission of Victoria chapter.

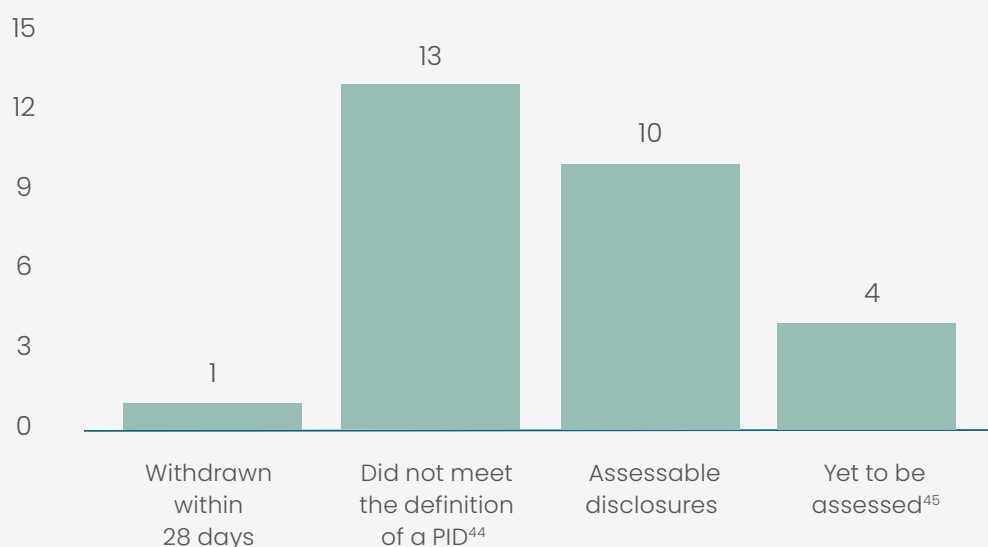
43 Section 56(1) of the PID Act.

Disclosures under the PID Act

We started 2024–25 with 5 active disclosures, 4 of which we finalised in 2024–25 on the basis they did not meet the definition of a public interest disclosure under section 9 of the PID Act. Due to a delay in receiving information, the fifth disclosure remained active at the end of the reporting period. This will be reported in next year's report.

In 2024–25, we received a further 28 disclosures under the PID Act and completed 24 disclosure assessments. See Figure 14 for the composition of the 28 disclosures.

Figure 14: Composition of disclosures received, 2024–25



Of the 10 assessable disclosures:

- one was determined to be a public interest complaint; the investigation of this public interest complaint was commenced and completed within the reporting period
- 5 were determined not to be public interest complaints; 3 of these remain open as complaints under the IOV Act
- 4 were notified to IBAC; 2 of these were determined by IBAC to be public interest complaints and referred to us as the more appropriate body to investigate the matters.⁴⁶ One was determined by IBAC not to be a public interest complaint and was dismissed, not warranting investigation or referral of these disclosures to another body for investigation. One was determined by IBAC to be a public interest complaint and was dismissed, not warranting investigation or referral of these disclosures to another body for investigation.

The assessable disclosures were all made directly to Integrity Oversight Victoria.

There were no misdirected disclosures notified to the Integrity and Oversight Committee and no applications for injunctions under section 50.

⁴⁴ Under s 9 of the PID Act.

⁴⁵ Assessment outcomes will be reported in our 2025–26 annual report

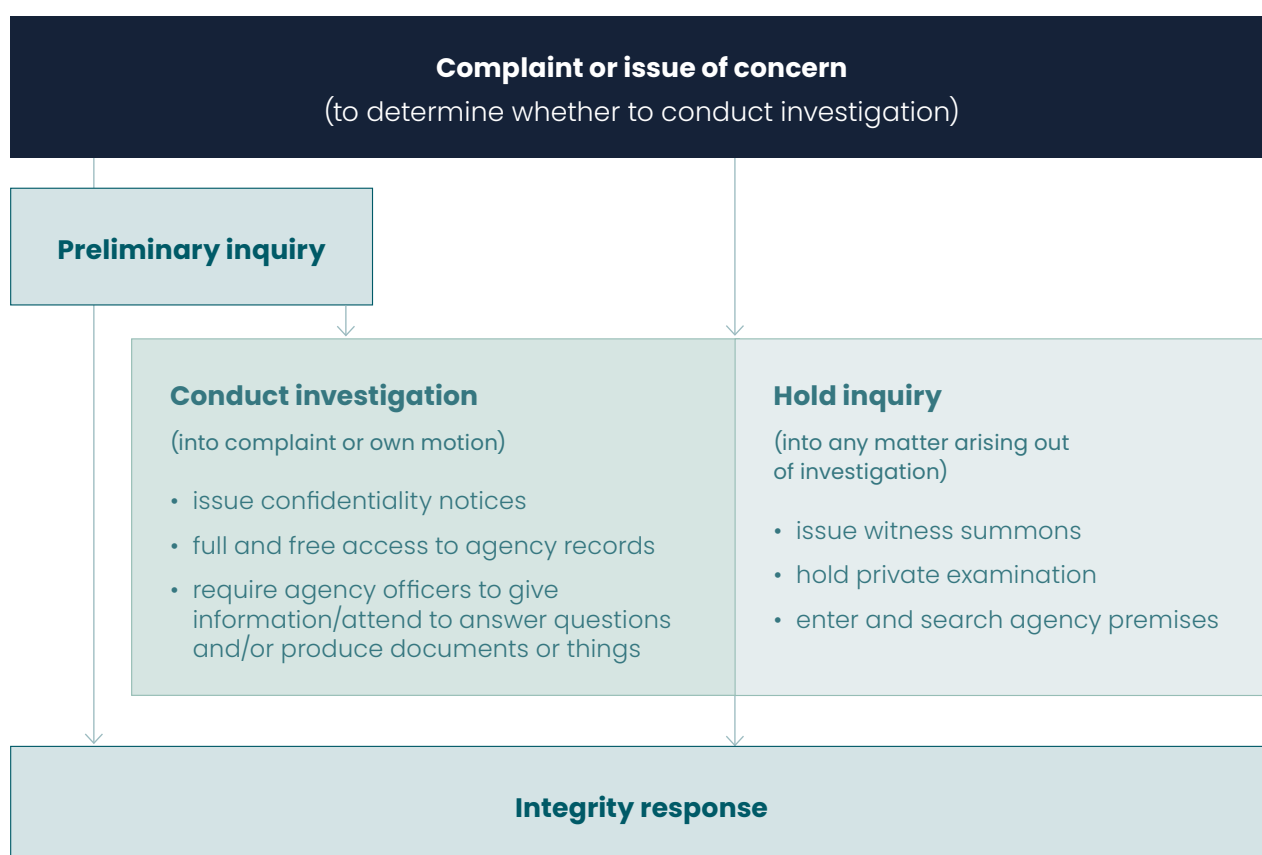
⁴⁶ Next steps in relation to one of these public interest complaints were under consideration on 30 June 2025. An investigation commenced in respect of the other.

Investigations and inquiries

Integrity Oversight Victoria can investigate complaints and initiate ‘own motion’ investigations. We may conduct a preliminary inquiry to determine whether to commence an investigation, during which we will typically request and assess information from the oversighted body. Until February 2025, we were required to investigate all public interest complaints that came to us.⁴⁷ We may now decline to investigate public interest complaints if certain criteria are met.⁴⁸

If warranted, we may conduct an inquiry into a matter arising from an investigation. This empowers us to examine witnesses and compel the production of documents and things. See Figure 15 for a diagram that shows our investigatory options.

Figure 15: Investigatory options available to Integrity Oversight Victoria



An examination takes place when we summons a person to give evidence, with or without the requirement to produce documents or things. Examinations are conducted on oath or affirmation, and the confidentiality of evidence provided may be protected by a confidentiality notice. We may also summons the production of documents or things to assist an investigation.

We may obtain evidence through voluntary interviews with witnesses. In addition, without a summons being issued, personnel of bodies that we oversee can be required to provide us information or attend Integrity Oversight Victoria to answer questions or produce documents in relation to an investigation.

During an investigation, we are entitled to full and free access to the records of the bodies we oversee and in certain circumstances may enter their premises and search for and copy or seize documents and things relevant to our inquiry.

⁴⁷ Under s 44(2) of the IOV Act.

⁴⁸ Under s 44A of the IOV Act.

Preliminary inquiries

We undertook 2 preliminary inquiries in 2024–25 to decide whether to investigate. One related to IBAC, commencing and concluding in 2024–25; it did not proceed to an investigation. The other preliminary inquiry related to the Victorian Ombudsman – it commenced in 2023–24 and was ongoing on 30 June 2025.

Investigations

We conducted 6 investigations in 2024–25. One investigation commenced in 2022–23 and 5 commenced in 2024–25. All were investigations of public interest complaints (PIC investigations) made under the public interest disclosure scheme, and one also included own motion elements.

We closed 3 investigations and 3 were ongoing on 30 June 2025.

Figure 16: Status of investigations on 30 June 2025

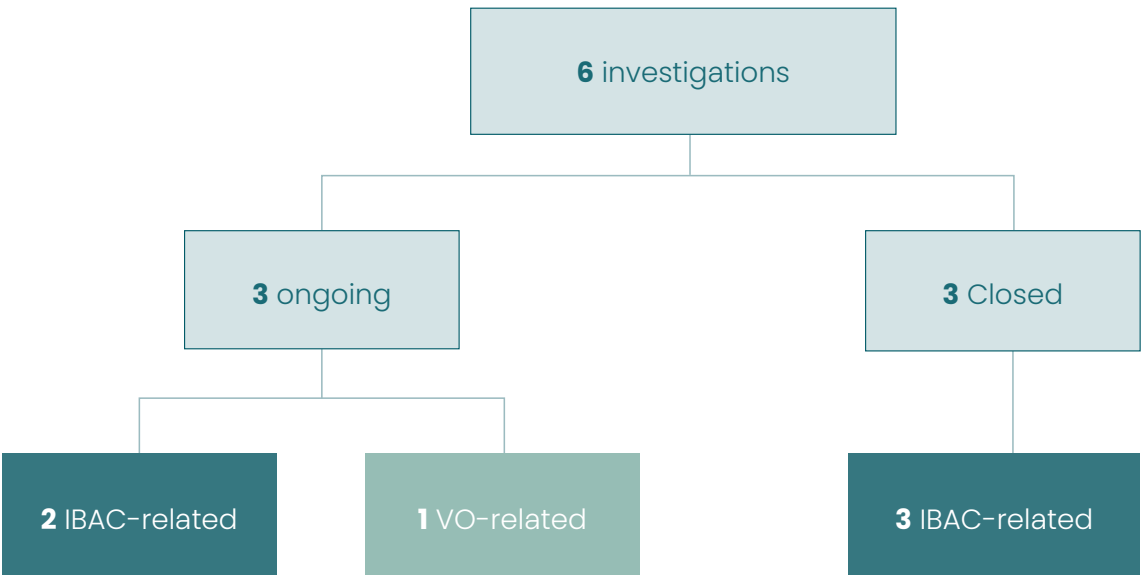


Table 6 describes the outcome of each closed investigation. Our investigations resulted in 2 recommendations to IBAC which were accepted.⁴⁹ We also made one suggestion to progress an outstanding issue, which was accepted.

49 See IBAC chapter for more information.

Table 6: Outcomes of investigations closed, 2024–25

Description	Outcome
PIC investigation and inquiry into the conduct of IBAC and IBAC Officers (commenced 2022–23)	• No allegations were substantiated but lesser deficiencies were identified for one allegation. • We made 2 private recommendations to improve record keeping and natural justice processes, and one suggestion about the content of IBAC reports to Integrity Oversight Victoria notifying intention to hold public examinations.⁵⁰ • IBAC accepted the recommendations and suggestion.
PIC investigation into the conduct of IBAC Officers (commenced 2024–25)	• The allegations were not substantiated.
PIC investigation into the conduct of IBAC Officers (commenced 2024–25)	• The allegation was not substantiated.

Powers exercised during investigations

We try to obtain information and evidence voluntarily where possible, but often witnesses are bound by confidentiality obligations and can only give evidence if those obligations are overridden by a requirement to assist us. We undertake a human rights assessment before we exercise coercive powers and use the least coercive and proportionate option available consistent with the goals of the investigation. For example, where possible, we will obtain oral evidence from integrity body personnel via an interview under section 47 of the *Integrity Oversight Victoria Act 2011* (IOV Act), rather than an examination before the Chief Integrity Inspector following the issuing of a summons.

Table 7: Coercive powers exercised, 2024–25

Coercive powers	Number of times exercised
Summonses issued	0
Confidentiality notices issued	1
Cancellations of confidentiality notices issued	11
Requirements issued to provide information, produce documents or attend to answer questions under s 47 of the IOV Act	8

50 IBAC must notify IOV under s 117(5) IBAC Act

First prosecution

As reported in our previous annual report, 'Investigation of unauthorised disclosures by an integrity officer', the special report published in June 2024, found a former officer of the Office of the Special Investigator (OSI) disclosed confidential information without authority.⁵¹ The investigation, known as Operation Shell, detailed the importance of current and former personnel of all agencies we oversight complying with their confidentiality obligations during and after their employment.

Following the conclusion of Operation Shell, in September 2024, we charged a witness with wilfully making a false or misleading statement to Integrity Oversight Victoria during the investigation.

Under section 97 of the *Integrity Oversight Victoria Act 2011*, it is a criminal offence for a person to wilfully make a false statement to Integrity Oversight Victoria, or to mislead or attempt to mislead it or an Integrity Oversight Victoria Officer whilst exercising powers during an investigation. A conviction may attract a fine of up to \$23,710 or 12 months in prison or both.

The witness took responsibility for their actions, and the prosecution was resolved in January 2025 when the witness entered a 6-month diversion program. The diversion is successfully completed if the accused is of good behaviour for the specified time. If this occurs, the charge will be struck out by the court and the witness will have no criminal record.

The prosecution demonstrates the importance for anyone who is required to attend or is summoned to give evidence to Integrity Oversight Victoria to always do so truthfully and in accordance with their lawful duties.

Inspections

We have a regular integrity program that includes physical inspections of records and documents associated with the use of covert, intrusive and extraordinary investigatory powers including the use of surveillance devices.⁵²

Additionally, we inspect the records of the Public Interest Monitor (PIM) to ascertain the extent to which it has complied with the prescribed obligations.⁵³ From time to time, we may also conduct an irregular inspection of an agency's records in response to a compliance concern connected to the use of a covert power.

We respond to identified issues by making formal findings of non-compliance and where appropriate, recommendations to prevent future breaches of the law.

Surveillance devices, controlled operations, and counter-terrorism reports are tabled in parliament and published on our website (bi-annually for surveillance devices and counter-terrorism; annually for controlled operations). Outcomes of telecommunications interception inspections are also reported annually, however these reports are not tabled in parliament (and not made public). Instead, they are sent directly to the bodies' chief officers and ministers.⁵⁴

Inspection outcomes in relation to PIM records are reported after each inspection. We conducted an annual inspection of PIM records during 2024–25. In accordance with the relevant Act, this report is not publicly available.

During 2024–25 we conducted 13 regular inspections. These inspections were conducted entirely at the premises of the inspected agencies over a total of 33 days.

⁵¹ See Investigation of unauthorised disclosures by an integrity officer on our website.

⁵² SD Act; CCO Act in respect of IBAC and VicPol; Fisheries Act in respect of VFA; Wildlife Act in respect of DEECA and the GMA; TIA Act empowers IBAC and Victoria Police to intercept telecommunications under the authority of a warrant, and to use and communicate lawfully intercepted information. We make reports under the TISP Act.

⁵³ As required by the IOV Act.

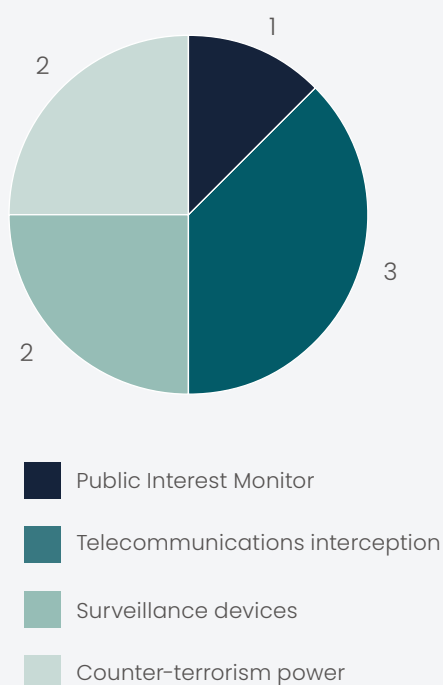
⁵⁴ As required by the TISP Act.

From these inspections, we finalised 6 inspection reports.⁵⁵ As permitted by the respective Acts, 3 reports were made to parliament after providing the agency an opportunity to respond to any adverse comments. In all cases, we gave a copy of each report to the relevant minister(s) and provided the finalised report, or relevant section of the report, to the oversight agency.

Two irregular inspection reports were also finalised. See below under telecommunications interceptions and surveillance devices.

Copies of the tabled reports are on our website.

Figure 17: Inspection reports completed, 2024–25



Telecommunications interception

In Victoria, there are 2 bodies empowered by the *Telecommunications (Interception and Access) Act 1979* (Cth) (TIA Act) to intercept telecommunications under the authority of a warrant and to use and communicate lawfully intercepted information. These are Victoria Police and IBAC.

Our inspection reports are made under the Victorian *Telecommunications (Interception) (State Provisions) Act 1988* (TISP Act) and are not publicly available. These reports are sent to the chief officers of each body, the Minister for Police (for Victoria Police) and the Attorney-General (for both Victoria Police and IBAC). The Minister for Police and State Attorney-General must then forward the reports to the minister responsible for the TIA Act, the Australian Government Minister for Home Affairs.⁵⁶

In 2024–25, we completed 2 inspection rounds at both IBAC and Victoria Police. We made 2 regular reports, one each for Victoria Police and IBAC, on the results of our biannual inspections within the required timeframe.

During this period, we provided IBAC with our final 3-part report relating to an irregular inspection conducted in May/June 2023. Since this report was made under the TISP Act, it is not publicly available. See the IBAC chapter for further detail.

In its most recent public report on telecommunications interceptions data, the Australian Government Attorney-General's Department reported that for the 2023–24 period, there were 8 telecommunications interception warrants issued to IBAC and 127 issued to Victoria Police.⁵⁷

⁵⁵ There can be more than one inspection necessary to complete one inspection report.

⁵⁶ The Administrative Arrangements Order made on 13 May 2025 transferred responsibility for administering the TIA Act from the Attorney-General's portfolio to Home Affairs portfolio.

⁵⁷ See 2023–24 Annual Report under the *Telecommunications (Interception and Access) Act 1979* and *Part 15 of the Telecommunications Act 1997*.

Surveillance devices

Under the *Surveillance Devices Act 1999* (SD Act), we have oversight of the use of surveillance devices by Victorian state bodies. The following 6 bodies are permitted to apply for warrants to covertly use optical, listening, tracking and data surveillance devices for the purpose of investigating offences:

- Victoria Police
- IBAC
- Game Management Authority (GMA)
- Victorian Fisheries Authority (VFA)
- Department of Energy, Environment and Climate Action (DEECA)
- Environment Protection Authority (EPA).

The SD Act requires us to inspect the records of those bodies from time to time and to report the results of inspections to each House of the Parliament as soon as practicable after 1 January and 1 July of each year. A copy of the report must be provided to the Attorney-General at the same time it is transmitted to parliament.

In 2024–25, we inspected the records of Victoria Police, IBAC and DEECA. No inspections were conducted at the VFA, GMA or EPA as these agencies did not make an application for a surveillance device warrant for the relevant period and there were no previous issues to address.

We transmitted an inspection report for tabling in parliament in May 2025. This report covered our inspection of 40 warrants administered by Victoria Police and 7 warrants administered by IBAC. For the period covered by this report, there were no relevant records to inspect for other bodies authorised under the SD Act.

Following an irregular inspection of IBAC in May/June 2023, we made a further report with findings connected to the SD Act. This report was finalised concurrently with the 3-part irregular TISP Act report, however unlike that report it was tabled in parliament in October 2024.

We also carried out an irregular inspection of Victoria Police surveillance device records during the relevant period, the results of which will be finalised in 2025–26. See the Victoria Police chapter for more details.

Controlled operations

A controlled operation is a covert investigation method used by law enforcement bodies. It involves authorised participants (predominantly law enforcement officers but sometimes a civilian) covertly obtaining evidence to support the prosecution of an offence. For this purpose and subject to strict controls, a participant may need to engage in conduct which, but for the controlled operations authority, would be unlawful. Under the legislation a controlled operations authority may be granted by a body head (or their delegate), which indemnifies authorised participants against liability for such unlawful conduct.

The power to conduct controlled operations is governed by the:

- *Crime (Controlled Operations) Act 2004* in respect of Victoria Police and IBAC
- *Fisheries Act 1995* in respect of VFA
- *Wildlife Act 1975* in respect of DEECA and the GMA.

We must inspect the records of the above bodies, and we also receive biannual reports from each body's chief officer on their controlled operations activities during the 6-monthly period. We report to the relevant ministers and to parliament on the work, activities and level of compliance with statutory requirements achieved by each body.

In 2024–25, we only inspected the records of Victoria Police. We did not inspect any records at IBAC, DEECA, VFA or the GMA as these bodies did not make any applications to conduct controlled operations. We further engaged with Victoria Police in relation to one outstanding recommendation made in June 2023. This recommendation remains open as we continue to track Victoria Police's progress in developing further processes in relation to planned conduct under a controlled operation. The inspection report for this period will be tabled in 2025–26.

Counter-terrorism powers

The *Terrorism (Community Protection) Act 2003* (TCP Act) permits Victoria Police to exercise certain exceptional powers for the purpose of preventing or responding to acts of terrorism and assigns an inspections role to us for the purpose of providing independent oversight of the use of these counter-terrorism powers.

We conducted one inspection of Victoria Police records under the TCP Act during 2024–25. We did not undertake an inspection during the first half of 2025 because Victoria Police had not exercised any relevant power since the last inspection of records in October 2024.

We finalised 2 reports in June 2025 that provided findings for inspections conducted in April 2024 and October 2024. In addition to commenting on preparatory activities undertaken by Victoria Police to support compliance with the TCP Act, each report provided the results of an inspection of records connected with an application to exercise special police powers under Part 3A of the TCP Act. In our report for the April 2024 inspection we also closed 3 recommendations from an earlier inspection of Victoria Police records following confirmation of the actions taken to address these.

PIM records

The role of the Public Interest Monitor (PIM) is to appear at hearings during which law enforcement officers apply for the use of certain coercive or covert powers and to test the content and sufficiency of the information relied on in the applications. We must inspect certain records kept by the PIM and to report on the outcomes of inspections to the Attorney-General at least once a year.

In 2024–25, we conducted one inspection of records held by the PIM. We delivered a report on the results of our inspection to the minister within the required timeframe. This report is not publicly available.

Further details of our inspection of PIM records are given in the Public Interest Monitor chapter of this report.

Coercive powers notifications

One of our core functions is the oversight of coercive powers by Victorian integrity, accountability and investigatory bodies. These powers, which limit the freedom and rights of individuals, 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.

The Independent Broad-based Anti-corruption Commission (IBAC), the Victorian Ombudsman (VO), Office of Chief Examiner (OCE), Office of the Victorian Information Commissioner (OVIC), the Parliamentary Workplace Standards and Integrity Commission (PWSIC), Wage Inspectorate Victoria (WIV), Victoria's Auditor-General's Office (VAGO), and the Judicial Commission must notify us when they use these powers (coercive powers notifications), although the notification requirements vary⁵⁸ and not all coercive powers need to be reported to us.⁵⁹

⁵⁸ When a summons (or in the case of the PWSIC, a request) or a confidentiality notice (CN) is issued, the notification usually includes the summons/CN, explanatory information given to the recipient, and a report to us explaining why the body issued the summons/CN. Where a person is required (or requested, in the case of the PWSIC) to give evidence, we receive a recording of the examination, a transcript (if one was made), and a report providing certain details (this is the legislative requirement for IBAC, OVIC, the PWSIC, VO, VAGO, WIV and OCE).

⁵⁹ 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 IOV Act.

Coercive powers notifications received

In 2024–25, we received 308 coercive powers notifications, 277 fewer than the 585 received in 2023–24. The notifications were made by IBAC, the VO, OCE, OVIC and PWSIC. We did not receive any notifications on the use of coercive powers by WIV, VAGO, or the Judicial Commission.

Figure 18: Coercive powers notifications received according to body, 2024–25

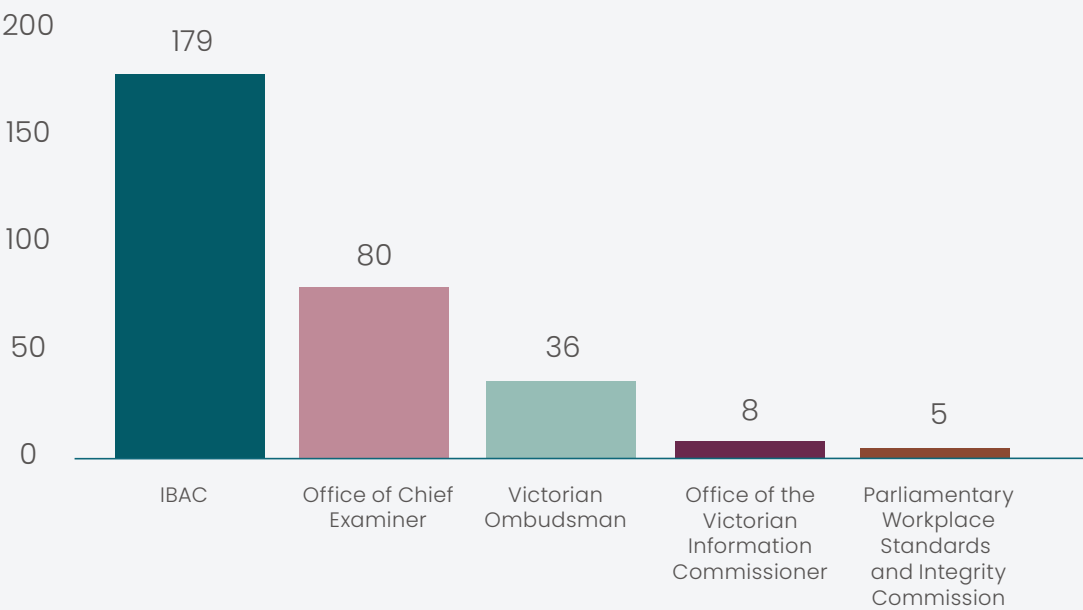
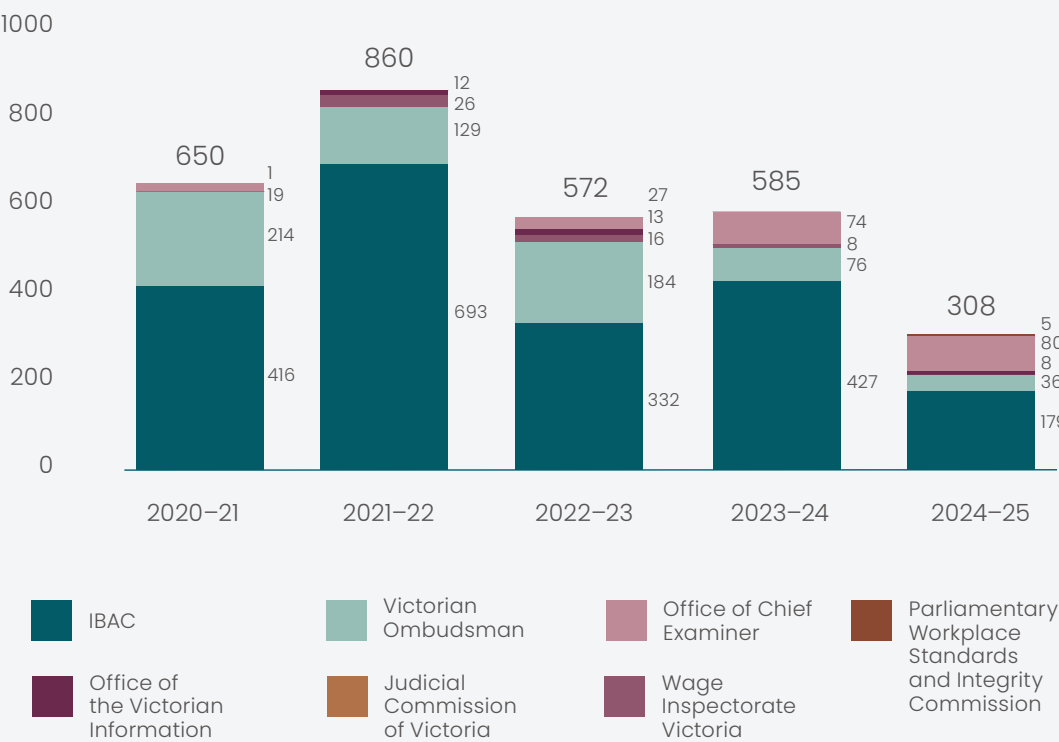


Figure 19: Coercive powers notifications received, 2020–21 to 2024–25



Monitoring the use of coercive powers

Our approach to reviewing coercive powers notifications includes:

- receiving and registering notifications
- a completeness check to identify any missing records or information
- a risk-based triage process to select notifications for review
- reviewing selected notifications by assessing whether the relevant body complied with requirements in the legislation when using the relevant coercive power.⁶⁰

Improvements to our processes

To decide which notifications to review, we use a risk-based triage methodology. Last year's extension of triaging OCE notifications rather than reviewing all notifications reduced resourcing pressures. During this period, we consolidated this process and processed a large volume of OCE notifications against this new methodology.

