



National Anti-Corruption Commission

Annual Report

2024–25



Further information

Enquiries about this report should be directed to the National Anti-Corruption Commission.

Contact	Annual report coordinator
Email	governance@nacc.gov.au
Phone	1300 489 844
Website	nacc.gov.au
Post	GPO Box 605, Canberra ACT 2601
Address	5 Constitution Avenue, Canberra ACT 2601

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Annual Report 2024–25

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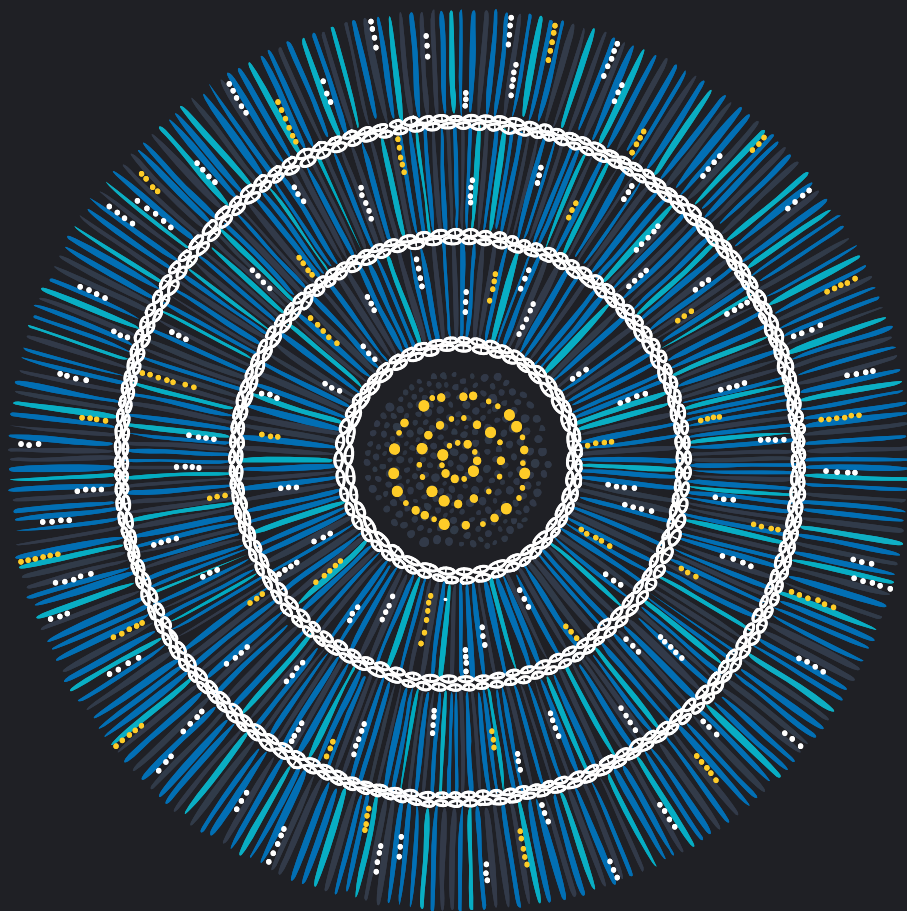
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Using the Commonwealth Coat of Arms

Guidelines for using the Commonwealth Coat of Arms are available from the Department of Prime Minister and Cabinet website (pmc.gov.au).

Acknowledgements

Thank you to all Commission staff who contributed to this Annual Report.



In the spirit of reconciliation, the National Anti-Corruption Commission acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

This artwork tells the story of the National Anti-Corruption Commission's mission to enhance integrity within the Commonwealth public sector.

It is made up of many multicoloured strokes, depicting our team's many weaving histories. At the core of the artwork are three white patterned rings, representing detecting, deterring, and preventing corruption. Our approach is fearless but fair and we work towards our goals with integrity, determination, and courage. We are on a journey to build a culture of unity, inclusion, and trust as we grow.

Our people working together are represented by white dots between each of the lines. At the heart of the artwork is the central element, encapsulating our commitment to contributing to reconciliation as we work to create a culturally safe environment where First Nations staff and partners feel respected and included.

Integrity at Our Heart

The artwork concept and narrative were developed by Navada Currie. Navada is a Mununjali and Kabi Kabi artist at Gilimbaa.

Letter of transmittal



National Anti-Corruption Commission

8 October 2025

The Hon Michelle Rowland MP
Attorney-General
Parliament House
Canberra ACT 2600

Dear Attorney-General

We are pleased to present the National Anti-Corruption Commission's annual report for the reporting period 1 July 2024 to 30 June 2025 (the reporting period).

This report has been prepared for the purposes of s 46 of the *Public Governance, Performance and Accountability Act 2013* (Cth).

In accordance with s 271 of the *National Anti-Corruption Commission Act 2022* (Cth), Part 2 of this report, the Annual Performance Statements, also includes a report on the performance of the Commissioner's functions during the reporting period (the Commissioner's annual report).

This report also includes the annual report concerning authorities for assumed identities provided in accordance with the requirements of s 15LD(1) of the *Crimes Act 1914* (Cth).

Yours sincerely

The Hon Paul Brereton AM RFD SC
National Anti-Corruption Commissioner

Mr Philip Reed
Chief Executive Officer

About this report

This annual report covers 1 July 2024 to 30 June 2025 (the reporting period).

Part 2 of this report, the Annual Performance Statements, details the performance of the National Anti-Corruption Commission (Commission) in achieving its purpose, as set out in the Corporate Plan and Portfolio Budget Statements.

This annual report has been developed in accordance with the requirements of the Public Governance, Performance and Accountability Rule 2014 (PGPA Rule) and the guidance material published by the Department of Finance and the Department of the Prime Minister and Cabinet.

In accordance with s 271 of the *National Anti-Corruption Commission Act 2022* (Cth) (NACC Act), Part 2 of this report, the Annual Performance Statements, also includes a report on the performance of the Commissioner's functions during the reporting period.

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Commissioner's foreword

Alongside the legislature, the executive and the judiciary, most forms of government have recognised the need for a fourth branch – the integrity branch – in order to ensure that public powers and functions are exercised and performed properly, for the purposes for which they were conferred and for no other purpose, and in that way to eliminate corruption, in the broad sense of the word, from government.

In Australia, the Commonwealth integrity branch comprises a number of independent guardrail institutions that are responsible for ensuring the accountable and transparent exercise of public power. The National Anti-Corruption Commission, now just 2 years old, is an integral part of the integrity branch.

The Commission was established, by the *National Anti-Corruption Commission Act 2022* (Cth) (NACC Act), to provide independent assurance to the Australian community that corrupt conduct involving Commonwealth public officials is prevented, detected, investigated, and responded to appropriately.

This is our second annual report. It provides an overview of our operational activities, as well as information about our role and function, workforce, performance, governance and finances.

The Commission has continued to grow – from 154 staff at commencement to 231. We now operate out of 5 offices nationwide, 3 of which have been constructed and occupied since commencement.

Our mission is to enhance integrity in the Commonwealth public sector, by deterring, detecting and preventing corrupt conduct involving Commonwealth public officials, through education, monitoring, investigation, reporting and referral.

In 2024–25, we continued to pursue 2 main lines of operation to achieve that mission:

- deterring corrupt conduct, through detection, investigation and exposure
- preventing corrupt conduct, through education and engagement.

Detection, investigation and exposure

In 2024–25, we received 2,271 referrals, in addition to the 3,194 received in the preceding year. Overall, we have assessed more than 4,700 – about 85%. Of these, 90% were excluded at the triage stage, because they did not raise a corruption issue within the jurisdiction of the Commission.

The Commission’s jurisdiction is concerned with serious and systemic corrupt conduct by or affecting Commonwealth public officials. Most mistakes, maladministration and misconduct do not involve corrupt conduct and are not within the jurisdiction of the Commission.

Other agencies have responsibility for oversight of administration, decision-making, the efficient and effective use of resources, and other aspects of the exercise of public power.

The Commission is not a complaints-handling or dispute resolution agency; nor is it an administrative decisions review authority.



The Hon Paul Brereton AM RFD SC
National Anti-Corruption Commissioner

However, even when referrals do not result in an investigation, they provide a valuable information base that helps us to identify possible serious or systemic corruption and decide what to investigate. In particular, they can be important if similar referrals are subsequently received. They also inform our corruption prevention activities, as they help us identify perceptions of corruption, which can be almost as damaging as the actuality.

In the last 12 months there has been widespread and intensive investigatory activity.

We commenced 33 preliminary investigations to help us decide whether or not to conduct a corruption investigation, in addition to 24 carried over from the previous year. Of these, 12 were completed in the reporting period. Three resulted in the commencement of a corruption investigation. Forty-five remained ongoing.

In 3 matters, we made public disclosures that no corruption issue arose, to 'clear the air' after there had been public reporting that there had been a referral to the Commission. These included a public statement in relation to the settlement between Ms Brittany Higgins and the Commonwealth, about which there had been significant public speculation that there might have been corrupt conduct. The Commission conducted an extensive preliminary investigation and found that no corruption issue within its jurisdiction arose.

By 30 June 2025, the Commission had commenced a total of 40 corruption investigations. Of these, 9 had been finalised on the basis that corrupt conduct would not be established. Thirty investigations remained on foot.

We decided to prepare investigation reports under s 149 of the NACC Act for 3 investigations.

The first is Operation Kingscliff, which concerned a paradigm case of nepotism in recruitment in the public service – an area of widespread concern. The Commission's first s 149 report was provided to the Attorney-General on 23 June 2025 and published on 30 June 2025.

The second is Operation Pelican, which concerned an official seeking a secret commission for facilitating the award of a contract. As at 30 June 2025, there had been a plea of guilty and submissions on sentencing.

The third pending report relates to a grants scheme.

The Commission is currently overseeing or monitoring 14 investigations by other agencies. Since commencement we have monitored or had oversight of over 45 internal corruption investigations by other Commonwealth agencies.

A sense of the extent of the detection and investigative work undertaken by the Commission during the reporting period can be gained from the statistics that 22 search warrants, 9 telephone intercept warrants, and 6 surveillance device warrants were obtained from courts; 184 notices or directions to produce documents were issued; and 24 witnesses were examined in private hearings in 6 investigations.

Our strategic corruption priorities remained corruption in senior executive decision-making, corruption involving contractors and consultants, corruption affecting vulnerable people, corruption affecting the environment, corruption at the border, and corruption in complex procurement. However, while we believe that it is in these areas that we can generally best add value, they are not exclusive.

The legacy case load we inherited from the former Australian Commission for Law Enforcement Integrity (ACLEI) continued to require significant work. We have to balance progressing the legacy matters with advancing the new referrals we have received since commencement.

During the year, as a result of ACLEI investigations continued by the Commission, there were 5 convictions, and we published 3 investigation reports.

The detection, investigation and exposure of corrupt conduct is necessarily challenging. Corruption is generally conducted in secret, often involving complex pathways of deception and deceit. Finding, testing, challenging and unravelling these pathways takes time. Getting the right and fair outcome also takes time.

First, it usually takes some time to decide whether the Commission should investigate a referral, because this is a significant decision as to how we will allocate our resources. Second, many of the Commission's powers appropriately require warrants to be obtained from Courts, and this too takes time. Then, the Commission often acquires very large volumes of information that require significant time and resources to analyse and decipher.

Sometimes, questions of legal professional privilege or parliamentary privilege have to be resolved before documents can be made available to investigators. Time is also required to arrange and conduct the hearings that may follow.

Drafting reports, including fair and careful consideration of whether to make a finding of corrupt conduct and any corruption prevention observations and recommendations, is an exacting process. Procedural fairness to affected persons is a critical part of the process but protracts it. This is similar for other anti-corruption commissions around the country.

During the reporting period the Commission also negotiated and concluded 2 important memoranda of understanding (MOU) relevant to our investigative work.

On 22 July 2024, the Commission entered an MOU with the Australian Federal Police (AFP) that provides a framework and arrangements for deconfliction of matters, joint investigations, information sharing and access to AFP technical capabilities. On 27 November 2024, the Commission entered an MOU with the Attorney-General, President of the Senate and Speaker of the House of Representatives in relation to parliamentary privilege. This MOU establishes agreed processes for the exercise of the Commission's powers in circumstances where issues of parliamentary privilege could arise, in order to ensure that parliamentary privilege is respected while permissible action by the Commission to detect and investigate corrupt conduct is not inhibited.

Education and engagement

From the referrals we receive and assess, and the matters we investigate, the domains in which we are seeing both the perception and, to a much lesser extent, the actuality of corrupt conduct, can broadly be categorised as:

- procurement – the awarding of government contracts and supplier relationships
- recruitment – promotion and entitlements in the Australian Public Service
- decision-making.

In all those areas, the perceived and actual mechanisms of corruption are typically:

- nepotism and cronyism – the preferring of family, friends and associates. In our Commonwealth Integrity Survey, nepotism and cronyism were the most common type of corruption
- misuse of information – the misuse of official information to gain an advantage.

Much of what we see occurs at the interface of the public and private sectors. This reflects the proliferation over recent decades of the government's use of contractors and consultants and the outsourcing of functions of government to the private sector.

As the private sector is necessarily interested in and driven by profit, this interface inevitably creates a point of friction between the interests of the private sector and the public interest.

As an aspect of our prevention function, the Commission has issued targeted guidance to relevant agencies, and is developing further materials to promote transparency and best practice in areas such as procurement processes, managing conflicts of interest and ethical decision-making.

In 2024–25, we held 138 engagements with public officials and civil society. We also made 9 submissions to a range of consultations and reviews regarding corruption and integrity policy.

Ahead of the May 2025 federal election, we published an open letter to election participants about corruption risks and vulnerabilities in the context of an election. And we designed and conducted the inaugural Commonwealth Integrity Survey, receiving and analysing responses from 58,309 public officials across 171 agencies, helping us understand and measure observations and trends relating to integrity and corruption in agencies and across the sector.

We, and those agencies, are now using survey data to identify potential corruption risks and inform anti-corruption strategies and prevention and education initiatives.

Conclusion

Two years is a very short time in the life of a national institution, and enhancing integrity across the Commonwealth public sector is a long-term endeavour. The existence and work of the Commission to date has laid a strong foundation for the enduring enhancement of integrity.

One manifestation of this is that in the 2 years since our inception, integrity has been at the forefront of discourse throughout the Commonwealth public sector. Never before has there been such a focus on integrity: everyone is talking about it; and most are conscious of our existence and remit.

Another manifestation is Australia's enhanced standing on Transparency International's Corruption Perception Index. While this is by no means attributable only to the Commission, the establishment, existence and educational activities of the Commission have contributed in a substantial measure.

Of course there has been controversy. Our initial decision not to investigate the referrals by the Royal Commission into the Robodebt Scheme was found by the Inspector to be affected by apprehended – not actual – bias, following which we appointed former High Court justice the Honourable Geoffrey Nettle AC KC to reconsider the decision not to investigate the referrals. He ultimately decided we would investigate the referrals.

That investigation is now underway, led by a Deputy Commissioner who was not involved in the original decision not to investigate the referrals, with Mr Nettle as Chief Adviser. We have also revised our internal procedures, to reduce the risk of any similar issue in the future.

There has also been debate about the transparency of our work. While we publish regular statistics on referrals, assessments and investigations, to provide as much visibility as we can, corruption investigations rarely benefit from publicity, and our work is generally conducted in private: to protect investigations, safeguard witnesses and whistleblowers, prevent unfair damage to reputations and encourage cooperation – all in keeping with our Act.

