

27 July 2023

To Whom It May Concern,

I am writing to voice some thoughts that I have about the proposed reforms to the lobbying oversight systems.

While the proposed reforms represent a positive start to improving Tasmania's lobbying framework, I would like to highlight several areas where I believe the reforms can be strengthened in order to ensure greater transparency, accountability, and ethical conduct in lobbying. I believe that there are certain areas where improvements can be made to strengthen public confidence in the integrity of the government and public officials. I would like to propose the following recommendations for consideration:

**1. INCORPORATE LOCAL GOVERNMENT INTO THE REFORMS:**

While the Commission has done well in broadening the coverage of lobbying regulations, it missed an opportunity by excluding local government from the reforms. As local government plays a crucial role in democracy, it should be subject to the same standards of transparency and accountability as state government. I strongly recommend that local government be incorporated into the lobbying reforms as soon as possible to ensure the best interests of constituents are prioritised over private interests.

**Recommendation:** *Include local government in the lobbying reforms to ensure transparency and accountability at all levels of government.*

**2. ENHANCE TRANSPARENCY IN LOBBYING ACTIVITIES:**

Transparency is paramount in ensuring public trust and confidence. The Commission's model for reform falls short in guaranteeing transparency as it only mandates lobbyists to declare if they have donated money above a certain threshold without specifying the exact amount or the beneficiary. The Commission should establish a very low threshold for disclosure, requiring lobbyists to reveal the identities and connections of the recipients of their donations.

**Recommendation:** *Set a low threshold for disclosure, obliging lobbyists to reveal the identities and connections of donation recipients.*

**3. EXPAND GIFT RESTRICTIONS:**

While the Commission explicitly states that public officials must reject gifts from registered lobbyists, it fails to address unregistered lobbyists. To ensure the effectiveness of the proposed recommendations, it is crucial to extend the ban on gift-giving to all lobbyists, including unregistered ones. The Commission should clarify and make it more explicit in the proposed reforms that gift restrictions apply to all lobbyists.

**Recommendation:** *Extend the ban on gift-giving to include unregistered lobbyists to uphold the integrity of public officials.*

#### **4. SECURE FUNDING FOR THE INTEGRITY COMMISSION:**

The Integrity Commission plays a pivotal role in overseeing processes that uphold transparency and facilitate a successful democracy. To ensure its effectiveness and independence, it is essential to guarantee funding for the Commission through legislation.

**Recommendation:** *Legislate the funding for the Integrity Commission to ensure its stability and effectiveness.*

#### **5. LENGTHEN COOLING-OFF PERIOD:**

The proposed 12-month cooling-off period for former public officials is inadequate to mitigate potential conflicts of interest. It would be more beneficial for Tasmania to align itself with the two-year cooling-off periods implemented in jurisdictions such as Queensland and South Australia. The Commission has not provided sufficient evidence to support the necessity of a shorter period, considering the prospects of former public officials seeking employment.

**Recommendation:** *Increase the cooling-off period from 12 months to two years to strengthen the measures against potential conflicts of interest.*

#### **6. IMPLEMENT LOBBYISTS' DISCLOSURE LOG:**

An important omission from the proposed reforms is the requirement for lobbyists to maintain a disclosure log. Given the profitability of lobbying and the public's heightened awareness of its influence, it is crucial for lobbyists to keep accurate records of meetings, discussion points, and general lobbying activities. This inclusion would enhance transparency and ensure accountability.

**Recommendation:** *Introduce a requirement for lobbyists to maintain a disclosure log, documenting meetings and discussions related to lobbying activities.*

#### **7. LEGISLATE THE LOBBYING CODE OF CONDUCT:**

The report overlooks the recommendation to legislate the Lobbying Code of Conduct. This is a significant oversight as legislative backing provides the Commission with a stronger position to hold both lobbyists and public officials accountable. Legislation would also enable the Commission to impose more stringent sanctions, including fines and lobbying bans.

**Recommendation:** *Legislate the Lobbying Code of Conduct to empower the Commission with stronger enforcement capabilities and sanctioning powers.*

The Framework Report presents a positive step forward, however further improvements are necessary to enhance public trust and ensure the integrity of government and public officials. By incorporating local government, enhancing transparency, expanding gift restrictions, securing funding, lengthening the cooling-off period, implementing a disclosure log, and legislating the Lobbying Code of Conduct, Tasmania can establish a robust model for lobbying oversight. These recommendations aim to foster public confidence and uphold the principles of transparency, integrity, and accountability in the democratic process.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D Steane', with a stylized, cursive script.

Dorothy Steane