

Annual Plan 2026-27



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.

Published by order, or under the authority,
of the Parliament of Victoria June 2026.

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ISSN 2982-3269 (online)

Published June 2026

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Foreword

I am pleased to present Integrity Oversight Victoria's annual plan for 2026-27.

This plan sets out what we are doing to maintain sustainability and influence as a contemporary best practice integrity body. Our catchline 'Integrity together' underscores the importance of IOV working together with Victoria's integrity bodies as a trusted integrity system that strengthens confidence in the Victorian public sector.

We do this by supporting the 13 integrity, accountability, and investigatory bodies, including the Independent Broad-based Anti-corruption Commission, to perform their functions lawfully and properly.¹

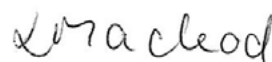
Drawing on external insights from stakeholder feedback and the experience and expertise of the IOV staff over the past 12 months, we have updated our strategic objectives, priorities and the underpinning delivery programs in a 2026-28 Strategic Direction statement. The 4 strategic priorities are designed to meet our objectives and continuously improve our systems and operations, enhance our capabilities, and better empower staff to deliver integrity responses that influence improvements across the integrity system.

These objectives and priorities also reflect the challenges faced by IOV and the integrity system. These include the global erosion of institutional integrity, increasingly complex complaints and investigations, the complex legislative framework we work within, the increasing complexity of the service needs of complainants and witnesses and our duties to limit the exposure of our staff to psychosocial hazards, and the ongoing cost pressures and fiscal constraints.

Our ability to deliver on our strategic objectives and priorities will always be determined by our resources, with priority given to core business over proactive monitoring when necessary. We will develop a business case to support the progressive uplift of our technology environment.

We also identify the 3 integrity areas we will focus on that will guide our complaints, investigations, monitoring and educative activities this year. These focus areas are reviewed annually in response to ongoing and emerging risks that undermine trust and confidence in the integrity system.

Complaints and investigations reveal conflicts of interest and the operation of the complex public interest disclosure scheme as emerging risks. Our goal is to proactively review and monitor integrity agencies' approach in these areas, and publish a guidance note on conflicts of interest. Our third focus area is responding to integrity agencies' appetite for guidance on our approach to coercive powers oversight. Due to their demonstrated commitment to compliance, guidance is sufficient to promote consistency of practice.



Louise Macleod

Chief Integrity Inspector



¹ See Appendix A for a list of bodies IOV oversees.

Section 1

Strategic Direction

Vision

Our vision is a trusted integrity system that strengthens confidence in the Victorian public sector.

We seek to achieve our vision by working together to meet our strategic objectives:

- Ensure lawful exercise of intrusive and coercive powers
- Proportionate, risk based, intelligence led oversight
- Guide and promote good practice in the integrity system
- Contribute expertise to optimise the legislative framework

To meet our strategic objectives, we have identified the following strategic priorities:

- Proportionate, targeted, impactful complaint, investigation & monitoring functions
- Accessible communications and influential stakeholder engagement
- User centric ICT, information & knowledge management
- Strong organisational sustainability, expertise and a positive culture

We will focus on the following integrity areas in 2026-27:

Review the operation of the *Public Interest Disclosures Act 2012* by integrity agencies, identify opportunities for law reform and co-host an integrity leaders forum

Consider how integrity agencies identify and manage conflicts of interest in the performance of their duties, functions and exercise of powers

Develop coercive powers guidance for integrity agencies

Strategic risks

We will mitigate our strategic risks to protect our staff, while operating within a tight fiscal environment, through strong governance and assurance practices.

Our Impact

We proactively identify and target high-risk integrity issues and trends of strategic importance to improve the integrity system

We are risk-based and use evidence to assess risks of non-compliance and respond effectively using our powers in a proportionate way

We highlight good practice in the integrity system to support compliance, lawfulness, and propriety in the performance of duties and functions and the exercise of powers

Section 2

Core Business

Integrity Oversight Victoria's role is to oversee the Independent Broad-based Anti-corruption Commission (IBAC), the Victorian Ombudsman (VO) and 11 other integrity, accountability and investigatory bodies and their officers. We help to ensure they perform their functions lawfully and properly.