As mentioned, we conducted numerous private hearings. There is a misconception that other anti-corruption commissions routinely hold public hearings, due to a handful of high-profile matters. In fact, most corruption investigations and hearings are conducted out of the public eye. Under our legislation, we can only conduct public hearings in exceptional circumstances. Corrupt conduct is exposed through our reports.

As the Commission enters its next phase, complex investigations will reach completion and the Commission's operational achievements will gradually become more visible.

Some of that work, protracted and painstaking as it is, will result in the exposure of serious and systemic corrupt conduct. However, corruption in the Commonwealth public sector is the exception and not the norm, and inevitably, much of our investigation work will lead to findings that a corruption issue is not sustained. The ability to dispel suggestions that there has been corrupt conduct is as important as exposing it where it exists.

Both outcomes serve, in slightly different ways, to enhance integrity and sustain confidence in the institutions of government, by showing that exercises of public power and performance of public functions are subject to independent and objective scrutiny, in order to ensure that they are proper.

Finally, I would like to express my gratitude to all the Commission's staff for their hard work and dedication, and to my fellow statutory office holders for their support and counsel, and contributions to the leadership and guidance of the Commission.

A handwritten signature in blue ink, consisting of a stylized 'P' followed by a series of loops and a horizontal line ending in a dot.

The Hon Paul Brereton AM RFD SC
National Anti-Corruption Commissioner

1

Overview

Role and function

Outcome and program

Purpose

Accountable authority

Organisational structure

Minister and portfolio

Oversight

Role and function

The Commission is an independent statutory agency established by the *National Anti-Corruption Commission Act 2022* (Cth) (NACC Act). It commenced operations on 1 July 2023.

The Commission's mission is to enhance integrity in the Commonwealth public sector by deterring, detecting and preventing corrupt conduct involving Commonwealth public officials through education, monitoring, investigation, reporting and referral.

Jurisdiction

There are 4 types of corrupt conduct under the NACC Act. A person engages in corrupt conduct if:

- they are a public official and they breach public trust
- they are a public official and they abuse their office as a public official
- they are a public official or former public official and they misuse information they have gained in their capacity as a public official
- they do something that adversely affects a public official's honest or impartial exercise of powers or performance of official duties.

A person also may engage in corrupt conduct if they conspire or attempt to do any of these things.

The Commission can only investigate corrupt conduct that involves a public official. Public officials include:

- staff members of Commonwealth agencies
- contracted service providers
- parliamentarians and their staff.

The Commission can investigate any person, even if they are not a public official, if they do something that might cause a public official to perform their official role in a manner that is other than honest or impartial.

Concerns relating to state, territory or local government officials are not within the Commission's jurisdiction.

Receiving referrals

Anyone can report concerns of corrupt conduct or provide information about a corruption issue to the Commission. These referrals can be made by webform, phone or post.

Agency heads and public interest disclosure officers have mandatory obligations to refer to the Commission corruption issues they become aware of that they suspect could involve serious or systemic corrupt conduct.

See Receiving and assessing referrals on page 54 for information about referrals received during the reporting period.

Investigating corruption issues

The Commission investigates allegations of serious or systemic corrupt conduct within the Commonwealth public sector.

Where the Commission decides to investigate allegations of corruption, it may do this by conducting its own investigation or by conducting a joint investigation with another Commonwealth agency.

See Investigating corruption issues on page 62 for information on investigations conducted in the reporting period.

The Commission may also refer the corruption issue to another Commonwealth agency to which the corruption issue relates to investigate. Where this occurs, the Commission may also choose to oversee the investigation of a Commonwealth agency or require reports on the outcomes of these investigations. The Commission can also refer the corruption issues to a Commonwealth or state or territory government entity for consideration.

See Referring corruption issues to agencies on page 75.

Prevention and education

The Commission's functions include preventing corruption in the Commonwealth public sector by educating the public service and the public about corruption risks and prevention.

See Preventing corrupt conduct: corruption prevention and education on page 76.

Outcome and program

The Portfolio Budget Statements 2024–25 describe the Commission's outcome and program as follows:

Outcome 1 – Independent assurance to the Australian community that corrupt conduct involving Commonwealth public officials is prevented, detected, investigated and responded to appropriately.

Program 1.1 – Detect and investigate serious or systemic corrupt conduct involving Commonwealth public officials; assist Australian Government entities to manage corruption risks through corruption prevention education and information.

Purpose

The Commission's purpose is to prevent, detect, investigate and report on serious or systemic corruption in the Commonwealth public sector. This includes educating the public service and the public about corruption risks and prevention.

The Commission has 5 key activities to deliver this purpose:

1. Detecting corruption and enhancing the Commonwealth public sector's capabilities to detect corruption
2. Receiving and assessing referrals of alleged corrupt conduct
3. Conducting NACC investigations into corruption issues that could involve serious or systemic corrupt conduct. These investigations may be undertaken jointly with other Commonwealth agencies or with state or territory agencies
4. Referring allegations of corrupt conduct back to other Commonwealth agencies for investigation
5. Creating and disseminating information and education to enhance the effectiveness and maturity of approaches to corruption prevention and build a strong integrity culture across the public sector.

Accountable authority

In accordance with the requirements of the *Public Governance, Performance and Accountability Act 2013* (Cth) (PGPA Act) and as determined by s 20(2) of the NACC Act, Mr Philip Reed, as Chief Executive Officer (CEO), is the accountable authority for the Commission. Mr Reed was CEO for the duration of the reporting period.

Organisational structure

The Commission’s executive comprises the National Anti-Corruption Commissioner (Commissioner), the CEO, 3 Deputy Commissioners and 6 general managers at the Senior Executive Service (SES) level. A diagram outlining the organisational structure as at 30 June 2025 is in Figure 1.1.

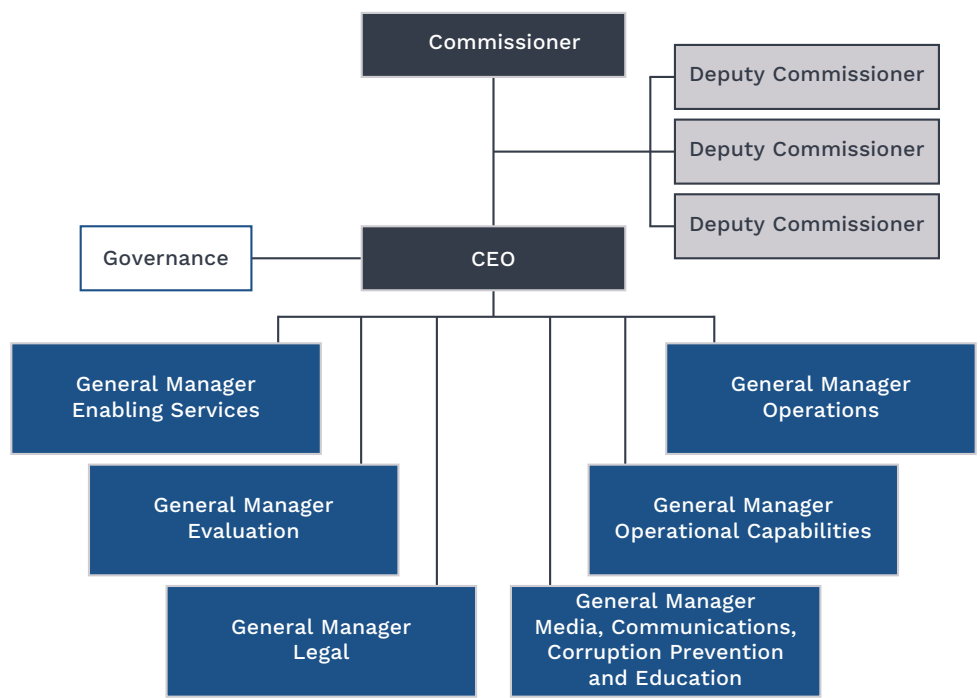
The Commissioner is responsible for all operational matters within the Commission. The 3 Deputy Commissioners report directly to the Commissioner and assist them in managing the Commission’s functions under the NACC Act.

The general managers are each responsible for one of the Commission’s 6 branches:

- Enabling Services
- Evaluation
- Legal
- Media, Communications, Corruption Prevention and Education
- Operational Capabilities
- Operations.

The general managers report to both the CEO and Commissioner.

Figure 1.1: Organisational structure at 30 June 2025



Executive



Commissioner

The Hon Paul Brereton AM RFD SC was appointed from 1 July 2023 as the inaugural Commissioner of the National Anti-Corruption Commission for a 5-year term. The Commissioner is the agency head and oversees the operations of the Commission. Section 17 of the NACC Act sets out the functions of the Commissioner.



Chief Executive Officer

Mr Philip Reed was appointed as the CEO from 1 July 2023 for a 5-year term. The CEO oversees the corporate responsibilities of the Commission as the accountable authority under the PGPA Act. Under the NACC Act, the CEO is responsible for managing the affairs of the Commission and ensuring the Commission performs its functions. Governance, including integrity and risk, reports directly to the CEO.



Deputy Commissioners

Dr Ben Gauntlett and Ms Nicole Rose PSM were appointed as Deputy Commissioners from 1 July 2023 for 5-year terms. Ms Kylie Kilgour was appointed a Deputy Commissioner from 12 February 2024 for a 5-year term. Section 19 of the NACC Act sets out the functions of a Deputy Commissioner.

General Manager Enabling Services

Mr George-Philip de Wet is General Manager Enabling Services, Chief Security Officer and Chief Data Officer. The Enabling Services Branch includes Finance, Procurement and Travel, ICT and Security, People and Property, and Data and Information Governance teams.

General Manager Evaluation

Mr Angus Burnett is General Manager Evaluation. This branch includes the Intake and Triage team and Assessments team, which receive, analyse and assess referrals of alleged corrupt conduct.

Ms Katie Liddle acted as General Manager Evaluation from 26 February 2025 for the remainder of the reporting period, following Mr Burnett's temporary secondment to the Australian Criminal Intelligence Commission for 6 months.

General Manager Legal

Ms Rebekah O'Meagher is General Manager Legal. The Commission's Legal Branch includes 2 Operations Legal Services teams, a Corporate Legal Services team and Special Counsel. These teams and Special Counsel provide legal services relating to operational and corporate matters.

General Manager Media, Communications, Corruption Prevention and Education

Ms Peta Hegarty is General Manager Media, Communications, Corruption Prevention and Education. The branch is responsible for providing media and communications advice and services to the Commission; and delivering the Commission's corruption prevention, education and engagement activities.

General Manager Operational Capabilities

Mr Peter Ratcliffe is General Manager Operational Capabilities. This branch includes the Intelligence Operations, Strategic Intelligence and Digital Forensics teams, as well as a team responsible for electronic collections, evidence, compliance and agency investigations; and a team dedicated to witness welfare.

Mr Tim Graham acted as General Manager Operational Capabilities from 1 July 2024 to 1 January 2025, during which time Mr Ratcliffe acted in the temporary SES Band 2 role of Divisional Manager Evaluation and Operational Capabilities.

General Manager Operations

Mr Brendan Hough is General Manager Operations and oversees the Commission's corruption investigations. This branch includes 7 operations teams, comprising investigators, intelligence analysts and forensic accountants, which are located in Brisbane, Canberra, Melbourne, Perth and Sydney.

Minister and portfolio

The Commission is in the Attorney-General's portfolio. The responsible minister is the Attorney-General.

The Hon Michelle Rowland MP was appointed Attorney-General on 13 May 2025, following the outcome of the federal election held on 3 May 2025. Prior to this, the Attorney-General and responsible minister for the Commission was the Hon Mark Dreyfus KC MP.

The Commission is an independent statutory agency and operates independently of government.

Oversight

Parliamentary Joint Committee on the National Anti-Corruption Commission

The Parliamentary Joint Committee on the National Anti-Corruption Commission (PJC-NACC) is responsible for overseeing aspects of the Commission and its operations.

The PJC-NACC's functions include:

- considering proposed recommendations for certain appointments
- examining reports tabled in Parliament relating to the Commission and the Inspector of the National Anti-Corruption Commission (Inspector)
- examining trends and changes in corruption and reporting to Parliament on desirable changes to the functions, powers, procedures, structure and staffing of the Commission or Inspector
- reviewing the sufficiency of the Commission's budget and finances and reporting on the outcome of that review.

The PJC-NACC cannot review operational decisions, methods or activities.

The Commission attended one private and one public meeting before the PJC-NACC during the reporting period.

More information on the activities of the PJC-NACC can be found under External scrutiny on page 103.

Inspector of the National Anti-Corruption Commission

The Inspector is an independent officer who oversees the operations and conduct of the Commission. The Governor-General appointed Ms Gail Furness SC as the Inspector. Established by the NACC Act, the Inspector is independent of the government and the Commission.

The Inspector's functions include:

- investigating allegations of serious or systemic corrupt conduct within the Commission
- investigating complaints about the Commission
- auditing the operations of the Commission to monitor its compliance with Commonwealth laws and detect agency maladministration and officer misconduct.

See External scrutiny on page 103 for more information on the Inspector.

2

Annual performance statements

Chief Executive Officer's review

Understanding the Commission's results

Results

Analysis of performance

Chief Executive Officer's review

As accountable authority for the National Anti-Corruption Commission, I am pleased to present our 2024–25 Annual Performance Statements as required under s 39(1)(a) of the *Public Governance, Performance and Accountability Act 2013* (Cth) (PGPA Act). Based on the advice of our Audit and Risk Committee, I am satisfied that these Annual Performance Statements accurately reflect our performance during 2024–25 and comply with s 39(2) of the PGPA Act.

This section of the Annual Report outlines how we have delivered against our purpose in 2024–25, our second year of operation.

Our ability to operate and respond effectively is reflected in our achievements against the 3 key performance indicators and each of the performance measures as published in our Corporate Plan 2024–28.



Mr Philip Reed

Chief Executive Officer

In addition to the results and analysis of our performance contained in this section, the Commissioner's foreword on page xii provides an overview of how we have performed against these measures, in accordance with the Commissioner's annual reporting requirements in the *National Anti-Corruption Commission Act 2022* (Cth) (NACC Act).

In 2024–25, we continued to refine our processes and build capacity. We honed our understanding of our operating environment through exposure to emerging themes in referrals, ongoing engagement with members of our jurisdiction, and applied learnings following the outcomes of our Commonwealth Integrity Survey.

Our achievements in 2024–25 owe much to the spirit of teamwork and dedication shown by our diverse and highly skilled people.

I am proud to represent our high-performing agency and the staff that contribute to our outcomes. From those who provide enabling services such as information technology and property support to those who ensure our actions are legal and those who forensically analyse digital devices, they come to work each day with a strong sense of commitment to our mission. Their delivery toward the strategic goals of the agency has been consistent and high quality, and I thank them for this.

I am also proud to serve alongside my fellow statutory office holders. I acknowledge their exceptional fortitude and stewardship through a challenging period of growth and advancement.



Mr Philip Reed
Chief Executive Officer

Understanding the Commission's results

This section provides relevant explanatory content to assist readers in understanding Commission results and performance information contained in this report and provide a clear and meaningful picture of the Commission's activities.

The Commission is continuing to refine its reporting capabilities, processes and practices.

Performance information in this report

This report includes performance information for the 2024–25 financial year on:

- results against the Commission's Portfolio Budget Statements (PBS) key performance indicators (KPIs)
- the performance of the Commissioner's functions under the NACC Act
- Australian Commission for Law Enforcement Integrity (ACLEI) legacy matters that the Commission continued to conduct in the reporting period.