We developed new compliance assessments checklists for several types of notifications that are more thematically focused, with greater emphasis on issues that have real-world impacts. We will continue to refine our checklists into 2025–26.

We commenced reviewing our triage assessment process to ensure it accounts for current risks and appropriately balances mitigating factors. We expect to finalise this process in 2025–26 and redevelop the procedure governing our notifications review process.

Triage

The triage process assesses the notification against a threshold by reviewing key elements of the notification and noting risk factors that may elevate or reduce risk.

For example, when triaging an examination recording, we view the examination commencement, a sample of interactions during the examination, and the examination closing, among other areas.

By assessing these areas, we can determine the risk profile of the examination and assign a risk rating. If that rating meets the threshold, the notification will be assigned for review (with some exceptions).⁶¹

If a witness presents with a welfare issue, we usually review the notification and assess how it was managed and consider the supports offered to the witness.

We also apply mandatory review principles where the powers are rarely exercised, where there could be elevated risks, such as public examinations, immediate summonses, and directions to lawyers, or where the power relates to a new investigation.

Content of reviews

The IOV Act specifies that a review must assess:

- whether the notification is compliant with the legislation governing the body
- whether a requirement to produce documents or things may reasonably be considered to assist the body to achieve the purposes of its investigation
- whether the questioning of a person attending the body for an examination may reasonably be considered to assist it to achieve the purposes of the relevant investigation.

We also consider the welfare of witnesses when reviewing coercive powers notifications.

Triage and review statistics

We triaged all 308 coercive powers notifications received during 2024–25 and selected 89 (28%) of these notifications for review, including:

- 67 documents (i.e. summonses, confidentiality notices)
- 22 examinations/interviews (i.e. recordings).

We undertook 85 reviews during 2024–25 of which 4 were not completed by 30 June 2025. We also completed reviews of 20 coercive powers notifications received in 2023–24.

As PWSIC was using its powers for the first time, we reviewed all 5 of their notifications. We take this approach for new bodies, to give guidance that can help shape and improve processes at the earliest opportunity.

⁶⁰ The IOV Act specifies the issues we must review when we exercise our discretion to conduct a review of a coercive powers notification. See ss 40A, 41A, 42AA, 42B(2), 42C, 42E and 42F.

⁶¹ Where multiple similar notifications are received that are assigned a similar risk rating, a sample of these will be reviewed (with preference to the highest risk rating) in the first instance. Some notifications that meet the risk threshold will not be assigned for review if there are insufficient resources, or other, higher priority workloads.

We also reviewed 6 of OVIC’s 8 notifications as it had not exercised its powers for some time.

The number of coercive powers notifications reviewed in 2024–25 (85) is a decrease from the 186 notifications reviewed in 2023–24. The decrease aligns with the introduction of our risk-based triage and review process and a reduction in overall notifications received. By reducing the number of reviews for low-risk notifications, we could apply a greater proportion of resources to complex reviews and the management of thematic issues.

Despite the decrease in total notifications, we received a higher volume of more complex notifications, particularly from OCE.

Consistently with applying the triage process in the last period, we reviewed a lower proportion of summonses and confidentiality notices compared to examinations and interviews.

In addition to the above figures, we completed a review of 13 OCE examinations and 3 OCE summonses triaged and assigned for review in the previous period and reviewed 2 prior period IBAC confidentiality notices and summonses.

The number and types of reviews we conducted are detailed in the table below.

Table 8: Coercive powers notifications received and reviewed

	Received 2024–25	Reviewed 2024–25	% Reviewed	Received 2023–24 Reviewed 2024–25	Total Received
Confidentiality notices	24	7	29%	2	9
Cancellations of confidentiality notices	56	4	7%	0	4
Summons / Orders / Notices	174	55	32%	5	60
Examinations / interviews	54	19	35%	13	32
Total	308	85	28%	20	105

Risk profile of notifications received

Under our risk-based model certain notifications are reviewed on a mandatory basis including notifications relating to a new investigation or preliminary inquiry, immediate summonses, public examinations and directions to lawyers. During the period we designated 41 notifications for mandatory review. For notifications that are not reviewed on a mandatory basis,⁶² we undertake a further triage to assign a risk rating.

A notification may be assigned a higher risk rating in circumstances where there are elevated welfare risks, thematic compliance issues, or other factors that increase the vulnerability of a witness, such as the reliance on an interpreter in an examination.

Of the 308 coercive powers notifications received during 2024–25, we assigned a risk rating to 232. Notifications assigned a rating of medium and above will, in most instances, be assigned for review.⁶³ There were 4 notifications rated below this threshold which were assigned for review on a sample or targeted basis. Examples include where we did not receive a notification for the relevant operation for a significant period of time, or where we receive a batch of 3 or more similar notifications and select one to ensure appropriate oversight.⁶⁴ Thirty-five notifications did not receive a rating as they related to a cancelled confidentiality notice or other notification types which did not require assessment.

62 Cancellations of a confidentiality notice are excluded from this risk-based assessment. We review these on a sample basis.
63 We assessed 3 summonses at a medium risk level but did not undertake a review. This was due us prioritising other higher risk notifications from the same period.
64 If compliance issues are identified additional reviews may be conducted.

The breakdown of risk profile of the 308 notifications is in Figure 20.⁶⁵

Compared to the previous 12-month period, we saw a lower proportion of medium and high-risk notifications. This corresponds with fewer examinations being notified, as these typically have higher ratings than document-related notifications.

Figure 20: Risk ratings assigned to coercive powers notifications, 2024–25

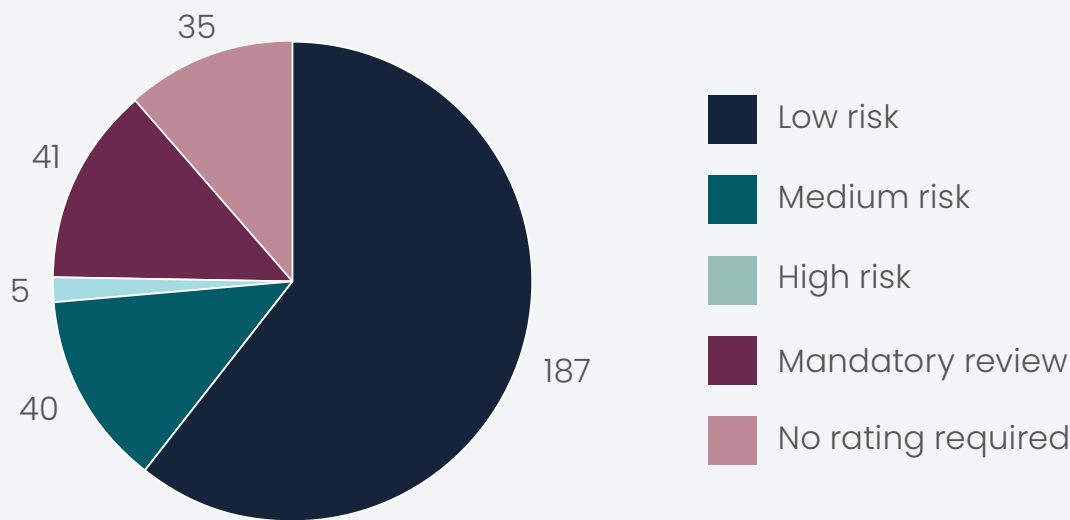


Figure 21: Risk ratings according to body, 2024–25



⁶⁵ As 20 notifications were triaged during 2023–24 but with reviews commenced in 2024–25, the number of notifications that are eligible for review and the figures of notifications reviewed do not align.

Duration of examinations and interviews

To manage the workload, we continued capturing and analysing data on time spent reviewing examinations.

An examination of a witness continues until the witness is excused from attendance. Given the varying complexity of each body's investigations an examination duration can range from less than an hour to several days. Where an examination takes more than one day, the examination can re-commence at an agreed time. Voluntary interviews are typically shorter in duration and rarely exceed a few hours.

The total duration of examination and interview recordings received during the period was 227 hours and 49 minutes (compared with 183 hours and 16 minutes in 2023–24).

We reviewed a total recording duration of 195 hours and 39 minutes (excluding any break in the examination), including 110 hours and 19 minutes of recordings carried over from the last period.

The shortest recording reviewed was 21 minutes long and the longest reviewed was 18 hours and 29 minutes long (over 6 separate days). The average duration of an examination was 6 hours and 6 minutes.

We reviewed:

- 168 hours and 4 minutes of OCE examinations
- 20 hours and 48 minutes of IBAC examinations
- 3 hours and 58 minutes of OVIC compulsory interviews
- 2 hours and 49 minutes of VO voluntary interviews.

The cumulative duration of recordings viewed is significantly higher as this total figure does not reflect the total time to complete a review, nor the duration of recordings viewed during triage.

We also began capturing further data in our case management system to provide a more detailed picture of the time spent on examination and interview triage. As this data only covered part of the period, it will be included in our next annual report.

Periodic reporting model

In March 2023, we introduced a periodic reporting model where compliance issues and feedback were consolidated and privately reported to the body at certain intervals. This resulted in a more systemic approach to providing feedback to bodies, with a view to improving future compliance. For IBAC and the VO, we changed our reporting cycle to 6-monthly in recognition of fewer overall issues being identified in prior reports and an intention to direct our focus on persistent and important issues.

Due to the complexity and varying volumes of OCE notifications, we continue to provide our reports on an ad-hoc basis.

While most issues are captured within these periodic reports, we may still elevate issues for direct correspondence where the matter is serious, requires ongoing engagement, or its management is time sensitive. This includes where we find a summons that could be considered invalid, confidentiality notices that contain incorrect or misleading information, or summonses that do not provide the required period of notice to a person. All these issues have a bearing on the fairness and proportionality of the exercise of a coercive power.

When we report compliance issues or provide feedback to a body, we aim to explain why we believe something may be an issue and outline steps we think may address, or help to manage, the issue. We do this by making suggestions that consider a body's own practices, policies and procedures, and our own experience and knowledge of effective practices gained from our oversight role.

Each body is given an opportunity to respond to these reports, the key issues from which are summarised for inclusion in our annual reports.

During 2024–25, we issued 5 periodic reports. For details, see the relevant bodies' chapters.

Essential practices for coercive powers

We identified and acted on a range of issues associated with the use of coercive powers by IBAC, VO, OCE and OVIC. Last year, we outlined 3 essential practices:

- Essential Practice 1: Effective and consistent quality assurance
- Essential Practice 2: Clear and consistent approval practices
- Essential Practice 3: Periodic review of active confidentiality notices

From the issues identified this year, we highlight a further 3 (Essential Practices 4–6) to be considered by all bodies exercising coercive powers:

- Essential Practice 4: Clear and up-to-date delegation of powers
- Essential Practice 5: Clear basis for requests during examinations or interviews
- Essential Practice 6: Sufficient reasons for issuing a summons.

Clear and up to date delegation of powers to be exercised

Context

Delegations are fundamental to ensuring the exercise of a power has a lawful basis. We identified occasions over the last few years where delegations that authorise staff to exercise certain powers, or perform certain actions, lack clarity or do not explicitly cover certain functions. The most significant risk that may arise is where a power is exercised by an undelegated officer. Where that power was used to obtain information under summons, or compel a person to attend for examination, any derivative use of evidence obtained can be affected. This can impact investigations and can mean evidence is disregarded.

While not a coercive power, our latest surveillance devices report on an irregular inspection of IBAC conducted in May to June 2023 discussed an instance dating back to 2021 where some IBAC Officers were not sworn in by a delegated person. This affected some functions these IBAC Officers could perform during a 12-month period, including a surveillance device application (which was not executed at the time the issue was discovered by IBAC).

Essential Practice 4

Bodies exercising coercive powers should ensure they appropriately delegate powers and functions relevant to the exercise of coercive powers. This can include who may issue or vary a summons, who may undertake or be present at interviews, who can take an oath or affirmation from a witness or who can serve a summons. Delegations should be regularly reviewed and aim to clearly state who is covered and the extent of powers they may exercise.

Officers who may exercise any powers should regularly ensure they check the latest delegations – and where any gaps are apparent, should raise these with the relevant work area.

Clear basis for requests during examinations

Context

The lawful and proper use of coercive powers is central to Victoria's integrity system.

Integrity Oversight Victoria expects that agencies' exercises of power are:

- lawfully based
- clearly communicated
- accurately recorded
- supported by policies and practices.

When a body summonses a witness for questioning, their powers are generally limited to asking questions within the scope of the summons.

If an agency summonses a witness only to answer questions, but then during questioning requires a witness to produce documents or other things, the agency will have exceeded that lawful power.⁶⁶

Given the compulsory context of questioning, if there is no lawful power to request further documents, an agency should be clear about the voluntary nature of any response.

This is to ensure that any cooperation is at the sole discretion of the witness and the witness (and their legal representative, if applicable) is informed that prior legal compulsion does not apply to the request, and there would be no adverse consequence for non-compliance.

Preferably, agencies should follow up on any such request in writing. This would avoid ambiguity and any implied requirement that a response must be provided.

Agencies should also ensure policies and procedures and any internal controls or processes for monitoring requests consistently support this practice.

Integrity Oversight Victoria has previously highlighted this issue.

As noted in our 2023–24 annual report, IBAC accepted our suggestion that an examiner must be clear whether a request is voluntary or compulsory. It agreed to provide feedback to counsel assisting in a specific operation and inform future counsel assisting. The issue has not reoccurred.

We also identified examples of this issue with respect to the OCE and made similar improvement suggestions. The OCE indicated that where requests for documents are made during an examination, it would ensure it makes clear to a witness whether the request is voluntary or compulsory, including whether it relies on the Chief Examiner's power under section 35A.⁶⁷

Essential Practice 5

Agencies with compulsory examination powers only make requests for documents during questioning if they are clear about the nature and basis of any request. These expectations are fundamental to procedural fairness, protecting the rights of witnesses, and ensuring trust in Victoria's integrity system.

⁶⁶ Except for the Chief Examiner, who has a specific power under s 35A to require evidence and documents during an examination that have not been summonsed.

⁶⁷ The Chief Examiner has a power under s 35A to require evidence and documents that are in a witness's possession at an examination that have not been summonsed.

Sufficient reasons for issuing a summons

Context

Where an agency has issued a summons⁶⁸ requiring a recipient to produce a document/thing or to give evidence, a key consideration in our review of the notification is to assess whether the requirement may reasonably be considered as assisting the agency to achieve the purposes of the investigation.

To make this assessment, we require sufficient contextual information to determine the relevance of the information or documents summonsed. This information is included in a report accompanying the summons notification.

Assessing the relevance and scope of a summons, ensures that agencies have lawful and reasonable bases for the summons and that the scope is relevant to the investigation. Where a summons requires extensive information, such as information over a long timeframe, affecting multiple persons, or covering a range of documents, further information about the reasons for the scope may be required. This may include, why a long timeframe was specified, practices about filtering and managing unnecessary information and why information about specific persons has been sought.

In last year's special report on the VO's use of coercive powers, we noted instances where we requested additional information about extensive requests made in summonses. VO agreed to document in the accompanying report consideration of scope, and how it would manage unrelated information. We also noted the VO had generally provided limited information relating to the reasons for issuing a summons.⁶⁹

In this reporting period, we continued to assess the relevance of notified summonses and, where unclear, sought additional information about relevance. We also communicated the importance of bodies reporting sufficiently detailed explanations of the reasons for summoning specific information or documents.

Essential Practice 6

To allow us to appropriately assess the issue of a summons, in particular its relevance to an investigation, agencies should provide a sufficiently detailed explanation of the reasons for summoning the information or documents, including the basis for summoning extensive information.

Further planned activities

In last year's report, we foreshadowed a plan to assess the effectiveness of IBAC's newly introduced practice to manage the status of confidentiality notices. As the risk of non-compliance was low, we focused instead on improving our notifications review checklists to streamline our review processes and adjust our thematic focus. In 2025–26, we intend to continue this activity, including finalising our notifications review procedures.

Examples of issues identified through our monitoring of coercive powers are included in the relevant body's chapter of this report.

⁶⁸ We note, depending on the agency a 'summons' may also be referred to as 'a notice' or 'a request'.

⁶⁹ See Compliance case study on the use and oversight of coercive powers on our website.

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Bodies that we oversee

Independent Broad-based Anti-corruption Commission

Overview

Our broad range of oversight functions relating to IBAC include monitoring the compliance of IBAC and IBAC personnel with the *Independent Broad-based Anti-corruption Commission Act 2011* (IBAC Act), the *Integrity Oversight Victoria Act 2011* (IOV Act), the *Public Interest Disclosures Act 2012* (PID Act), and other laws.⁷⁰ We fulfil our functions through:

- receiving and assessing complaints about IBAC and IBAC personnel
- preliminary inquiries and investigations about the conduct of IBAC and IBAC personnel
- assessing public interest disclosures and investigating public interest complaints about IBAC and IBAC Officers
- reviewing coercive powers notifications
- inspections relating to IBAC's exercise of covert and intrusive powers
- general monitoring activities.

In June 2025, we signed a memorandum of understanding (MoU) with IBAC which represents a significant step forward in our inter-agency engagement. The MoU provides a framework for cooperation when performing respective legislative functions and obligations to ensure an effective and efficient relationship.

The former Inspector, the acting and the ongoing Chief Integrity Inspector/Chief Executive Officer met regularly with the IBAC Commissioner and Chief Executive Officer during the year to seek and share information and status updates, discuss challenges, provide context and discuss any shared risks.

Our Director of Integrity Operations and Policy and Manager, Complaints met regularly with IBAC's Director, Complaint and Assessment Services and other representatives during the reporting year. These meetings provided a structured and positive opportunity for engagement about complaints and information exchange.

The number of complaints we received about IBAC or IBAC personnel increased from 79 to 83 in 2024–25 with 7 allegations substantiated.

⁷⁰ 'Other laws', includes IBAC's legislative obligations in relation to covert powers under the TIA Act, the TISP Act, the SD Act and the CCO Act.

We completed 3 public interest complaint investigations about IBAC or IBAC Officers. No allegations were substantiated but in response to some lesser deficiencies in one investigation we made 2 recommendations and one suggestion, all which IBAC accepted.

IBAC updated their PID guidelines in June 2025. We will review and engage with IBAC about the guidelines in 2025–26.

We monitored IBAC’s use of coercive powers, engaging with IBAC on one matter and providing 3 periodic reports seeking clarification or giving feedback on IBAC’s use of these powers.

We also provided IBAC with our finalised irregular inspection reports, which followed our inspection conducted in May/June 2023. IBAC accepted the final 2 remaining recommendations, bringing the total recommendations made and accepted in relation to that inspection to 19.

Compliance with statutory obligations

We must report on:

- details of IBAC’s compliance with the IOV Act, IBAC Act and PID Act
- details of the comprehensiveness and adequacy of reports made to Integrity Oversight Victoria by IBAC under the IOV Act
- the extent to which IBAC has acted on recommendations by Integrity Oversight Victoria.

Enquiries

Two enquiries about IBAC were open on 30 June 2024.⁷¹

We received a further 52 enquiries and closed 53 enquiries about IBAC during 2024–25.

One enquiry about IBAC remained open on 30 June 2025. Read about how we helped Tyson with their enquiry below.

Case study 1: Helping Tyson clarify their concerns

Tyson sent us multiple communications in a short space of time containing information about a recent interaction with IBAC.

Tyson’s communications were difficult to understand and did not paint a clear picture of their concerns.

We contacted Tyson, summarising the information provided, explaining what we could consider in relation to IBAC, and asked questions to help us understand their concerns. Tyson was able to clarify they believed an IBAC Officer who handled their complaint was biased and decided their complaint outcome before speaking to Tyson.

We closed the enquiry and registered a complaint for Tyson once we had a clear understanding of their concerns.

Complaints

Thirty-three IBAC-related complaints were open on 30 June 2024.

In 2024–25, we received a further 83 IBAC complaints, closed 71, and had 45 IBAC-related complaints open at the end of the reporting period.

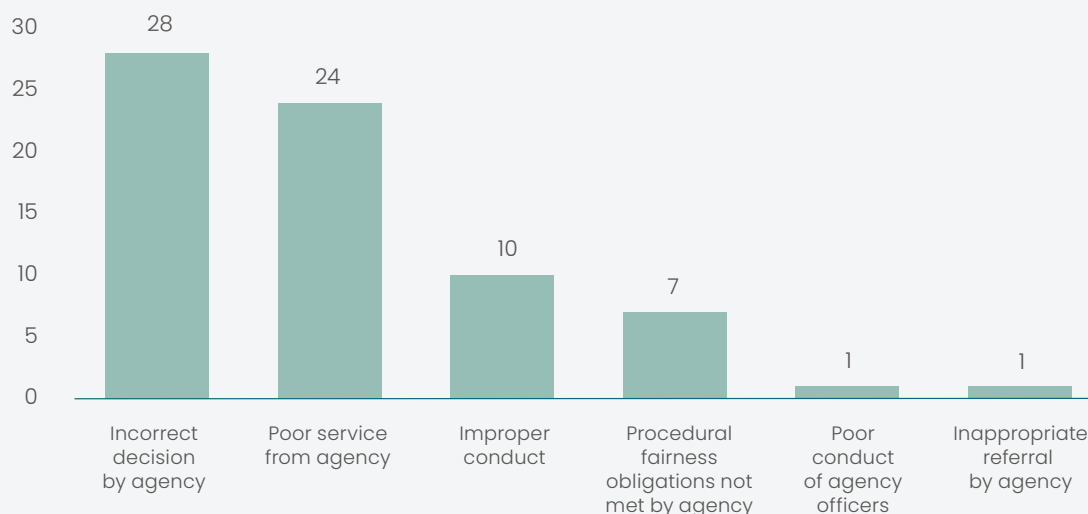
We closed 51 of the 83 IBAC-related complaints received during 2024–25. Thirty-two of the 45 IBAC complaints open at 30 June 2025 are from this reporting period and 13 are from prior reporting periods.

Of the 83 complaints received, 71 were made directly to us and 12 were notified to us by IBAC under section 71 of the IBAC Act. These were complaints made to IBAC that relate to the conduct of IBAC, or any person who is, or was at the time of the conduct, an IBAC Officer.

Primary issues

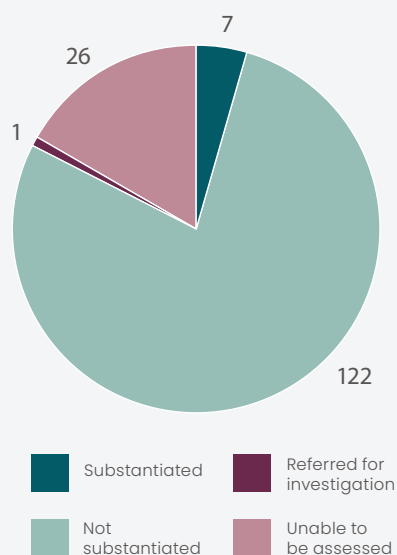
Of the complaints about IBAC closed in 2024–25, the primary issues are shown in Figure 22, noting this includes complaints received in prior years.

⁷¹ In our 2023–24 annual report, we stated in error there were no open IBAC enquiries on 30 June 2024. Further reconciliation showed 2 enquiries were carried over from 2023–24.

Figure 22: Primary issue reported in complaints about IBAC, closed in 2024–25

Allegation outcomes

We assessed 156 allegations across the 71 complaints closed this reporting period. See Figure 23 for the breakdown.

Figure 23: Allegation outcomes relating to IBAC, 2024–25

- 7 allegations were substantiated:

- 4 allegations where feedback was provided to IBAC
- one allegation resulting in an observation to IBAC
- 2 allegations resulting in recommendations to IBAC

- one allegation was determined to be a public interest complaint, to be determined by investigation⁷²
- 122 allegations were not substantiated:
 - 48 allegations with no further action taken following assessment
 - 62 allegations with no further action taken following engagement with IBAC to seek further information
 - 9 allegations where we provided feedback or observations
 - 3 allegations with no further action after engagement with IBAC to resolve service level issue (usually a delay)
- 26 allegations were unable to be assessed:
 - 11 allegations with no further action
 - 8 allegations were withdrawn
 - one allegation was outside our complaint handling jurisdiction
 - one allegation resolved after engaging with IBAC
 - 5 allegations were otherwise unable to be assessed.

⁷² Our investigation found this allegation was not substantiated.