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

We publish input and output statistics across each key function in our annual report.

The functions we perform differ for each integrity body we oversee, including complaints, investigations, inspections and monitoring. See our website to view our jurisdiction and functions for each integrity body.



Section 2: Core Business

Complaints

We assess each complaint under the *Integrity Oversight Victoria Act 2011* (IOV Act) and respond proportionately, providing written reasons for the outcome. We are not a complaint resolution body. Our focus is on the improper and unlawful conduct of officers, and compliance of agencies. As we are not a court, we do not have the power to overturn a decision or remake a decision of another organisation.

Most complaints are assessed and concluded after obtaining relevant information from the complainant and, if necessary, the body about whom the complaint is made. Implementing a new complaint to investigation optimisation framework, complaints will be triaged, with decisions about action based on the impact we can have on improving an oversight body's processes or identifying and addressing poor conduct.

To ensure we are proportionate when deciding to take action and transparent about the purpose of information requests, preliminary inquiries will be used more frequently to determine whether to investigate. Information will be collected from complaint and preliminary inquiries that do not proceed to investigation, and reports providing insights will be provided to the bodies about whom complaints are regularly made, to identify complaint themes and frequency, track compliance and support process improvements.

Public interest disclosures

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

Investigations

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

Coercive powers notification reviews

The agencies we oversee must notify us each time they exercise coercive powers.

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

Inspections

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

Compliance monitoring

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

Section 2: Core Business

Oversight methodology

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

The criteria in our integrity response guidelines published on our website help us decide how to influence change including in response to emerging and ongoing non-compliance by integrity agencies we oversee. Criteria include the readiness of the body we oversee to comply, the need for accountability, and prevention of harm to individuals and the integrity system.

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

Where it is in the public interest, we make public recommendations in special reports that are tabled in Parliament and published on our website. To help improve the practice of bodies we oversee, and strengthen the integrity system, we also make observations, suggestions and provide feedback.

Educational activities

We also undertake education activities to support compliance, promote integrity and improve access to, and understanding of, the integrity system.

Activities include publishing guidance materials to share lessons learned.

Section 3

Programs for 2026–27

Priority 1: Proportionate, targeted and impactful complaint, investigation and monitoring functions

Program of preventative actions that support better practice

- Develop coercive powers guidance for integrity agencies
- Consider how integrity agencies identify and manage conflicts of interest (resource dependent)

Strategic risk²

Stakeholder engagement (influence)

DPS measure³

Educational activities
Systemic improvements

Target completion date

Ongoing

Program of proactive activities targeting high-risk issues

- Table monitoring project report on IBAC's oversight of police complaints
- Table Part 2 inspection report on Victoria Police's use of surveillance devices in prisons
- Review operation of the *Public Interest Disclosures Act 2012* by integrity agencies (resource dependent)
- Implement data and information measures to improve risk analysis and target priorities

Strategic risk

Stakeholder engagement (influence)

Legislative improvements

Financial resourcing

Financial management

DPS measure

IOV recommendations accepted by agencies

Systemic improvements

Target completion date

Reports: 30 September 2026

Review : 30 June 2027

Analysis measures: 30 June 2027

Complaint and investigation optimisation program: Phase 1

- Implement complaints to investigations optimisation framework focused on achieving impact through proportional activities, including:
 - soft transfer back to agencies to address procedural fairness & some service complaints
 - preliminary inquiries to test evidentiary basis for further action
 - data collection to identify and report to agencies on systemic themes
- Update IOV service charter to reflect revised complaint-handling principles

Strategic risk

Stakeholder engagement (influence)

Financial resourcing

Financial management

DPS measure

Reasons for decisions

Systemic improvements

Complaint and investigation timeliness measures

Target completion date

30 June 2027

² See Appendix B for IOV's strategic risks.

³ Department Performance Statement measures (DPS measures) are metrics used to assess how effectively a government department delivers its objectives and outputs.