The Commission's KPIs are set out in the 2024–25 PBS and the Commission's 2024–28 Corporate Plan.

Under s 271 of the NACC Act, the Commissioner must give the Attorney-General a report on the performance of the Commissioner's functions during each financial year (Commissioner's annual report).

The National Anti-Corruption Commission Regulations 2023 (NACC Regulations) detail the performance information that must be included in the Commissioner's annual report. Results against these performance measures are provided following the PBS KPI results. The other matters required to be included in the Commissioner's annual report are addressed in the analysis of the performance statements, with the relevant section indicated in Table 2.5, Commissioner's annual report list of requirements.

Under s 70 of the Public Governance, Performance and Accountability Rule 2014 (Cth) (PGPA Rule) and s 40(2) of the *National Anti-Corruption Commission (Consequential and Transitional Provisions) Act 2022* (Cth) (C&T Act), the Commission must continue, as part of the Commission's PGPA Act annual report, to report on ACLEI legacy matters until they are completed. As in the Commission's 2023–24 PGPA Act annual report, where there are results for ACLEI legacy matters during the reporting period, they are provided at the relevant measure, following the results for the Commission. Those sections state whether results relate to transitioned matters, *Law Enforcement Integrity Commissioner Act 2006* (Cth) (LEIC Act) matters, or ACLEI legacy matters collectively.

A consolidated summary of the status of all ACLEI legacy matters is provided in Appendix B: Finalising the operations of ACLEI on page 142. This shows the progress made towards completing ACLEI legacy matters.

This approach provides a comprehensive account of the Commission's activities during the reporting period and maintains appropriate delineation between ACLEI legacy activity and Commission-initiated activity, while remaining readable.

Measures with nil results

There are measures for which the Commission does not have results it can report. This is largely attributable to the fact that the Commission is in only its second year of operation and includes instances where:

- relevant activity has commenced but has not yet met the criteria for reporting against a particular measure
- no relevant activity has occurred, although it may occur in future reporting periods.

In these instances, the Results section includes a short description of the relevant activity and a statement to the effect that no results are available for the measure.

Commission media alerts

To provide visibility to media and the public, the Commission reports weekly on its operational activity, including the latest figures for Commission referrals, assessments, investigations and matters before the court.

Regular publication of data on the Commission's activities has also played a vital role in developing Commission data reporting capabilities and validation processes. Data contained in weekly media alerts and published on the homepage should not be considered performance information in the context of annual reporting and is not replicated in the 'Results' section. The media alerts and monthly summaries are based on indicative data at the time of reporting. Results in the annual report may differ, because they are subject to more comprehensive validation requirements.

The Commission also publishes transcripts of speeches from Commission presentations and engagements throughout the year. As with media alerts and monthly summaries, figures used for these engagements are typically point-in-time and should not be considered performance information in the context of annual reporting.

Information excluded from this report

The Commission does not generally disclose what matters have been referred to it or who has referred them; and typically will not comment on operational activities until a matter has been finalised or otherwise enters the public domain. This is to avoid unfair damage to reputations and to avoid compromising the integrity of investigations.

Section 272 of the NACC Act also requires the exclusion from this report of any information the Commissioner is satisfied is sensitive information, as well as any information subject to a certificate issued by the Attorney-General under s 235.

The Commission is required to report on the number of certificates issued as part of the Commissioner's annual report (see Table 2.5 on page 21).

Key concepts and measurement approach

The Commission's 2023–24 annual report included a short description of key terms used by the Commission in undertaking, measuring and reporting on its activities. For the most part, these descriptions were reflective of definitions contained in the NACC Act, the NACC Regulations or the NACC Bill Explanatory Memorandum.

It also included explanatory content developed for the Commission's data governance and performance reporting capabilities, where it may be helpful for those seeking to understand the Commission's activities and results.

This information now appears throughout the KPI results and Commissioner's annual report results, alongside the relevant measures. See Glossary of data terms on page 168.

The result for KPI 1.1 is based on finalised referral assessments only and does not take into account referrals that have exceeded the 90-day target but remain open at the end of the reporting period. This is in accordance with the KPI methodology as published in the Corporate Plan, but means the KPI does not provide a complete picture of the Commission's performance in relation to meeting its 90-day target for assessing referrals. To ensure the Commission's results are provided with appropriate context, additional information on the number of assessments that remained open at the end of the reporting period and exceeded 90 days is included in the results and analysis of KPI 1.1.

Similarly, the result for KPI 1.2 is, in accordance with the KPI methodology as published in the Corporate Plan, based on investigations that were finalised within the reporting period. This means that the result has limited significance at this stage of the Commission's existence, as it is not yet possible for any of the Commission's investigations to have exceeded 2 years in duration.

Results

Key performance indicators

The PBS and Corporate Plan 2024–28 contain 3 KPIs. Baseline data from the Commission’s performance in 2023–24 informed the establishment of targets for the 2024–25 KPIs, as set out in Table 2.1. A KPI for the Commission’s corruption prevention and education function is new in 2024–25.

See Glossary of data terms on page 168 for further information on key terms used in measuring and reporting on the Commission’s results.

KPI 1.1: Percentage of referrals assessed within 90 days of receipt

The Commission met the target for KPI 1.1 with a result of 86.5%.

The Commission had 2,765 referrals on foot for assessment during the reporting period, comprising:

- 494 open referral assessments as at 30 June 2024
- 2,271 referrals received from 1 July 2024 to 30 June 2025.

The Commission finalised the assessment of 2,004 referrals in total. Of these, 1,733 referral assessments were finalised in less than 90 days from receipt, providing a result of 86.5% against a target of 80%.

At the end of the reporting period, there were 761 open referrals¹ in the Commission’s case management system to be carried forward. Of these, 440 were not finalised within the 90-day timeframe for assessments, including 281 received in 2024–25 and 159 received in 2023–24.

Table 2.1: KPI targets

PBS	Corporate Plan	KPI	Target
1.1	1.1	Percentage of referrals assessed within 90 days of receipt	80%
1.2	1.2	Percentage of investigations finalised within 2 years	60%
1.3	1.3	Number of corruption prevention and education products and engagements	100

¹ Excludes one ACLEI inherited referral open at 30 June 2025.

ACLEI legacy referrals

The Commission did not meet the target for KPI 1.1 for ACLEI legacy referrals.

The 32 open ACLEI referrals inherited by the Commission were received by ACLEI prior to 1 July 2023.

After the Commission’s first year of operation, 4 ACLEI legacy referral assessments remained open and were carried forward into 2024–25. Of these, 3 were closed shortly after the beginning of the reporting period.

At 30 June 2025, the assessment of the remaining ACLEI legacy referral remained in progress and is the subject of a preliminary investigation.

See Receiving and assessing referrals on page 54 for further information.

KPI 1.2: Percentage of investigations finalised within 2 years

The Commission met the target for KPI 1.2 with a result of 100%.

During 2024–25, the Commission commenced 14 corruption investigations. Twenty-six investigations commenced in 2023–24 were ongoing at the beginning of the reporting period. A total of 40 corruption investigations commenced under the NACC Act were on foot during 2024–25. Of these, 10 were finalised in the reporting period. All 10 were finalised in less than 2 years.

At 30 June 2025, 30 corruption investigations commenced under the NACC Act remained ongoing. None had been on foot for longer than 2 years. For investigations commenced under the NACC Act, the Commission achieved a result of 100% of investigations finalised in less than 2 years, against a target of 60%, but that must be seen in the context that the Commission has been in operation for only 2 years and so no Commission investigation could yet have exceeded that duration.

Table 2.2: Results for KPI 1.1

Referral type	Assessments finalised <90 days	Assessments finalised total	Result
NACC Act matters	1,733	2,004	86.5%
Transitioned matters	0	3	0%

Table 2.3: Results for KPI 1.2

Type of investigation	Total finalised	Finalised in less than 2 years	Result
NACC Act matters	10	10	100%
Transitioned matters	1	0	0%
LEIC Act matters	8	0	0%

ACLEI legacy investigations

The Commission did not meet the target for KPI 1.2 for ACLEI legacy investigations.

At transition time the Commission inherited 22 ACLEI investigations at various stages, comprising 5 transitioned and 17 LEIC Act² investigations. One LEIC Act matter was completed in 2023–24, leaving 21 ACLEI legacy investigations to be carried forward into 2024–25.

In September 2024, an additional active legacy LEIC Act investigation was subject to a transitional determination to be continued under the NACC Act. This means 6 transitioned investigations and 15 LEIC Act investigations were on foot in the reporting period.

In 2024–25, the Commission finalised a total of 9 ACLEI legacy investigations. The majority of ACLEI legacy investigations had either already exceeded the 2-year target timeframe at commencement of the Commission or did so during the Commission’s first year of operation. Therefore, the Commission’s result for KPI 1.2 was 0% for transitioned investigations and LEIC Act investigations.

At 30 June 2025, there were 12 ACLEI legacy investigations ongoing, comprising 5 transitioned and 7 LEIC Act investigations. The longest running ACLEI legacy investigation ongoing at 30 June 2025 commenced in 2019–20.

See Investigation outcomes on page 37 for further information.

KPI 1.3: Number of corruption prevention and education products and engagements

The Commission met the target for KPI 1.3 with a result of 149. KPI 1.3 is new in 2024–25 and results are reported for the first time. The Commission’s annual target is 100 corruption prevention and education (CPE) products and engagements.

The Commission significantly exceeded this initial target, achieving a result of 149 CPE products and engagements. During the reporting period, the Commission produced 11 corruption prevention and education products and participated in 138 engagements with jurisdictional agencies, the public, and national and international partners.

See Preventing corrupt conduct: corruption prevention and education on page 76 for further information.

Table 2.4: Results for KPI 1.3

Output	Result
Corruption prevention and education products	11
Corruption prevention and education engagements	138
Total	149

2 This number was incorrectly reported as 16 on page 22 of the 2023–24 annual report in the KPI 1.2 results section.

Commissioner's annual report

This report relates to the performance of the Commissioner's functions under the NACC Act for the reporting period (1 July 2024 to 30 June 2025).

Index of requirements

The performance measures and content requirements for the Commissioner's annual report are set out in s 271(2) of the NACC Act and ss 27–32 of the NACC Regulations. Table 2.5 lists these requirements and where the data can be found in this report.

Table 2.5: Commissioner's annual report list of requirements

Requirement	Legislative reference	Table
Number of voluntary referrals received	NACC Act: s 271(2)(a)(i) NACC Regulations: s 27(a)	2.7
Number of mandatory referrals received	NACC Act: s 271(2)(a)(i) NACC Regulations: s 27(b)	2.8
Total number of corruption issues dealt with (decisions under s 41(1) and s 41(6))	NACC Act: s 271(2)(a)(ii) NACC Regulations: s 28(1)	2.11
Number of corruption issues investigated by the Commission (decisions under s 41(1)(a))	NACC Act: s 271(2)(a)(ii) NACC Regulations: s 28(2)(a)	2.11
Number of corruption issues investigated jointly by the Commission and a Commonwealth agency or a state or territory government entity (decisions under s 41(1)(b))	NACC Act: s 271(2)(a)(ii) NACC Regulations: s 28(2)(b)	2.11
Number of corruption issues referred to a Commonwealth agency for investigation (decisions under s 41(1)(c))	NACC Act: s 271(2)(a)(ii) NACC Regulations: s 28(2)(c)	2.11
Number of corruption issues referred to a Commonwealth agency or a state or territory government entity for consideration (decisions under s 41(1)(d))	NACC Act: s 271(2)(a)(ii) NACC Regulations: s 28(2)(d)	2.11
Number of corruption issues where the decision is to take no action (decisions under s 41(6))	NACC Act: s 271(2)(a)(ii) NACC Regulations: s 28(2)(e)	2.11
Number of s 41(2) investigations completed	NACC Act: s 271(2)(a)(iii) NACC Regulations: s 29(a)	2.15
Number of s 41(2) investigations ongoing at the end of the reporting period (including any commenced prior to the reporting period)	NACC Act: s 271(2)(a)(iii) NACC Regulations: s 29(b)	2.16, 2.17
Number of corruption issues referred to a Commonwealth agency for investigation (decisions under s 41(1)(c)) that were referred, investigated and completed during the reporting period	NACC Act: s 271(2)(a)(iv) NACC Regulations: s 30(a)	2.32
Number of corruption issues referred to a Commonwealth agency for investigation (decisions under s 41(1)(c)) where there is oversight by the Commissioner	NACC Act: s 271(2)(a)(iv) NACC Regulations: s 30(b)	2.31

Requirement	Legislative reference	Table
Number of public inquiries completed	NACC Act: s 271(2)(a)(v) NACC Regulations: s 31(1)(a)	Nil
Number of public inquiries ongoing at the end of the reporting period (including any commenced prior to the reporting period)	NACC Act: s 271(2)(a)(v) NACC Regulations: s 31(1)(b)	Nil
Number of s 235 certificates issued by the Attorney-General	NACC Act: s 271(2)(a)(vi) NACC Regulations: s 32(1)	Nil
Number of s 236 (international relations) certificates issued by the Attorney-General	NACC Act: s 271(2)(a)(vii) NACC Regulations: s 32(2)	Nil
Extent to which corruption investigations have resulted in prosecution of persons for offences	NACC Act: s 271(2)(e)	2.23, 2.24
Extent to which corruption investigations have resulted in confiscation proceedings	NACC Act: s 271(2)(f)	2.25
Number and type of applications made for judicial review	NACC Act: s 271(2)(g)(i)	2.35
Outcomes of applications made for judicial review	NACC Act: s 271(2)(g)(i)	Nil
Number of other court proceedings involving the Commissioner	NACC Act: s 271(2)(g)(ii)	Nil
Outcomes of other court proceedings involving the Commissioner	NACC Act: s 271(2)(g)(ii)	Nil
A description of the kinds of corruption risks, corruption vulnerabilities or measures to prevent corruption into which the public inquiry or inquiries were conducted	NACC Act: s 271(2)(a)(v) NACC Regulations: s 31(2)	Nil
A description of the corruption investigations conducted by the Commissioner during that year that the Commissioner considers raise significant issues for, or reflect developments in, Commonwealth agencies	NACC Act: s 271(2)(b)	Page 64
A description of any patterns or trends, and the nature and scope of corruption in Commonwealth agencies or by public officials that have come to the Commissioner's attention during that year	NACC Act: s 271(2)(c)	Page 51
Any recommendations for changes to the laws of the Commonwealth or administrative practices of Commonwealth agencies that the Commissioner, as a result of performing the Commissioner's functions during that year, considers should be made	NACC Act: s 271(2)(d)	Page 80

Referrals

Anyone may refer a corruption issue or provide information about a corruption issue to the Commissioner (known as a voluntary referral).

Commonwealth agencies, Commonwealth intelligence agencies and public interest disclosure officers have mandatory reporting obligations and must report information about a suspected corruption issue involving their agency to the Commissioner (known as a mandatory referral).

The Commission may also deal with a corruption issue of its own initiative (own initiative).

Descriptions for all types are provided in the Glossary of data terms on page 168.

Counting referrals

All referrals received are counted, regardless of whether they are assessed to be within jurisdiction or raise a corruption issue during the assessment process. This ensures that results related to receiving and assessing information about corruption issues are reported with appropriate context and that a full picture of the Commission's work in this area is provided.