Table 9: Complexity of closed complaints relating to IBAC, 2024–25

Complexity of closed complaints	No. of complaints	No. of allegations
Low	35	50
Medium	25	58
High	11	48
Total	71	156

Table 10: Primary issues and integrity responses in substantiated allegations relating to IBAC, 2024–25

Primary issue	No. of allegations substantiated	Integrity response
Incorrect decision by agency	1	We provided feedback to IBAC about its decision to dismiss a prisoner's complaint before giving them a reasonable opportunity to provide their supporting information when they had advised IBAC they had more information to provide. See Erwin's case study.
Procedural fairness obligations not met by agency	2	We provided feedback to IBAC about its dismissal of a complaint before assessing all relevant information. The complainant was vulnerable and had advised they had further information to provide IBAC. We also provided feedback about IBAC sharing the complainant's information with Victoria Police, the body which was the subject of the complaint, after the complainant expressed concerns for their safety arising from Victoria Police. See Abel's case study.
Poor service from agency	3 ⁷³	These findings stemmed from a single complaint. Our response included making 2 recommendations to IBAC about its handling of this complaint, and how it handles allegations of detrimental action. We also provided IBAC with feedback about meaningful monitoring of referred complaints and the need to manage and mitigate risks. See Henry's case study.
Inappropriate referral by agency	1	This complaint related to a referral of a matter to Victoria Police. We provided feedback to IBAC that it had not fully assessed the complaint before deciding to refer it to Victoria Police.
Total substantiated issues	7	

73 One part of a further allegation was also substantiated. As the whole allegation was not substantiated, it is not included in this figure.

Complaints feedback and observations

In circumstances where we identify any opportunity for improvement, including issues that are not the subject of the complaint, we share this information with IBAC to consider for future improvements to its processes and procedures.

In our 2023–24 annual report, we outlined our observations to IBAC to improve its complaint handling. Broadly, these related to:

- the value of IBAC providing clear information to complainants and other investigating bodies about the content, context and purpose of its referral and review procedures
- handling complaints in a procedurally fair manner
- making reasonable adjustments for complainants who require additional support, and
- IBAC considering all aspects and allegations in a person's complaint.

Our examples and observations from 2024–25 show complainants are approaching us with similar concerns about how they can provide their information in a way that is accessible to them, whether that information is fairly assessed, and what happens to their information when a matter is referred to a different body or person for investigation.

These themes are demonstrated in our case studies.

Case study 2: Abel's complaint about Victoria Police

Abel raised concerns with IBAC about their treatment by several local police. They believed they were being bullied and targeted by certain officers, and their report about an attempted assault was not believed by police due to Abel's history as a past offender.

When considering what to do with the complaint, IBAC asked Abel if they consented to IBAC providing details of their complaint to Victoria Police's Professional Standard's Command (PSC), despite consent not being required.⁷⁴ While Abel agreed to this, IBAC did not explain this could result in Abel's information being shared with the police they had complained about. IBAC shared the information with Victoria Police under s 41. IBAC eventually dismissed the complaint without referring it under s 73 of the IBAC Act to Victoria Police.

Abel complained to Integrity Oversight Victoria that IBAC had not properly considered their information, and that its disclosure to PSC could have been responsible for further alleged maltreatment by their local police.

We reviewed IBAC's complaint files and found that IBAC had not adequately informed the complainant about how their information might be used by PSC and IBAC did not request or consider the complainant's photo and video evidence of the alleged attempted assault.

IBAC accepted our feedback that by failing to obtain and review evidence and explain its referral process, it did not handle the complaint in a procedurally fair way. IBAC responded that it would ensure complainants in similar circumstances were made reasonably aware that PSC could disclose their information to local police without a complainant's consent. IBAC also agreed to re-engage with the complainant to obtain and assess their evidence afresh.

⁷⁴ Under s 41 of the IBAC Act, consent is not required for IBAC to share complaint information it considers relevant to the performance or functions of another body.

Case study 3: Accessibility for Jawad and Carmen⁷⁵

Jawad and Carmen both lodged complaints with IBAC about their interactions with Victoria Police and came to Integrity Oversight Victoria with different concerns about the way their complaints were handled.

While we found IBAC's decisions to dismiss both complaints were lawful, we identified 2 ways it could improve its response to each complainant's needs and circumstances.

In the first case, we found Jawad told IBAC on 5 separate occasions they lived with several disabilities, including Post-Traumatic Stress Disorder and an acquired brain injury. While Jawad did not explicitly request any adjustments, we provided an observation to IBAC that good practice is to ask the complainant if there were any reasonable adjustments IBAC could make.

In the second case, Carmen explicitly requested help lodging their complaint because they had challenges with writing and literacy. IBAC told Carmen it could not help them because a certain part in IBAC's legislation said all complaints had to be submitted in writing.⁷⁶ IBAC did not tell the complainant this part did not apply in exceptional circumstances.

By denying the complainant the opportunity to submit their complaint in a way that was accessible for them, we found IBAC had failed to identify the complainant's circumstances could be considered exceptional, and it may not have made reasonable adjustments to its service as required. We provided this feedback to IBAC and suggested additional training for staff to assist them in identifying complainant vulnerabilities, and where exceptional circumstances might apply.

IBAC accepted our feedback and agreed to re-engage with the complainant. Shortly afterwards, IBAC also introduced a new verbal complaints policy to assist its officers to ensure verbal complaints were handled fairly and consistently. Later, in response to our inquiry about the progress of its training, IBAC said:

- the verbal complaint procedure is now provided to new staff in the complaints and assessment services team
- it had delivered call-taker training and planned to do so annually⁷⁷
- it planned to supplement this with note-taker training in 2025.

⁷⁵ Under the Equal Opportunity Act, service providers are required to make reasonable adjustments for a person to access those services, if the failure to make those adjustments would limit their access.

⁷⁶ See IBAC Act s 53.

⁷⁷ IBAC noted this plan would be subject to its available budget.

Case study 4: Helping Erwin make a complaint while in prison

Erwin tried to complain about corrupt conduct to IBAC while incarcerated. Erwin completed a complaint form and sent it to IBAC, stating they wanted to provide more information verbally. They later specified they would prefer a private telephone or video call with IBAC to provide their information, due to concerns for their personal safety.

When Erwin approached Integrity Oversight Victoria, they told us that IBAC had closed their complaint without attempting to facilitate any kind of phone call with them and they had not had a fair opportunity to provide their information.

In our assessment of Erwin's complaint, we looked at IBAC's verbal complaints policy, which was in place when Erwin made their complaint. We found that although the policy required IBAC officers to accept complaints by phone if requested by a complainant, this step was not taken.

Given the vulnerability of prisoners, we offered feedback to IBAC and suggested it re-engage with the complainant. We also made several enquiries about IBAC's systems and processes for adequately identifying and triaging complaints from prisoners.

IBAC confirmed it would re-engage with Erwin, and that its systems had adequate fields to record complainant vulnerabilities. In addition, IBAC said it would also consider how it could better identify and manage prisoner complaints and integrate these considerations into its 2025 review of its verbal complaints policy.

Case study 5: Addressing Henry's concerns about IBAC's handling of disclosures and allegations of detrimental action

Henry, who was at the time a serving member of Victoria Police, raised serious concerns about a matter with IBAC. IBAC determined their complaint was a protected disclosure⁷⁸ and referred the complaint to Victoria Police for investigation. IBAC explained it would review the investigation once concluded.

Henry returned to IBAC 8 months later concerned about the investigation telling IBAC they were experiencing detrimental action⁷⁹ at work as it had become known they had complained about a fellow police officer. It was then, and continues to be, unlawful for detrimental action to be taken against someone in reprisal for making a disclosure.⁸⁰

Henry made another complaint to IBAC alleging 2 of their colleagues had breached the *Protected Disclosure Act 2012* and expressing concern about the adequacy of the referred investigation. Henry also reported the underlying conduct alleged had not been addressed. IBAC referred this complaint to Victoria Police for investigation, noting it would review the investigation.

Approximately 3 and a half years later, Henry made a further complaint to IBAC about Victoria Police's investigation. Henry said Victoria Police failed to investigate properly and had exposed Henry to ongoing detrimental action. Henry also reported they had not received an outcome to the investigation. IBAC dismissed this complaint.

⁷⁸ Under the then Protected Disclosure Act which has been replaced by the PID Act.

⁷⁹ As defined in the then Protected Disclosure Act and the current PID Act.

⁸⁰ See s 45 of the PID Act.

Henry made a complaint to us about how IBAC handled his matters. We reviewed IBAC's files and engaged with IBAC. Our assessment found:

- IBAC did not appear to take steps to confirm Victoria Police was properly investigating
- although concerns about potential criminal offending were raised, IBAC did not proactively monitor the investigation to ensure it was finalised before the statute of limitations had expired
- IBAC did not address the extended period of investigation by which time some police officers named in the disclosures had resigned from Victoria Police before the investigation was completed, meaning disciplinary action could not be pursued
- IBAC did not intervene or consider withdrawing its referral to Victoria Police despite the excessive duration of the investigation
- IBAC failed to properly consider Henry's welfare when handling their complaints, including allegations of detrimental action. We noted that Henry told IBAC repeatedly they no longer felt they could attend their workplace due to the treatment they were receiving. IBAC did not take steps to protect Henry from detrimental action⁸¹, and ultimately Henry, an experienced police officer, ceased working for Victoria Police.

We provided feedback to IBAC that it should ensure its monitoring of referred matters is proactive, so that any risks can be identified and mitigated. We also made 2 private recommendations to IBAC to improve its future complaint handling regarding detrimental action allegations, and to improve Henry's IBAC complaint outcome. IBAC accepted both recommendations.

IBAC acknowledged the assessment of Henry's complaints fell short of its standards and agreed to reengage with Henry.

IBAC acknowledged our view that serving members of Victoria Police who make a complaint or disclosure to IBAC are particularly vulnerable as the supports available to them are intertwined with their employment, and the widely known challenges in policing organisations with respect to whistleblowers.

We acknowledge improvements by IBAC to processes, procedures and staff training since Henry's complaint.

⁸¹ Section 3 of the PID Act defines detrimental action as including action causing injury, loss or damage; intimidation or harassment; discrimination, disadvantage or adverse treatment in relation to a person's employment, career, profession, trade or business, including the taking of disciplinary action. We note the definition of detrimental action in the then Protected Disclosure Act, was the same as the current definition in the PID Act.

Public interest disclosures

At the commencement of the reporting period, we had 3 active disclosures relating to IBAC. Two of these were finalised in 2024–25 and did not meet the definition of a public interest disclosure.⁸² One remained active on 30 June 2025.⁸³

During 2024–25, we received and assessed 9 disclosures relating to IBAC under the PID Act:

- Three disclosures did not meet the definition of a public interest disclosure under the PID Act. These complaints were then considered under the IOV Act.
- Six were assessable disclosures. Five were determined not to be public interest complaints and one was determined to be a public interest complaint (PIC). The investigation of the PIC commenced and was finalised during the reporting year and the allegation was not substantiated.

Five disclosures were under assessment on 30 June 2025.

Investigations

During the reporting period we closed 3 investigations relating to IBAC or IBAC personnel. One of those investigations commenced in 2022–23, and the other 2 commenced in this reporting period. Two IBAC-related investigations that commenced in this reporting period are ongoing.

Table 11: Status of IBAC investigations on 30 June 2025

Description	Outcome	Powers we exercised
Investigation ongoing from 2022–23		
PIC investigation and inquiry into the conduct of IBAC and IBAC personnel	• Investigation closed. • The allegations were not substantiated, but we identified lesser deficiencies for one allegation. • Two private recommendations made to improve record keeping and natural justice processes, and one suggestion made about the content of IBAC notification reports to Integrity Oversight Victoria about public examinations. • Both recommendations and the suggestion accepted and acted upon by IBAC during the reporting period.	• One IBAC Officer required to attend to answer questions under s 47 of the IOV Act. • Ten confidentiality notices cancelled.

82 As defined in s 9 of the PID Act.
83 This will be reported on in 2025–26.

Investigations commenced in 2024–25

One PIC investigation and inquiry into the conduct of IBAC personnel ⁸⁴	- Investigation closed. - The allegations were not substantiated.	- One confidentiality notice issued and cancelled. - Under s 47 of the IOV Act, IBAC required to produce documents or information once, and IBAC Officers required to attend to answer questions on 3 occasions. - IBAC also provided documents in response to a voluntary request.
One PIC investigation into the conduct of IBAC personnel	- Investigation closed. - The allegation was not substantiated.	- No powers exercised during this investigation. - Documents requested and received from IBAC on one occasion.
One PIC investigation with own motion elements about IBAC and IBAC personnel	Investigation ongoing on 30 June 2025.	- Under s 47 of the IOV Act, 2 IBAC Officers required to attend to answer questions.⁸⁵ - Information and documents sought from and provided by IBAC on 3 occasions.
One PIC investigation about IBAC and IBAC personnel	Investigation ongoing on 30 June 2025.	- No powers exercised during the reporting period. - Information sought from and provided by IBAC once.

Inspections

Regular inspections

In 2024–25, we inspected IBAC’s surveillance device records and in May 2025 transmitted an inspection report for tabling in parliament.⁸⁶ We found that IBAC had not complied with a condition imposed on a warrant regarding how it may use a listening device installed in a premise. This is detailed in the surveillance device warrant case study below.

We completed 2 inspections of telecommunications interception records and made a regular report to the Attorney-General on the results of these inspections. As IBAC did not apply for an authority to conduct a controlled operation, we did not review any such records.

⁸⁴ The investigation examined 3 allegations; one was assessed as a PIC and the other 2 were complaint allegations that warranted investigation under s 43(1) of the IOV Act.

⁸⁵ One IBAC officer was excused from attending in response to a s 47 requirement and subsequently attended in response to a further requirement. That is, 3 requirements were issued in total but only 2 IBAC officers were interviewed.

⁸⁶ See Surveillance Devices Inspection Report on our website.

Case study 7: Surveillance device warrant non-compliance

A surveillance device warrant was issued to IBAC by the Supreme Court of Victoria subject to a condition that recording capabilities were only to be activated at times when information indicated that person of interest 1 and person of interest 2 were meeting at the premises; or person of interest 1 was meeting with other persons of interest to the investigation.

Over a 6-day period from when they were installed, rather than only record conversations that related to meetings between persons of interest, these devices recorded all conversations.

This was because the listening devices were programmed to record on voice activation. IBAC confirmed the surveillance device captured conversations of persons in contravention of the condition on the warrant.

We subsequently made 2 recommendations to support compliance with warrant conditions and transparency for this instance of non-compliance. IBAC acknowledged our finding of non-compliance and accepted our recommendations in full. IBAC promptly updated its procedures and made a revised report to the judge who issued the warrant.

Irregular inspections

In May 2023, we notified IBAC we would conduct an irregular inspection of records following a disclosure it made relating to an error in its delegations. We conducted an inspection of records at IBAC's premises late May/early June 2023. In 2023–24, we reported IBAC's acceptance of 17 other recommendations connected with this irregular inspection.

Our 2 irregular inspection reports were finalised in 2024–25 and IBAC accepted the remaining 2 of the total 19 recommendations.

One of those reports relating to surveillance devices was tabled in parliament in October 2024.⁸⁷

During 2024–25, we wrote to IBAC to confirm the implementation of the irregular inspection recommendations and received a detailed and positive response outlining changes made and copies of the relevant updated policies and procedures. Our assessment was completed in July 2025; the outcome of which will be reported in 2025–26.

Coercive powers notifications

During the reporting period, we received 179 coercive powers notifications from IBAC under the IBAC Act, a 58% decrease from the 427 notifications received in 2023–24. While IBAC has consistently used its coercive powers more than other bodies we oversee, we observed a steep decrease in notifications from 1 January 2025, where we received only 44 notifications. This was the fewest in the last 5 years of data when comparing similar periods.

Most notably, we received the lowest number of examinations on record since the 2012–13 period when IBAC was first established – with only 6 examination recordings being received in 2024–25. In the last period, we received 48, which was also a decrease on the prior period.

We received no notifications of directions in relation to specified legal practitioners under section 128 of the IBAC Act.⁸⁸

IBAC did not hold any public examinations (hearings) during 2024–25 and has not held any since 2021–22.

⁸⁷ See Report on irregular inspection of IBAC surveillance device records on our website.

⁸⁸ Under ss 127(2), (7A) or (8) of the IBAC Act, IBAC may direct certain persons not to seek legal advice or be represented by a specified Australian legal practitioner. IOV's annual reports covering periods prior to 1 July 2017 do not include details on the number of directions given under s 127(2); however, since that time there has been a consistently low number of directions.

Table 12: Coercive powers notifications received from IBAC, 2020–21 to 2024–25

IBAC Act notification requirements		2020–21	2021–22	2022–23	2023–24	2024–25
s 43	Confidentiality notices issued	64	140	66	73	18
s 43	Confidentiality notices cancelled	39	72	36	77 ⁸⁹	45
s 59G	Summons, preliminary inquiry	4	26	22	41	16
s 122	Summons, investigation	251	363	179	169	94
s 134	Recordings (and any transcripts)	52	89	28	48	6
s 128	Directions about lawyers	3	0	1	19	0
s 117(5)	Public examination	3	3	0	0	0
Total		416	693	332	427	179

Coercive powers notifications feedback and observations

We made no recommendations to IBAC about its exercise of coercive powers. All feedback on coercive powers was addressed through IBAC's responses to the issues identified in periodic reports and correspondence.

We provided 3 periodic reports to IBAC containing observations on notifications received from April 2024 to May 2025. We also received IBAC's response to the periodic report for March to April 2024 issued during 2023–24.

Due to the decrease in notifications and lower number of reviews we conducted, we made limited observations to IBAC during this period. Many of our observations sought clarification on IBAC's processes and its approach, which IBAC satisfactorily explained.

Overall, we observed far fewer issues than were recurrent in prior periods. These included late notifications, errors in prescribed forms and issues with conveying rights and responsibilities to witnesses at the start of examinations.

We made 13 observations to IBAC during the period. Each of these varied in significance, with 5 made for consideration without requiring any action of IBAC. The remaining 8 observations sought clarification from IBAC on its approach, and its processes, to ensure IBAC had accounted for certain risks or factors. We did not make any suggestions for actions to be taken.

IBAC also responded to 15 observations made during the prior period, of which 6 were for consideration and did not require any action. One clarification request related to how IBAC had listed on a summons the matters about which a witness would be questioned. While not suggested, IBAC advised that in future, it would be mindful to consistently and appropriately frame in summonses the nature of matters about which a person is to be questioned, especially when examinations are conducted at the early stages of investigations (as was the case for the observation raised).

We also noted IBAC had taken a positive approach to explaining how the examinations would be run for a group of witnesses who were being examined but were not persons of interest in the investigation.

⁸⁹ Seventeen of these related to notifications from IBAC where it had earlier notified the confidentiality notice recipient of invalidity or cancellation but had not notified IOV. These were identified through discrepancies we raised with IBAC.

Immediate summonses for devices

Outside our periodic reporting, we engaged with IBAC about the requirements imposed on witnesses when summonsed to immediately produce an electronic device. We told IBAC we did not believe a summons recipient could be required to take additional steps, such as unlocking the device, when producing a device under summons. While IBAC disagreed with our views on this matter, it advised it would further consider its approach to summonsing electronic devices and the use of particular words regarding the state in which a device should be produced by a recipient.

Further monitoring of IBAC's compliance

Embargoed reports to the media

In general terms, section 166(1) of the IBAC Act creates a criminal offence if a person provided with a proposed report, or a part or draft of a proposed report, discloses the report without authority, unless certain exceptions apply.⁹⁰ Integrity Oversight Victoria communicated to IBAC its view that section 166 does not apply to the media if IBAC provides them an embargoed copy of a special report prior to tabling. We also communicated that section 166 does not apply to a witness once the report is finalised.

Following engagement on this issue, IBAC noted our view and agreed not to make any representations to the effect that section 166(1) did apply to the media. IBAC is determining whether any legal measures are available to maintain confidentiality of embargoed reports.

IBAC also have a preferred practice of offering a witness an opportunity to have IBAC explain the final report before it is tabled, with a counsellor available to support this step. Integrity Oversight Victoria and IBAC agree this is important for witness welfare. As we consider section 166(1) does not apply to a witness once the report is finalised, IBAC is considering how it can share the report before tabling whilst lawfully preventing its disclosure.

Oversight of IBAC's performance of public interest disclosure functions

We engaged with IBAC at the Public Interest Disclosure Consultation Group (chaired by IBAC) which continues to provide an important forum for integrity bodies to discuss complexities associated with operating the public interest disclosure scheme.

IBAC updated their PID guidelines in June 2025. We will review and engage with IBAC about the guidelines in 2025–26.

Recommendations

IBAC accepted Integrity Oversight Victoria's 8 recommendations made in 2024–25. The recommendations were integrity responses to:

- a longstanding police complaint⁹¹
- a PIC investigation⁹²
- our 2023 irregular inspection regarding telecommunications interception powers⁹³
- our 2024–25 inspection finding that IBAC did not comply with a warrant condition.⁹⁴

Improvements made

By raising issues and seeking change from the integrity bodies we oversee, we made 8 improvements to the integrity system in 2024–25.

Issues raised with and addressed by IBAC contributed to the improvements reported in the Performance, achievements and priorities section of this report and are summarised below.

⁹⁰ Section 166 also applies to the Premier, minister or the relevant secretary if they are provided an advance copy of a report under s 162A of the IBAC Act.

⁹¹ Read Case study 5 about Henry.

⁹² See Table 11 in this report.

⁹³ Telecommunications interception reports are provided to the Attorney-General but not tabled.

⁹⁴ Read Case study 7 and see Surveillance Devices Inspection Report May 2025 on our website.

Table 13: IBAC improvements, 2024–25

No.	Improvement	Improvement type	Function
1. Improvements to warrant processes under TIA Act			
a.	IBAC accepted 2 final recommendations about warrant processes.	Policy and procedure changes to prevent breach of TIA Act by IBAC	Irregular inspection under TIA Act
2. Improvements to IBAC's application of IBAC Act in complex areas			
	IBAC noted our view that s 166(1) of the IBAC Act, a non-disclosure offence provision for draft and advanced copies of special reports, does not apply to the media if IBAC provides an embargoed copy of a special report to the media ahead of tabling, nor to a witness once the report is finalised. IBAC agreed not to represent that s 166(1) of the IBAC Act applied to the media in these circumstances.	Practice change to prevent breach of IBAC Act	Monitoring
	Whilst not agreeing its approach was unlawful, IBAC agreed to reconsider summoning electronic devices by using particular words (unedited, unaltered and unlocked) to specify the state in which the device must be produced.	Practice change to prevent breach of IBAC Act	Coercive powers notifications
3. Improvements to decision-making and communication, record keeping, natural justice process for reports, and public examination notifications to IOV			
a.	IBAC accepted recommendation to reinforce record keeping obligations with staff, emphasising need for senior officers to document activities and relevant communications, as well as decisions.	Training to support clear, transparent records of actions, communications and decisions	Public interest complaint investigation
b.	IBAC accepted and implemented recommendation to create a policy to manage natural justice obligations for public and private reports, including properly addressing witness welfare, and training staff on the policy.	Policy and procedure change and training to prevent non-compliance with IBAC Act and OHS Act	
c.	IBAC accepted and implemented suggestion to create a template s 117(5) report to IOV on public examinations.	Policy and procedure change to prevent non-compliance with IBAC Act	

No.	Improvement	Improvement type	Function
4. Improvements to address non-compliance execution of surveillance device warrant			
	IOV identified non-compliance with a listening device warrant condition that limited activation to the presence of 2 specified people; instead, IBAC recorded conversations over a 6-day period. IBAC accepted IOV's 2 recommendations:	Transparent about an instance of non-compliance and practice change to prevent non-compliance with covert search warrant conditions	Inspection under SD Act
	i. to keep detailed records to show how the installation/use of a device complied with conditions specified on the warrant		
	ii. to submit a supplementary report under s 30K to the issuing judge.		
5. Improvements re exercise of covert and coercive powers			
Summons improvements (coercive powers)			
a.	IBAC changed process for variation of summons.	Change to summons process	Coercive powers notifications
b.	IBAC will be mindful in summonses when framing the nature of matters about which a person will be questioned.	Change to summons practice	
Warrant improvements (covert power)			
c.	IBAC made process improvements in relation to warrants (including where an error is identified after issued in court).	Policy and procedure change to ensure warrants reflect court order	Inspections
6. Improvement to address allegations of detrimental action under the Public Interest Disclosures Act 2012			
	IBAC accepted a recommendation to undertake and document consideration of any allegations of detrimental action for a complaint/disclosure awaiting assessment or investigation or made after a matter referred to another body.	Prevent non-compliance and remedy any harm or loss re detrimental action from PIDs	Complaint outcome; see Henry's case study
7. Improvements to IBAC's police oversight			
a.	IBAC accepted a recommendation to provide a complainant with the outcome of reviews of VicPol investigations and consider whether appropriate to apologise to complainant.	Remedy harm or loss from handling of a police complaint	Complaint outcome – Henry's case study
b.	IBAC acknowledged it would update policy and procedures to reflect consideration of police complainants as vulnerable complainants.	Policy and procedures to prevent non-compliance in handling police complaints	Complaint

Victorian Ombudsman

We oversee Victorian Ombudsman (VO) officers' exercise of coercive powers and their compliance with procedural fairness requirements under the *Ombudsman Act 1973* (Ombudsman Act) or any other Act through:

- receiving and assessing complaints about VO officers
- preliminary inquiries and investigations about VO officers' conduct
- reviewing notifications when VO officers exercise coercive powers during investigations
- monitoring Ombudsman practices and procedures relating to coercive powers, procedural fairness and public interest disclosures.

Integrity Oversight Victoria and the VO reached in-principle agreement on a Memorandum of Understanding. The MoU provides a framework for engagement when performing our respective legislative functions and obligations to ensure a more effective and efficient relationship.

The former Inspector, the acting and the ongoing Chief Integrity Inspector/Chief Executive Officer met with the Ombudsman and Deputy Ombudsman during the year to seek and share information and status updates, discuss challenges, provide context and discuss any shared risks.

During 2024–25, our Director, Integrity Operations and Policy and our Manager Complaints met regularly with the VO's Director Legal, members of their legal team and VO's Director, Complaints. These collaborative meetings enabled the effective exchange of information, and changes to our complaint handling process on a trial basis that should assist us to address VO complaints more efficiently. This involves, in certain matters, referring people back to the VO if they have not engaged with the VO about their concerns or asked for an internal review after their complaint at the VO was closed. These complainants can return to Integrity Oversight Victoria if they remain concerned about the VO's actions following any re-engagement.

We provided feedback and made observations in relation to complaints and made 3 private recommendations about a summons issue arising from notifications reviews.

Compliance with statutory obligations

We must report on:

- the VO's exercise of coercive powers
- compliance by Ombudsman officers with procedural fairness requirements under the Ombudsman Act, or any other Act⁹⁵
- the comprehensiveness and adequacy of reports made to us by the VO
- the extent to which recommended action is taken.

Enquiries

We commenced the year with 4 open VO enquiries.⁹⁶ During 2024–25 we received a further 52 enquiries and closed 54.

Two of these 2024–25 enquiries remained open 30 June 2025.

Case study 8: Helping Anju understand our jurisdiction

Anju contacted us about concerns with the VO. They had read on our website that we can accept complaints about the VO's compliance with procedural fairness requirements under law. Anju believed the VO had not afforded them procedural fairness when handling their complaint.

We explained what procedural fairness means and what sort of conduct it includes and asked for further information about Anju's concerns. Based on what they told us, we found that Anju's concerns about the VO, while important, did not relate to procedural fairness.

We explained this to Anju and provided them with information about other potential avenues to pursue their concerns as these were outside our jurisdiction.