Section 3: Programs for 2026-27

Priority 2: Accessible communications and influential stakeholder engagement

Strategic stakeholder engagement program

- Finalise and implement stakeholder engagement strategy, informed by 2026 stakeholder survey

Strategic risk

Stakeholder engagement (influence)

DPS measure

IOV recommendations accepted by agencies

Target completion date

30 June 2027

Targeted communications and awareness program

- Finalise and implement external communications strategy
- Presentations showcasing expertise, experience and nature of work
- Public reports on areas of public interest

Strategic risk

Stakeholder engagement (reputation and influence)

DPS measure

Educational activities
Systemic improvements

Target completion date

30 June 2027

Program of law reform proposals to enhance integrity system

- Inquiry submissions
- Engagement with DJCS⁴ on reform ideas and consultation feedback, including expert reference group responding to IOC⁵ recommendations on IBAC's legislative framework
- Active member of IBAC's Public Interest Disclosure Consultative Group

Strategic risk

Legislative improvements
Financial resourcing

DPS measure

N/A

Target completion date

Ongoing

Program to build a network to promote integrity across the VPS

- Collaborate with integrity agencies on shared challenges and law reform
- Co-host with IBAC a forum for integrity agency leaders to optimise the public interest disclosure (PID) scheme

Strategic Risk

Stakeholder engagement (influence)
Legislative improvements
Financial resourcing

DPS measure

N/A

Target completion date

Collaboration: Ongoing
PID forum: By 31 December 2026

⁴ Department of Justice and Community Safety.

⁵ Integrity and Oversight Committee of Parliament.

Section 3: Programs for 2026–27

Priority 3: User-centric ICT, information and knowledge management

Information management review and ICT uplift program

- Implement records management framework and action plan
- Implement ICT Strategy 2026–29, year 1, including:
 - A business case to support further and progressive uplift of technology environment
 - Enterprise system upgrades – hardware and software (resource dependent)
 - VicChat AI platform
 - CMS cloud optimisation

Strategic risk

Security IT
Records management
Staff retention and capability
Financial management

DPS measure

Supports all measures

Target completion date

30 June 2027

Priority 4: Strong organisational sustainability, expertise and a positive culture

Strategic workforce planning program

- Implement new strategic workforce plan including:
 - Expand internal knowledge and capability for platforms and systems, and identify super users to consolidate expertise
 - Further training on dealing with challenging behaviours
 - Audit methodology training to support monitoring projects
- Review our DPS measures

Strategic risk

Records management
Staff health, wellbeing and safety
Staff retention and capability
Financial resourcing

DPS measure

Supports all measures

Target completion date

31 December 2026

Psychosocial wellbeing program

- Implement new actions identified in psychosocial hazards risk assessment
- Update service charter to reflect unreasonable complainant behaviour policy
- Introduce formal staff recognition pathways

Strategic risk

Staff health, wellbeing and safety
Staff retention and capability

DPS measure

Supports all measures

Target completion date

31 March 2027

Section 4

Performance measures: Department Performance Statement

We are accountable to the public, through the Victorian Parliament, to fulfil our purpose and undertake our statutory functions in an efficient, effective and economical way.

Our performance measures and targets for 2026–27 are reported in the Victorian Budget’s Department Performance Statement.⁶



⁶ Department of Treasury and Finance, *2026–27 Department Performance Statement* (2026), 169–170.

Section 4: Performance measures: Department Performance Statement

Performance measure	2026–27 Target
Quantity	
Recommendations of Integrity Oversight Victoria accepted by the agencies	75%
Reasons for decisions provided to complainants within one month of complaint outcomes	100%
Educational activities to improve community access and explain rights, responsibilities and Integrity Oversight Victoria's role	3
Quality	
Systemic improvements by agencies to support compliance in the integrity system ⁷	7
Timeliness	
Proportion of low and medium complexity investigations completed within 12 months	65%
Acknowledge receipt of new complaints within 5 business days	95%
Proportion of low complexity complaints completed within 2 months	75%
Proportion of medium complexity complaints completed within 5 months	65%

Progress against each performance measure will be reported in the 2026–27 annual report.

To drive our quality measure of systemic improvements, we will respond proportionately to identified issues through the framework of our published integrity response guidelines.

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

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

⁷ Systemic improvements are recorded when we can measure a demonstrable change to the conduct and compliance of any of the bodies we oversee after identifying non-compliance or other issues.