The Commission also receives enquiries, which may or may not be related to existing referrals or operational activities. Enquiries are most often handled by the Commission's Intake and Triage team but are not considered to be referrals.

Referrals received in the reporting period

During the reporting period, the Commission received 2,271 referrals, including 2,161 voluntary referrals and 107 mandatory referrals.

Table 2.6 provides the total number of referrals received. The breakdown of voluntary referrals received is in Table 2.7 and the breakdown of mandatory referrals received is in Table 2.8.

Table 2.6: Total referrals received (2024–25)

Referral type	2024–25
Voluntary referrals – total	2,161
Mandatory referrals – total	107
Own initiative	3
Total referrals received	2,271

Table 2.7: Number of voluntary referrals received (2024–25)

Referral type	2024–25
Voluntary Commonwealth agency	22
Voluntary public report	2,139
Total voluntary referrals received	2,161

Table 2.8: Number of mandatory referrals received (2024–25)

Referral type	2024–25
Mandatory Commonwealth agency (excluding intelligence agencies)	106
Mandatory intelligence agency	1
Mandatory public interest disclosures	0
Total mandatory referrals received	107

Total referrals received by the Commission

In its first annual report, the Commission reported receiving a total of 3,190 referrals in its first year of operations, including 3,023 voluntary, 116 mandatory, 10 own initiative and 41 related to an existing matter. During 2024–25, a small number of corrections to these figures were identified through new variance reporting processes.

The changes were due to:

- referrals received towards the end of the reporting period being entered into the case management system in 2024–25 – for example, referrals received by mail
- re-categorisation of referral type occurring at various stages of the referral assessment process.

Table 2.9 shows the variance to the 2023–24 reported figures and Table 2.10 provides a breakdown of all referrals received by type and year received, reflecting the changes arising from the variance report.

ACLEI legacy matters – referrals

The 32 ACLEI referrals inherited by the Commission were received by ACLEI prior to 1 July 2023.

See Appendix B: Finalising the operations of ACLEI on page 142 for further information.

Table 2.9: Change to number and type of referrals received reported in the previous annual report

Referral type	2023–24	Variance	Total
Voluntary referrals – total	3,023	2	3,025
Mandatory referrals – total	116	2	118
Own initiative	10	–	10
Other (relating to an existing matter)	41	–	41
Total referrals	3,190	4	3,194

Table 2.10: Number of referrals received by referral type and year received

Referral type	2023–24	2024–25	Total
Voluntary referrals – total	3,025	2,161	5,186
Mandatory referrals – total	118	107	225
Own initiative	10	3	13
Other (relating to an existing matter)*	41	N/A	41
Total referrals	3,194	2,271	5,465

* Other is not reported for 2024–25, as it is no longer an active category. However, as it was reported in 2023–24 it is included here for completeness.

Corruption issues

Under s 41 of the NACC Act, the Commission may deal with a corruption issue in any one or more of the following ways:

1. The Commission may investigate the corruption issue (corruption investigation):
 - by itself (NACC investigation)
 - together with a Commonwealth agency or state or territory government entity (joint investigation).
2. The Commission may refer the corruption issue to:
 - a Commonwealth agency to which the issue relates for investigation (agency investigation), with or without oversight by the Commission
 - a Commonwealth agency or state or territory government entity for consideration (agency consideration).
3. The Commissioner may at any time:
 - reconsider how a corruption issue is dealt with (reconsideration)
 - decide to take no action in relation to the corruption issue (no further action).

Most corruption issues are dealt with as a result of referrals progressing through the assessment process. This does not preclude the Commissioner from dealing with corruption issues outside the referral assessment process where it is appropriate to do so. The own initiative category allows the Commission to deal with corruption issues that come to its attention in other ways.

The Commissioner may decide to conduct a preliminary investigation as part of the assessment process to assist in determining whether a corruption issue exists and/or to determine whether or how to deal with a corruption issue.

Corruption issues dealt with

During the reporting period, the Commissioner dealt with a total of 244 corruption issues.

Table 2.11 shows the total number of corruption issues dealt with during the period and how corruption issues were dealt with.

How the Commission counts corruption issues

For reporting purposes, a corruption issue is reported as 'dealt with' based on the recorded date of decision, which is not the same as the date an assessment is closed (as used for KPI 1.1). This is because subsequent activity can be commenced immediately following a decision from the Commissioner, while the process to finalise an assessment can include drafting correspondence and carrying out administrative closure steps in the case management system.

In most cases, each referral is treated as potentially raising one corruption issue, even where there are multiple allegations or persons of interest. In these instances, the outcome reported for 'corruption issues dealt with' represents the most interventionist decision for each referral. For example, the reported outcome would be a 'joint investigation' if one element of the referral was dealt with in that way, even though other elements of the referral are not progressed for investigation and, if considered separately, may have been reported as 'no further action'.

However, where it appears likely the referral will result in more than one interventionist decision, it may be:

- considered as raising multiple corruption issues to be dealt with separately or in more than one way (split corruption issue)
- considered to raise a single corruption issue but a decision is made to deal with it in more than one way (multi-outcome issue).

In such cases, both outcomes are counted and, where relevant for reporting purposes, an explanatory note is provided. For example, the Commission might initiate its own investigation into one issue raised by a referral but refer another issue to an agency for investigation or consideration; or the Commission may refer an issue to an agency for investigation, while also referring it for consideration to the applicable oversight body for their awareness.

Additionally, where multiple referrals have been received about related allegations or persons of interest, they may be:

- considered separately, if it appears that each raises a potentially distinct corruption issue
- merged, if they duplicate, or include information from the same referrer about, the same issue
- considered together, as related referrals, if it appears that each raises the same corruption issue
- a combination of the above, including where these decisions are made following separate or subsequent consideration.

Table 2.11: Number of corruption issues dealt with by the Commissioner (2024–25)

Subsection	How a corruption issue was dealt with	2024–25
s 41(1)(a)	NACC investigation	13
s 41(1)(b)	Joint investigation	6
s 41(1)(c)	Referred to agency for investigation	13*
s 41(1)(d)	Referred to agency for consideration	8^
s 41(6)	No further action	204
Total corruption issues dealt with		244

* Includes one multi-outcome issue that was also referred for consideration in 2024–25. Includes 3 issues where the referral was underway at the end of the reporting period.

^ Includes one multi-outcome issue that was also referred for investigation in 2024–25 and one issue that was reconsidered to s 41(6) no further action after the reporting period.

Corruption issues ‘dealt with’ does not equal corruption investigations

While in many cases a corruption investigation or an agency investigation relates to a single corruption issue, that is not always the case. The Commissioner may investigate multiple corruption issues together. This can occur at the commencement of the investigation, or at any point during the investigation, where subsequent corruption issues may be:

- added to the investigation
- merged into an existing corruption issue or issues associated with the investigation.

Results in the Commissioner’s annual report related to agency investigations (page 40) require the count of corruption issues, not the number of agency investigations. However, measures related to corruption investigations (page 30) require the number of investigations, not the count of corruption issues.

Occasionally, the decision to deal with a corruption issue by investigation is reconsidered during the planning and scoping phase of a corruption investigation (pending investigation). A corruption investigation formally commences when a decision minute has been approved by the Commissioner or delegate. This may not occur within the same reporting period.

Pending investigations that are reconsidered prior to commencement are not counted as corruption investigations. However, they are counted as corruption issues dealt with by means of a NACC or joint investigation (Table 2.11). Therefore, the number of corruption issues dealt with by a NACC or joint investigation may not equal the number of corruption investigations commenced.

Decisions to refer a corruption issue to another agency for consideration or investigation (including whether the Commission will oversee the investigation) are similarly occasionally reconsidered before the formal referral is made³ – for example, where the Commission is provided additional information by the agency prior to the formal notification being sent.

The Commission may also disclose relevant material to another appropriate agency for their information (disclosure), under s 229(2) of the NACC Act. However, this is not the same as a referral of a corruption issue for agency consideration, under s 41(1)(d). Disclosures under s 229 are therefore excluded when reporting on corruption issues dealt with in Table 2.11.

Summary

- Every referral received is assessed, but only those found to have raised a corruption issue are counted under corruption issues dealt with.
- The total number of referrals assessed as raising a corruption issue may not be equal to the number of corruption issues dealt with, as referrals can be merged, split or separately progressed to determine the corruption issues considered.
- Similarly, a corruption issue can be merged, split or separately progressed for action following consideration.
- The number of investigations (whether independent, joint or referred to agencies) may not be equal to the number of corruption issues dealt with in each of those ways.
- How a corruption issue is dealt with can be reconsidered at any time, but whether this is reported at corruption issues dealt with (Table 2.11) or elsewhere will depend on at what stage the reconsideration occurred.

³ See Agency investigations on page 40 for more information on referral underway.

Preliminary investigations

In 2024–25, a total of 57 preliminary investigations were on foot (Table 2.12). Thirty-three were commenced during the reporting period and a further 24 were carried forward from 2023–24.

During the reporting period, the Commission finalised 12 preliminary investigations whereby:

- 9 were finalised as it became apparent that an investigation would not find corrupt conduct
- 3 progressed to a corruption investigation.

At 30 June 2025, 45 preliminary investigations remained ongoing. Table 2.13 shows the status of preliminary investigations at the end of the reporting period and Table 2.14 breaks down the outcomes of preliminary investigations closed during the reporting period.

Table 2.12: Number of preliminary investigations on foot (2024–25)

Preliminary investigations	2024–25
Carried over	24*
Commenced	33
Total preliminary investigations	57

* Includes one preliminary investigation commenced from an ACLEI inherited referral.

Table 2.13: Status of preliminary investigations by commencement year (at 30 June 2025)

Preliminary investigations	2023–24	2024–25	Total
Ongoing	20	25	45
Closed	4	8	12
Total preliminary investigations	24	33	57

Table 2.14: Number of preliminary investigations closed during the reporting period by outcome

Outcome	2023–24	2024–25	Total
No further action	4	5	9
Progressed to s 41(1)(a) investigation	0	3	3
Total preliminary investigations closed	4	8	12

Investigations

A corruption investigation can be conducted independently by the Commission (NACC investigation) or jointly (joint investigation) with a Commonwealth agency or state or territory government entity (partner agency).

Status of investigations

The status of a corruption investigation can be ongoing or finalised.⁴ This applies to both NACC and ACLEI legacy matters. An ongoing investigation includes where:

- the Commission has commenced the corruption investigation and is undertaking investigative activities (active)
- a brief has been referred to the Commonwealth Director of Public Prosecutions (CDPP) for consideration on whether to commence court proceedings (with CDPP)
- court proceedings have been commenced and are ongoing (before the court)
- a recommendation on how to finalise the investigation is in progress or a completion report (where applicable) is being prepared (finalisation or reporting underway).

A corruption investigation is finalised when:

- the completion report is signed off by the Commissioner (or delegate) and provided to the Minister
- the Commissioner reconsiders how to deal with the corruption issue under investigation and decides to take no further action.

Twenty-six corruption investigations were carried forward from 2023–24, including 7 joint investigations. During the reporting period, the Commission commenced 14 corruption investigations, including 5 joint investigations.

A total of 40 corruption investigations were on foot in 2024–25. Ten were finalised, all of which had commenced in 2023–24. Thirty were ongoing at 30 June 2025.

Table 2.15 shows the status of NACC Act investigations at the end of the reporting period by type. Tables 2.16 and 2.17 show the commencement year of completed and ongoing investigations by the Commission on foot during the reporting period for NACC and joint investigations respectively. Table 2.18⁵ provides a further status breakdown for ongoing investigations at the end of the reporting period.

4 In the 2023–24 annual report, investigations were categorised as ongoing or complete. The change in wording reflects updated internal terminology and provides consistency across the Commissioner's report and KPI 1.2.

5 In the Commission's 2023–24 report, this table also set out the number of finalised investigations. This information is now available in Tables 2.26 and 2.27, with additional details provided under Investigation outcomes on page 37.

Table 2.15: Status of NACC and joint investigations (at 30 June 2025)

Status of investigation	NACC	Joint	Total
Ongoing	21	9	30
Finalised in 2024–25	7	3	10
Total on foot in the period	28	12	40

Table 2.16: Status of NACC investigations by commencement year (at 30 June 2025)

Status of NACC investigation	2023–24	2024–25	Total
Ongoing	12	9	21
Finalised in 2024–25	7	0	7
Total on foot in the period	19	9	28

Table 2.17: Status of joint investigations by commencement year (at 30 June 2025)

Status of joint investigation	2023–24	2024–25	Total
Ongoing	4	5	9
Finalised in 2024–25	3	0	3
Total on foot in the period	7	5	12

Table 2.18: Details of ongoing NACC Act corruption investigations (at 30 June 2025)

Status of investigation	NACC	Joint	Total
Active investigation	19	6	25
With CDPP	–	1	1
Before the court	–	1	1
Finalisation or reporting underway	2	1	3
Total ongoing	21	9	30

**ACLEI legacy investigations
(number and status)**

The Commission had 21 ACLEI legacy investigations on foot in 2024–25, including 6 transitioned and 15 LEIC Act investigations. Two LEIC Act investigation reports were provided to the Minister during the reporting period and public reports were released for both. A further 6 LEIC Act investigations and one transitioned investigation were finalised with no further action taken.

At 30 June 2025, 5 transitioned investigations and 7 LEIC Act investigations remained ongoing. The status of all ACLEI legacy investigations at 30 June 2025 is shown in Table 2.19.

Twelve ACLEI legacy investigations, including 5 transitioned and 7 LEIC Act matters, will be carried forward. Tables 2.20 and 2.21 show the commencement year of completed and ongoing ACLEI legacy investigations on foot during the reporting period. Table 2.22⁶ provides a further status breakdown for ongoing investigations at the end of the reporting period.

6 In the Commission's 2023–24 report, this table also set out the number of finalised investigations. This information is still set out in Tables 2.15 to 2.18 and additional detail is provided in ACLEI legacy investigation outcomes on page 39.

Table 2.19: Status of ACLEI legacy investigations (at 30 June 2025)

Status of investigation	Transitioned	LEIC Act	Total
Ongoing	5	7	12
Finalised in 2024–25	1	8	9
Total	6	15	21

Table 2.20: Status of transitioned investigations by commencement year (at 30 June 2025)

Status of transitioned investigations	2021–22	2022–23	Total
Ongoing	2	3	5
Finalised in 2024–25	1	–	1
Total on foot in the period	3	3	6

Table 2.21: Status of LEIC Act investigations by commencement year (at 30 June 2025)

Status of LEIC Act investigations	2015–16	2018–19	2019–20	2020–21	2021–22	2022–23	Total
Ongoing	0	0	1	2	2	2	7
Finalised in 2024–25	1	1	1	3	2	–	8
Total on foot in the period	1	1	2	5	4	2	15

Table 2.22: Details of ongoing ACLEI legacy corruption investigations (at 30 June 2025)

Status of investigation	Transitioned	LEIC Act	Total
Active investigation	2	1	3
With CDPP	–	–	–
Before the court	1	1	2
Finalisation or reporting underway	2	5	7
Total ongoing	5	7	12

Investigations resulting in further activity

Where the Commissioner is satisfied that allegations investigated may amount to criminal conduct, the Commission can refer a brief of evidence to the CDPP. In joint investigations, a referral to the CDPP may be facilitated by a partner agency. The CDPP determines whether to commence a prosecution, having regard to whether there is a reasonable prospect of conviction and whether a prosecution is in the public interest.