⁹⁵ Including in the conduct of enquiries and investigations and the making of reports and recommendations under the Ombudsman Act or any other Act.

⁹⁶ In our 2023–24 annual report, we incorrectly reported 3 instead of 4 open VO enquiries due to later registration of one enquiry received in that year.

Complaints

We received 33 new complaints about VO officers this reporting period and closed 36 complaints, comprising:

- 21 complaints received in 2024–25
- 15 complaints received in prior reporting periods.

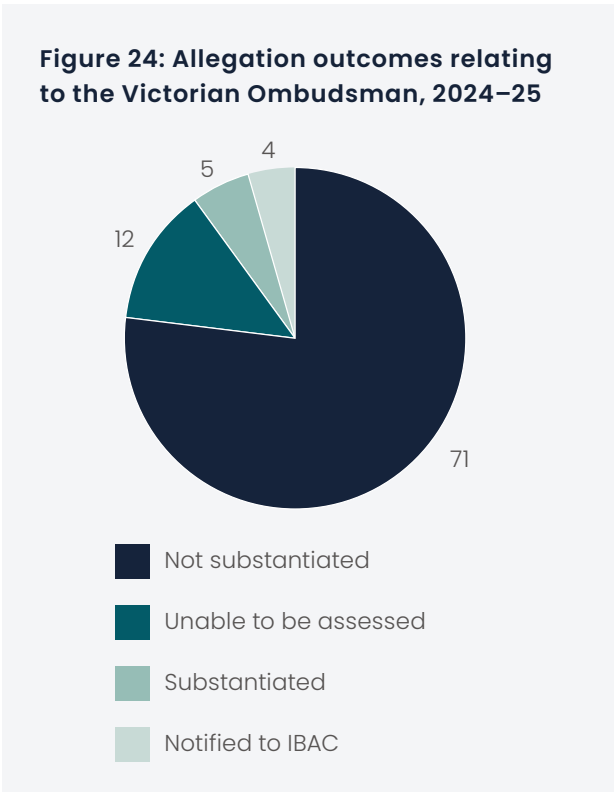
Allegation outcomes

For the 36 complaints about VO officers closed this reporting period, we assessed 92 allegations.

Table 14: Complexity of closed complaints relating to the Victorian Ombudsman, 2024–25

Complexity of closed complaints	No. of complaints	No. of allegations
Low	10	23
Medium	19	47
High	7	22
Total	36	92

Figure 24 shows the findings and outcomes of the 92 allegations assessed and closed.



- 5 allegations were substantiated⁹⁷
- 71 allegations were not substantiated:
 - 39 allegations with no further action taken following assessment
 - 27 allegations with no further action taken following engagement with the VO to seek further information
 - 5 allegations with observations about what we felt could be a better practice
- 12 allegations were unable to be assessed:
 - 6 allegations outside our jurisdiction
 - 2 allegations unable to be assessed
 - 2 allegations not assessed after facilitating a resolution with the VO
 - one withdrawn allegation
 - one allegation unable to assess, but observation made
- 4 allegations were notified to IBAC:
 - allegations met threshold for notification under s 21 of the PID Act.

Complaint feedback and observations

In 2024–25, we made observations to the VO in relation to several complaints.

Our observations primarily drew attention to the importance of clear communication from VO officers to complainants about when and why it decides to close a complaint.

See our case studies for some examples of feedback and observations made to the VO.

97 Three of these allegations were complaints lodged in the 2023–24 reporting period. The remainder were from this reporting period.

Case study 9: Conrad's additional complaint information

Conrad complained to the Victorian Ombudsman about a department's decision to change court-ordered visitation arrangements with their children. After receiving this complaint, the VO promptly contacted the department to make enquiries. Approximately 3 weeks later, the VO contacted Conrad and told them it did not find any issues with the department's decision making or its consideration of Conrad's human rights.

When Conrad came to Integrity Oversight Victoria, they said the VO had missed the second part of their complaint about the department contacting a health care provider about the situation, which led to the cancellation of supported inpatient stays with the children and the children's mother.

To assess Conrad's complaint, we reviewed the VO's complaint file. We found Conrad had called the VO to ask how to provide more information, then emailed the VO their second complaint about the department a few hours later. However, the VO did not consider or respond to the email or open a new complaint.

We provided this feedback to the VO, and while it accepted it had missed Conrad's second complaint, it also noted Conrad had not contacted the VO again before complaining to us. The VO re-engaged with Conrad about the second complaint. As a result of our engagement, the VO suggested trialling a new way for our teams to communicate about single-issue or lower complexity complaints where there may be an opportunity for the VO to easily address a mistake or shortfall. We view the VO's proactive approach to addressing issues as an example of good practice.

Integrity Oversight Victoria agreed to the pilot process and now refers complainants who are willing to re-engage with the VO back to the VO to request an internal review if they are yet to do so.

Case study 10: VO's positive response to complaint about Kei's university refund

Kei complained to the Victorian Ombudsman about a university charging their son for a course they did not complete. Kei's son complained to the VO previously, and his complaint was closed. Kei told Integrity Oversight Victoria the VO initially said it would make enquiries with the university and then stopped returning Kei's phone calls. Kei was unhappy as they had called the VO several times over a month and no one had called them back.

After we contacted the VO, it proactively re-engaged with Kei, offered an apology, and opened a new complaint. The VO also sought further information from the university about the status of Kei's son's original complaint. Through its re-engagement, the VO found Kei had negotiated a refund of the course fees directly with the university. While the VO initially did not provide the complainant a fair hearing when it failed to communicate with the complainant, the VO's response to our enquiries was positive and comprehensive.

Public interest disclosures

We received and assessed 4 disclosures about the VO under the PID Act:

- Two disclosures (comprising 4 allegations) were notified to IBAC as assessable disclosures under section 21 of the PID Act. IBAC determined 2 allegations were public interest complaints and referred them to us as the more appropriate body to investigate the matters.⁹⁸
- Two disclosures were not assessable disclosures under the PID Act. One allegation was not assessed under the IOV Act as it was outside our jurisdiction. The remaining allegations relating to these 2 disclosures were considered under the IOV Act and not substantiated following assessment.

Preliminary inquiries

Our one open preliminary inquiry about the VO during the reporting period was ongoing on 30 June 2025.

Investigations

We commenced one public interest complaint investigation about VO officers in 2024–25, which was ongoing at the end of the reporting period.

Coercive powers notifications

During the reporting period, we received 36 coercive powers notifications from the VO under the Ombudsman Act, half the number received in 2023–24; and far fewer than received each year since 2020–21.

We issued 2 periodic reports to the VO covering notifications received between May and June 2024; and July to December 2024. We did not issue reports for other periods, as we had no reportable observations from our reviews.

Our periodic reports contained significantly less feedback and observations than in 2023–24, as there was both an overall improvement in the VO’s processes and a reduction of notifications received. The 2024–25 reports focused on confirming the implementation of prior feedback, or clarifying processes, rather than raising new observations for action by the VO.

Table 15: Coercive powers notifications received from Victorian Ombudsman, 2020–21 to 2024–25

Ombudsman Act notification requirements		2020–21	2021–22	2022–23	2023–24	2024–25
s 26E	Confidentiality notices issued	68	11	40	11	6
s 26E	Confidentiality notices cancelled	32	50	9	35	11
s 18A	Summons	54	40	77	13 ⁹⁹	9
s 18Q	Compulsory appearance recordings	33	10	24	18	2
s 26FB	Voluntary appearance recordings	27	18	34	9	8
Total		214	129	184	76	36

98 Next steps in relation to these public interest complaints were under consideration on 30 June 2025.

99 This includes 2 instances where the VO notified of a variation to the summons that did not involve the issue of a new summons.

Coercive powers notifications recommendations, feedback and observations

While we had fewer notifications from the VO, we focused on assessing the VO's draft report into its review of summonses (the summons review). The VO assessed 77 summonses issued over a 12-month period after we raised concerns about practices at the VO of making changes to summonses after approval. Further information is below.

Significantly, during this period, the VO reported it had finalised the review of its quality assurance process, which was prompted by the recommendation we made in our March 2024 special report: *Compliance case study on the use and oversight of coercive powers*. We consider the VO undertook extensive work to understand its quality assurance framework and improve processes governing the future use of coercive powers as evidenced by the depth and scope of its review.

To give effect to the review, the VO made a range of changes to its practices, procedures and workflows and template relating to the most critical issues of concern. The VO also commenced further actions to implement the review and advised this work would continue until 30 September 2025.

Some of the improvements stemming from our earlier reports and this special report implemented in this period are listed in the improvements section below.

Review of summonses by the VO¹⁰⁰

Following the concerns we raised with the VO about its process for the approval of summonses, the VO commenced a review of 77 summonses issued over a 12-month period (immediately prior to it introducing a revised process).

The review sought to identify (for each summons in the period):

- whether the relevant summons was amended after approval
- the nature of those amendments
- why these might have been made
- whether the issuer was aware of and/or authorised the making of any amendments.

The VO provided its draft report in August 2024, setting out its findings and proposed actions. Given the significance of the issues, we analysed the VO's proposed conclusions and recommendations, before reaching our own conclusion on the likely validity of certain summonses and confidentiality notices issued by the VO.

We found:

- the VO's 'modified process'¹⁰¹ for issuing summonses during a complex investigation was not properly documented or communicated to key staff involved in the drafting, submission and approval of summonses
- that 4 summonses issued under this process have some risk of being invalidly issued
- the standard process for issuing summonses was not routinely followed and the practice of inserting or amending matters in the summonses was introduced without proper awareness or communication between key staff
- 13 summonses issued using the standard process had some risk of invalidity.

We made 3 recommendations to the VO under section 82 of the *Integrity Oversight Victoria Act 2011* (IOV Act), which the VO accepted. See the recommendations section below for details about these recommendations.

Changed process for voluntary interviews

In previous years, the VO notified us when they conducted voluntary interviews where the witness was required to give evidence on oath or affirmation. With changes introduced by the *Justice Legislation Amendment (Integrity, Defamation and Other Matters) Act 2024* removing the VO's ability to require a witness to give evidence on oath or affirmation when attending voluntarily, we advised the VO in 2025 it was no longer required to notify us of voluntary appearances.

¹⁰⁰ The recommendation, feedback and observations in this section relate to summons approval processes that occurred prior to the current Ombudsman's term.

¹⁰¹ 'Modified process' refers to a specific process established and used during a particular VO investigation.

Recommendations

We made 3 private recommendations to the VO after our assessment of their summons review. These related to training on the summons issue process, notifying persons whose summonses may have been invalid, and assessing whether a further review of earlier summonses was required. Each recommendation was accepted.

On 30 June 2025, the VO advised it assessed the risks and benefits of notifying recipients of potential invalid summonses and when completed, this recommendation would be closed. The VO also acquitted our recommendation of considering a further review of earlier summonses, determining this would not provide any further insights or lead to improvements but significantly use resources and carry other risks.

VO advised our recommendation regarding training on the summons issue process will be incorporated into the VO's wider training improvements which are to be finalised by 30 September 2025.

Improvements made

Issues raised with and addressed by the VO contributed to the improvements reported in the Performance, achievements and priorities section of this report and are summarised below in Table 16.

Table 16: Improvements by the Victorian Ombudsman, 2024–25

Improvement number	Improvement	Improvement type	Function
5. General improvements re exercise of coercive powers			
c.	VO will provide more detailed information to IOV about why a summons is issued.	Informing IOV re summons	Notifications
d.	VO will provide more detailed information to IOV about why a confidentiality notice was issued.	Informing IOV re confidentiality notice	
e.	VO will update templates to directly inform recipients and witnesses about right to complain to Integrity Oversight Victoria.	Change to be made to templates	
f.	VO amended summons template when addressing a summons to a head of an entity.	Change to summons template	
g.	VO agreed to consider informing a witness of risks and rights re a summons that may be invalid.	Summons compliance	
h.	Updated staff training on interview techniques.	Interviews – technique training	
i.	VO reconsidered confidentiality notice to ensure restricted matters accurate.	Confidentiality notice compliance	
j.	VO will review audio settings in interview room.	Interviews	
6. Improvements to exercise of coercive powers arising from summons review			
	Last year, we reported the VO undertook a review of 77 summonses issued over a 12-month period to ascertain the extent of a serious approval issue identified by Integrity Oversight Victoria.¹⁰² During that reporting period, the VO provided its draft review findings. In 2024–25 we considered the VO's draft review and made 3 private recommendations to address issues identified by us and the VO. The VO accepted and acquitted our recommendations, including: • Training on the appropriate summons issue process, to reduce the risk of the summons approval issues recurring. • Notifying witnesses of potentially invalid summonses. While there are limited remedies available to such recipients, we consider notifying witnesses assists in improving accountability where there is a potentially invalid exercise of a coercive power. • Considering whether a further review necessary.	Practice changes to prevent non-compliance of summonses	Monitoring

¹⁰² See Compliance case study on the use and oversight of coercive powers on our website.

Office of Chief Examiner

We oversee the compliance of Victoria's Chief Examiner¹⁰³ with their obligations under the *Major Crime (Investigative Powers) Act 2004* (MCIP Act).¹⁰⁴ The Chief Examiner conducts coercive examinations of witnesses for the purposes of investigating and combatting organised crime offences. The Chief Examiner must notify us within 3 days of issuing a summons or custody order compelling a person to appear to give evidence, or to produce documents or things (or to do both). Upon completing an examination, the Chief Examiner must send us a copy of the video recording and any transcript of the examination.

The Chief Examiner may only conduct examinations where the Supreme Court has issued a coercive powers order under the MCIP Act.

Compliance with statutory obligations

When reviewing matters provided by the Chief Examiner, we must assess:

- whether requirements under the MCIP Act have been complied with
- the extent to which examination questions and requirements to produce documents were relevant to the commission of the organised crime offence relevant to the coercive powers order.

In this report, we must detail:

- compliance with the *Integrity Oversight Victoria Act 2011* (IOV Act) and the MCIP Act by the Chief Examiner or an Examiner
- the comprehensiveness and adequacy of reports made to us by the Chief Examiner under the IOV Act
- the extent to which the Chief Examiner acts on recommendations by Integrity Oversight Victoria.

Enquiries and complaints

We did not receive any enquiries, nor any complaints in relation to the Chief Examiner during this reporting period.

Investigations

We did not undertake any investigations in relation to the Chief Examiner or an Examiner during 2024–25.

Coercive powers notifications

During the reporting period, we received 80 coercive powers notifications from the Chief Examiner under the MCIP Act. This was a slight increase on the 74 notifications received in 2023–24. This period we reached the consolidation phase of our new risk-based triage process for Chief Examiner notifications and finalised a thematic report on notifications received between October 2023 and March 2025.

As the Major Crime (Investigative Powers) Regulations 2015 were due to sunset during 2025, we also provided input into the form of the new regulations, the Major Crime (Investigative Powers) Regulations 2025, during the consultation phase.

¹⁰³ References in this report to the Chief Examiner can be taken to include other Examiners, who are appointed by the Governor in Council under Pt 3 of the MCIP Act.

¹⁰⁴ Our full list of functions is described in s 51 of the MCIP Act.

Table 17: Coercive powers notifications received from Office of Chief Examiner, 2020–21 to 2024–25

MCIP Act notification requirements		2020–21	2021–22	2022–23	2023–24	2024–25
s 52	Summons or Orders (CE)	7	0	16	36	43
s 53	Recordings	12	0	11	33	34
SCV issued	Summons (Supreme Court)	0	0	0	5	3
Total		19	0	27	74	80

We assess the Chief Examiner’s compliance by reviewing the content of any reports, transcripts and video recordings notified to us by the Chief Examiner in relation to the exercise of coercive powers. We also periodically engage with the Chief Examiner to assess whether specific policies and procedures of the Office of Chief Examiner support compliance with the Act’s requirements.

In the last period, we reported how we had expanded our risk-based triage process to include notifications from the Chief Examiner.¹⁰⁵ We consolidated our application of this process during the period as we worked towards processing a backlog of examination recordings.

To simplify our processes, we removed the longstanding practice of the Chief Integrity Inspector carrying out a preliminary assessment of each notification. These now enter the triage queue directly for assessment by Integrity Oversight Victoria staff.

We also continued training additional officers to conduct these reviews with a view to increasing our internal capacity and improving the timeliness of our reviews. This was effective as we only had 3 examinations carried over on 30 June 2025, compared to 13 for the prior period.

Coercive powers notifications feedback and observations

In May 2025, we provided our first periodic report to the Chief Examiner since October 2023. This report encompassed 109 notifications received between October 2023 and March 2025, of which we reviewed 32, including 23 examinations.

The delay with compiling our report was in part due to the transition to the risk-based oversight model, updated process and training of staff to support independent triaging and review. We anticipate providing our feedback reports more regularly as our new process matures.

Due to the range of matters reported, the Chief Examiner had not finalised their complete response to the report at 30 June 2025. For that reason, any observations not yet responded to are not reported here.

Our report included several observations and areas where we were seeking clarification on the Chief Examiner’s practice. This information assists us in performing our oversight and ensures that we are accounting for the Chief Examiner’s practices when we undertake our assessments or formulate observations.

One of our report observations, which the Chief Examiner responded to, is about the role of legal representatives in examinations.

¹⁰⁵ Previously, we assigned each notification from the Chief Examiner for review by a senior officer.

Role of legal representatives in examinations

We observed that it is a challenge for legal representatives to object to matters not relevant to a coercive powers order, given they are not privy to a coercive powers order and will have a limited understanding of what is relevant.

The Chief Examiner advised their view is that objections can be made but as legal representatives or witnesses do not have access to materials as they would in court, it is difficult to raise relevant objections. The Chief Examiner noted that legal representatives do ask or raise objections where they have concerns.

The Chief Examiner indicated that, in relation to our feedback about a more communicative approach to dealing with questions or objections from legal representatives, attempts would be made to do so where it does not impact operational matters or prejudice the investigation.

Outside the periodic reporting process, we also engaged with the Chief Examiner about short service of summons and a summons directed to an incorrect witness.

Short service of summons

We identified that a witness had received a witness summons 2 days before the date of required attendance. We made enquiries about this with the Chief Examiner given that a summons must be served a reasonable time before the date of attendance. We advised that we considered where late service occurs the examination should be rescheduled prior to the witness attending.

The Chief Examiner provided information on their approach to service of summonses and noted that reasonability must have regard to the circumstances, including factors specific to the witness. While the Chief Examiner did not accept that an examination should be automatically adjourned due to late service, it was noted that favourable consideration should be given to an adjournment – and this would involve consideration of the circumstances relevant to each witness.

The Chief Examiner indicated that procedures would be amended to ensure that if shorter service may occur, advice be sought from the Chief Examiner or Examiner on whether attempts to serve should continue.

The Chief Examiner also advised the following would be updated:

- instructions on service of summonses so that investigators seek advice if they believe they are unable to serve a summons at least 7 days before an examination
- information given to witnesses to advise that they may be entitled to an adjournment if the summons is served less than 7 days before an examination.

Summons directed to incorrect witness

In their examination report to us, the Chief Examiner explained they had determined a witness who was summonsed for examination was not connected to the matters investigated under the coercive powers order. As a result, we sought clarification on what had occurred, and what steps would be taken so this does not recur.

We also sought clarification on certain steps taken that may assist in confirming the witness' connection to the investigation.

The Chief Examiner provided a detailed explanation of how this occurred and advised of additional measures that would be implemented to prevent a recurrence.

As indicated by the Chief Examiner, this is the first time this has happened, and we have not previously made such an observation. We are hopeful the additional measures will effectively minimise the possibility of this re-occurring.

Recommendations

We made 2 recommendations to the Chief Examiner in our report for the period October 2023 to March 2025. As the Chief Examiner has not had an opportunity to respond to these recommendations, they will be addressed in our next annual report.

Improvements made

Any improvements arising from our October 2023 to March 2025 report will be detailed in our next annual report.

Issues raised with and addressed by the Chief Examiner this reporting period contributed to the improvements reported in the Performance, achievements and priorities section of this report and are summarised in Table 18.

Table 18: Improvements made by Chief Examiner, 2024–25

Improvement number	Improvement	Improvement type	Function
5. Chief Examiner improvements re exercise of coercive powers			
l.	Chief Examiner changed process re service periods, including that investigators are to seek advice from the Office of Chief Examiner if they cannot serve summons at least 7 days before examination; and witnesses to be advised they may be entitled to adjournment for short service.	Policy and procedure change to summons service process	Notifications
m.	Chief Examiner to update summons process to confirm appropriate identity checks undertaken prior to issuing summons and to account for whether witnesses can give voluntary statements.	Policy and procedure change re decision to summons	Notifications
n.	Chief Examiner to take a more communicative approach to dealing with questions or objections from legal representatives (where it does not impact operational matters or prejudice the investigation).	Practice change to examination approach	Notifications
o.	Chief Examiner amended script for examination opening remarks to more clearly explain rights available to witnesses under 18 prior to their election to have an independent person or parent present.	Script change to examination opening remarks	Notifications

Office of the Victorian Information Commissioner

Integrity Oversight Victoria oversees the exercise of coercive powers by the Office of the Information Commissioner (OVIC) under both the *Freedom of Information Act 1982* (FOI Act) and the *Privacy and Data Protection Act 2014* (PDP Act). In addition, we must monitor OVIC’s compliance with procedural fairness requirements when it exercises those coercive powers, conducts investigations, makes recommendations and investigation reports, and issues compliance notices.

Enquiries

We received and closed 2 enquiries about OVIC in 2024–25.

Complaints

We did not receive any complaints in relation to OVIC during the reporting period.

Investigations

We did not conduct any investigations in relation to OVIC during the reporting period.

Coercive powers notifications

During the reporting period, we received 8 coercive powers notifications under the PDP Act. We did not issue a feedback report to OVIC as we did not identify any reportable or notable issues from our review of these notifications. The matters reported in 2022–23 did not arise again in this period.

We did correspond with OVIC regarding its delegations authorising officers to conduct interviews under the PDP Act. While we found no issues, we indicated that specific delegations for investigations officers regarding interviews would reduce the risk of any unauthorised exercise of power during an investigation. OVIC advised us after the period that it would incorporate this approach in its delegations.

We also provided feedback to OVIC regarding the scheduling of group compulsory interviews. OVIC accepted our feedback on the risks associated with this approach and elected to instead conduct individual compulsory interviews.

As OVIC did not exercise powers or conduct voluntary appearances in the last reporting period, we engaged with OVIC during 2024–25 to seek an update on how it had implemented proposed action arising from feedback we gave in 2022–23. After assessing its responses and documentation, we advised OVIC it had provided a clear outline of how it had implemented or planned to implement our feedback.

Table 19: Coercive powers notifications received from OVIC, 2020–21 to 2024–25

	2020–21	2021–22	2022–23	2023–24	2024–25
FOI Act notification requirements					
s 61ZD Notice to produce or attend	0	3	3	0	0
s 61ZH(7) Recordings	0	0	3	0	0
PDP Act notification requirements					
s 83D Notice to produce or attend	0	3	5	0	4
s 83GA(7) Recordings	0	3	2	0	4
Total	0	9	13	0	8

Recommendations	Improvements made
We made no recommendations to OVIC or about OVIC officers.	As there were no complaints about OVIC, there were no improvements to be made in that regard. One issue raised with and addressed by OVIC contributed to an improvement reported in the Performance, achievements and priorities section of this report and summarised below.

Table 20: Improvement by OVIC, 2024–25

Improvement number	Improvement	Improvement type	Function
5. OVIC improvement re exercise of coercive powers			
k.	OVIC decided not to conduct ‘group’ compulsory interviews in response to guidance from Integrity Oversight Victoria.	Changed interview structure	Notifications

Judicial Commission of Victoria

The Judicial Commission of Victoria investigates complaints about the conduct or capacity of judicial officers and non-judicial members of the Victorian Civil and Administrative Tribunal (VCAT). The Judicial Commission also provides guidance on the highest standards of ethical and professional judicial conduct. They may dismiss a complaint, refer a complaint to the head of jurisdiction, or refer it to an investigating panel appointed by the Judicial Commission.¹⁰⁶

We monitor the use of coercive powers by the Judicial Commission or an investigating panel to require the medical examination of a judicial officer or a VCAT member, and the investigating panel's use of its coercive powers to examine a judicial officer or member during a panel hearing.

The Director of the Judicial Commission must notify us about the exercise of these coercive powers and why they were exercised, and we may request information from them about the use of coercive powers.

The Judicial Commission may also make guidelines about:

- standards of conduct by judicial officers and VCAT members
- supporting investigating panels in the performance of their functions
- the making of complaints or referrals
- the assistance to be provided by the Director and staff of the Judicial Commission to any investigating panel including the hearing of a matter in public or private
- the use of coercive powers.

We may make recommendations to the Judicial Commission about the making of guidelines in relation to the use of coercive powers.

Public interest disclosures

Two disclosures relating to the Judicial Commission of Victoria were closed as they did not meet the threshold for notification to IBAC under the *Public Interest Disclosures Act 2012* (PID Act).

Coercive powers notifications

A notification process enables the Judicial Commission to report to us on the use of coercive powers by the Judicial Commission and investigating panels.

The Judicial Commission did not report the exercise of any coercive powers during the reporting period. The exercise of powers was last reported in 2020–21.

Monitoring

There were no issues requiring monitoring from prior periods.

Oversight of the Judicial Commission's PID procedures

As the Judicial Commission may receive disclosures about judicial officers and non-judicial members of VCAT, we are responsible for reviewing whether their public interest disclosure procedures are consistent with the PID Act, the Public Interest Disclosures Regulations 2019 and IBAC's guidelines.¹⁰⁷

The Justice Legislation Amendment (Integrity, Defamation and Other Matters) Act 2024 amended the IBAC Act to permit IBAC to refer public interest complaints to the Judicial Commission.¹⁰⁸ After this amendment commenced in September 2024, the Judicial Commission aligned their procedures to reflect the change and considered the further feedback we provided during this reporting period. In November 2024, the Judicial Commission advised it published updated procedures on its website.

Recommendations

We did not make any recommendations to the Judicial Commission during the reporting period.

Improvements made

No feedback was provided in relation to coercive powers as no powers were exercised.

¹⁰⁶ Two members of the panel are former or current judicial officers, while the third is appointed from a pool of persons of high standing in the community. Members of the pool are appointed for this purpose by the Governor in Council, on the recommendation of the Attorney-General.

¹⁰⁷ Under s 62(1) of the PID Act.

¹⁰⁸ The new s 73A(1)(d) of the IBAC Act permits IBAC to refer public interest complaints to the Judicial Commission.

Victoria Police

Victoria Police apply to the Supreme Court for coercive powers orders under the *Major Crime (Investigative Powers) Act 2004* (MCIP Act). These orders enable the Chief Examiner to issue witness summonses and conduct examinations into organised crime offences. In addition to overseeing the Chief Examiner, we also oversee compliance of the Chief Commissioner of Police (CCP) and other police officers with the MCIP Act.

The CCP acquitted their reporting obligations under section 66 of the MCIP Act by providing 6-monthly reports.

The CCP also acquitted their obligation to provide a report under Regulation 11(n) of the Major Crime (Investigative Powers) Regulations 2015 on 3 occasions.

In the period, we refined our process for assessing the reports provided by Victoria Police by developing a new checklist which will allow us to undertake more structured assessments of these reports in the next period.