Section 5

Funding

2026–27 Budget

Recurrent base operating funding	\$7,723,800
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Depreciation funding	\$1,173,800
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Total Operating	\$8,897,600
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Total Budget	\$8,897,600
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Appendix A

Who Integrity Oversight Victoria oversees⁸

Chief Examiner

Department of Energy, Environment and Climate Action

Environment Protection Authority Victoria

Game Management Authority

Independent Broad-based Anti-corruption Commission

Judicial Commission of Victoria

Office of the Victorian Information Commissioner

Parliamentary Workplace Standards and Integrity Commission

Public Interest Monitor

Victorian Auditor-General's Office

Victorian Fisheries Authority

Victorian Ombudsman

Victoria Police

⁸ As at 30 June 2026.

Appendix B

Strategic risks

We maintain a strategic risk register in accordance with the Victorian Government Risk Management Framework, informed by our risk champions and overseen by our Audit and Risk Committee. We actively monitor and manage strategic risks through mitigation activities to drive the residual risk level towards our defined risk appetite.

Our 2026–27 programs will help mitigate the strategic risks in the table below.⁹

The ‘current rating’ is the risk’s rating in our strategic risk register at 30 June 2026. The ‘forecast residual rating’ is the anticipated rating at year end after implementing the programs detailed in this annual plan, should all other factors remain the same.

Risk category: Reputation and influence

Risk title	Risk summary	Current rating	Related programs	Forecast residual rating
Stakeholder engagement	Failure to maintain influential relationships with the bodies that we oversee, reducing our ability to influence change within the Victorian integrity system.	Low (4)	Preventative actions Proactive activities Complaint and investigation optimisation Strategic stakeholder engagement and survey Targeted communication and awareness Network to promote integrity	Low (4)
Legislative improvements ¹⁰	Failure to assign adequate resources and efforts to influencing legislation that impacts the Victorian integrity system.	Low (3)	Law reform proposals	Low (3)

⁹ Not all risks in the strategic risk register are represented in this table.

¹⁰ This risk was closed at 30 June 2026 as the endorsed risk rating was within our defined risk appetite.

Appendix B – Strategic risks

Risk category: Personnel

Risk title	Risk summary	Current rating	Related programs	Forecast residual rating
Staff retention and capability	Inadequate steps to develop staff capability and support professional development, resulting in reduced staff retention levels.	Moderate (5)	Information management review and ICT uplift Strategic workforce planning Psychosocial wellbeing	Low (4)
Staff health, safety and wellbeing	Failure to maintain, so far as reasonably practicable, a safe and healthy working environment where health, safety and wellbeing risks are identified and managed.	Moderate (5)	Strategic workforce planning Psychosocial wellbeing	Low (4)

Risk category: Finance

Risk title	Risk summary	Current rating	Related programs	Forecast residual rating
Financial resourcing	Failure of government to provide adequate resources, and increasing cost pressures, impact the ability to deliver statutory obligations and to meet compliance obligations.	Moderate (5)	Preventative actions Proactive activities Complaint and investigation optimisation Law reform proposals Build network to promote integrity Information management review and ICT uplift Strategic workforce planning	Moderate (5)
Financial management	Failure to take adequate measures to support/oversee compliant financial reporting and budget management	Low (4)	Preventative actions Proactive activities Complaint and investigation optimisation Information management review and ICT uplift	Low (4)
Critical infrastructure asset management	Failure to maintain critical assets resulting in compromised or non-functioning systems.	Low (4)	ICT uplift	Low (4)

Appendix B – Strategic risks

Risk category: Security

Risk title	Risk summary	Current rating	Related programs	Forecast residual rating
Security: IT	Failure to take adequate steps to prevent the loss of data due to system failures or to prevent, or to reduce the impact of, cyber incidents.	Moderate (5)	Information management review and ICT uplift	Moderate (5)

Risk category: Organisational

Risk title	Risk summary	Current rating	Related programs	Forecast residual rating
Records management	Failure to manage records in a manner that makes records and information readily accessible to staff.	Moderate (5)	Information management review and ICT uplift	Low (4)