There was one matter arising from a joint investigation under the NACC Act before the court at the beginning of the reporting period. The defendant entered a plea of guilty in December 2024 and was sentenced after the reporting period, in July 2025.

In addition to this, during 2024–25:

- the Commission referred a brief of evidence arising from a NACC investigation to the CDPP. The matter remained under consideration by the CDPP at 30 June 2025
- court proceedings were commenced arising from a joint investigation, and the matter was before the court as at 30 June 2025.

Table 2.23 shows the number and status of briefs of evidence arising from NACC Act investigations referred to the CDPP as at 30 June 2025. It is possible for more than one brief of evidence to arise from a single investigation, so the total will not always equal the number of investigations where a referral has been made.

Since commencement, a total of 3 briefs of evidence have been referred to the CDPP, arising from 3 NACC Act investigations. The 2 briefs of evidence referred to the CDPP during the reporting period arose from 2 joint investigations.

Where evidence indicates an investigation involves the proceeds of crime, a brief of evidence can be referred to a proceeds of crime authority, including the Australian Federal Police (AFP) or CDPP or state and territory authorities responsible for conducting confiscation proceedings. Whether the referral is accepted is a matter for the proceeds of crime authority.

The Commission did not make any referrals to a proceeds of crime authority during the reporting period.

Table 2.23: Number and status of briefs of evidence referred to the CDPP resulting from NACC Act investigations (at 30 June 2025)

Status of referral to CDPP	NACC	Joint	Total
Under consideration	–	1	1
Did not proceed to prosecution	–	–	–
Before the court	–	1	1
Awaiting sentencing	–	1	1
Prosecution finalised (successful)	–	–	–
Prosecution finalised (unsuccessful)	–	–	–
Total	0	3	3

ACLEI legacy investigations resulting in further activity

At the beginning of the reporting period, there were 2 transitioned investigations with briefs under consideration by the CDPP and 2 matters before the courts arising from one transitioned investigation.

During 2024–25:

- one defendant was sentenced in a proceeding arising from a brief that had been under consideration by the CDPP at the beginning of the reporting period
- 2 defendants were sentenced in 2 proceedings that arose from the same investigation. This investigation also generated 2 further briefs which were under consideration by the CDPP and did not proceed to prosecution
- the Commission referred one additional brief of evidence to the CDPP for consideration and proceedings were commenced. This matter was before the court as at 30 June 2025.

There was one LEIC Act investigation with a brief of evidence under consideration by the CDPP; and 4 matters before the court arising from 4 LEIC Act investigations. During 2024–25:

- one brief of evidence under consideration by the CDPP did not proceed to prosecution and the investigation was finalised by the Commission
- 3 prosecutions arising from LEIC Act investigations were concluded and 3 defendants were sentenced. One matter remained before the court as at 30 June 2025.

Table 2.24 shows the number and status of briefs of evidence arising from ACLEI legacy matters referred to the CDPP as at 30 June 2025.

One confiscation proceeding was commenced by a proceeds of crime authority in relation to one ACLEI legacy investigation. Table 2.25 shows the number and status of confiscation proceedings arising from investigations as at 30 June 2025.

Table 2.24: Number and status of briefs of evidence referred to the CDPP resulting from ACLEI legacy investigations (at 30 June 2025)

Referral to CDPP	Transitioned	LEIC Act	Total
Under consideration	–	–	–
Did not proceed to prosecution	2	1	3
Before the courts	1	1	2
Prosecution finalised (successful)	3	3	6
Prosecution finalised (unsuccessful)	–	–	–
Total briefs	6	5	11
Total investigations	3	5	8

Table 2.25: Number of ACLEI legacy investigations resulting in confiscation proceedings (at 30 June 2025)

Referral for confiscation proceedings	Transitioned	LEIC Act	Total
Under consideration by a proceeds of crime authority	–	–	–
Referral did not proceed	–	–	–
Confiscation proceedings commenced by a proceeds of crime authority	–	1	1
Total	0	1	1

Investigation outcomes

Upon completion of an investigation, the Commissioner must provide a copy of an investigation report to the Minister.

Prior to doing so, if the investigation report may include an opinion, finding or recommendation that is critical of a person or agency, the Commission must engage in a procedural fairness process with the person and/or agency.

If the Commissioner is satisfied it is in the public interest to do so, the Commission may make public a version of an investigation report provided to the Minister.

The Commissioner can also make public statements about a decision not to investigate or where a preliminary investigation has been conducted and no corruption issue has been found to arise. The Commissioner may take this step where the matter has received significant public attention and the statement will assist in avoiding unjust damage to reputations and restoring trust in public officials and/or institutions.

Nine investigations commenced under the NACC Act were finalised in 2024–25 with no further action being taken, as it became apparent that no corrupt conduct would be proven. One investigation report arising from a NACC Act corruption investigation, Operation Kingscliff, was provided to the Minister on 23 June 2025. A public version of that report was released on 30 June 2025.

Table 2.26 shows the number of finalised investigations resulting in findings of corrupt conduct and indicates whether a report was provided to the Minister. Details on the findings of investigations finalised by the Commission during the period are in Table 2.27 and provided as case studies in Analysis of performance on page 45.

It is possible for multiple findings in relation to multiple individuals to arise from a single corruption investigation. Therefore, the total findings in Table 2.27 may not be equal to the total number of investigations with corruption findings in Table 2.26.

Table 2.26: Outcomes of finalised NACC Act corruption investigations (2024–25)

Investigation findings	Report provided	No report provided	Total
Corruption findings	1	–	1
Court outcome	–	–	0
No further action – no corrupt conduct	–	9	9
Total	1	9	10

Table 2.27: Details of findings in NACC Act corruption investigations finalised in the reporting period (2024–25)

Investigation findings	Findings	Investigations
Breach of public trust	–	–
Abuse of office	1	1
Misuse of information	1	1
Conduct adversely affecting the honest or impartial performance of a public official's functions	–	–
Total	2	1*

* Findings relate to the same investigation.

ACLEI legacy investigation outcomes

During the reporting period, 2 LEIC Act investigations, Operation Wilson and Operation Elektra, were finalised, with investigation reports provided to the Minister. These reports were published on 12 February 2025 and 11 June 2025 respectively and are available on the Commission’s website.

Tables 2.28 and 2.29 show the number of finalised transitioned and LEIC Act investigations resulting in findings of corrupt conduct and indicate whether a report was provided to the Minister.

Details on the findings of LEIC Act investigations finalised by the Commission during the period are in Table 2.30. Summaries of those in which there has been a public outcome are provided in Analysis of performance on page 45.

Table 2.28: Outcomes of finalised transitioned corruption investigations (2024–25)

Investigation findings	Report provided	No report provided	Total
Corruption findings	–	–	–
Court outcome	–	1	1
No further action	–	–	–
Total	0	1	1

Table 2.29: Outcomes of finalised LEIC Act corruption investigations (2024–25)

Investigation findings	Report provided	No report provided	Total
Corruption findings	–	–	–
Court outcome	–	1	1
No further action	–	–	–
Total	0	1	1

Table 2.30: Details of findings in LEIC Act corruption investigations finalised in the reporting period (2024–25)

Investigation findings	Findings	Investigations
Abuse of office	3	2
Perverting the course of justice	–	–
Corruption of any other kind	–	–
Total	3	2

Agency investigations

The Commissioner can refer a corruption issue to a Commonwealth agency for investigation (agency investigation).

Where the Commissioner deals with a corruption issue by referring it to a Commonwealth agency for investigation, the Commissioner may also oversee the investigation (overseeing an agency investigation). This may include:

- giving directions on the planning and conduct of the investigation (give directions)
- requiring reports be provided to the Commission on the progress of the investigation (mandatory progress report)
- requiring a report be provided once the investigation is finalised (mandatory completion report).

Agency investigations

An agency investigation is considered finalised only when a mandatory completion report has been received. Where an agency investigation is not overseen or monitored in any of the abovementioned ways, there is no requirement for the agency to inform the Commission of the completion or outcome of the matter. For that reason, only overseen or monitored agency investigations are included when reporting on whether a corruption issue referred for agency investigation is ongoing or finalised.

Referral underway

For corruption issues referred for agency investigation or agency consideration, the Commission formally notifies the agency that the corruption issue is referred to them and, in the case of an agency investigation, if it is subject to oversight.

Once the formal notification has occurred, the matter is reported as referred to agency. The notification also provides the commencement date for overseen or monitored agency investigations. The stage between the decision to deal with a corruption issue by referral (decision date) and the date of formal notification (date referred) is reported as referral underway.

This means there will be instances where the decision date and the date referred may fall in different reporting periods. This means that reports accurately reflect the decisions taken and work underway in each reporting period and facilitates tracing corruption issues dealt with through to the number and duration of agency investigations with oversight.

Agency consideration

The Commissioner can refer a corruption issue to a Commonwealth agency or state or territory government entity for consideration (agency consideration). Where the referral is for agency consideration, the Commissioner is not required to be informed of the completion or outcome of the matter, and the agency is not obliged to take any particular action.

Corruption issues referred for consideration are not relevant for reporting on the number, status or oversight type for corruption issues referred for investigation. Figures for agency consideration are reported in Table 2.11 under ‘corruption issues dealt with’.

Referrals to Commonwealth agencies for investigation

At 1 July 2024, there were 4 ongoing agency investigations subject to oversight. During the reporting period a further 11 agency investigations commenced that were subject to oversight, including one where the decision to refer the corruption issue for investigation occurred in the previous reporting period.

At 30 June 2025, there were a further 3 agency investigations subject to oversight where the referral to the agency was still in progress at the end of the reporting period.

Table 2.31 shows the number of corruption issues referred for agency investigation based on the type of oversight applied.⁷

Table 2.31: Corruption issues referred for agency investigation by type of oversight (2024–25)

Type of oversight	Referred to agency	Referral underway	Total
Not subject to oversight	–	–	–
Subject to oversight	11*	3	14
Total	11	3	14

* Includes one referral where the decision to refer was made in 2023–24.

7 Figures in Table 2.31 include one referral where the decision to refer occurred in 2023–24; the totals are therefore one more than the number of s 41(1)(c) decisions reported in Table 2.6 but equal to the number of agency investigations commenced in Table 2.32.

**Ongoing and finalised
agency investigations**

The Commission received 4 mandatory completion reports in respect of a corruption issue that was referred for agency investigation in the reporting period. Two agency investigations that commenced in previous reporting periods were finalised in 2024–25, including:

- one where the mandatory completion report was received
- one where the Commissioner reconsidered how to deal with the matter and decided to commence a NACC investigation.

There were 9 agency investigations overseen by the Commission ongoing at 30 June 2025. Table 2.32 shows the status of corruption issues referred to a Commonwealth agency for investigation, where the Commission was overseeing the investigation, as at 30 June 2025.

ACLEI legacy agency investigations

All ACLEI legacy agency investigations were subject to a requirement for mandatory completion reports; however, only some had specific oversight requirements under the LEIC Act. Where the Commissioner decided an ACLEI legacy agency investigation would continue under the LEIC Act, it is not reported as an overseen investigation or as subject to oversight. To avoid confusion with new NACC Act matters, these are referred to as ‘monitored agency investigations’.

Twelve ACLEI legacy agency investigations, including 9 transitioned and 3 LEIC Act matters, were ongoing at 30 June 2024 and were carried forward into 2024–25. Four transitioned agency investigations and all 3 LEIC Act agency investigations were completed in the reporting period. Five monitored investigations were ongoing at 30 June 2025.

Tables 2.33 and 2.34 show the commencement year of completed and ongoing ACLEI legacy agency investigations monitored by the Commission during the reporting period.

Further information on ACLEI legacy agency investigations is available in Appendix B: Finalising the operations of ACLEI on page 142.

Table 2.32: Status of agency investigations by commencement year (at 30 June 2025)

Status of agency investigations	2023–24	2024–25	Total
Ongoing	2	7	9
Finalised in 2024–25	1	4	5
Reconsidered	1	–	1
Total on foot in the period	4	11	15

Table 2.33: Status of transitioned agency investigations monitored by the Commission by commencement year (at 30 June 2025)

Transitioned agency investigations	2020–21	2021–22	2022–23	Total
Ongoing	1	1	3	5
Finalised in 2024–25	–	1	3	4
Total monitored	1	2	6	9

Table 2.34: Status of LEIC Act agency investigations monitored by the Commission by commencement year (at 30 June 2025)

LEIC Act agency investigations	2022–23	Total
Ongoing	–	–
Finalised in 2024–25	3	3
Total	–	3

Court proceedings including applications for judicial review

Certain decisions under the NACC Act are subject to review under the *Administrative Decisions (Judicial Review) Act 1977* (Cth). There were no applications for judicial review or court proceedings involving the Commissioner.

There was one application for judicial review under the *Judiciary Act 1903* (Cth) made to the Federal Court of Australia during the reporting period. This application relates to a request under the *Freedom of Information Act 1982* (Cth) processed by the Commission. No outcomes were finalised in the reporting period.

Table 2.35 shows the list of applications made during the reporting period.

Table 2.35: Judicial review applications made during the reporting period (2024–25)

Reference	Application date	Type	Court
VID784/2024	6 August 2024	Freedom of information (review of decision)	Federal Court of Australia

Public inquiries

Under s 161 of the NACC Act, the Commissioner may conduct public inquiries into corruption risks and vulnerabilities and/or measures to prevent corruption in Commonwealth agencies.

The Commission did not conduct any public inquiries during the reporting period.

Certificates issued

The Attorney-General did not issue any certificates under s 235 or s 236 of the NACC Act during the reporting period.

Analysis of performance

Operating environment

Key features of the Commission's operating environment include:

- The Commission's statutory remit is serious or systemic corrupt conduct involving Commonwealth public officials. The limits of this are not well understood by some of those who engage with us.
- The Commission is a new agency – just 2 years old at the end of the reporting period – and still building its capability and refining its systems.
- We inherited from our predecessor, ACLEI, a significant workload of open assessments and investigations, which we are obliged to finalise. We also received an enormous influx of referrals in our first year, which continues to take time to work through. This requires balancing new matters with finalising the ACLEI legacy matters.
- The Commission has to balance the legal and practical imperative of confidentiality about its work with keeping the public informed. Much of its investigation work must necessarily remain confidential, both by law and by necessity if corruption investigations are to be effective.
- The Commission's work is subject to oversight and scrutiny – in particular, by the Inspector and the Parliamentary Joint Committee on the National Anti-Corruption Commission (PJC-NACC), but also through Senate estimates and the media.

Remit

The management of public expectations poses an ongoing challenge. The Commission's statutory functions define what it can do, and that does not correlate with what some may expect it to do.

The Commission is an anti-corruption commission concerned with investigating and preventing serious and systemic corruption in the Commonwealth public sector.

Serious corrupt conduct:

- is corrupt conduct that is significant, more than negligible or trivial
- does not have to be severe or grave.

Systemic corrupt conduct:

- is corrupt conduct that involves more than an isolated case, involves a pattern of behaviour, or affects or is embedded in a system
- can occur in one or multiple agencies, and can involve one or multiple individuals
- does not have to be coordinated.

It is not a complaints handling agency or an administrative decisions review authority. Making a referral to the Commission is not like making a complaint to the Ombudsman or an application to the Administrative Review Tribunal; the Commission does not adjudicate on individual complaints.