Counter-terrorism powers

In accordance with the Terrorism (*Community Protection*) Act 2003 (TCP Act), Victoria Police can:

- conduct covert searches of premises under the authority of a warrant issued by the Supreme Court; covert search warrants can also permit the seizure of things, the copying of documents or information, and the testing or taking of samples, among other things (Part 2)
- detain and question people without charge, for prevention or to preserve evidence: adults can be detained for up to 4 days, and children aged 14 years or older can be detained for up to 36 hours (Part 2AA)
- use special police powers under the authority of a Supreme Court order, or an interim order made by the CCP or a Deputy Commissioner (Part 3A).

These powers were given to Victoria Police to assist them to prevent, or respond to, a terrorist act, or the threat of a terrorist act. The Act imposes strict requirements on Victoria Police in exercising these powers, as they are among the most intrusive and coercive afforded to law enforcement bodies.

Our inspection role is to assess Victoria Police's compliance with Parts 2, 2AA and 3A of the TCP Act (which provide for the powers described above), and to report to the Attorney-General and parliament on our findings. Our oversight role is an important integrity mechanism to ensure Victoria Police complies with the TCP Act and provide the public with assurance that these intrusive police powers are used lawfully.

In 2024–25, we conducted one inspection to assess an application made by Victoria Police to use special police powers under Part 3A of the TCP Act. We also assessed its preparatory activities to support compliance with the TCP Act, including engagement with agencies and procedural updates. Our report on this inspection, which we conducted in October 2024, was one of 2 reports under the TCP Act finalised during 2024–25.

Our second report, about an inspection conducted in April 2024, acknowledged Victoria Police took appropriate action in response to 3 previous recommendations about covert search warrants, and closed the recommendations. The action including policy changes and seeking legislative reform to aspects of the TCP Act.

Since Victoria Police did not exercise its powers under Parts 2, 2AA and 3A of the TCP Act after the October 2024 inspection, we did not conduct an inspection in the first half of 2025.

Controlled operations and technical surveillance powers

In 2024–25, we made a total 24 site visits to various work areas within Victoria Police to inspect records associated with covert investigative powers. We completed 2 inspections for each of the following types of records: surveillance devices, controlled operations, and telecommunications interception.

Surveillance devices

We inspected records held by Victoria Police's Special Projects Unit, Technical Projects Unit and their Technical Surveillance Unit under the SD Act. We made one report to the Attorney-General and parliament for the period in May 2025. Except for errors with the information given in 2 reports to the judge who issued surveillance device warrants, and information recorded in the use and communications register for 2 warrants, we found Victoria Police complied with its obligations under the SD Act.

In June 2025, we carried out an irregular inspection of Victoria Police's surveillance devices records. As the inspection encompassed records from a large span of time and involved different work units within Victoria Police, the inspection was divided into 3 separate site visits in May/June 2025. The outcomes from this inspection will be publicly reported during 2025–26. We anticipate conducting a second irregular inspection to review further records connected to the same issue.

Controlled operations

Controlled operations records were inspected at Victoria Police's Crime Command in 2024–25. From these inspections, we inspected a total 53 files connected with an authority to conduct a controlled operation. The results will be reported in 2025–26.

During the period, we held further discussions with Victoria Police regarding one outstanding recommendation from June 2023. This recommendation remains open as we continue to track Victoria Police's progress in developing further processes on how it manages planned conduct under a controlled operation.

Telecommunications interception

We inspected telecommunications interception records at Victoria Police's Special Projects Unit and Technical Projects Unit. In September 2024, we delivered our annual inspection report to the Minister for Police and the Attorney-General, who must then provide a copy of the report to the Commonwealth Attorney-General. These reports are not publicly available.

Recommendations

No recommendations were made to Victoria Police in 2024–25. We closed 3 previous recommendations actioned by Victoria Police relating to inspection of counter-terrorism powers under the TCP Act.

Improvements made

In response to our suggestions from the previous reporting period, Victoria Police improved how it administers controlled operations and the use of surveillance devices in 2024–25.

As a result of our inspections, Victoria Police also took the following actions:

- made supplementary reports to the judge who issued a surveillance device warrant
- corrected information in the general register for controlled operations
- made a supplementary report to the Chief Commissioner of Police for a completed authorised operation.

These issues raised with and addressed by Victoria Police contributed to the improvements reported in the Performance, achievements and priorities section of this report and summarised below.

Table 21: Improvements by Victoria Police, 2024–25

Improvement No.	Improvement summary	Improvement type	Function
1. Improvements to warrant processes under TIA Act			
	Victoria Police agreed to process improvements relating to warrants.	Policy and procedure changes to reduce the risk of breach of TIA Act	Inspections
5. Victoria Police improvements re exercise of covert powers			
	q. Victoria Police introduced quality assurance checklists for controlled operation authorisations.	Policy and procedures re Crimes (Controlled Operations) Act	Inspections
	r. Victoria Police (SPU) introduced an errors/ issues register to assist with making compliance disclosures and identifying opportunities to improve processes and reduce recurrence of any systemic issues.	Policy and procedures re TIA Act and SD Act	
	s. Victoria Police implemented a new process to ensure warrant reports delivered to the minister in accordance with TISP Act and updated their warrant file checklist to ensure proper filing.	Policy and procedures re warrant reports and record keeping under TISP Act	

Public Interest Monitor

We must inspect certain records kept by the Public Interest Monitor (PIM) and report on the outcomes of inspections to the Attorney-General at least once a year.

The role of the PIM is to represent the public interest:

- when courts and the Commonwealth Administrative Review Tribunal consider applications for warrants and orders authorising the covert collection of evidence in Victoria (e.g. telecommunications interceptions and surveillance devices) and the use of coercive examination powers¹⁰⁹
- when the Chief Commissioner of Police makes decisions to provide, suspend or terminate protection under the *Witness Protection Act 1991* (WP Act)
- when courts consider applications for covert search warrants, preventative detention orders and prohibited contact orders, and review police preventative detention decisions under the *Terrorism (Community Protection) Act 2003* (TCP Act).

The PIM's functions are to test the content and sufficiency of information relied on and the circumstances of applications, to pose questions to applicants, and to make submissions to the decision-maker regarding the appropriateness of granting the application.

We monitor the PIM's compliance with obligations prescribed by the *Public Interest Monitor Act 2011* (PIM Act), WP Act and TCP Act. These prescribed obligations include:

- making receipts for notifications and documents received
- keeping adequate procedures for ensuring information security
- maintaining a document register
- keeping law enforcement data securely stored
- returning all documents promptly to the applicant.

We also oversee the PIM's exercise of its powers to direct a member of Victoria Police to answer questions, produce documents or provide

information under the *Human Source Management Act 2023*.¹¹⁰ Connected to this, during the period, we engaged with the PIM to give feedback on its procedures for managing documents and information in accordance with the *Human Source Management Regulations 2024*.

We can receive disclosures about a PIM under the *Public Interest Disclosures Act 2012* (PID Act).¹¹¹

Inspection results

In 2024–25, we conducted one inspection of records held by the PIM, inspecting a representative sample of 152 of the 276 relevant files for the period. While we presently review all available records for other inspection functions, our decision to inspect a sample of PIM records for the period was based on several factors. These included the significant volume of records and our assessment of PIM records being lower risk due to consistently high levels of compliance confirmed in previous inspections.

We delivered a report on our inspection to the Attorney-General within the required timeframe, being 3 months after the inspection was conducted.

The results of the 2024–25 inspection show the PIM continues to achieve a high level of compliance with legislative and regulatory requirements, a reflection of its robust internal quality assurance processes.

Enquiries

During 2024–25 we received nil enquiries about a PIM.

Public interest disclosures

During 2024–25 we received one disclosure about a PIM, however this disclosure did not meet the definition of a public interest disclosure in section 9 of the PID Act. See the Public interest disclosures chapter for more information.

Recommendations

No recommendations were made to the Public Interest Monitor.

Improvements made

There were no issues identified which required improvement.

¹⁰⁹ Including under the MCIP Act, the SD Act and the TIA Act.

¹¹⁰ See s 52(2)(b) and 82(1)(a) of the HSM Act 2023.

¹¹¹ See s 14 (b) of the PID Act.

Wage Inspectorate Victoria

Integrity Oversight Victoria has overseen the Wage Inspectorate Victoria (WIV) since it commenced operation on 1 July 2021 with the introduction of the *Wage Theft Act 2020* (WT Act).

The WT Act provides WIV the power to enter, search and seize materials from the premises of a body without consent or a warrant, and compel the production of information, documents, other things

or attendance at WIV to answer questions. Our jurisdiction is limited to overseeing WIV’s exercise of these coercive powers.

In December 2023, the Victorian Government announced plans to repeal Victoria’s wage theft offences. From October 2023 we received no further coercive powers notifications from WIV.

Table 22: Coercive powers notifications received from WIV, 2020–21 to 2024–25

Wage Theft Act notification requirements		2020–21	2021–22	2022–23	2023–24	2024–25
s 42	Notice of entry, search and seizure	NA	1	0	0	0
s 54	Notice to produce	NA	25	16	8	0
Total		NA	26	16	8	0

Recommendations

We did not make any recommendations to WIV in 2024–25.

Improvements made

As WIV did not exercise its powers, we did not provide any feedback.

Office of the Special Investigator

The Office of the Special Investigator (OSI) was an independent statutory body established under the *Special Investigator Act 2021* (SI Act) in response to the recommendations of the Royal Commission into the Management of Police Informants. The OSI was established to investigate potential criminal conduct and breaches of discipline relating to the recruitment, management and use by Victoria Police of Nicola Maree Gobbo as a human source.

In June 2023, the Victorian Attorney-General announced the government’s decision to accept recommendations from both the

Special Investigator and the Royal Commission Implementation Monitor to wind up the OSI. Following this announcement the *Special Investigator Repeal Act 2023* (SIR Act) came into operation in February 2024, repealing the SI Act and abolishing the OSI.

The SIR Act progressively removes our functions and powers in relation to the OSI. See Table 23 for details.

Table 23: Cessation of our functions and powers in relation to the Office of the Special Investigator

Function/power	Cessation date	Action during reporting period
Assess appropriateness and effectiveness of policies and procedures	2 February 2024	N/A
Monitor compliance with Part 3 SI Act and other laws	2 February 2024	N/A
Receive and assess complaints and public interest disclosures	2 August 2024	Nil
Investigate complaints and public interest complaints	2 August 2025	Nil
Make recommendations and report on investigations to the Attorney-General	2 February 2026	Nil

Victorian Auditor-General's Office

The Victorian Auditor-General's Office (VAGO) undertakes annual audits of the financial statements of the public sector and reviews the state's estimated financial statements, providing an opinion for inclusion in the state's budget papers. VAGO also conducts performance audits to evaluate whether an organisation or government program is performing effectively, economically and efficiently, and in compliance with all relevant legislation.

The Audit Act 1994 (Audit Act) provides a suite of specific coercive powers for VAGO to gather information, obtain evidence and enter premises for the purpose of financial or performance audits.

We monitor the exercise of these coercive powers and compliance by VAGO officers with certain sections of the Audit Act¹¹², which relate to information gathering, entry to premises and reporting to us.

We can receive complaints relating to the use of coercive powers or compliance with certain sections of the Audit Act¹¹³ which relate to information gathering, entry to premises and reporting to us.

We can also investigate and assess their conduct and make reports and recommendations.

Coercive powers notifications

VAGO utilises a self-reporting tool created by us to report their exercise of any coercive powers. VAGO reported it did not exercise any coercive powers this financial year.

Enquiries

We received one enquiry relating to VAGO in 2024–25.

Complaints

We didn't receive any complaints about VAGO in 2024–25.

Recommendations

We made no recommendations to the Auditor-General during the reporting period.

Improvements made

As VAGO did not exercise any coercive powers, we did not provide any feedback.

¹¹² Sections 30 to 37, 39, 43 to 46, 50(1) and 51 of the Audit Act.

¹¹³ Sections 30 to 37, 39, 41 to 46, and 48 to 51 of the Audit Act.

Parliamentary Workplace Standards and Integrity Commission

The Parliamentary Workplace Standards and Integrity Commission (PWSIC) was established on 31 December 2024. PWSIC is responsible for dealing with allegations of parliamentary misconduct involving Victorian members of parliament, ministers, and parliamentary secretaries. PWSIC can receive, manage, and resolve allegations of parliamentary misconduct and inappropriate parliamentary workplace behaviour.

Integrity Oversight Victoria is PWSIC’s oversight body. The *Integrity Oversight Victoria Act 2011* (IOV Act) was amended to give us the following oversight functions:

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

To assist PWSIC to create a framework to lawfully exercise its powers, we provided PWSIC a guidance document setting out:

- PWSIC’s notification requirements to Integrity Oversight Victoria
- our objects, functions and powers in relation to PWSIC
- matters for consideration by PWSIC relating to witness welfare, confidentiality notices, human rights, procedural fairness, information that assists witnesses when making investigation requests, and the utility of scripts for issues relevant to each interview.

We met with PWSIC in February 2025 to understand its operating environment and to give insight into how we would go about our oversight role.

Enquiries and complaints

We did not receive any enquiries or complaints about PWSIC during the reporting period.

Investigations

We did not conduct any investigations in relation to PWSIC during the reporting period.

Coercive powers notifications

We received our first 5 coercive powers notifications from PWSIC in 2025.

Consistent with our usual practice for bodies exercising powers for the first time, we reviewed each of these notifications, using new checklists to assess each notification against relevant legislative requirements.

We made some enquiries with PWSIC and provided them with preliminary feedback in late June 2025.

Table 24: Coercive powers notifications received from PWSIC, 2024–25

Parliamentary Workplace Standards and Integrity Act 2024 notification requirements		2024–25
s 22	Request for information relating to investigation	2
s 24	Request to attend for interview	3
s 24(4)	Recording of interview	0
Total		5

Recommendations

There were no recommendations made to PWSIC during the reporting period.

Improvements made

Any improvements from the feedback provided on the 5 notifications will be reported next year.

Other bodies

We oversee all Victorian agencies that are authorised to use covert powers, including the use of surveillance devices and the conduct of controlled operations. In addition to inspecting the records of Victoria Police and IBAC on the use of these powers, we also inspect the records of the following bodies:

- Department of Energy, Environment and Climate Action (DEECA)
- Environment Protection Authority (EPA)¹¹⁴
- Game Management Authority (GMA)
- Victorian Fisheries Authority (VFA).

To meet our requirement to report to parliament, we conduct 6-monthly inspections of each bodies' available records. In 2024–25, we inspected 2 surveillance device warrants administered by DEECA. In the report tabled in parliament during this period for an earlier inspection of surveillance device records, we reported findings for DEECA, EPA, GMA and the VFA to the extent only that these agencies complied with their reporting obligation under section 30L of the *Surveillance Devices Act 1999*.¹¹⁵

We did not conduct an inspection of controlled operations records at these other bodies during the period because they had no ceased authorities to conduct a controlled operation to be inspected.

Recommendations

No recommendations were made to these other bodies during the reporting period.

Improvements made

We did not make any suggestions for improvement.

¹¹⁴ While the EPA may make an application to use a surveillance device under the SD Act, it is not an authorised agency for the purpose of conducting a controlled operation.

¹¹⁵ See Surveillance Devices Inspection Report on our website.

Risk, audit and compliance

Risk

We take an integrated approach to risk management, with risk management practices incorporated into all activities as 'business as usual'. Through this risk-based approach we ensure consideration of risk and opportunity informs decision-making.

These key elements underpin our risk management approach:

- risk management framework
- strategic risk register
- risk champions
- Victorian Managed Insurance Authority risk management benchmarking self-assessment.

Risk management framework

Our risk management framework provides the foundations and organisational arrangements for designing, implementing, monitoring and continuing risk management throughout our organisation. This framework defines our positive risk culture, contains our risk appetite statements and allocates roles and responsibilities relating to risk management. We revised our risk management framework in 2024–25 and will complete a review of risk appetite statements next year.

Strategic risk register

Our strategic risk register identifies and supports the management of organisational risks, including risks impacting our strategic priorities. Risk categories include operations, finance, HR, IT, security, communications and compliance. The risk register is a dynamic document presented quarterly at Audit and Risk Committee¹¹⁶ meetings to update the committee on the current risk level and any mitigating activities proposed or undertaken.

Risk champions

Our risk champions, established under our risk champions charter, are representatives from various business areas within Integrity Oversight Victoria. Their role includes facilitating information sharing to better inform organisational understanding of our strategic risk profile and ensuring risk management accountabilities are organisation-wide and do not sit solely with senior management. The risk champions also act as a first point-of-call for staff to raise and discuss any risk-related concerns and play a central role in promoting a positive risk culture within their respective business units.

¹¹⁶ For more information about the committee and its membership, see section on Audit and Risk Committee.

Victorian Managed Insurance Authority risk management benchmarking self-assessment

We participate annually in the Victorian Managed Insurance Authority risk management benchmarking self-assessment to identify and action risk management improvement opportunities, ensuring continuous improvement.

Other risk management practices

Other risk management practices that we adopt include:

- security risk assessments
- privacy impact assessments
- risk management assessments
- a documented business continuity plan, data breach response plan and cyber incident response plan
- contract management plans (for contracts valued at over \$100,000)
- quality and assurance workflows.

Cybersecurity

We are responsible for managing information in line with the standards issued by the Public Record Office Victoria and the Office of the Victorian Information Commissioner. The types of information we manage, and its classification, are detailed in our information asset register. This informs our use of ICT platforms and systems.

In 2022, we established a 3-year ICT strategy for 2023 to 2025 which included a current-state strategic assessment and an improvement roadmap with 12 improvement initiatives to be considered subject to organisational need and available budget. Two initiatives are complete, and progress made against a further 6. Several initiatives are phased across the strategy's lifecycle and due to be completed in 2025–26.

In 2024–25, we:

- commenced a review of our compliance with the Victorian Protective Data Security Standards, the Protective Security Policy Framework and the Information Security Manual, with an aim to finalise the review in 2025–26
- implemented and embedded additional secure platforms, including document review software and a new secure file sharing platform, to improve efficiencies whilst maintaining the security of our information
- explored options for a cloud hosted case management system to integrate with other platforms
- upgraded the audio-visual equipment in our primary meeting rooms to improve efficiency and user experience
- participated in the Victorian Managed Insurance Authority's annual cyber security benchmarking exercise
- developed an internal artificial intelligence (AI) information hub to provide high-level information to our staff on the risks and opportunities pertaining to the use of AI.

In 2025–26 one of our strategic priorities is to develop our next 3-year ICT strategy.

Audit

Internal audit program

Between the appointment of internal auditors in 2019, and 30 June 2025, 16 internal audits were completed covering procurement, privacy management, IT governance, risk management, fraud and corruption control, records and information management, and HR management. To date, the internal auditor has issued 71 audit recommendations, all endorsed by our Audit and Risk Committee. Of these, 63 recommendations are completed or closed, with 8 in progress. This reporting period, the internal auditor completed 2 audits and commenced a third. The Committee endorsed their 3 recommendations, each of low-to-moderate risk, and 3 improvement opportunities. Details are set out in Table 25.

Table 25: Status of internal audits conducted in 2024– 25

Audit	Audit status	Recommendations and improvement opportunities	Implementation status
Stakeholder management and advocacy	Completed	Recommendation 1 Enhance the existing external communications and stakeholder engagement strategy by: • adding staff's roles and responsibilities relating to stakeholder engagement • maintaining a stakeholder communications register • developing criteria for creating memorandums of understanding between Integrity Oversight Victoria and integrity agencies.	In progress
		Recommendation 2 Develop and implement stakeholder engagement and communications-related training for relevant staff members.	In progress
Compliance with Standing Directions issued under <i>Financial Management Act 1994</i>	Completed	Recommendation 1 Ensure regular review and testing of business continuity plan processes, at minimum every 2 years.	In progress
		Improvement opportunity 1 Ensure the Responsible Body completes a formal review of our Audit and Risk Committee's overall performance and membership at least once every 3 years.	In progress
		Improvement opportunity 2 Align documented maximum monthly limit and individual transaction limit for credit cardholder to ensure consistency between policy and practice.	In progress
		Improvement opportunity 3 Review and update our short-form contract template to incorporate a provision regarding contract specifications under requirement (g) of Instruction 4.2.1.3 of the Standing Directions.	Complete
Investigations function	Commenced	Yet to be determined	N/A

Compliance

Our integrity statement

Our compliance policy contains this integrity statement.

Maintaining the highest standards of integrity is core to Integrity Oversight Victoria's identity and compliance culture, and one way we protect our staff, information, assets, and organisational integrity. It aligns with our value to act with integrity in everything we do and ensures we properly fulfil our functions.

All our staff members, regardless of role, are expected to demonstrate a high level of personal integrity and awareness of the critical importance of protecting Integrity Oversight Victoria's organisational integrity.

Senior management are committed to collaborating with staff to develop and maintain a workplace culture in which integrity, accountability, transparency and compliance with the law are central to the way we work.

Our integrity framework is underpinned by the VPS code of conduct for employees of special bodies (code of conduct), our compliance policy and these policies, registers and guidelines:

- induction manual for new staff
- conflict of interest policy and register
- gifts, benefits and hospitality policy and register
- fraud, corruption and other losses policy and register
- respect in the workplace policy
- prevention of sexual harassment in the workplace policy
- integrity and operations governance policy
- integrity response guidelines
- privacy policy.

Staff must pass several screening stages to ensure their suitability for appointment. Prior to their commencement, all staff must make an oath or affirmation under the *Integrity and Oversight Victoria Act 2011* (IOV Act) that they:

- will faithfully and impartially perform the duties and functions and exercise the powers of the office
- will not disclose, except as authorised or required by law, any information received in the performance of the duties and functions or the exercise of the powers of the office.

Conflicts of interest

All Integrity Oversight Victoria officers must place public interest above their private interest when carrying out official duties. Accordingly, we ensure actual, potential, or perceived conflicts of interests are declared, and where possible, avoided. Where such conflicts cannot be avoided, they must be declared and managed in accordance with our conflict of interest policy. The policy, updated in 2024–25 to reflect the model policy issued by the Victorian Public Sector Commission (VPSC), requires reasonable steps to be taken to restrict the extent to which a private interest could compromise or be seen to compromise impartiality when carrying out official duties.

Officers involved in any procurement process, recruitment activity, complaint assessment or investigation must complete a conflict of interest declaration regardless of whether a conflict exists. Employees who engage in outside employment, including voluntary roles, must seek approval to do so on at least an annual basis.

Where an officer identifies a conflict of interest in relation to an operational matter, they are excluded from any involvement in that matter (including being privy to discussions or having access to information) unless an alternative approach is in place to manage the conflict.

All conflicts of interest are centrally recorded with the details of operational conflicts stored in our case management system.

Gifts, benefits and hospitality

Our approach to both receiving and offering gifts, benefits and hospitality is governed by our gifts, benefits and hospitality policy which is available on our website. On 30 June 2025, the policy was being reviewed against the VPSC model policy. The purpose of this policy is to ensure we avoid conflicts of interest and maintain high levels of integrity and public trust. Under the policy, there are limited circumstances in which a non-token offer (an offer with a value greater than \$50) would be accepted as it would require a legitimate business benefit and the acceptance does not raise an actual, potential or perceived conflict of interest. Regardless of whether a non-token offer is accepted, it must be declared and recorded in our gifts, benefits and hospitality register which is also published on our website.

Compliance with the *Disability Act 2006*

We acknowledge the importance of strengthening the rights of people with a disability and are committed to creating and maintaining an accessible and inclusive environment for all people with a disability who engage with us, whether as employees, stakeholders or members of the public more generally. We leverage off DJCS policies to ensure that our policies and services are accessible and responsive to the needs of people with a disability.

Application and operation of the *Carers Recognition Act 2012*

To the extent applicable, we have taken all practical measures to comply with our obligations under the *Carers Recognition Act 2012*.

Occupational health and safety

Occupational health and safety is an important component of how we conduct operations for staff, contractors and all visitors. All employees have access to physical and psychological wellbeing services including an independent employee wellbeing and support service, influenza vaccinations and ergonomic assessments. Most staff have completed mental health first aid training (which is included in the induction program for all new employees) and are accredited mental health first aiders.

Our frontline staff have access to additional support via an independent mental health provider, including a dedicated specialist counselling support service, with customised support for each operational team. Witnesses involved in our investigations can access a 24/7 hotline for specialist counselling support.

Our witness welfare framework was further enhanced with the release of a tailored eLearn for our staff on our witness welfare guidelines. The eLearn is part of the induction program for all new employees.

We have a health and safety wellbeing hub on our intranet which:

- provides a central location for resources relating to workforce safety and wellbeing
- communicates health, safety and wellbeing related updates to all employees
- provides a platform for staff consultation on matters relating to health, safety and wellbeing.

Consistent with previous years, we did not have any accidents or near misses and did not have any lost time in relation to OH&S injuries. As we didn't receive any claims, there were no associated costs for the year beyond the cost of our insurance premium.

Application and operation of *Freedom of Information Act 1982*

Under the *Freedom of Information Act 1982* (FOI Act) the public has a right of access to certain documents held by Integrity Oversight Victoria. Information about the type of material we produce is available on our freedom of information website page under Statement 2.

This reporting period, we received 4 requests for access to documents under the FOI Act. All requests were from the public. In response to the first request, the applicant was asked to provide further information to support their request. No further action was taken when the applicant did not respond to our request. In response to the second request, we processed it outside the FOI Act and provided documents to the applicant. The third request sought access to documents covered by an exemption in section 102 of the *Integrity Oversight Victoria 2011 Act* (IOV Act), explained further below. The final request sought documents more closely connected with the functions of another government agency and was transferred to that agency under section 16 of the FOI Act.

FOI exemptions for Integrity Oversight Victoria documents

Section 102 of the IOV Act exempts certain classes of documents in our possession from being accessed under the FOI Act. Specifically, the FOI Act does not apply to a document in the possession of a 'relevant person or body' to the extent to which the document discloses information that relates to:

- a complaint made under the IOV Act
- an inspection made under the IOV Act
- an investigation conducted under the IOV Act
- a recommendation made by us under the IOV Act
- a report, including a progress report, on an investigation conducted under the IOV Act.

Making an FOI request

Section 17 of the FOI Act outlines the requirements for making a request. FOI requests can be lodged online at ovic.vic.gov.au. An application fee of \$33.60 applies. Access charges may also be payable if the document pool is large and the search for material time consuming.

Alternatively, a request can be made to us directly, which must:

- be in writing
- identify as clearly as possible which document is being requested
- be accompanied by the appropriate application fee (the fee may be waived in certain circumstances).

Access charges may also apply once documents are processed and a decision on access is made, for example photocopying and search and retrieval charges. Requests for documents in our possession should be addressed to:

Integrity Oversight Victoria

Freedom of Information
PO Box 617 Collins Street West
Melbourne Vic 8007
Email: privacy@integrityoversight.vic.gov.au

Under the FOI Act the processing time for FOI requests received is 30 days. In some cases, this time may be extended.

If an applicant is not satisfied with our decision, they have a right under section 49A of the FOI Act to seek a review by the Office of the Victorian Information Commissioner within 28 days after the day on which they are given written notice of the decision.

Further information can be obtained from the FOI Act, regulations made under the FOI Act, and www.ovic.vic.gov.au.