Referrals to the Commission are not individual initiating processes on which a referrer is entitled to an adjudication but, rather, a source of information. These referrals, in conjunction with other information, help the Commission to identify and decide what to investigate; and where to focus, in the public interest, to have the optimal impact in deterring and preventing corrupt conduct in the Commonwealth public sector. Often that means the Commission will focus on matters which are not and have not been the subject of investigation by other agencies, rather than those which have been or are under investigation elsewhere.

Building capability and refining systems

In its second year of operation, the Commission refined existing systems and processes established during its inaugural year and introduced new resources and technologies to support staff and build capability.

Construction, fit-out and testing of the Commission's purpose-built hearing room was completed in October 2024, enabling a critical component of the investigation process to be managed within the Commission's secure premises in a state-of-the-art facility. It was used for hearings over more than 30 days.

To support witnesses at hearings, as well as others who interact with the Commission through referrals and investigations, the Commission finalised establishment of a Witness Liaison function. The Witness Liaison team works with the Commission's investigators and lawyers and contacts witnesses where appropriate to assess their wellbeing and formulate support plans suited to their circumstances.

The Witness Liaison team assists with logistic and other information and, where appropriate, refers witnesses to independent wellbeing support and counselling services.

To ensure data and information assets are fit for purpose and compliant with relevant legislation, standards and guidelines, the Commission established a Data and Information Governance team and developed its first Data Strategy, with work commencing on implementation of its key priorities.

As a new organisation committed to continuous improvement, the Commission tested and refined its processes. In particular, a reform program identified opportunities to streamline the process for evaluating referrals and gain efficiencies; there was a major enhancement to the case management system to support updated processes; and staff capability was increased through training and other development opportunities. The Commission also reviewed and updated internal policies and enhanced its travel and expense management systems.

Building capability in the Commission's workforce remained a key priority. The Commission introduced new training to support its staff, including targeted training modules to address a range of operational needs identified through routine training surveys and analyses. In partnership with the Tasmania Police Academy, the Commission developed and rolled out bespoke authorised officer training to support the knowledge and capability of the Commission's authorised officers and other staff performing field operations. This training supports officers to exercise their duties, powers and responsibilities in the field safely, lawfully and professionally in accordance with the NACC Act.

The Commission also conducted training to support frontline staff in the Commission's call centre, which receives referrals and provides information to callers about how to make referrals. This means of communication provides a vital alternative to the webform. However, it can also pose challenges for staff and can impact on their wellbeing. Although the Commission already had policies that allowed staff to terminate calls and limit the way individuals contact the Commission if they behave unacceptably, in 2024–25, in response to an increase in the frequency of unreasonable behaviour by some callers towards staff, a callback system was introduced and training provided for handling difficult calls and managing vicarious trauma. These initiatives support staff wellbeing by limiting and managing the impact of the behaviour but have also resulted in an improvement in the quality of information gained from phone referrals.

The Commission negotiated and executed a memorandum of understanding with the Attorney-General, the President of the Senate and the Speaker of the House of Representatives on parliamentary privilege, which was tabled in both houses in November 2024. This important instrument provides agreed procedures under which the Commission can use its investigatory powers in relation to parliamentarians, while respecting parliamentary privilege. Negotiation of the memorandum of understanding was followed by training for Commission staff on aspects of parliamentary privilege relevant to the Commission's work.

Balancing ACLEI legacy and new workloads

The Commission progressed assessments and investigations carried over from 2023–24, including complex referrals awaiting assessment and legacy matters inherited from the former ACLEI.

From its first year of operation, the Commission carried forward 494 open referral assessments (including 24 ongoing preliminary investigations), 26 ongoing corruption investigations, and 4 ongoing agency investigations. In this second year, the Commission received 2,271 referrals, commenced 14 new investigations, and oversaw an additional 11 agency investigations. In addition, on 1 July 2024, there were 4 open ACLEI legacy referral assessments, 21 ongoing ACLEI legacy corruption investigations, and 12 ongoing ACLEI legacy agency investigations.

The Commission has had to balance finalisation of ACLEI legacy activities, mindful of the age of some of them, with progressing matters under the NACC Act that have commenced since the Commission was established. In response to these competing demands, a review of ACLEI legacy investigations was undertaken to identify matters to be prioritised for finalisation. As a result of this review, we finalised 9 of the 21 ACLEI legacy investigations, including publishing 2 investigation reports.⁸ The Commission also completed assessment of 3 of the 4 open ACLEI legacy referral assessments and closed 7 of the 12 ACLEI legacy agency investigations.⁹

⁸ Excludes report for Operation Bannister, which was published prior to this review.

⁹ For more information on ACLEI legacy matters, see Appendix B: Finalising the operations of ACLEI on page 142.

Balancing confidentiality and transparency

Like most other anti-corruption and integrity bodies, much of the Commission's work must remain confidential, by law and by necessity, to enable the Commission to perform its functions effectively.

The Commission is bound by strict confidentiality provisions in the NACC Act. Public hearings are permitted by law only in exceptional circumstances. The Commissioner can make public disclosures only if satisfied that it is in the public interest and for a purpose connected to the Commission's functions.

Confidentiality of investigations is essential for the following reasons:

- Protecting investigations: Publicising information about investigations can compromise them. It limits investigatory pathways, particularly the use of covert powers, and can lead to the loss or fabrication of evidence.
- Safeguarding whistleblowers and witnesses: Confidentiality protects people who give us information from retaliation and undue pressure.
- Avoiding unfair damage to reputations: Disclosing that a referral has been made about an individual, or that an individual is subject to investigation, can cause unjust harm to their reputation, as not all referrals and investigations result in a finding of corrupt conduct.
- Encouraging cooperation: Witnesses are usually more cooperative and forthcoming in a private setting than in a public one.

Because of a handful of high profile matters in some states, there is a misconception that other anti-corruption commissions routinely hold public hearings. In fact, most corruption investigations and hearings are conducted in private. As the former Chief Commissioner of the Tasmanian Integrity Commission recently stated upon his retirement:¹⁰

This approach protects the integrity of our investigations by affording fairness to the subjects of those investigations – who, by definition, have not been found to have engaged in any act of misconduct – and allowing our people to fulfil their responsibilities without unnecessary public influence or pressure.

Within these constraints, the Commission seeks to keep the public informed of its activities.

In 2023–24, the Commission published weekly media updates providing information on its operational activity, such as the number of referrals received, matters before the court and investigations underway.

In 2024–25, the Commission continued to provide weekly updates on this data and published monthly summaries providing more detailed information about relevant issues and activities.

¹⁰ Greg Melick AO KC, [Reflections at the conclusion of my term – Integrity Commission](#), Integrity Commission Tasmania, 15 August 2025.

The publication of investigation reports following completion of a corruption investigation informs the public about the outcomes of investigations, exposes corrupt conduct, provides information about corruption trends and vulnerabilities, and serves as a deterrent.

Upon completion of an investigation, the Commission can publish a report if it is in the public interest to do so. This will usually be the case if a finding of corrupt conduct is made, but that judgment has to be made on a case-by-case basis, taking into account a range of factors, including risks to the safety or welfare of individuals, jeopardy to court proceedings, and the public interest in exposing and deterring corrupt conduct.

During the reporting period, the Commission published the following 4 investigation reports, 3 of which involved findings of corrupt conduct:

- Operation Bannister (see page 68)¹¹
- Operation Wilson (see page 69)
- Operation Elektra (see page 68)
- Operation Kingscliff (see page 65).

The Commission can also make a public disclosure if satisfied that it is in the public interest to do so, including to ‘clear the air’ of an unfounded allegation.

In 2024–25, the Commission published 3 statements of this kind in relation to matters which had been the subject of publicity:

- Statement on outcome of referral of former Australian Securities and Investments Commission (ASIC) Deputy Chair Ms Karen Chester (see Case study 5: Allegations concerning the former Deputy Chair of the Australian Securities and Investments Commission on page 60)¹²
- Statement on outcome of referral about Ms Zoe Daniel MP, Member for Goldstein¹³
- Public disclosure of information about the outcome of a preliminary investigation relating to the settlement between Ms Brittany Higgins and the Commonwealth (see Case study 4: Higgins compensation settlement on page 59).¹⁴

Case studies and investigation summaries included in this report provide additional information about the Commission’s work.

11 All [investigation reports](#), including for Operation Bannister, are available on the NACC website.

12 NACC, ‘[Statement on outcome of referral of former ASIC Deputy Chair Ms Karen Chester](#)’ [media release], NACC, 12 September 2024.

13 NACC, ‘[Statement on outcome of referral about Ms Zoe Daniel MP, Member for Goldstein](#)’ [media release], NACC, 20 February 2025.

14 NACC, ‘[Public disclosure of information about the outcome of a preliminary investigation relating to the settlement between Ms Brittany Higgins and the Commonwealth](#)’ [media release], NACC, 12 June 2025.

Oversight

The Commission's work is subject to independent oversight by the PJC-NACC and by the Inspector of the National Anti-Corruption Commission (Inspector).

Parliamentary Joint Committee on the National Anti-Corruption Commission

The Commission appeared before the PJC-NACC on 12 November 2024 (private hearing) and on 22 November 2024 (public hearing).

The PJC-NACC produced a report¹⁵ on its examination of the Commission's 2023–24 annual report, which was tabled in Parliament on 27 March 2025.

More information on the PJC-NACC is provided on page 08.

Inspector – Robodebt Royal Commission referrals

The Inspector inquired into the Commission's decision, announced on 6 June 2024, that it would not commence a corruption investigation into the referrals concerning 6 public officials made to it on 6 July 2023, 5 days after it commenced operations, by the Royal Commission into the Robodebt Scheme (Robodebt Royal Commission).

The Inspector found that, although the decision was delegated to a Deputy Commissioner, the Commissioner's involvement in the process, after declaring a perceived conflict of interest because of a historical professional association with one of the referred persons, was conduct that was not unlawful but arose from a mistake of law or of fact, and thus 'officer misconduct' as defined in s 184(3) of the NACC Act.

The Inspector recommended that the Commissioner reconsider the decision, under s 41(5) of the NACC Act.

On 30 October 2024, the Commission announced it would appoint an independent eminent person to reconsider its previous decision not to investigate the Robodebt Royal Commission referrals. The Hon Mr Geoffrey Nettle AC KC, a former Justice of the High Court of Australia, was appointed on 13 December 2024 to independently reconsider the decision not to investigate the referrals.

On 10 February 2025, Mr Nettle, as independent reconsideration delegate, decided that the Commission would investigate the issues raised by the referrals. As a result, as announced on 18 February 2025, the Commission has commenced a corruption investigation, under s 41(1)(a) of the NACC Act, into whether any of the 6 referred persons engaged in corrupt conduct.

The Deputy Commissioner who is conducting the investigation is supported by Mr Nettle as chief adviser and by independent senior and junior counsel assisting. The Commissioner and Deputy Commissioners who were involved in the original decision not to investigate the referrals are not participating in the investigation, and the Commission has implemented additional measures to ensure the independence and impartiality of the investigation.

¹⁵ Parliament of Australia, [Examination of the National Anti-Corruption Commission annual report 2023–24](#), Parliament of Australia website, 27 March 2025.

Deterring corrupt conduct: detecting and investigating

The Commission's first main line of operations is deterring corrupt conduct through detection, investigation and exposure.

The Commission detects and investigates corrupt conduct involving Commonwealth public officials. One means of detecting corrupt conduct is through receiving and assessing referrals. However, the clandestine nature of corrupt conduct requires that, in addition, the Commission undertakes other activities to detect corrupt conduct, including open source research, engagement with jurisdictional agencies, and surveys.

The Commission's work to detect and prevent corruption is informed by its understanding of the nature and scope of corruption risks and vulnerabilities across the Commonwealth public sector. The Commission's Strategic Intelligence team conducts strategic analysis of the nature and extent of corruption risks and vulnerabilities in the Commonwealth public sector. In 2024–25, this generated strategic intelligence assessments and intelligence briefs on various themes, including:

- trends and indicators of corruption related to issues or agencies of interest, including on barriers to reporting corrupt conduct
- the impact of corrupt conduct on efforts to respond to climate change
- corruption threats associated with regulation and compliance.

These products support the Commission and jurisdictional agencies to adopt an informed and targeted approach to the detection and prevention of corrupt conduct.

Patterns and trends in corrupt conduct

Section 271(2)(c) of the NACC Act requires the Commission to provide 'a description of any patterns or trends, and the nature and scope, of corruption in Commonwealth agencies or by public officials that have come to the Commissioner's attention during that year'.

Strategic corruption priorities

The strategic analysis in the previous section has informed the development of the Commission's 6 strategic corruption priorities, which assist in focusing the Commission's investigative functions and provide coherence to its detection and prevention activities. They are the areas in which we think the Commission can have the greatest impact in enhancing integrity.

The Commission's strategic corruption priorities remain:

- corruption at the Australian border
- corruption in complex procurements
- corruption in senior public official decision-making
- corruption involving contractors and consultants
- corruption affecting the environmental sector
- corruption affecting vulnerable people.

These priorities are not exclusive and do not mean that the Commission disregards serious or systemic conduct that does not fit within them. While the priorities serve to focus its work on relevant major corruption themes, the Commission retains the flexibility to address emerging issues. The Commission regularly reviews these priorities to consider whether they need to be adjusted in response to changes in the integrity environment.

Commonwealth Integrity Survey

During the reporting period, the Commission conducted the first Commonwealth Integrity Survey to gain an evidence-based understanding of the nature and extent of corruption risks and to gather observations and perceptions of integrity and corruption across the Commonwealth public sector.

The survey was made available to more than 278,000 public officials in the Commonwealth public sector and the Commission received over 58,000 responses.

Key findings from the survey were:

- Fifteen per cent of respondents stated they have specific knowledge of corruption, and the majority of respondents who had specific knowledge of corruption were aware of more than one incident.
- Nepotism and cronyism was the most common type of corruption.
- The domain most frequently associated with corrupt conduct was procurement. However, recruitment and promotion were not offered as options, and the prevalence of nepotism and cronyism suggests that recruitment and promotion would be dominant areas.

- There is a reasonably supportive reporting culture. Notably, 64% considered that colleagues would be supportive or very supportive of those who reported corrupt conduct. In respect of the most recent incident of corrupt conduct of which they were aware in their agency, 64% took some action.
- A lack of proof and fear of repercussions were the main reasons for not reporting suspected corrupt conduct.

The Commission has shared agency-specific results with the heads of all participating agencies. The Commission plans to conduct the survey every 2 years to monitor trends in corruption risks, detect emerging issues, and support agencies with corruption prevention initiatives.

Insights from referrals

Analysis of referrals received by the Commission indicates that the corruption issues raised in mandatory referrals received from agencies differ significantly from those raised in voluntary referrals received from individuals.

The following analysis is based on referrals that passed the initial triage and progressed to Tier 2 assessment:¹⁶

Mandatory referrals accounted for approximately 5% of referrals received but 20% of those that progressed to Tier 2. They related mostly to fraud, misuse of information, and conflicts of interest in procurement.

¹⁶ Even so, there are limitations with the use of referrals data, including that they are unsubstantiated at the time of assessment, can be incomplete or lacking detail, and are not a comprehensive or reliable indicator of the actual prevalence of particular conduct.

Voluntary referrals accounted for 95% of referrals received and nearly 75% of those that progressed to Tier 2. Voluntary referrals covered a broader range of conduct. The most frequently raised area of concern was the integrity of investigations or decision-making undertaken by government agencies. Other issues raised included cronyism and nepotism in procurement and recruitment.

While voluntary referrals more typically related to executive-level staff and parliamentarians, mandatory referrals were more likely to relate to more junior (APS-level) staff.

In addition to broad trends, the Commission also identifies agency-specific trends that it shares with agencies where appropriate.

For example, from an analysis of mandatory referrals received relating to one Commonwealth agency, the Commission identified systemic corruption risks associated with the misappropriation of funds intended to be available for public benefit. The Commission produced a brief to share these insights with the agency and outline strategies that could be used to address the identified risks. This supported corruption prevention work the agency had initiated in response to these matters.

Notably, referrals relating to government business enterprises were overwhelmingly concerned with bribes or secret commissions for the award of contracts.

Insights from investigations

Of the 40 corruption investigations that were on foot during the reporting period:

- 7 concern the conduct of current or former parliamentarians
- 5 concern the conduct of current or former parliamentary staff
- 12 concern the conduct of current or former senior executive officials
- 7 concern the conduct of consultants or contractors
- 9 concern the conduct of law enforcement officials
- 20 relate to procurement
- 6 relate to recruitment
- 5 relate to entitlements
- 5 relate to corrupt conduct at the border
- 3 relate to grants
- 6 relate to misconduct in law enforcement.

The above categories do not capture all the corruption investigations, and some investigations fall under multiple categories, but they provide a flavour of the Commission's activities. In considering them, it is important to remember that not all corruption investigations ultimately result in a finding of corrupt conduct.

Receiving and assessing referrals

The receipt and assessment of referrals is the responsibility of the Commission’s Evaluation Branch, which comprises an Intake and Triage team and an Assessments team.

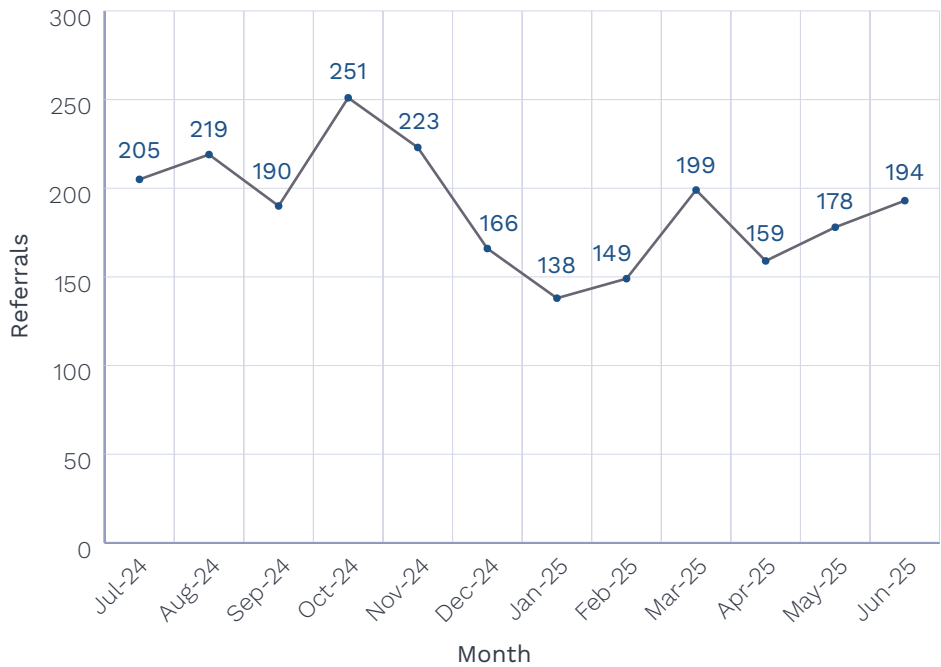
Referrals received

The Commission receives referrals by webform, by phone or by mail. In the reporting period, the Commission received 2,271 referrals, including 2,161 voluntary referrals, 107 mandatory referrals and 3 own initiative matters, in addition to the 494 referrals carried over from the 2023–24 financial year.

The Commission serviced 2,694 phone calls to its public 1300 number. Most calls fall into the following categories:

- assistance with making a referral
- facilitating access to the reporting webform
- pre-referral enquiries relating to jurisdiction
- queries about the assessment process
- providing information about corrupt conduct.

Figure 2.1: Referrals received by month (2024–25)



Referrals peaked in October 2024 (251) and reached their lowest in January 2025 (138), as shown in Figure 2.1. The total number of referrals over the 12-month period was 2,271.

Triage and assessment

Following receipt of a referral, referrals are triaged by confirming whether they appear to raise a corruption issue within the Commission's jurisdiction (that is, they relate to a Commonwealth public official and expressly or implicitly contain the elements of corrupt conduct as defined by the NACC Act). This process, and how referrals are assessed, are explained in the Commission's Assessment of Corruption Issues Policy.¹⁷

Consistent with 2023–24, the vast majority of referrals were closed at this initial triage stage. Of the 2,171 referrals triaged during the reporting period, 80% (1,743 referrals) were closed during this process, while 20% (428 referrals) progressed for further (Tier 2) assessment.

Referrals that pass triage are assessed to confirm whether they raise an issue which could involve corrupt conduct that is serious or systemic and, if so, to consider how to deal with the issue. This typically involves further open source research, requests for additional information, analysis, and occasionally preliminary investigation.

Once the assessment is complete, a recommendation is made on what action the Commission might take on the referral. Most recommendations are considered by the Commission's Senior Assessment Panel, in which the Commissioner is advised by the Deputy Commissioners and general managers. The Commissioner or an authorised delegate then makes a formal decision on how to deal with the referral.

The following case studies are examples of where the Commission received a referral and determined during the assessment process that the information provided did not raise a corruption issue and no further action was taken.

17 NACC, [How the NACC assesses corruption issues](#), NACC website.

Case study 1: A failure to disclose secondary employment not in itself corrupt conduct

The Commission received a mandatory referral from a Commonwealth agency containing information that a staff member had engaged in undeclared employment outside of the agency and failed to complete a conflict of interest declaration.

The assessment officer requested further information from the referring agency. Although the staff member had inappropriately failed to declare their secondary employment, it did not appear they had exercised any public power or performed any public function for an improper purpose, or used their position to obtain any benefit.

The Commission considered that the information did not raise a corruption issue within the meaning of s 9 of the NACC Act and had been appropriately investigated by the agency as a code of conduct issue. Failure to disclose secondary employment is not in itself corrupt conduct.

The Commission decided to take no further action, and the referring agency was advised of the outcome.

Case study 2: Mismanagement in an agency is not corrupt conduct

The Commission received a voluntary referral from a former executive-level staff member of a Commonwealth agency. The referral contained information about issues within the agency's information technology area, such as:

- inadequate resourcing and capabilities
- outsourcing of functions
- inadequate oversight from senior executives
- concerns about the quality, security and integrity of data held by the agency.

The reported issues occurred several years ago and had been previously considered by other Commonwealth bodies.

The assessment found that these issues were reflective of deficiencies with the agency's internal processes, project management issues and workplace disagreements about best practices. There was no information that the issues were attributable to dishonest conduct by senior executives for a personal benefit or that any agency staff members knowingly used their position for an improper purpose.

The Commission decided the information did not raise a corruption issue within the meaning of s 9 of the NACC Act, so it could take no further action. The referrer was advised of the outcome.

Timeframe for assessments

The Commission finalised the assessment of 2,004 referrals, representing 72.5% of the case load for the reporting period (Table 2.36).

Of these, 1,733 referral assessments were finalised in less than 90 days from receipt, providing a result of 86.5% against a target of 80%. At the end of the reporting period, there were 761 open referrals in the Commission’s case management system to be carried forward. Of these, 440 were not finalised within the 90-day timeframe for assessments.¹⁸

The Commission aims to complete assessments within 90 days. However, this is not always possible. The Commission does not prioritise referrals solely according to the date they are received, which means they are not necessarily assessed on a ‘first in, first out’ basis.

The time it takes the Commission to assess individual referrals is affected by many factors, such as:

- subject matter, including sensitivity and complexity
- the amount of supporting material and documents requiring review
- the time it takes for the Commission to receive additional information requested from the referrer, an agency or a third party
- the time-sensitive nature of a referral – for example, where there is a threat to safety or an operational urgency
- whether a preliminary investigation is required
- staffing availability and competing priorities.

In addition, the Commission received a large influx of referrals during its first year of operations, which created a backlog for triage and assessment.

Table 2.36: Referral assessment case load (2024–25)

Financial year received	Referral case load total	Assessments finalised in 2024–25	Percentage of case load*
2023–24	494	335	67.8%
2024–25	2,271	1,669	73.5%
Total	2,765	2,004	72.5%

* Figures in this column are percentages of the case load total for each financial year received and the total case load on foot for the reporting period respectively.

18 The Commission is unable to compare data concerning the duration of assessments across 2023–24 and 2024–25. This is due to the reclassification in the Commission’s case management system of approximately 1,600 referral assessments that had previously been ‘closed’, to ‘closed Tier 1’ or ‘closed Tier 2’. This means that, for reporting purposes, the duration of affected assessments in 2023–24 is artificially inflated.

Preliminary investigations

As part of its assessment process, the Commission can conduct preliminary investigations to confirm whether a corruption issue exists and to assist in determining whether and how to deal with a corruption issue. In a preliminary investigation the Commission can use some of its coercive information gathering powers, not otherwise available in the initial assessment stage, to require agencies or individuals to provide certain information and documents.

A preliminary investigation is not a corruption investigation. Rather, a preliminary investigation can be commenced to help the Commissioner decide if a corruption issue exists and, if so, whether the Commission should take any further action and what action may be the most appropriate.

Factors considered in determining whether to conduct a preliminary investigation include:

- information available at the initial assessment stage
- whether coercive powers are required to obtain additional information to make a decision about the referral.

In 2024–25, the Commission commenced 33 preliminary investigations and continued 24 preliminary investigations commenced in 2023–24. As at 30 June 2025, the Commission had closed 12 preliminary investigations. Three resulted in the commencement of a corruption investigation and 9 resulted in a determination that no corruption issue arose or that no further action should be taken.

The following case studies refer to 4 preliminary investigations undertaken by the Commission during the reporting period.

Case study 3: Procurement by a major Commonwealth department

Information was received from an anonymous referrer that a procurement process by a major Commonwealth department for training courses did not follow proper procedures and that there was email correspondence suggestive of an improper relationship between a staff member and a tenderer.

The information was not sufficient to raise a corruption issue but, given the matter involved a high value procurement activity (a strategic corruption priority of the Commission), the Commission commenced a preliminary investigation to confirm whether there was a corruption issue.

The preliminary investigation involved a comprehensive review of the tender process and of communications between the tenderers and the staff member.

While some of the communications could be considered inappropriate, the procurement process demonstrated good governance, transparency and adherence to policies and procedures.

The Commission decided to take no further action.

Case study 4: Higgins compensation settlement

Following several referrals, the Commission (in 2023) commenced a preliminary investigation into the settlement between Ms Brittany Higgins and the Commonwealth, which had received extensive media coverage and commentary.

During the preliminary investigation, the Commission issued multiple notices to produce to several departments and to external lawyers engaged to advise the Commonwealth in relation to the settlement. The Commission obtained thousands of documents that tracked the process undertaken by the relevant departments and external legal representatives.

The Commission found that, following receipt in December 2021 of the claims made by Ms Higgins, the Commonwealth sought external legal advice, which was received in April 2022 during the period of the Liberal-National Coalition government. This external legal advice was updated in response to later developments, but the conclusions and recommendations did not materially differ. As part of the settlement conclusion in late 2022, and as required by the Legal Services Directions 2017 (Cth), the Attorney-General at the time approved the settlement in accordance with the advice and recommendation of the Attorney-General's Department.

The extensive evidence obtained by the preliminary investigation showed the settlement reflected a process and outcome that was based on independent external legal advice, without any inappropriate intervention by any minister of either the Liberal-National Coalition government or the subsequent Labor government.

As there was no indication the settlement process was subject to any improper influence by any Commonwealth public official, the Commission was of the view that there was no corruption issue and decided to take no further action.

In light of the extensive public speculation about the matter, the Commission made a public disclosure.¹⁹

¹⁹ NACC, '[Public disclosure of information about the outcome of a preliminary investigation relating to the settlement between Ms Brittany Higgins and the Commonwealth](#)' [media release], NACC, 12 June 2025.

Case study 5: Allegations concerning the former Deputy Chair of the Australian Securities and Investments Commission

A voluntary referral from a member of the public contained information that the former Deputy Chair of ASIC, Ms Karen Chester, had shared market sensitive information via an encrypted messaging application. The referral also alleged that Ms Chester acted improperly by deleting the messages.

The Commission commenced a preliminary investigation, which obtained extensive information from multiple sources. The investigation did not confirm the existence of a corruption issue.

The Commission decided to take no further action. In light of the referral having been publicised, and conscious of the desirability of clearing the air and protecting against unfair damage to reputations, the Commission issued a public statement on the matter in September 2024.²⁰

Case study 6: A contracted service provider

In June 2024, the Commission received a mandatory referral from a Commonwealth agency containing information that property lease transactions had been negotiated on behalf of the Commonwealth by a contracted service provider that represented both the tenant and the landlord in the lease negotiations.

The Commission commenced a preliminary investigation that examined the legal arrangements between the Commonwealth and the service provider; and the processes adopted by the service provider.

The Commission found that there had been some deviations from the legal arrangements between the Commonwealth and the service provider, including in relation to formal disclosure of conflicts of interest, but these did not give rise to a corruption issue, as arms-length arrangements were maintained. The deficiencies in processes had since been addressed.

The Commission decided to take no further action.

²⁰ NACC, '[Statement on outcome of referral of former ASIC Deputy Chair Ms Karen Chester](#)' [media release], NACC, 12 September 2024.

Reviews

The Commission provides a review process so that referrers who are dissatisfied with a decision on their referral may request to have it reviewed. Reviews can be conducted on decisions to finalise a referral at triage (Tier 1) or after assessment (Tier 2). Requests for review are generally received via the Commission’s online Request for Review Form.

When a request for review is received, it is assessed by a staff member who has not previously been involved in a decision on the matter. They decide whether the request for review should be allowed.

In making this decision, relevant considerations include:

- whether a review of the decision has already been completed
- whether the request was received within 3 months of the original decision (or there is a reasonable explanation for the delay)
- whether there is a valid reason for a review – for example, where there has been a material error in the original assessment or where additional evidence is available.

If a request for review is allowed, the referral is reconsidered by staff who were not previously involved in the matter, who will either:

- uphold the original decision
- recommend a different decision.

Table 2.37: Review case load (2024–25)

Type of review	Review requests received	Review requests finalised*
Tier 1	40	42
Tier 2	8	14
Total	48	56

* Includes requests for review which were received in 2023–24 and finalised in 2024–25.

Table 2.38: Outcomes of finalised reviews (2024–25)

Type of review	Review not allowed	Decision upheld	Decision changed	Review withdrawn	Total
Tier 1	36	5	1	0	42
Tier 2	0	13	0	1	14
Total	36	18	1	0	56

Investigating corruption issues

The investigation of corruption issues is the responsibility of the Commission's Operations Branch, supported by the Operational Capabilities Branch.

The Commission investigates corruption issues and gathers information to prove or disprove them by:

- obtaining and analysing information (including documents and records)
- interviewing witnesses (including through hearings).

Investigations also produce intelligence about corruption risks and vulnerabilities.