Availability of other information

In compliance with the requirements of the Standing Directions 2018 under the *Financial Management Act 1994*, we have retained details in respect of the items listed below. They are available on request, subject to the provisions of the FOI Act:

- A statement that declarations of pecuniary interests are duly completed by all relevant officers.
- Details of shares held by a senior officer as nominee or held beneficially in a statutory authority or subsidiary.
- Details of publications produced by us about Integrity Oversight Victoria or the Victorian Inspectorate, and how these can be obtained.
- Details of changes in charged prices, fees, charges, rates and levies.
- Details of any major external reviews carried out by us or on us.
- Details of any major research and development activities undertaken by us.
- Details of overseas visits undertaken including a summary of the objectives and outcomes of each visit.
- Details of any major promotional, public relations and marketing activities undertaken by us to develop community awareness of us and our services.
- Details of assessments and measures undertaken to improve the occupational health and safety of employees.
- A general statement on industrial relations within Integrity Oversight Victoria and details of time lost through industrial accidents and disputes.

- A list of major committees sponsored by Integrity Oversight Victoria, the purposes of each committee and the extent to which the purposes have been achieved.
- Details of all consultancies and contractors including consultants/contractors engaged, services provided, and expenditure committed to for each engagement.

The information is available on request from:

General Manager, Corporate Services

Email: corporate@integrityoversight.vic.gov.au

Application and operation of *Public Interest Disclosures Act 2012*

We encourage and support the reporting and prevention of corruption and other improper conduct within the Victorian Public Sector. We take all appropriate steps to help facilitate the making, handling, notification and investigation of public interest disclosures and to protect people from reprisals for making those disclosures. Our public interest disclosure guidelines for this purpose are published on our website.

We expect the highest standards of integrity from our own officers and the other integrity, accountability and investigatory bodies and officers that we oversee and take all appropriate steps to uphold this integrity.

Making a disclosure to the IOV

Public interest disclosures about IBAC, an IBAC Officer, or a Public Interest Monitor must be made to Integrity Oversight Victoria. Public interest disclosures about most public bodies and officers may be made to Integrity Oversight Victoria. Our public interest disclosure guidelines, available on our website, provide important information for those who are thinking about making a public interest disclosure to us, including which disclosures we can receive. Further information on making a disclosure to us can be found at www.integrityoversight.vic.gov.au or by contacting us:

Integrity Oversight Victoria

1800 518 197

info@integrityoversight.vic.gov.au

PO Box 617, Collins Street West

Melbourne Victoria 8007

Alternatively, disclosures (excluding those required to be made to Integrity Oversight Victoria) may also be made directly to IBAC:

Independent Broad-based

Anti-corruption Commission

1300 735 135

www.ibac.vic.gov.au

Level 1, North Tower, 459 Collins Street

Melbourne, VIC 3000

Making a disclosure about IOV or IOV officers

Public interest disclosures about Integrity Oversight Victoria or Integrity Oversight Victoria officers must be made to the Integrity and Oversight Committee of the Victorian Parliament, or to a Presiding Officer. Their contact details are:

Integrity and Oversight Committee

03 8682 2830

ioc@parliament.vic.gov.au

Parliament of Victoria

Parliament House, Spring Street

East Melbourne VIC 3002

Speaker of the Legislative Assembly

03 9651 8580 or 03 9651 8575

speaker@parliament.vic.gov.au

The Speaker's Office

Parliament House, Spring Street

Melbourne VIC 3002

President of the Legislative Council

03 9651 8675

president@parliament.vic.gov.au

President's Office Parliament House, Spring Street

Melbourne VIC 3002

Environmental sustainability

Under Financial Reporting Direction 24, Integrity Oversight Victoria is classified as a tier 4 entity.

Tier 4 entities are generally required to report on the following:

- total electricity consumption segmented by source
- total electricity offsets segmented by offset type
- number and proportion of vehicles in the organisational boundary segmented by fuel type and vehicle category
- NABERS energy ratings of newly completed/occupied entity-owned office buildings and substantial tenancy fit-outs.

However, tier 4 entities are not required to report on the above indicators if 'all material energy and transport use is captured through state purchase contracts, HealthShare Victoria contracts, Share Service Provider, their portfolio department or by another public sector entity'.

Our electricity consumption and offset are captured by Victoria's Shared Service Provider, the Accommodation, Carpark and Library Service. We do not own or lease any vehicles, and we did not undertake any substantial tenancy fit outs during 2024–25.

In 2024–25 we reduced our environmental footprint by:

- minimising electricity and water use by using efficient appliances and office equipment
- turning off computer monitors when workstations are not in use using energy efficient lighting which turns off when staff are not present
- using 100% recycled copy paper, double-sided printing, and secure printing
- encouraging and supporting staff to adopt digital ways of working
- using segregated waste systems
- recycling waste material where possible
- encouraging staff to use public transport when travelling to/from our office or undertaking business activities, including through participating in the Department of Justice and Community Safety Commuter Club
- including social and sustainable procurement objectives as weighted selection criteria where appropriate.

People and culture

In 2024–25 we progressed our strategic priority of continuing to improve organisational sustainability, capability and a positive culture, with the aim of Integrity Oversight Victoria being recognised as an employer of choice. Activities included:

- maintaining focus on staff retention
- participating in the annual people matter survey
- launching a 'Towards Zero' campaign to support our zero tolerance for negative behaviours, supported by implementing an online, anonymous complaints portal for staff to report any negative behaviours
- expanding a comprehensive review of HR policies and procedures into a broader review including finance policies
- embedding our structured learning and development plan with an increased focus on development opportunities across the organisation
- supporting our Pride Network
- engaging external subject matter experts to deliver training to support the psychological safety of our staff.

Comparative workforce data

The data provided in Table 26 and Table 27 is actual full time equivalent (FTE) and headcount data on 30 June 2025 for Victorian Public Sector employees and does not include statutory appointments. Employees are correctly classified in workforce data collections. On 30 June 2025, we employed 30 staff (27.5 FTE) (27 ongoing and 3 fixed-term). This represents minimal change from the previous year.

Table 26: Employee numbers and type, June 2024 and June 2025

June 2024							June 2025						
Ongoing		Fixed Term		Casual		Total	Ongoing		Fixed Term		Casual		Total
Number	FTE	Number	FTE	Number	FTE	Number	Number	FTE	Number	FTE	Number	FTE	Number
(Headcount)		(Headcount)		(Headcount)		(Headcount)	(Headcount)		(Headcount)		(Headcount)		(Headcount)
28	26.9	2	1	0	0	30	27	25.3	3	2.2	0	0	30

Table 27: Employee classifications, June 2024 and June 2025

	June 2024				June 2025			
	Ongoing		Fixed term & Casual		Ongoing		Fixed term & Casual	
	Headcount	FTE	Headcount	FTE	Headcount	FTE	Headcount	FTE
Gender								
Male	10	10	1	0.4	9	9	0	0
Female	18	16.9	1	0.6	18	16.3	3	2.2
Self-described	n	n	n	n	n	n	n	n
Age								
Under 25	0	0	1	0.4	0	0	1	0.2
25-34	10	9.6	0	0	9	8.6	2	2
35-44	7	6.7	1	0.6	8	7.1	0	0
45-54	8	8	0	0	8	7.6	0	0
55-64	3	2.6	0	0	2	2	0	0
Over 64	0	0	0	0	0	0	0	0
Classification								
SES-2	1	1	0	0	1	1	0	0
SES-1	0	0	0	0	1	1	0	0
VPS Grade 6	8	7.7	0	0	7	6.5	0	0
VPS Grade 5	13	13	0	0	13	12.6	2	2
VPS Grade 4	3	2.6	1	0.6	3	2.6	0	0
VPS Grade 3	3	2.6	1	0.4	2	1.6	1	0.2
VPS Grade 2	0	0	0	0	0	0	0	0

Senior executive data

The senior executive data in Table 28 is current on 30 June 2025.

The increase in the number of senior executives in 2024–25 reflects the re-classification of an existing VPS6 position to an SES1 position. Appointment to the position followed a merit-based recruitment process.

Refer to our financial statements for further details regarding senior executive remuneration.

Table 28: Senior executive data, 2023–24 and 2024–25

	Male		Female		Self-described		Vacancies	
	2023–24	2024–25	2023–24	2024–25	2023–24	2024–25	2023–24	2024–25
Senior Executive 1	0	0	0	1	n	n	0	0
Senior Executive 2	0	0	1	1	n	n	0	0
Senior Executive 3	0	0	0	0	n	n	0	0
Total	0	0	1	2	n	n	0	0

Employment and conduct principles

The *Public Administration Act 2004* (PA Act) established the Victorian Public Sector Commission (VPSC). The VPSC's role is to strengthen public sector efficiency, effectiveness and capability, and advocate for public sector professionalism and integrity.

Our policies and practices are consistent with the VPSC's employment standards and provide for fair treatment, career opportunities and the early resolution of workplace issues. In addition to the VPSC policies, we leverage relevant Department of Justice and Community Safety (DJCS) employment policies and templates, as applicable to our organisation. In 2024–25 we accessed support through DJCS including expert advice on employment principles and processes as needed, in accordance with a memorandum of understanding between Integrity Oversight Victoria and DJCS.

Policies and related tools advise our employees how to avoid conflicts of interest and respond to offers of gifts and benefits, how we deal with misconduct, the prevention of sexual harassment and the need for respect in the workplace, and prevention of fraud, corruption and other losses. In 2024–25 policies were supported through in-house training to staff on a range of topics including respect in the workplace and the prevention of sexual harassment.

Our 'Towards Zero' campaign and the anonymous Respect@Work portal are aligned with our Respect in the Workplace Policy. The portal provides an alternative avenue for staff to make a report or complaint about workplace behaviour inconsistent with our values and/or our policy.

We are committed to public sector values and employment principles and to applying merit and equity principles when appointing staff. The selection processes ensure applicants are assessed and evaluated fairly and equitably based on the key selection criteria and other accountabilities without discrimination, and in accordance with the requirements of the (former) Jobs and Skills Exchange. We also promote our own values to staff and the need to always uphold them.

To ensure the suitability of employees, as part of our selection process, we undertake several screening stages including Fit2Work checks (national and international as required) and pre-employment misconduct declarations. All staff must apply for and maintain, at a minimum, a Negative Vetting Level 1 security clearance.

Strategic workforce planning

Integrity Oversight Victoria has a strategic workforce plan to ensure we have the right people in the right roles at the right time to enable us to meet both our legislative and strategic objectives. The plan considers:

- our short-term and long-term organisational objectives and priorities
- our current workforce and what the future workforce may look like
- initiatives for attracting and retaining a suitably skilled and experienced workforce.

The plan also recognises our ability to manage and plan our workforce is largely dependent upon factors outside our control and considers the limitations of our staffing profile of approximately 30. Key aspects of the plan include:

- resourcing and attraction
- retention
- vacancy management.

2024 People matter survey

We received a 93% response rate in the 2024 People matter survey and overall, a generally positive outcome which compared favourably against the aggregate comparator group and the broader Victorian public sector scores. We presented the survey results to staff in August 2024, including the action plan to address feedback with the key focus on continuing to build the organisation's strong, positive and healthy culture.

Performance development

All Integrity Oversight Victoria employees participate in the performance development and review process, including development of a Performance Development Plan (PDP) and participation in performance discussions and reviews, consistent with clause 31.1(e) of the Victorian Public Service Enterprise Agreement 2024.

The PDP process aims to provide our employees with a clear understanding of how they contribute to the organisation's objectives, the accountabilities they must meet at work and the opportunity to proactively plan for their professional learning and individual career development with their manager or supervisor.

Learning and development

In 2024–25 we continued our focus on supporting staff's personal and professional development by further embedding our structured learning and development plan.

The plan addresses 3 tiers of learning and development opportunities including delivering organisation-wide training to all staff, supporting skills and capability building across functional areas, and meeting individual learning and development needs.

In addition to participation in formal training such as attendance at courses, seminars, conferences and webinars (in person and online), other learning and development opportunities included formal and informal on the job training and mentoring and coaching.

Formal training undertaken in 2024–25 included attendance at/participation in:

- DJCS Everyday Integrity forums
- the Australian Public Sector Anti-Corruption Conference
- the Victorian Cyber Security Showcase 2024
- LGBTQIA+ Leadership, Allyship & Inclusion Summit
- managing difficult interactions and behaviours
- complaints handling forum
- contract management
- administrative decision-making
- training in IT platforms
- plain language writing skills
- witness welfare
- various AI training seminars and information sessions
- mental health first aid training
- investigative interviewing
- dealing with complex behaviours.

Chief Integrity Inspector's seminar series

The Chief Integrity Inspector's staff seminar series sessions continued with presentations from Sven Bluemmel and Gail Furness SC.

Presenters generously shared with our staff how they have met challenges and fulfilled their functions during their extraordinary careers. The sessions they presented were inspiring and very much appreciated by the staff in attendance.

Sven Bluemmel

Sven Bluemmel commenced as Victoria's Electoral Commissioner in August 2023, after serving as Victoria's Information Commissioner from 2017 to 2023. As a senior public sector executive Mr Bluemmel has led high-profile statutory bodies across multiple jurisdictions.

Gail Furness SC

Gail Furness SC was appointed Inspector of the National Anti-Corruption Commission in July 2023 and has also served as Inspector of the NSW Independent Anti-corruption Commission since July 2022. Ms Furness joined the NSW Bar in 1997 after holding senior positions with statutory oversight bodies.

Workforce inclusion policy

We are an equal opportunity employer and our recruitment processes focus on essential skills and abilities.

We welcome applicants from a diverse range of backgrounds and experiences, including Australia's First Nations peoples, people from culturally and linguistically diverse backgrounds, LGBTQIA+ communities, and people with disability.

We value our people and are committed to attracting, developing and retaining diverse talent. We actively promote diversity and inclusion in the workplace and do not discriminate based on age, carer or parental status, disability, race, religious belief, sexual orientation, gender identity or other characteristics.

We value staff with non-binary gender identities at all levels from VPS officers through to executives. We acknowledge that due to historic and current barriers to disclosure of non-binary gender identities, staff may not choose to disclose this information. As a result, targets or quotas are not currently a useful way to promote opportunities for gender-diverse staff.

Pride network

Our Pride Network is an employee-led initiative to create a community for staff who identify as LGBTQIA+, their allies and supporters, creating opportunities to promote visibility and an inclusive culture where diversity is affirmed and celebrated.

The aim of the pride network is to positively champion and enable LGBTQIA+ inclusion in the workplace through engaging with network members and making meaningful contributions to our policies and procedures to ensure they are respectful and inclusive of LGBTQIA+ staff.

Events throughout the year included participation in the Mid Summa march and a celebration of IDAHOBIT day with a rainbow-themed morning tea and quiz.



Staff profiles



Joan

What's your role?

I am Integrity Oversight Victoria's human resources project officer.

What did you do before working here?

Before working for Integrity Oversight Victoria, I held several roles across the Victorian public sector including working for Court Services and the Victorian Civil and Administrative Tribunal.

Why did you apply to work here?

I was drawn to working for Integrity Oversight Victoria because of the valuable work it does as Victoria's primary integrity agency. As a working mother of 2 young children, I also really appreciate how flexible the organisation is.

What is your favourite thing about working here?

My favourite thing about working as the organisation's human resources officer, is the relationships I have developed with our wonderful staff. As a small organisation, I have been able to get to know each staff member and support them throughout the employee lifecycle.

Is there anything that you are particularly proud of at work?

I am proud of the work we do in the Victorian Integrity system and the small role I play in facilitating that work. When people ask where I work, I enjoy telling them about our unique organisation and explaining the meaningful way we steer real change in the system.

Tell us a surprising or fun fact about you.

I studied in Slovenia at the University of Ljubljana for a summer semester.

Megan

What's your role?

I am a senior solicitor and my role includes providing legal advice and support related to the oversight of the Victorian integrity system. This includes supporting investigations, conducting legal research, and advising on operational matters and policy.

What did you do before working here?

I previously worked in both criminal law policy and practice for the Victorian Government.

Why did you apply to work here?

I wanted a role that was challenging and would allow me to engage in meaningful work that benefited the community. I have always had a strong interest in human rights and the role that Integrity Oversight Victoria has in protecting rights and ensuring powers are exercised lawfully really appealed to me. In particular, I like that we promote fairness, hold systems accountable and give people a voice to raise concerns. This makes the role fulfilling and reinforces the importance of oversight in the public service.

What is your favourite thing about working here?

I haven't been here for long, but already I admire the commitment from every colleague to the work they do.

I also find every day has been slightly different. The work is engaging, challenging and includes interesting legal research. It is also really rewarding to know that our work can lead to real change and empower individuals.

Tell us a surprising or fun fact about you.

I love spending time at the snow and have recently started volunteering as a ski guide for Disabled Wintersport Australia.



Finance and procurement

Financial overview

Financial performance

The Victorian government considers the net result from transactions to be the appropriate measure of financial management directly attributable to government policy.

This measure excludes the effects of revaluations (holding gains or losses) arising from changes in market prices and other changes in the value of assets and liabilities on the comprehensive operating statement, which are outside the control of Integrity Oversight Victoria.

Based on the above, we recorded a net operating result of \$0.44 million in 2024–25.

The loss of \$0.004 million in other economic flows is mainly due to the impact of movements in the bond rate used for the valuation of leave liabilities.

Financial position – Balance Sheet

Our total assets increased slightly from \$8.156 million last year to \$8.174 million, primarily attributable to a reduction in the Right of Use Asset value associated with the accommodation lease and offset by an increase in receivables and prepayments.

The reduction in total liabilities from \$3.44 million to \$3.02 million is predominantly due to the reduced recognition of borrowing costs related to the Right of Use Asset attributable to the accommodation lease and the reduction in leave liabilities.

Cash flow

The net cash flow from operating activities increased slightly compared to the previous year predominantly due to reduced interest expense on lease liabilities. The cash and cash equivalent at the end of the financial year decreased due to payments made during the year.

Table 29: Five-year financial summary

	2025	2024	2023	2022	2021
Total income from transactions	\$8,184,764	\$7,840,468	\$8,639,662	\$5,746,475	\$4,940,038
Total expenses from transactions	\$7,740,482	\$7,698,732	\$7,093,788	\$5,746,475	\$4,940,038
Net result from transactions	\$444,282	\$141,736	\$1,545,874	–	–
Other economic flows included in net result*	(\$3,823)	\$20,244	\$5,478	\$38,301	\$35,635
Net result for the period	\$440,459	\$161,980	\$1,551,352	\$38,301	\$35,635
Net cash flow from operating activities	\$333,984	\$321,710	\$1,658,354	\$842,043	\$590,524
Cash and cash equivalent at the end of the financial year	\$464,371	\$565,388	\$907,856	–	–
Total assets	\$8,173,551	\$8,156,284	\$6,362,330	\$4,597,061	\$4,970,121
Total liabilities	\$3,016,666	\$3,439,858	\$1,807,883	\$1,593,967	\$2,019,900

* Includes gains or losses from revaluing leave liabilities due to changes in the government bond rate.

Annual financial statements



Integrity Oversight Victoria Financial Management Compliance Attestation Statement

I, Louise Macleod, the Chief Integrity Inspector of Integrity Oversight Victoria, certify that Integrity Oversight Victoria has no Material Compliance Deficiency with respect to the applicable Standing Directions under the *Financial Management Act 1994* and Instructions.

A handwritten signature in blue ink that reads "lmacleod".

Louise Macleod

Chief Integrity Inspector

19 September 2025

Independent Auditor's Report

To the Inspector of Integrity Oversight Victoria

Opinion	I have audited the financial report of Integrity Oversight Victoria which comprises the: • balance sheet as at 30 June 2025 • comprehensive operating statement for the year then ended • statement of changes in equity for the year then ended • cash flow statement for the year then ended • notes to the financial statements, including material accounting policy information • declaration in the financial statements. In my opinion the financial report presents fairly, in all material respects, the financial position of Integrity Oversight Victoria as at 30 June 2025 and its financial performance and cash flows for the year then ended in accordance with the financial reporting requirements of Part 7 of the <i>Financial Management Act 1994</i> and applicable Australian Accounting Standards - Simplified Disclosures.
Basis for Opinion	I have conducted my audit in accordance with the <i>Audit Act 1994</i> which incorporates the Australian Auditing Standards. I further describe my responsibilities under that Act and those standards in the <i>Auditor's Responsibilities for the Audit of the Financial Report</i> section of my report. My independence is established by the <i>Constitution Act 1975</i>. My staff and I are independent of Integrity Oversight Victoria in accordance with the ethical requirements of the Accounting Professional and Ethical Standards Board's APES 110 <i>Code of Ethics for Professional Accountants (including Independence Standards)</i> (the Code) that are relevant to my audit of the financial report in Victoria. My staff and I have also fulfilled our other ethical responsibilities in accordance with the Code. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.
Inspector's responsibilities for the financial report	The Inspector of Integrity Oversight Victoria is responsible for the preparation and fair presentation of the financial report in accordance with Australian Accounting Standards - Simplified Disclosures and the <i>Financial Management Act 1994</i>, and for such internal control as the Inspector determine is necessary to enable the preparation and fair presentation of a financial report that is free from material misstatement, whether due to fraud or error. In preparing the financial report, the Inspector is responsible for assessing Integrity Oversight Victoria's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless it is inappropriate to do so.

Auditor’s responsibilities for the audit of the financial report

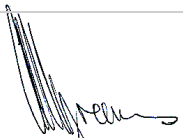
As required by the *Audit Act 1994*, my responsibility is to express an opinion on the financial report based on the audit. My objectives for the audit are to obtain reasonable assurance about whether the financial report as a whole is free from material misstatement, whether due to fraud or error, and to issue an auditor’s report that includes my opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the Australian Auditing Standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this financial report.

As part of an audit in accordance with the Australian Auditing Standards, I exercise professional judgement and maintain professional scepticism throughout the audit. I also:

- identify and assess the risks of material misstatement of the financial report, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for my opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of Integrity Oversight Victoria’s internal control
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Inspector
- conclude on the appropriateness of the Inspector’s use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on Integrity Oversight Victoria’s ability to continue as a going concern. If I conclude that a material uncertainty exists, I am required to draw attention in my auditor’s report to the related disclosures in the financial report or, if such disclosures are inadequate, to modify my opinion. My conclusions are based on the audit evidence obtained up to the date of my auditor’s report. However, future events or conditions may cause Integrity Oversight Victoria to cease to continue as a going concern.
- evaluate the overall presentation, structure and content of the financial report, including the disclosures, and whether the financial report represents the underlying transactions and events in a manner that achieves fair presentation.

I communicate with the Inspector regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that I identify during my audit.

MELBOURNE
7 October 2025



Andrew Greaves
Auditor General

Annual Financial Statements 2024-25

INTEGRITY OVERSIGHT VICTORIA

Report structure

Integrity Oversight Victoria has presented its audited general purpose financial statements for the financial year ended 30 June 2025 in the following structure to provide users with information about Integrity Oversight Victoria's stewardship of resources entrusted to it.

Certifications	Declaration in financial statements Independent auditor's report
Financial statements	Comprehensive operating statement Balance sheet Cash flow statement Statement of changes in equity
Notes to the financial statements	1 About this report The basis on which the financial statements have been prepared and compliance with reporting regulations 2 Funding delivery of services Income recognised from grants and other sources 2.1 Income that funds the delivery of our services 2.1.1 Summary of compliance with annual parliamentary appropriations 2.2 Grants 3 Cost of delivering services Operating expenses of Integrity Oversight Victoria 3.1 Expenses incurred in the delivery of services 3.2 Other operating expenses 4 Key assets available to support delivery of our services Property, plant and equipment 4.1 Property, plant and equipment 4.2 Intangible assets 5 Other assets and liabilities Working capital balances, and other key assets and liabilities 5.1 Receivables 5.2 Payables 5.3 Other Provisions 6 Financing operations Borrowings, cash flow information and leases 6.1 Borrowings 6.2 Commitments for expenditure 7 Risks, contingencies and valuation judgements Financial risk management, contingent assets and liabilities as well as fair value determination 7.1 Financial instruments specific disclosures 7.2 Contingent assets and contingent liabilities 7.3 Fair value determination 8 Other disclosures 8.1 Responsible persons 8.2 Remuneration of executives 8.3 Related parties 8.4 Remuneration of auditors 8.5 Subsequent events

Declaration in the financial statements

The attached financial statements for Integrity Oversight Victoria have been prepared in accordance with Direction 5.2 of the Standing Directions of the Minister for Finance under the *Financial Management Act 1994*, applicable Financial Reporting Directions, Australian Accounting Standards including Interpretations and other mandatory professional reporting requirements.

We further state that, in our opinion, the information set out in the comprehensive operating statement, balance sheet, cash flow statement, statement of changes in equity and notes forming part of the financial statements, presents fairly the financial transactions during the year ended 30 June 2025 and financial position of Integrity Oversight Victoria as at 30 June 2025.

At the time of signing, we are not aware of any circumstance which would render any particulars included in the financial statements to be misleading or inaccurate.

We authorise the attached financial statements for issue on 19 September 2025.



Samuel Ho
Chief Finance Officer

Melbourne
19 September 2025



Louise Macleod
Accountable Officer

Melbourne
19 September 2025

Comprehensive operating statement

For the financial year ended 30 June 2025

			(\$)
	Note	2025	2024
Income from transactions			
Output appropriations	2.1	8,184,764	7,840,468
Total income from transactions		8,184,764	7,840,468
Expenses from transactions			
Employee expenses	3.1.1	(5,402,576)	(4,805,839)
Depreciation and amortisation		(700,264)	(826,414)
Interest expense	6.1	(74,563)	(109,501)
Other operating expenses	3.2	(1,563,079)	(1,956,978)
Total expenses from transactions		(7,740,482)	(7,698,732)
Net result from transactions (net operating balance)		444,282	141,736
Other economic flows included in net result			
Net gain from the revaluation of leave liabilities		(3,823)	20,244
Total other economic flows included in net result		(3,823)	20,244
Net result		440,459	161,980
Comprehensive result		440,459	161,980

The above comprehensive operating statement should be read in conjunction with the notes to the financial statements.

Balance sheet

As at 30 June 2025

			(\$)
	Note	2025	2024
Assets			
Financial assets			
Cash		464,371	565,388
Receivables	5.1	5,850,798	5,127,893
Total financial assets		6,315,169	5,693,281
Non-financial assets			
Prepayments		75,254	52,694
Property, plant and equipment	4.1.3	1,767,653	2,368,306
Intangible assets	4.2	15,475	42,003
Total non-financial assets		1,858,382	2,463,003
Total assets		8,173,551	8,156,284
Liabilities			
Payables	5.2	261,686	306,083
Borrowings	6.1	1,204,852	1,562,948
Employee related provisions	3.1.2	1,021,628	1,102,385
Other provisions	5.3	528,500	468,442
Total liabilities		3,016,666	3,439,858
Net assets		5,156,885	4,716,426
Equity			
Accumulated surplus		1,366,034	925,575
Contributed capital		3,790,851	3,790,851
Net worth		5,156,885	4,716,426

The above balance sheet should be read in conjunction with the notes to the financial statements.

Cash flow statement

For the financial year ended 30 June 2025

			(\$)
	Note	2025	2024
Cash flows from operating activities			
Receipts			
Receipts from government		7,461,859	7,033,371
Total receipts		7,461,859	7,033,371
Payments			
Payments to suppliers and employees		(7,053,312)	(6,602,160)
Interest and other costs of finance paid	6.1.2	(74,563)	(109,501)
Total payments		(7,127,875)	(6,711,661)
Net cash flows from/(used in) operating activities		333,984	321,710
Cash flows from investing activities			
Purchases of non-financial assets		(73,083)	(280,095)
Net cash flows from/(used in) investing activities		(73,083)	(280,095)
Cash flows from financing activities			
Repayment of principal portion of lease liabilities ^(a)	6.1.3	(361,918)	(384,083)
Net cash flows from/(used in) financing activities		(361,918)	(384,083)
Net increase/(decrease) in cash and cash equivalents		(101,017)	(342,468)
Cash and cash equivalents at beginning of financial year		565,388	907,856
Cash and cash equivalents at end of financial year		464,371	565,388

The accompanying notes form part of these financial statements.

Notes:

- (a) Integrity Oversight Victoria has recognised cash payments for the principal portion of lease payments as financing activities; cash payments for the interest portion as operating activities consistent with the presentation of interest payments and short-term lease payments for leases and low-value assets as operating activities.

Statement of changes in equity

For the financial year ended 30 June 2025

				(\$)
	Note	Contributed capital	Accumulated surplus	Total
Balance at 1 July 2023		3,790,851	763,595	4,554,447
Net result for year		-	161,980	161,980
Balance at 30 June 2024		3,790,851	925,575	4,716,426
Balance at 1 July 2024		3,790,851	925,575	4,716,426
Net result for year		-	440,459	440,459
Balance at 30 June 2025		3,790,851	1,366,034	5,156,885

The above statement of changes in equity should be read in conjunction with notes to the financial statements.

1. About this report

Integrity Oversight Victoria is a body corporate established under Section 8 of the *Integrity Oversight Victoria Act 2011* (the Act). Integrity Oversight Victoria's objectives, functions, powers, and duties are set out in sections 5, 11 and numerous other provisions of the Act. Since 1 July 2020 (in accordance with sections 90A to 90D of the Act), Integrity Oversight Victoria is legislatively required to be budget independent and is now funded directly through parliamentary appropriations.

On 10 February 2025, the former Victorian Inspectorate was renamed to Integrity Oversight Victoria following proclamation of the *Justice Legislation Amendment (Integrity, Defamation and Other Matters) Act 2024*. The name change does not affect the entity's legal status, operations, or financial position. All rights, obligations, and contracts previously held under the Victorian Inspectorate continue under Integrity Oversight Victoria. These financial statements are presented under the new name in accordance with the *Financial Management Act 1994* and Australian Accounting Standards.

The address of Integrity Oversight Victoria is

Integrity Oversight Victoria
Level 8
565 Bourke Street
Melbourne VIC 3000

A description of the nature of the principal services of Integrity Oversight Victoria is included in the **"Report of Operations"** of the Annual Report which does not form part of these financial statements.

Basis of preparation

These financial statements are Tier 2 general purpose financial statements prepared in accordance with AASB 1060 *General Purpose Financial Statements – Simplified Disclosures for Not-for-Profit Tier 2 Entities* (AASB 1060) and Financial Reporting Direction 101 Application of Tiers of Australian Accounting Standards (FRD 101).

Integrity Oversight Victoria is a Tier 2 entity in accordance with FRD 101. These financial statements are the first general purpose financial statements prepared in accordance with Australian Accounting Standards – Simplified Disclosures. Integrity Oversight Victoria's prior year financial statements were general purpose financial statements prepared in accordance with Australian Accounting Standards (Tier 1). As Integrity Oversight Victoria is not a 'significant entity' as defined in FRD 101, it was required to change from Tier 1 to Tier 2 reporting effective from 1 July 2024.

These financial statements are in Australian dollars and the historical cost convention is used unless a different measurement basis is specifically disclosed in the notes to the financial statements.

The accrual basis of accounting has been applied in preparing these financial statements whereby assets, liabilities, equity, income, and expenses are recognised in the reporting period to which they relate, regardless of when cash is received or paid.

Consistent with the requirements of AASB 1004 *Contributions*, contributions by owners (that is, contributed capital and its repayment) are treated as equity transactions and, therefore, do not form part of the income and expenses of Integrity Oversight Victoria.

Judgements, estimates, and assumptions are required to be made about the carrying values of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on professional judgements derived from historical experience and various other factors that are believed to be reasonable under the circumstances. Actual results may differ from these estimates.

Revisions to accounting estimates when applicable are recognised in the period in which the estimate is revised and also in future periods that are affected by the revision.

These financial statements cover Integrity Oversight Victoria as an individual reporting entity and include all the controlled activities of Integrity Oversight Victoria.

Compliance information

These general-purpose financial statements have been prepared on a going concern basis in accordance with the *Financial Management Act 1994* and applicable Australian Accounting Standards (AASs) including Interpretations issued by the Australian Accounting Standards Board (AASB).

Where appropriate, those Australian Accounting Standards' paragraphs applicable to not-for-profit entities have been applied. Accounting policies selected and applied in these financial statements ensure that the resulting financial information satisfies the concepts of relevance and reliability, thereby ensuring that the substance of the underlying transactions or other events is reported.

Other accounting policies

Material and other accounting policies that summarise the recognition and measurement basis used and are relevant to an understanding of the financial statements are provided throughout the notes to the financial statements.

2. Funding delivery of services

Introduction

Integrity Oversight Victoria is predominantly funded by accrual based Parliamentary appropriations for the provision of outputs.

2.1 Income that funds the delivery of our services

			(\$)
	Notes	2025	2024
Income from transactions			
Output appropriation	2.1.1	8,184,764	7,840,468
Total income		8,184,764	7,840,468

Appropriations

Once annual parliamentary appropriations are approved by the Treasurer, they become controlled by Integrity Oversight Victoria and are recognised as income when applied for the purposes defined under the legislation governing the use of appropriations.

2.1.1 Summary of compliance with annual parliamentary appropriations

							(\$)
Appropriations Act		Financial Management Act		Total parliamentary authority	Appropriations applied	Variance ⁽ⁱⁱ⁾	
Annual appropriation	Advance from Treasurer	Section 30	Section 32 ⁽ⁱ⁾				
2025							
Controlled							
Provision of outputs	8,449,300	209,000	-	-	8,658,300	8,184,764	473,536
Additions to net asset base	-	-	-	-	-	-	-
Total	8,449,300		-	-	8,658,300	8,184,764	473,536
2024							
Controlled							
Provision of outputs	8,187,854	-	-	-	8,187,854	7,840,468	347,386
Additions to net asset base	-	-	-	300,000	300,000	-	300,000
Total	8,187,854		-	300,000	8,487,854	7,840,468	647,386

Notes:

(i) Section 32 constitutes the approved carryover of unapplied appropriations from the prior year to be applied against Additions to Net Asset Base in the current year.

(ii) Variances in output appropriations relate to the underspend in depreciation, which cannot be repurposed and is required to be returned into the consolidated fund. Variances in the usage of additions to net assets is due to availability of depreciation equivalent funding as a source to meet capital spend requirements.

3. Cost of delivering services

Introduction

This section provides an account of the expenses incurred by Integrity Oversight Victoria in delivering its services. The funds that enable the provision of the services were disclosed in Note 2.

3.1 Expenses incurred in the delivery of services

			(\$)
	Notes	2025	2024
Employee benefit expenses	3.1.1	5,402,576	4,805,839
Other operating expenses	3.2	1,563,079	1,956,978
		6,965,655	6,762,817

3.1.1 Employee expenses in the comprehensive operating statement

			(\$)
	Notes	2025	2024
Salary and wages, annual leave and long service leave		4,953,988	4,438,803
Defined contribution superannuation expense		448,588	367,036
Total employee expenses		5,402,576	4,805,839

Employee benefit expense includes all costs related to employment including wages and salaries, fringe benefits tax, leave entitlements, termination payments and WorkCover premiums.

The amount recognised in the comprehensive operating statement in relation to superannuation is employer contributions for members of both defined benefit and defined contribution superannuation plans that are paid or payable during the reporting period. Integrity Oversight Victoria does not recognise any defined benefit liabilities because it has no legal or constructive obligation to pay future benefits relating to its employees. Instead, the Department of Treasury and Finance (DTF) discloses in its annual financial statements the net defined benefit cost related to the members of these plans as an administered liability (on behalf of the State as the sponsoring employer).

3.1.2 Employee related provisions

Provision is made for benefits accruing to employees in respect of annual leave and long service leave for services rendered to the reporting date and recorded as an expense during the period the services are delivered.

			(\$)
		2025	2024
Current provisions			
Annual leave		387,036	512,167
Long service leave		533,668	372,780
Total current provisions		920,704	884,947
Non-current provisions			
Long service leave	5.1	100,924	217,438
Total non-current provisions		100,924	217,438
Total provisions for employee benefits		1,021,628	1,102,385

Current provisions

The annual leave liability is classified as a current liability as Integrity Oversight Victoria does not have an unconditional right to defer settlement of the liability for at least 12 months after the end of the reporting period.

Unconditional long service leave is disclosed as a current liability; even where Integrity Oversight Victoria does not expect to settle the liability within 12 months because it will not have the unconditional right to defer the settlement of the entitlement should an employee take leave within 12 months.

No provision has been made for sick leave as all sick leave is non-vesting and it is not considered probable that the average sick leave taken in the future will be greater than the benefits accrued in the future. As sick leave is non-vesting, an expense is recognised in the Comprehensive Operating Statement as it is taken.

Employment on-costs such as payroll tax, workers compensation and superannuation are included as a component of the provision for employee related expenses.

Non-current provisions

Conditional long service leave is disclosed as a non-current liability. There is a conditional right to defer the settlement of the entitlement until the employee has completed the requisite years of service. This non-current long service leave is measured at present value.

Any gain or loss following revaluation of the present value of non-current long service leave liability is recognised as a transaction, except to the extent that a gain or loss arises due to changes in bond interest rates for which it is then recognised as an 'other economic flow' in the net result.

3.2 Other operating expenses

	(\$)	
	2025	2024
Purchase of services and supplies	1,128,742	1,150,698
Low-value lease expenses	34,500	37,665
Information technology costs	323,205	424,224
Occupancy costs	76,632	344,391
Total expenses	1,563,079	1,956,978

Other operating expenses generally represent the day-to-day running costs incurred in delivering services of Integrity Oversight Victoria and are recognised as an expense in the reporting period in which they are incurred.

All leases (except below) are accounted for under AASB 16 Leases in Integrity Oversight Victoria's balance sheet.

The following lease payments are recognised on a straight-line basis:

- Short-term leases – leases with a term less than 12 months; or
- Low value leases – leases with the underlying asset's fair value (when new, regardless of the age of the asset being leased) is no more than \$10 000.

There are no short-term leases for the financial year.

4. Key assets available to support delivery of our services

Introduction

Integrity Oversight Victoria controls assets that are utilised in fulfilling its objectives and conducting its activities. They represent the resources that have been entrusted to Integrity Oversight Victoria to be utilised for delivery of these services.

4.1.1 Property, plant and equipment

(\$)

	Gross carrying amount		Accumulated depreciation		Net carrying amount	
	2025	2024	2025	2024	2025	2024
Right of use buildings	1,967,274	1,967,274	(885,274)	(491,819)	1,082,000	1,475,455
Leasehold improvements	598,764	598,764	(412,317)	(328,447)	186,447	270,317
Office and computer equipment at fair value	917,742	844,658	(418,535)	(222,124)	499,207	622,534
Total	3,483,780	3,410,696	(1,716,126)	(1,042,390)	1,767,653	2,368,306

Initial recognition: Items of property, plant and equipment are measured initially at cost. Where an asset is acquired for no or nominal cost, the cost is its fair value at the date of acquisition.

The cost of leasehold improvements is capitalised as an asset and depreciated over the remaining term of the lease or the estimated useful life of the improvements, whichever is the shorter.

The cost of the office furniture and equipment is the purchase price and any other additional cost incurred to bring the asset to the place and condition it is available for use.

Subsequent measurement: Property, plant and equipment are subsequently measured at fair value less accumulated depreciation and impairment. Fair value is determined with regard to the asset's highest and best use (considering legal or physical restrictions imposed on the asset, public announcements or commitments made in relation to the intended use of the asset).

Right-of-use asset – Initial recognition

Integrity Oversight Victoria recognises a right-of-use asset and a lease liability at the lease commencement date. The right-of-use asset is initially measured at cost which comprises the initial amount of the lease liability adjusted for:

- any lease payments made at or before the commencement date less any lease incentive received; plus
- any initial direct costs incurred; and
- an estimate of costs to dismantle and remove the underlying asset or to restore the underlying asset or the site on which it is located.

Right-of-use asset – Subsequent measurement

Integrity Oversight Victoria depreciates the right-of-use assets on a straight-line basis from the lease commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the lease term.

The right-of-use assets are also subject to revaluation.

In addition, the right-of-use asset is periodically reduced by impairment losses, if any and adjusted for certain remeasurements of the lease liability.

Impairment: Property, plant, and equipment, is tested for impairment whenever there is an indication that an asset may be impaired.

The assets concerned are tested as to whether their carrying value exceeds their recoverable amount. Where an asset's carrying value exceeds its recoverable amount, the difference is considered to be an impairment and is written off as an 'other economic flow', except to the extent that it can be offset to an asset revaluation surplus amount applicable to that class of asset.

The recoverable amount for most assets is measured at the higher of current replacement cost and fair value less costs to sell. Recoverable amount for assets held primarily to generate net cash inflows is measured at the higher of the present value of future cash flows expected to be obtained from the asset and fair value less costs to sell.

4.1.2 Depreciation and amortisation

All buildings, plant and equipment and other non-financial physical assets that have finite useful lives, are depreciated. Depreciation is generally calculated on a straight-line basis, at rates that allocate the asset's value, less any estimated residual value, over its estimated useful life. Typical estimated useful lives for the different asset classes for current and prior years are included in the table below:

Asset	Useful life (years)
Buildings (leased)	4 years
Leasehold improvements	4 years
Office and computer equipment	3 to 5 years
Software	3 to 5 years

The estimated useful lives, residual values and depreciation method are reviewed at the end of each annual reporting period, and adjustments made where appropriate.

Right-of-use assets are generally depreciated over the shorter of the asset's useful life and the lease term. Where Integrity Oversight Victoria obtains ownership of the underlying leased asset or if the cost of the right-of-use asset reflects that the entity will exercise a purchase option, the entity depreciates the right-of-use asset over its useful life. Leasehold improvements are depreciated over the shorter of the lease term and their useful lives.

4.1.3 Reconciliation of movements in carrying amounts of property, plant and equipment

						(\$)
	Right of use buildings	Leasehold improvements	Buildings' Works In Progress	Office and computer equipment	Plant and equipment works in progress	Total
	\$	\$	\$	\$	\$	\$
2025						
Carrying amount at the start of the year	1,475,455	270,317	-	622,534	-	2,368,306
Additions	-	-	-	73,082	-	73,082
Depreciation expenses	(393,455)	(83,870)	-	(196,410)	-	(673,735)
Carrying amount at the end of the year	1,082,000	186,447	-	499,206	-	1,767,653
2024						
Carrying amount at the start of the year	-	139,440	291,462	220,749	269,170	920,821
Additions	1,967,274	6,618	91,686	5,216	176,575	2,247,369
Transfers to/from Asset Classes	-	287,158	(383,148)	541,735	(445,745)	-
Depreciation expenses	(491,819)	(162,899)	-	(145,166)	-	(799,884)
Carrying amount at the end of the year	1,475,455	270,317	-	622,534	-	2,368,306

4.2 Intangible assets

	(\$)	
	2025	2024
Gross Carrying Amount		
Opening balance	88,429	88,428
Additions	-	-
Closing balance	88,429	88,428
Accumulated amortisation and impairment		
Opening balance	46,425	19,895
Amortisation of intangible assets	26,529	26,530
Closing balance	72,954	46,425
Net book value at end of financial year	15,475	42,003

Purchased intangible assets are initially recognised at cost. Subsequently, intangible assets with finite useful lives are carried at cost less accumulated amortisation and accumulated impairment losses. Depreciation and amortisation begin when the assets are available for use - that is, when they are in the location and condition necessary for them to be capable of operating in the manner intended by management.

Internally generated intangible assets arising from development (or from the development phase of an internal project) are recognised if, and only if, all of the following are demonstrated:

- (a) there is an intention to complete the intangible asset for use or sale
- (b) there is an ability to use or sell the intangible asset
- (c) the intangible asset will generate probable future economic benefits
- (d) there is availability of adequate technical, financial, and other resources to complete the development and to use or sell the intangible asset
- (e) there is an ability to measure reliably the expenditure attributable to the intangible asset during its development.

Internally generated intangible assets with finite useful lives, are amortised on a straight-line basis over their useful lives.

Intangible assets with indefinite useful lives (and intangible assets not yet available for use) are tested for impairment annually or whenever there is an indication that the asset may be impaired.

Impairment

Intangible assets not yet available for use are tested annually for impairment and whenever there is an indication that the asset may be impaired. Intangible assets with finite useful lives are tested for impairment whenever an indication of impairment is identified.

5. Other assets and liabilities

Introduction

This section sets out those assets and liabilities that arose from Integrity Oversight Victoria's delivery of services.

5.1 Receivables

		(\$)
	2025	2024
Statutory		
Amounts owing from Victorian Government ^(a)	5,850,798	5,127,893
GST input tax credit recoverable	-	-
Total receivables	5,850,798	5,127,893
Represented by		
Current receivables	5,749,874	4,910,455
Non-current receivables 3.1.2	100,924	217,438

Notes:

(a) Represents the balance of available appropriations relating to providing outputs as well as funds available for capital purchases, for which payments had not been disbursed at the balance date, and accordingly had not been drawn from the Consolidated Fund.

Statutory receivables do not arise from contracts and are initially recognised at fair value plus any directly attributable transaction costs. Subsequent to initial measurement they are measured at amortised cost using the effective interest method, less any impairment and are not classified as financial instruments.

5.2 Payables

	(\$)	
	2025	2024
Contractual		
Creditors and accruals	260,017	304,237
Statutory		
Amounts payable to government agencies	1,669	1,846
Total statutory payables	261,686	306,083
Total payables		
Represented by		
Current payables	261,686	306,083

Contractual payables are classified as financial instruments and measured at amortised cost. Creditors and accruals represent liabilities for goods and services provided to Integrity Oversight Victoria prior to the end of the financial year that are unpaid.

Statutory payables are recognised and measured similarly to contractual payables but are not classified as financial instruments and not included in the category of financial liabilities at amortised cost because they do not arise from a contract.

5.3 Other provisions

	(\$)	
	2025	2024
Make-good provision	500,900	442,442
Other	27,600	26,000
Total other provisions	528,500	468,442

Other provisions are recognised when Integrity Oversight Victoria has a present obligation, the future sacrifice of economic benefits is probable and the amount of the provision can be measured reliably. The amount recognised as a provision is the best estimate of the consideration required to settle the present obligation at reporting date, taking into account the risks and uncertainties surrounding the obligation.

The make-good provision is recognised in accordance with the lease agreements. Integrity Oversight Victoria must restore the premises to its original condition at the end of the lease term.

Reconciliation of movements in other provisions

	(\$)		
	Make-good	Other	Total 2025
Opening balance	442,442	26,000	468,442
Additions	58,458	1,600	60,058
Closing balance	500,900	27,600	528,500

The make-good provision is recognised in accordance with the lease agreement over the plants. IOV must remove any leasehold improvements from the leased plants and restore the premises to its original condition at the end of the lease term.

6. Financing operations

Introduction

This section provides information on the sources of finance available to Integrity Oversight Victoria during its operations, along with interest expenses (the cost of finance lease liabilities) and other information related to financing activities of Integrity Oversight Victoria.

This section also includes disclosures on commitments for expenditure.

6.1 Borrowings

Borrowings refer to interest bearing liabilities, which for Integrity Oversight Victoria consist only of lease liabilities. Borrowings are measured at amortised cost.

	(\$)	
	2025	2024
Current Lease liabilities	399,425	358,096
Non-current Lease liabilities	805,428	1,204,852
Total borrowings	1,204,852	1,562,948

Leases are recognised as assets and liabilities of Integrity Oversight Victoria at amounts equal to the fair value of the lease property or, if lower, at the present value of the minimum lease payments, each determined at the inception of the lease. The leased asset is depreciated over the shorter of the estimated useful life of the asset or the term of the lease.

Minimum lease payments are apportioned between reduction of the lease liability and periodic finance charges which are calculated using the interest rate implicit in the lease and charged directly to the comprehensive operating statement.

Leases are secured borrowings as the right to the leased assets will revert to the lessor in the event of a default.

There were no defaults and breaches of any lease conditions during the current or previous financial years.

Integrity Oversight Victoria's leasing activities

Integrity Oversight Victoria leases various IT equipment. The lease contracts are typically made for a fixed period of 1-5 years with an option to renew the lease after that date.

Leases of IT equipment with shorter contract terms of up to 12 months or low-value items of \$10k or less are not recognised as right-of-use assets and lease liabilities. These lease expenses are recognised when they become payable by Integrity Oversight Victoria.

6.1.1 Right-of-use assets

Right-of-use assets are presented in note 4.1.

6.1.2 Amounts recognised in the comprehensive operating statement

The following are recognised in the comprehensive operating statement relating to lease;

	(\$)	
	2025	2024
Interest expense on lease liabilities	74,563	109,501
Expenses relating to leases of low-value assets	34,500	37,665
Total	109,063	147,166

6.1.3 Amounts recognised in the cash flow statement

The following lease amounts are recognised in the cash flow statement relating to lease;

	(\$)	
	2025	2024
Lease liability payments	361,918	384,083
Total cash outflow for leases	361,918	384,083

Contracts containing leases

For any new contracts entered into Integrity Oversight Victoria considers whether the contract is or contains a lease. A lease is defined as 'a contract, or part of a contract, that conveys the right to use an asset (the underlying asset) for a period of time in exchange for consideration'. To apply this definition Integrity Oversight Victoria assesses whether the contract meets three key evaluations:

- Whether the contract contains an identified asset, which is either explicitly identified in the contract or implicitly specified by being identified at the time the asset is made available to Integrity Oversight Victoria and for which the supplier does not have substantive substitution rights; and
- Whether Integrity Oversight Victoria has the right to obtain substantially all of the economic benefits from use of the identified asset throughout the period of use, considering its rights within the defined scope of the contract and Integrity Oversight Victoria has the right to direct the use of the identified asset throughout the
- Whether Integrity Oversight Victoria has the right to take decisions in respect of 'how and for what purpose' the asset is used throughout the period of use.

Separation of lease and non-lease components

At inception or on reassessment of a contract that contains a lease component, the lessee is required to separate out and account separately for non-lease components within a lease contract and exclude these amounts when determining the lease liability and right-of-use asset amounts.

Recognition and measurement of leases

Lease Liability - Initial measurement

The lease liability is initially measured at the present value of the unpaid lease payments at the commencement date, discounted using the interest rate implicit in the lease if that rate is readily determinable or Integrity Oversight Victoria's incremental borrowing rate.

Lease payments included in the measurement of the lease liability comprise of the following:

- fixed payments (including in-substance fixed payments) less any lease incentive receivable;
- variable payments based on an index or rate, initially measured using the index or rate as at the
- amounts expected to be payable under a residual value guarantee; and
- payments arising from purchase and termination options that are reasonably certain to be exercised.

Lease Liability - Subsequent measurement

Subsequent to initial measurement, the liability will be reduced for payments made and increased for interest. It is remeasured to reflect any reassessment or modification, or if there are changes in-substance fixed payments.

When the lease liability is remeasured, the corresponding adjustment is reflected in the right-of-use asset, or profit and loss if the right-of-use asset is already reduced to zero.

Short-term leases and leases of low-value assets

Integrity Oversight Victoria has elected to account for short-term leases and leases of low-value assets using the practical expedients. Instead of recognising a right-of-use asset and lease liability, the payments in relation to these are recognised as an expense in profit or loss when the expenditure is incurred.

Presentation of right-of-use assets and lease liabilities

Integrity Oversight Victoria presents right-of-use assets as 'property plant and equipment' unless they meet the definition of investment property, in which case they are disclosed as 'investment property' in the balance sheet. Lease liabilities are presented as 'Borrowings' in the balance sheet.

6.1.4 Future lease payments

	Minimum future lease payments	
	(a)	
	2025	2024
Not longer than 1 year	432,354	411,058
Longer than 1 year but not longer than 5 years	807,912	1,240,266
Longer than 5 years	-	-
Minimum future lease payments	1,240,266	1,651,324
Less future finance charges	215,403	251,071
Present value of minimum lease payments	1,024,863	1,400,253

Note:

(a) Minimum future lease payments include the aggregate of all base payments and any guaranteed residual

6.2 Commitments for expenditure

Commitments for future expenditure include operating commitments arising from contracts. These commitments are recorded below at their nominal value and inclusive of GST. Where it is considered appropriate and provides additional relevant information to users, the net present values of significant individual projects are stated. These future expenditures cease to be disclosed as commitments once the related liabilities are recognised in the balance sheet. There are no capital commitments to disclose (2024:

	(\$)	
	2025	2024
Other commitments		
Commitments for minimum payments in relation to non-cancellable expenses, not recognised as liabilities, are payable as follows:		
Within one year	278,060	548,786
Later than one year but not later than five years	108,323	205,215
More than five years	-	-
Total commitments (inclusive of GST)	386,383	754,001
Less GST recoverable	(35,126)	(68,546)
Total commitments (exclusive of GST)	351,257	685,455

7. Risks, contingencies and valuation judgements

Introduction

Integrity Oversight Victoria is exposed to risk from its activities and outside factors. In addition, it is often necessary to make judgements and estimates associated with recognition and measurement of items in the financial statements.

This section sets out financial instrument specific information (including exposures to financial risks) as well as those items that are contingent in nature or require a higher level of judgement to be applied, which for Integrity Oversight Victoria relates mainly to fair value determination.

7.1 Financial instruments specific disclosures

Financial instruments arise out of contractual agreements between entities that give rise to a financial asset of one entity and a financial liability or equity instrument of another entity. Due to the nature of Integrity Oversight Victoria's activities, certain financial assets and financial liabilities arise under statute rather than a contract. Such financial assets and financial liabilities do not meet the definition of financial instruments in AASB 132 Financial Instruments: Presentation. For example, statutory receivables do not meet the definition of financial instruments as they do not arise under contract. Other than the statutory receivables Integrity Oversight Victoria does not hold financial assets. Integrity Oversight Victoria's statutory receivables are disclosed in note 5.1.

Categories of financial liabilities

Financial liabilities at amortised cost

Financial instrument liabilities are initially recognised on the date they are originated. They are initially measured at fair value less any directly attributable transaction costs.

Financial instrument liabilities measured at amortised cost include all of Integrity Oversight Victoria's contractual payables and borrowings.

Derecognition of financial liabilities

A financial liability is derecognised when the obligation under the liability is discharged, cancelled or expires.

7.1.1 Financial Instruments - Net gain/(loss) on financial instruments by category

		(\$)
2025	Carrying amount	Total interest (expense)
Financial liabilities at amortised cost		
Payables	260,017	-
Borrowings	1,204,852	(74,563)
Total financial liabilities	1,464,869	(74,563)

		(\$)
2024	Carrying amount	Total interest (expense)
Financial liabilities at amortised cost		
Payables	304,237	-
Borrowings	1,562,948	(109,501)
Total financial liabilities	1,867,185	(109,501)

Note: Receivables and payables disclosed exclude statutory receivables and payables (i.e. amounts receivable from / payable to government agencies and GST recoverable).

7.2 Contingent assets and contingent liabilities

Contingent assets and contingent liabilities are not recognised in the balance sheet, but are disclosed in this note and, if quantifiable, are measured at nominal value.

Contingent assets and contingent liabilities are presented inclusive of GST.

7.2.1 Contingent assets

Contingent assets are possible assets that arise from past events, whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the entity.

Contingent assets are classified as either quantifiable, where the potential economic benefit is known, or non-quantifiable.

There were no contingent assets relating to Integrity Oversight Victoria as at 30 June 2025 (30 June 2024: Nil)

7.2.2 Contingent liabilities

Contingent liabilities are:

- possible obligations that arise from past events, whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the entity; or
- present obligations that arise from past events but are not recognised because:
 - it is not probable that an outflow of resources embodying economic benefits will be required to settle the obligations;
 - or the amount of the obligations cannot be measured with sufficient reliability.

Contingent liabilities are also classified as either quantifiable or non-quantifiable.

There were no contingent liabilities relating to Integrity Oversight Victoria as at 30 June 2025 (30 June 2024: Nil).

7.3 Fair value determination

Integrity Oversight Victoria determines the policies and procedures for fair value measurements such as property, plant, and equipment in accordance with the requirements of AASB 13 Fair Value Measurement and the relevant Financial Reporting Directions issued by DTF.

In determining fair values, a number of inputs are used. To increase consistency and comparability in the financial statements, these inputs are categorised into three levels, also known as the fair value hierarchy:

- Level 1 - quoted (unadjusted) market prices in active markets for identical assets;
- Level 2 - valuation techniques for which the lowest level input that is significant to the fair value measurement is directly or indirectly observable; and
- Level 3 - valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable. Changes in unobservable values will result in changes to the asset carrying values.

Integrity Oversight Victoria currently holds financial instruments that are recorded in the financial statements where the carrying amounts approximate to fair value, due to their short-term nature or with the expectation that they will be paid in full by the end of the subsequent reporting period. These financial instruments are disclosed in note 7.1.

Integrity Oversight Victoria's property, plant and equipment and intangible assets are held at fair value and classified as level 3. The fair value is determined using the current replacement cost method. There were no changes in valuation techniques throughout the period to 30 June 2025. For all assets measured at fair value, the current use is considered the highest and best use. Significant unobservable inputs associated with these assets are cost and useful life which have remained unchanged for the financial period.

8. Other disclosures

Introduction

This section includes additional material disclosures required by accounting standards or otherwise for the understanding of this financial report.

8.1 Responsible persons

In accordance with the Ministerial Directions issued by the Minister for Finance under the *Financial Management Act 1994*, the following disclosures are made regarding responsible persons for the reporting period.

Names

The people who held the positions of Ministers and Accountable Officers in Integrity Oversight Victoria (from 1 July 2024 to 30 June 2025 unless otherwise stated) were as follows:

Attorney-General	The Hon. Jaclyn Symes, MP	1 July 2024	to	18 December 2024
	The Hon. Sonya Kilkeny, MP	19 December 2024	to	30 June 2025
Acting Attorney-General	The Hon. Enver Erdogan, MP	1 November 2024	to	5 November 2024
Accountable Officer	Eamonn Moran PSM KC	1 July 2024	to	12 January 2025
	Louise Macleod	21 May 2025	to	30 June 2025
Acting Accountable Officer	Catherine Cato	13 January 2025	to	20 May 2025

Remuneration

Remuneration received or receivable by the Accountable Officer, in connection with the management of Integrity Oversight Victoria during the reporting period was in the range of \$710,000-\$719,999. In 2023-24 the range was \$501,000-\$509,999. The increase in 2024-25 is due to employee entitlements paid out on resignation.

Amounts relating to the Ministers are reported in the financial statements of the State's Annual Financial Report.

8.2 Remuneration of executives

The number of executive officers, other than Ministers and the Accountable Officer, and their total remuneration during the reporting period are shown in the table below. Total annualised employee equivalents provides a measure of full time equivalent executive officers over the reporting period.

Remuneration comprises employee benefits in all forms of consideration paid, payable or provided by the entity, or on behalf of the entity, in exchange for services rendered, and is disclosed in the following

- short-term employee expenses include amounts such as wages, salaries, annual leave or sick leave that are usually paid or payable on a regular basis, as well as non-monetary benefits such as allowances and free or subsidised goods or services;
- post-employment benefits include employer contributions for members of both defined benefit and defined contribution superannuation plans;
- other long-term benefits include long service leave and other long term benefits.
- termination benefits include termination of employment payments, such as severance packages.

	(\$)	
Remuneration of executive officers	2025	2024
Total remuneration	779,548	446,288
Total number of executives	2	1
Total annualised employee equivalents ^(a)	2	1

Notes:

- ^(a) Annualised employee equivalent is based on paid working hours of 38 ordinary hours per week over the 52 weeks for the reporting period.

8.3 Related parties

Integrity Oversight Victoria is a wholly owned and controlled entity of the State of Victoria. Related parties of Integrity Oversight Victoria include:

- all key management personnel and their close family members;
- all cabinet ministers and their close family members; and
- all departments and public sector entities that are controlled and consolidated into the whole of state consolidated financial statements.

All related party transactions have been entered into on an arm's length basis.

Key management personnel (KMP)

The Key Management Personnel (KMP) of Integrity Oversight Victoria include

Accountable Officer	Eamonn Moran PSM KC Louise Macleod
Acting Accountable Officer, Chief Executive Officer and General Counsel	Catherine Cato
Director Integrity Operations and Policy	Alison Lister ⁽²⁾

The compensation detailed below excludes the salaries and benefits that the Portfolio Minister receives. The Ministers' remuneration and allowances are set by the *Parliamentary Salaries and Superannuation Act 1968* and have been disclosed within the 2024-25 Financial Report for the State of Victoria.

	(\$)	
Compensation of KMPs ⁽¹⁾	2025	2024 ⁽³⁾
Total	1,307,535	971,736

Notes:

1. Some KMPs are also reported in the disclosure of remuneration of executive officers (Note 8.2)
2. Alison Lister was not included in KMPs last year as this is a new position
3. 2024 result does not include the compensation of Alison Lister

Transactions and balances with KMPs and other related parties

Given the breadth and depth of State government activities, related parties transact with the Victorian public sector in a manner consistent with other members of the public e.g. stamp duty and other government fees and charges. Further employment of processes within the Victorian public sector occur on terms and conditions consistent with the *Public Administration Act 2004* and Codes of Conduct and Standards issued by the Victorian Public Sector Commission. Procurement processes occur on terms and conditions consistent with the Victorian Government Purchasing Board requirements.

Outside of normal citizen type transactions with Integrity Oversight Victoria, there were no related party transactions that involved key management personnel, their close family members and their personal business interests. No provision has been required, nor any expense recognised, for impairment of receivables from related parties.

8.4 Remuneration of auditors

	(\$)	
	2025	2024
Audit fees paid or payable to the Victorian Auditor-General's Office		
Audit of the annual financial statements	27,600	26,000
Total	27,600	26,000

8.5 Subsequent events

No matters or circumstances have arisen since the end of the financial year which significantly affected or may significantly affect the operations of Integrity Oversight Victoria, the results of those operations, or the state of affairs of Integrity Oversight Victoria in future financial years.

Procurement

Major contracts

Nil

Social procurement framework

We consider social and sustainable procurement objectives wherever possible in accordance with the Victorian government social procurement framework and within the constraints of our limited purchasing activities. In 2024–25 we included social and/or sustainable procurement objectives as weighted selection criteria for all select request for quote/request for proposal activities. We also continued our engagement of Just Gold Digital Agency, as part of our creative services panel. Just Gold Digital Agency is a management consultancy and creative agency that is also an accredited social enterprise and People and Planet First certified.

Consultancies over \$10,000

Nil

Consultancies under \$10,000

In 2024–25, one consultancy had total fees payable to the consultant under \$10,000. TrustyCyber is the expert cyber security consultancy used by Integrity Oversight Victoria to provide expert advice in relation to ICT projects.

Table 30: Details of consultancies under \$10,000, 2024–25

Consultant	Start date	End date	Total approved project fee (excl. GST)	Expenditure 2024–25 (excl. GST)	Future expenditure (excl. GST)
TrustyCyber	11/04/2025	10/4/2028	Up to \$60,000	\$4,875	\$55,125

ICT expenditure

For the 2024–25 reporting period, our total information and communication technology (ICT) expenditure was \$351,205. See Table 31 for details.

ICT expenditure refers to our costs in providing business-enabling ICT services within the current reporting period. It comprises:

- business as usual (BAU) ICT expenditure: expenditure extending or enhancing our current ICT capabilities
- non-business as usual (Non-BAU) ICT expenditure: all remaining ICT expenditure, primarily ongoing activities to operate and maintain the current ICT capability.

Table 31: ICT expenditure, 2024–25

All operational ICT expenditure	ICT expenditure related to projects to create or enhance ICT capabilities		
	Non-BAU ICT expenditure	Operational expenditure	Capital expenditure
\$351,205	\$14,394	–	\$14,394

Government advertising expenditure

Nil

Disclosure of emergency procurement

Nil

Appendix A

Bodies overseen by Integrity Oversight Victoria

1. Chief Examiner
2. Department of Energy, Environment and Climate Action
3. Environment Protection Authority Victoria
4. Game Management Authority
5. Independent Broad-based Anti-corruption Commission
6. Judicial Commission of Victoria
7. (Former) Office of the Special Investigator (Victoria)
8. Office of the Victorian Information Commissioner
9. Parliamentary Workplace Standards and Integrity Commission
10. Public Interest Monitor
11. Victorian Auditor-General's Office
12. Victorian Fisheries Authority
13. Victorian Ombudsman
14. Victoria Police
15. Wage Inspectorate Victoria

Appendix B

Acts relating to Integrity Oversight Victoria's work

Our jurisdictional remit and powers are established by the *Integrity Oversight Victoria Act 2011* and 19 other Acts of parliament.

We perform our duties, functions and powers under these Acts:

- *Crime (Controlled Operations) Act 2004* (Vic)
- *Fisheries Act 1995* (Vic)
- *Integrity Oversight Victoria Act 2011* (Vic)
- *Major Crime (Investigative Powers) Act 2004* (Vic)
- *Parliamentary Workplace Standards and Integrity Act 2024* (Vic)
- *Public Interest Disclosures Act 2012* (Vic)
- *Public Interest Monitor Act 2011* (Vic)
- *Surveillance Devices Act 1999* (Vic)
- *Telecommunications (Interception and Access) Act 1979* (Cth)
- *Telecommunications (Interception) (State Provisions) Act 1988* (Vic)
- *Terrorism (Community Protection) Act 2003* (Vic)
- *Wildlife Act 1975* (Vic)
- *Witness Protection Act 1991* (Vic)

These Acts set out further obligations of the agencies we oversight:

- *Audit Act 1994* (Vic)
- *Freedom of Information Act 1982* (Vic)
- *Independent Broad-based Anti-corruption Commission Act 2011* (Vic)
- *Judicial Commission of Victoria Act 2016* (Vic)
- *Ombudsman Act 1973* (Vic)
- *Privacy and Data Protection Act 2014* (Vic)
- *Wage Theft Act 2020* (Vic)

Appendix C

Summary and index of systemic improvements by agencies

No.	Improvement summary and agency	Improvement Type	Reference for further detail
1. Improvements to warrant processes under TIA Act			
	IBAC accepted 2 recommendations	IBAC & VicPol policy and procedure (P&P) changes to reduce the risk of breaching TIA Act	IBAC chapter
	VicPol agreed to process improvements		VicPol chapter
2. IBAC improvements to applying IBAC Act in complex areas			
	a. Embargoed reports to media	Practice change to reduce risk of breaching IBAC Act	IBAC chapter
	b. Approach to summoning electronic devices	Practice change to prevent breach of IBAC Act	
3. IBAC improvements to decision-making and communication, record keeping, natural justice process for reports, and public examination notifications to IOV following an investigation			
	a. Accepted private recommendation re training and record keeping	Training to support clear and transparent records of actions, communications & decisions.	IBAC chapter
	b. Implemented private recommendation re natural justice policy	P&P change to prevent non-compliance with IBAC Act and OHS Act.	
	c. Created template report for notifying IOV of public hearing	P&P change to prevent non-compliance with IBAC Act	
4. IBAC improvements to address non-compliant execution of covert search warrant			
	Accepted 2 recommendations in surveillance device inspection report ¹⁷	Ensure transparency and prevent non-compliance with warrant conditions	IBAC chapter

117 See Surveillance Devices Report No 1 for 2023–24.

No.	Improvement summary and agency	Improvement Type	Reference for further detail
5. Various agencies' improvements re exercise of coercive and covert powers			
IBAC improvements re exercise of coercive powers			IBAC chapter
	a. Changed variation process	Summons process	
	b. Consideration of framing	Summons	
VO improvements re exercise of coercive powers			VO chapter
	c. Explanation to IOV re summons	Informing IOV re summons	
	d. Explanation to IOV re confidentiality notice (CN)	Informing IOV re CN	
	e. More information to witnesses	Interviews – right to complain to IOV	
	f. Summons template amendment	Summons template	
	g. Informing witness re potentially invalid summons	Summons compliance	
	h. Updated staff training on interview techniques	Interviews – technique	
	i. Reconsidered restricted matters in CN	CN compliance	
	j. Review audio settings in interview room	Interviews	
OVIC improvement re exercise of coercive powers			OVIC chapter
	k. No 'group' compulsory interviews	Changed approach to interview structure	
Chief Examiner improvements re exercise of coercive powers			OCE chapter
	l. Process re service periods	P&P change to summons service process	
	m. Update summons process re identity checks	P&P change re decision to summons	
	n. Approach to dealing with questions or objections from legal representatives	Practice change to examination approach	
	o. Rights explanation for witnesses under 18 prior an examination	Script change to opening remarks	

No.	Improvement summary and agency	Improvement Type	Reference for further detail
IBAC improvement re warrants			
	p. Process improvements to identify warrant errors by Court	P&P re warrant review	IBAC chapter
Victoria Police improvements re exercise of intrusive, covert powers			
	q. New quality assurance checklists for controlled operation authorisations	P&P re Crimes (Controlled Operations) Act	Victoria Police chapter
	r. New errors/issues register for compliance disclosures	P&P re TIA Act and SD Act	
	s. New process for warrant reports	P&P re warrant reports & record keeping – TISP Act	
6. VO improvements to exercise of coercive powers arising from summons review			
	Summons training and response to potentially invalid summonses	Practice changes to address and prevent summons non-compliance	VO chapter
7. IBAC improvement to address allegations of detrimental action under the PID Act arising from complaint			
	Accepted private recommendation re detrimental action	Prevent non-compliance with PID Act and IBAC Act re detrimental action from PIDs	IBAC chapter
8. IBAC improvements relating to police oversight arising from complaint			
	Accepted private recommendation re review outcome to complainant	Specific action re handling of a police complaint	IBAC chapter
	Acknowledged consideration of police complainants as vulnerable	P&P change to prevent non-compliance in handling police complaints	

Appendix D

Summary of recommendations made by IOV in 2024-25

Agency	Recommendation	Response	Number accepted	Reference for further detail
IBAC	Two private recommendations regarding telecommunications interceptions warrant.	Accepted	2/2	IBAC chapter
IBAC	Two private recommendations to address systemic errors in summons approval process	Accepted	2/2	IBAC chapter
IBAC	Two public recommendations to address non-compliance with surveillance warrant conditions.	Accepted	2/2	IBAC chapter
VO	Three private recommendations to address systemic summons approval issue.	Accepted and acquitted	3/3	VO chapter
IBAC	Two private recommendations to address handling of police complaint.	Accepted	2/2	IBAC chapter
OCE	Two private recommendations regarding process for requiring things or documents from witnesses during an examination.	Awaiting response at 30 June 2025 as made 29 May 2025	0 of 2 to date	OCE chapter
Total			11/13 (85%)	

Appendix E

IOV jurisdiction and functions

						
Receive and assess complaints about its conduct and the conduct of its officers	Receive and assess complaints about some conduct of its officers	Receive and assess complaints about some conduct of the Chief Examiner or Examiners	Receive and assess complaints about its conduct and the conduct of its officers (until 2/8/24)	Receive and assess complaints about some conduct of its officers	Receive and assess complaints about some conduct of its officers	
Investigate conduct	Investigate conduct	Investigate conduct	Investigate conduct (until 2/8/25)	Investigate conduct	Investigate conduct	Investigate conduct
Monitor the exercise of coercive powers	Monitor the exercise of coercive powers	Monitor the exercise of coercive powers		Monitor the exercise of coercive powers	Monitor the exercise of coercive powers	Monitor the exercise of coercive powers
Assess the effectiveness and appropriateness of policies and procedures		Assess the effectiveness and appropriateness of policies and procedures				
Monitor compliance with the IBAC Act and other related laws	Monitor compliance with procedural fairness	Monitor compliance with Major Crime (IP) Act		Monitor compliance with procedural fairness	Monitor compliance with ss.30–37, 39, 43–46, 50(1) and 51 of the Audit Act	
Review PID procedures	Review PID procedures					
Oversee performance of its PID Act functions						
Receive and assess PIDS			Receive and assess PIDS (until 2/8/24)			
Investigate PICs			Investigate PICs (until 2/8/25)			
Monitor interaction between it and other integrity bodies						
Inspect its records on telephone interception, use of surveillance devices and controlled operations						

In addition to the key functions in this table, Integrity Oversight Victoria must consider whether any disclosure received by it relating to any public body or public officer is a public interest disclosure that must be notified to the appropriate entity.

 JUDICIAL COMMISSION OF VICTORIA	 VICTORIA POLICE	 PIM	 pwsic	 Game Management Authority	 Victorian Fisheries	 VICTORIA State Government	 EPA VICTORIA
			Receive and assess complaints about some conduct of its officers				
			Investigate conduct				
Monitor the exercise of coercive powers							
	Monitor compliance with Major Crime (IP) Act		Monitor the exercise of coercive powers				
Review PID procedures							
		Receive and assess PIDS					
		Investigate PICs					
			Monitor compliance with procedural fairness				
	Inspect its records on telecommunications interception, use of surveillance devices and controlled operations	Inspect records relating to order/warrant applications		Inspect its records on use of surveillance devices and controlled operations	Inspect its records on use of surveillance devices and controlled operations	Inspect its records on use of surveillance devices and controlled operations	Inspect its records on use of surveillance devices
	Inspect its records on use of counter-terrorism powers						

Shortened forms

AFP	Australian Federal Police
Audit Act	<i>Audit Act 1994</i>
BP3	Budget Paper No. 3: Service Delivery
CCP	Chief Commissioner of Police
CSCPPA	<i>Change or Suppression (Conversion) Practices Prohibition Act 2021</i>
DEECA	Department of Energy, Environment and Climate Action
DJCS	Department of Justice and Community Safety
DPP	Director of Public Prosecution
EPA	Environment Protection Authority Victoria
GN2	Guidance Note 2
Human Source Act	<i>Human Source Management Act 2023</i>
IBAC	Independent Broad-based Anti-corruption Commission
IBAC Act	<i>Independent Broad-based Anti-corruption Commission Act 2011</i>
ICAC Act	<i>Independent Commission Against Corruption Act 1988 (NSW)</i>
IOC	Integrity and Oversight Committee
IOV Act	<i>Integrity Oversight Victoria Act 2011</i>
JLA Bill	Justice Legislation Amendment (Integrity, Defamation and Other Matters) Bill 2024
MCIP Act	<i>Major Crime (Investigative Powers) Act 2004</i>
OCE	Office of Chief Examiner
OSI	Office of the Special Investigator (Victoria)
OVIC	Office of the Victorian Information Commissioner
PAEC	Public Accounts and Estimates Committee
PIC	Public interest complaint
PID	Public interest disclosure
PID Act	<i>Public Interest Disclosures Act 2012</i>
PIM	Public Interest Monitor
PWSIC	Parliamentary Workplace Standards and Integrity Commission
SI Act	<i>Special Investigator Act 2021</i>
SIR Act	<i>Special Investigator Repeal Act 2023</i>

VAGO	Victorian Auditor-General's Office
VCAT	Victorian Civil and Administrative Tribunal
VEOHRC	Victorian Equal Opportunity and Human Rights Commission
VI	Victorian Inspectorate
VI Act	<i>Victorian Inspectorate Act 2011</i>
VO	Victorian Ombudsman
VWA	Victorian Workcover Authority
WIV	Wage Inspectorate Victoria

Glossary

BP3 performance measures

The State Budget Paper 3: Service Delivery (BP3) provides an overview of the goods and services funded by the government and delivered by departments, and how these support the government's strategic objectives. It outlines the government's priorities for the services it provides and sets out the costs of the services for Victorians. BP3 performance measures are the indicators for whether we have met the objectives set out in Budget Paper 3.

Coercive powers

Coercive powers are powers used to compel persons to answer questions or produce documents or things, or to keep specific matters confidential. 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.

Coercive powers notification

When an integrity body that we oversee uses coercive powers they must give us certain information to enable us to assess how they used the powers. This is called a coercive powers notification.

Complaint

A complaint is made when a person contacts Integrity Oversight Victoria about an issue that is within our jurisdiction and the supporting information they provide makes clear their intention is to make a complaint.

A complaint may be defined as low, medium or high complexity. Low complexity complaints require limited interaction with the complainant and/or integrity body and limited document analysis. Medium complexity complaints are difficult to assess, requiring significant interaction with the complainant and/or integrity body. They may also raise legal issues. High complexity complaints require extensive interaction with the complainant and/or integrity body. They may require extensive document review and/or analysis and raise complex legal issues.

Confidentiality notice

A confidentiality notice is a legal document given by an integrity body to a person that prevents certain information from being shared with third parties. This power is exercised to protect the integrity of an investigation, the safety or reputation of a person, or the fair trial of a person who has been, or may be, charged with an offence. Exceptions are provided for the recipient to share the information with certain persons, such as a spouse or domestic partner, a registered health practitioner and permitted support services.

Controlled operation

A controlled operation is a covert investigation method used by law enforcement bodies. It authorises law enforcement officers (and sometimes civilians) to engage in conduct or activities that could be offences. This provides them protection while they investigate certain criminal offences. Without the protection of an authority, participants in the controlled operation could be criminally responsible and civilly liable for any offences committed.

Disclosure index

A disclosure index is a list of selected items which is reported in company reports.

Financial Reporting Direction 10 requires entities like ours to include a legislative disclosure index in their annual reports that includes the following:

- a list identifying the relevant clauses of Victorian legislation with statutory disclosure requirements the entity must comply with
- a short description of the relevant requirements
- the page in the annual report where the disclosure for each requirement is made.

Enquiry

An enquiry is made when a person contacts Integrity Oversight Victoria, typically by phone or email, about:

- the complaints we can receive or our role in Victoria's integrity system
- a concern they have relating to an organisation that is not within our complaint handling jurisdiction
- a concern they have about an integrity body within our complaints handling jurisdiction that does not meet the threshold of a complaint or public interest disclosure.

Examination

An examination takes place after a person is served a summons requiring them to give evidence, with or without the requirement to produce documents or things. Examinations are conducted on oath or affirmation and the confidentiality of the evidence provided may be protected by a confidentiality notice, and other confidentiality obligations.

An examination is often more tightly regulated and has a higher level of formality than a compulsory interview or interview conducted voluntarily. Examinations are also overseen by an Examiner, usually the Chief Integrity Inspector, with counsel assisting to ask questions.

Inspection

As part of our oversight functions, and in accordance with legislative requirements, we conduct physical inspections of records and documents associated with the use of covert, intrusive and extraordinary investigatory powers including the use of surveillance devices, the conduct of controlled operations, telecommunications interceptions and the exercise of police counter-terrorism powers.

From time-to-time, we may also conduct 'irregular inspections' of an agency's records in response to a compliance concern connected to the use of a covert power.

Inquiry

Integrity Oversight Victoria may conduct an inquiry into a matter arising from an investigation. Inquiries empower us to examine witnesses and compel the production of information under legislation. As part of an inquiry, we may issue summonses to produce documents or things, hold private examinations, and/or enter and search agency premises.

Integrity response

Integrity Oversight Victoria provides independent assurance to parliament and the people of Victoria by providing appropriate responses to non-compliance and other issues. We call these integrity responses.

Integrity responses can range from taking no further action, providing informal feedback, writing letters and providing guidance to making formal recommendations and issuing reports. We may also decide to initiate further oversight projects or programs.

Interview

An interview takes place when a person is asked, or required, to answer questions relevant to an investigation. An interview by Integrity Oversight Victoria or another body may be held in person or remotely. A person may be invited to take part in an interview without a summons or legal requirement to attend. This is a voluntary interview.

A compulsory interview is an interview where a witness is required by Integrity Oversight Victoria or another body to present for interview. While formal, a compulsory interview is not as formal or tightly regulated as an examination. Each body's powers determine whether they can hold compulsory interviews and/or examinations.

Investigation

Integrity Oversight Victoria can investigate a complaint, including a public interest complaint, and can also initiate 'own motion' investigations.

During an investigation, we may issue confidentiality notices, access agency records, and require agency officers to give information/attend to answer questions and/or produce documents or things.

Monitoring project

A monitoring project is a strategically targeted and finite activity with well-defined objectives, methodology and deliverables. Monitoring projects are a proactive way of monitoring compliance with specific matters within our statutory functions.

Own motion investigation

An own motion investigation is an investigation initiated by Integrity Oversight Victoria, without a complaint having to be made about the specific matter to be investigated.

Preliminary inquiry

Integrity Oversight Victoria may conduct a preliminary inquiry to determine whether to commence an investigation.

Public interest complaint

A public interest complaint is a disclosure made under the *Public Interest Disclosures Act 2012* (PID Act) that, according to the decision maker, shows or tends to show, or discloses information that the discloser believes on reasonable grounds shows or tends to show, improper conduct or detrimental action.

Public interest disclosure

A public interest disclosure is information provided about improper conduct or detrimental action in the public sector that meets the threshold in the *Public Interest Disclosures Act 2012* (PID Act).

Improper conduct includes corrupt conduct by public officers or public bodies and several other forms of conduct by public officers or public bodies set out in the PID Act. It also includes actions of a person intended to adversely affect the effective or honest performance of a public officer or public body. An example of this includes bribing a public officer so they grant a permit or approval.

Detrimental action includes action taken, or proposed to be taken, against a person in reprisal for that person (or another person):

- intending to make a public interest disclosure
- having made a public interest disclosure or
- having cooperated with the investigation of a public interest disclosure.

In the past, a person who made a public interest disclosure was known as a whistleblower.

Recommendation

When we identify serious issues, we make recommendations that outline the steps we consider a body should take to improve compliance or prevent a recurrence of the issue. Recommendations can be private or public, but if public must be made in a report.

Legislative reporting (disclosures) index

This annual report is prepared in accordance with all relevant Victorian legislation and pronouncements. This index has been prepared to facilitate identification of Integrity Oversight Victoria's compliance with statutory disclosure requirements.

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