In 2024–25, the Commission commenced 14 investigations, including 5 joint investigations with other agencies, in addition to 26 investigations (not including those on page 66) carried over from 2023–24. The Commission finalised 10 investigations – one resulting in an investigation report under s 149 of the NACC Act and the others being discontinued when it became apparent that corrupt conduct would not be found.

Information-gathering powers and hearings

In investigations and preliminary investigations, the Commission has:

- issued 18 directions and 164 notices to produce documents or information and 63 confidentiality notices
- obtained 22 search warrants, 9 telecommunications interception warrants, 6 surveillance device warrants and 4 stored communication warrants.²¹

Hearings (under s 62 of the NACC Act) are routinely used in the investigation process as a means of gathering information and evidence from witnesses, including persons of interest. During the reporting period, the Commission conducted private hearings in 6 investigations, involving a total of 24 witnesses. No public hearings were conducted during the reporting period, as in none of the investigations in which hearings were held was the 'exceptional circumstances and public interest' test satisfied.

Finalising and reporting on investigations

At any time before completing a corruption investigation, the Commissioner may decide to reconsider the corruption issue and take no further action. Typical reasons for this include that, after reasonable investigative steps, it is apparent that corrupt conduct will not be found; that the Commissioner is no longer of the opinion that the issue could involve corrupt conduct that is serious or systemic; or that the issue has been sufficiently exposed in court proceedings.

Under s 149 of the NACC Act, upon completion of a corruption investigation, the Commissioner must prepare a report on the investigation.

That report is referred to as an 'investigation report' and must set out:

- the Commissioner's findings or opinions on the corruption issue that was investigated
- a summary of the evidence and other material on which those findings or opinions are based
- any recommendations that the Commissioner sees fit to make
- the reasons for those recommendations.

21 Not all notices or warrants issued are served or executed.

Preparing a report typically involves collaboration between investigators, corruption prevention practitioners and lawyers.

Before making any findings, opinions or recommendations that are critical of an agency or an individual, the Commissioner must provide a reasonable opportunity to the agency or individual to respond to the potential adverse finding. This is called procedural fairness and is an important and often time-consuming part of the process. The Commission has produced a fact sheet and web content about procedural fairness in Commission investigations.²² If, at that stage, the Commission is considering publishing the report in whole or in part, submissions on that question may also be invited.

The Commission must also consult with any agencies whose information the Commissioner proposes to include in the report about whether that information is ‘sensitive information’ within the meaning of s 227(3) of the NACC Act.

Once the relevant agencies and individuals have had a reasonable opportunity to make submissions, any submissions are carefully considered, the investigation report finalised and a decision made about whether to publish the report in whole or in part. The public interest in transparency weighs heavily in deciding what the Commission publishes. While the Commission’s starting position is to name those who have engaged in corrupt conduct, the Commission decides whether to name individuals involved in an investigation on a case-by-case basis, as transparency has to be balanced with individual safety, welfare and privacy concerns.

The investigation report must be provided to the Attorney-General, the head of the agency to which the report relates and the minister administering that agency. The Commission may also provide copies of the report to the individuals whose conduct was investigated and the person who referred the corruption issue to the Commission.

Timeframe for investigations

Corruption investigations take time. The contributing factors include the following:

- **Complexity:** Corruption usually happens in secret with intricate layers of deception. It takes time and care to uncover information and context around allegations.
- **Legal processes:** The Commission has extensive investigatory powers, but their exercise is dependent on strict compliance with legal procedures and processes. Many of them appropriately require the Commission to obtain warrants from courts, and this process takes time.
- **Evidence analysis:** Investigations often collect very large volumes of documents and information. It takes time and effort to review and analyse this information and extract what is relevant and important. It also takes time to arrange and conduct hearings, which includes accommodating the needs of witnesses.
- **Thorough and careful investigation:** The Commission is committed to ensuring it makes correct and fair decisions. Rushing an investigation risks overlooking relevant information, procedural errors and unfairness.

²² NACC, [Procedural fairness](#), NACC website.

- **Procedural fairness process:** As part of finalising any investigation where adverse findings are contemplated, the Commission must ensure affected individuals or agencies are given a reasonable opportunity to respond.
- **Court proceedings:** Sometimes, if court proceedings are commenced against a person of interest while an investigation is on foot, it may be inappropriate to finalise the investigation, or to publish a report, until those proceedings are concluded, as publishing a report may jeopardise the fairness of the court proceedings.

Having regard to these considerations, the Commission set the target for KPI 1.2, 'Percentage of investigations finalised within 2 years', to reflect the natural duration of a corruption investigation, which is years and not months. As no NACC Act investigation could have been on foot longer than 2 years at the end of 2024–25, it is not possible to provide a meaningful assessment of this KPI, although 100% of investigations finalised during the period were finalised within 2 years.

Most ACLEI legacy investigations had already exceeded the 2-year timeframe when the Commission commenced operations on 1 July 2023 or did so during the Commission's first year. In 2024–25, the Commission finalised the 3 longest running ACLEI legacy investigations, the oldest of which commenced in 2015–16. The longest running ACLEI legacy investigation ongoing at 30 June 2025 commenced in 2019–20.

Significant investigations (NACC Act s 271(2)(b) requirement)

Section 271(2)(b) of the NACC Act requires the Commission to provide 'a description of the corruption investigations conducted by the Commissioner during that year that the Commissioner considers raise significant issues for, or reflect developments in, Commonwealth agencies'.

Operation Kingscliff

The investigation that was completed and the subject of a s 149 report was Operation Kingscliff, which concerned whether a Senior Executive Service staff member in the Department of Home Affairs had improperly used her position to influence the recruitment of her sister's fiancé into a position in that department and to assist her sister in another recruitment process. The investigation also examined the conduct of the sister and her fiancé.

The official's involvement in the recruitment of her sister's fiancé into the department included that she proposed his transfer into the department, promoted his candidacy and qualities to other staff, created the recruitment requisition, nominated herself as the delegate approver, and took steps to have the onboarding prioritised, including by forging a witness signature on an onboarding form. At the same time, she concealed their familial relationship from other staff members involved in the process.

The Commission found that this was an abuse by the official of her public office: she used her position to procure the transfer of her sister's fiancé into the department for the purpose of benefiting her sister's fiancé and her sister, knowing it to be improper. In another recruitment process, in which her sister was an applicant, the official disclosed certain interview questions to her sibling.

The Commission found that this was an abuse by the official of her public office and a misuse by her of official information: she provided official information in the form of interview questions, to which she had access because of her position, to her sister, to give her sister an advantage in the recruitment process, knowing it to be improper.

She thereby engaged in corrupt conduct which, having regard to her seniority, the deception involved, the multiple occasions and the significance of the benefit conferred on her sister's fiancé, was serious; and which, having regard to the prevalence of complaints of nepotism, cronyism and undeclared conflicts of interest in recruitment in the Australian Public Service, was systemic.

The Commission did not find that the official's sister or her fiancé engaged in corrupt conduct.

Since the Commission's establishment, it has received many referrals relating to recruitment and promotion in the Australian Public Service. As has been noted by other anti-corruption agencies, the power to recruit someone to a public position is a power not to be underestimated, given the salary and other benefits the position confers.²³ Nepotism, cronyism and undeclared conflicts of interest in recruitment and promotion is an area of widespread concern. Nepotism in recruitment and promotion undermines the merit selection process and erodes morale. According to the Commission's 2024 Commonwealth Integrity Survey, nepotism and cronyism are the most commonly observed types of corrupt conduct.²⁴

Operation Kingscliff provides a powerful illustration of the risks and vulnerabilities in these areas and the importance of corruption prevention measures. It also illustrates how a good reporting culture in the Department of Home Affairs enabled the reporting and subsequent investigation of the conduct.

The [investigation report](#) is available on the Commission's website.

23 Office of the Independent Commissioner Against Corruption NT, [Public statement – Operation Apollo – improper conduct in recruitment](#), ICAC NT website, 2025.

24 NACC, [Commonwealth Integrity Survey 2024](#), NACC website, 2024.

Other finalised investigations

In 2024–25, the Commission finalised another 9 corruption investigations on the basis that further investigation was not warranted because the investigation had obtained information from which it appeared that corrupt conduct within the Commission's jurisdiction would not be proven.

One of these investigations examined whether several external contractors engaged by a department had abused their office and/or misused official information by accessing information to gain a commercial advantage over their competitors to win further contracts with the department. The investigation, which commenced in November 2023, focused on the contractors' access to departmental holdings and whether they used their access to unfairly compete for further contracts with the department. Search warrants and telecommunications intercept warrants were executed, and 6 witnesses were examined in private hearings. The investigation did not obtain evidence that the contractors used access to departmental information to obtain a commercial advantage, and on reconsideration of the corruption issue it was decided to take no further action.

In several of these investigations, although it became apparent that corrupt conduct within the Commission's jurisdiction would not be proven, intelligence reports were disseminated to relevant Commonwealth and state agencies.

For example, in one, a range of risks associated with detainees dealing in tobacco were identified, and relevant information was disseminated to the Department of Home Affairs, Australian Border Force (ABF), the Australian Taxation Office (ATO) and the Department of Health (Western Australia).

In another, vulnerabilities associated with industry supply chain insiders supplying information about the interest of law enforcement agencies in cargo containing border controlled drugs were identified. As they were not Commonwealth public officials under the NACC Act, the Commission lacked jurisdiction to investigate further, and on reconsideration of the corruption issue it was decided to take no further action, but the Commission disseminated relevant information to the AFP and Department of Home Affairs (including ABF).

ACLEI legacy investigations

On 1 July 2024, there were 21 ongoing ACLEI legacy investigations.²⁵

The Commission has had to balance finalisation of these investigations, mindful of the age of some of them, with progressing NACC Act investigations commenced since the Commission's commencement.

The Commission conducted a review of ACLEI legacy investigations to identify those which could be finalised.

During the reporting period, a total of 9 ACLEI legacy investigations were finalised:

- In 2, the Commission provided a report to the Minister.²⁶
- In 7, the investigation was finalised without reporting because the corrupt conduct to which the corruption issues related had been the subject of court proceedings or further investigation was not warranted.²⁷

During 2024–25, the Commission also published a report for an ACLEI legacy investigation which had been finalised in 2023–24.²⁸

Investigation summaries are provided of finalised ACLEI legacy investigations that led to publicly available outcomes.²⁹

25 Further information on ACLEI legacy matters is located in Appendix B: Finalising the operations of ACLEI on page 142.

26 See investigation summaries for Operation Elektra and Operation Wilson.

27 See investigation summaries for Operation Angelo, Operation Overbeek, Operation Roe, Operation Nambung and Operation Harvey.

28 See investigation summary for Operation Bannister.

29 Operations Bannister, Roe and Nambung were included in the 2023–24 annual report as case studies.

Operation Bannister

Operation Bannister was a joint investigation commenced by ACLEI and the Department of Home Affairs into a former Department of Home Affairs employee's familial links to a contracted service provider.³⁰ In accordance with the transitional arrangements, the Commissioner reviewed the evidence and completed the investigation report.³¹

The investigation concluded that the employee had not engaged in corrupt conduct.

Operation Elektra

Operation Elektra was a joint investigation commenced by ACLEI, the Department of Immigration and Border Protection (now the Department of Home Affairs) and the AFP, and continued by the Commission after 1 July 2023, into whether a Serco officer was abusing her office by selling mobile phones to detainees.

This was not established. However, the investigation obtained evidence that a Serco officer working at Christmas Island Immigration Detention Centre (IDC) used her position to provide subscriber identity module cards to 2 detainees, with whom she had intimate relationships, and routinely paid for a telephone service for one of the detainees (known as Detainee B in the report). Detainee B was then transferred to Yongah Hill IDC and commenced a relationship with a second Serco officer, who used her position to access and disclose official information to Detainee B. Detainee B also became friends with a third Serco officer at Yongah Hill IDC, who disclosed generic detainee information to Detainee B.

The investigation resulted in the first and second Serco officers being prosecuted. The first was convicted and fined \$2,000. The second was discharged without conviction upon entering a recognisance to be of good behaviour and comply with a supervision order for 10 months.

In accordance with the transitional arrangements, the Commissioner reviewed the evidence and completed the investigation report,³² including findings that the 2 Serco officers had engaged in corrupt conduct.

30 The investigation was also included in the 2023–24 annual report.

31 NACC, [Investigation report: Operation Bannister](#), NACC, 2024.

32 NACC, [Investigation report: Operation Elektra](#), NACC, 2025.

Operation Wilson

Operation Wilson was a joint investigation commenced by ACLEI with the Department of Home Affairs, the AFP and Victoria Police, and continued by the Commission after 1 July 2023, into whether a former ABF officer abused their office by accessing and providing to an associate, who was under investigation in connection with illicit tobacco importations, information about the associate's consignments held in ABF databases.

The investigation obtained evidence that, while employed at ABF, the officer did work for a company of which the associate was the managing director and accessed ABF information relating to certain shipping containers in which the associate had an interest, some of which contained illicit cigarettes. These accesses were unrelated to the officer's employment with ABF and without authority.

The investigation resulted in the ABF officer pleading guilty to 2 charges of unauthorised access to restricted data contrary to s 478.1(1) of the Criminal Code (Cth). They were convicted and fined \$4,000.

In accordance with the transitional arrangements, the Commissioner reviewed the evidence and completed the investigation report.³³

The Commissioner found that the ABF officer had engaged in corrupt conduct – namely, abuse of office.

Operation Angelo

Operation Angelo was a joint investigation commenced by ACLEI and the Department of Home Affairs, and continued by the Commission after 1 July 2023, into whether a former Department of Home Affairs employee had abused their office by accessing departmental records and sharing information from them with family and friends without authorisation between December 2010 and January 2022.

A brief of evidence was referred to the CDPP and in late 2024 the employee pleaded guilty to contraventions of the Criminal Code (Cth), including unauthorised access to restricted data, unauthorised disclosure of information, and abuse of public office. The original sentence in May 2025 was imprisonment for 14 months, but to be released immediately upon a recognisance in the sum of \$500 to be of good behaviour for 2 years. On appeal to the District Court, the sentence was reduced to 12 months. The District Court judge referred to the position of trust held by public servants and their access to private data, emphasising that the former employee had used Department of Home Affairs systems as a personal browser to look up confidential information.

In light of the matter having been dealt with and exposed in court proceedings, the Commission finalised the matter without an investigation report, in accordance with the LEIC Act, s 42(3)(d).

³³ NACC, [Investigation report: Operation Wilson](#), NACC, 2025.

Operation Overbeek

Operation Overbeek was a joint investigation commenced by ACLEI with the AFP, the Victoria Police, the Department of Home Affairs and the then Department of Agriculture, Water and the Environment (DAWE), and continued by the Commission after 1 July 2023, into whether an employee of DAWE had abused their office by accepting bribes totalling \$10,000 on 3 occasions in exchange for accessing and disclosing sensitive information to facilitate the importation of illicit tobacco.

The investigation resulted in a prosecution and, in June 2021, the employee was found guilty of 3 counts of receiving a bribe as a Commonwealth official, 2 counts of abuse of office, and 2 counts of unauthorised disclosure of restricted information. The employee was sentenced to two and a half years imprisonment and was released on a recognisance release order after serving 3 months.

In light of the matter having been dealt with and exposed in court proceedings, the Commission finalised the matter without an investigation report, in accordance with the LEIC Act, s 42(3)(d).

Operation Roe

Operation Roe was a joint investigation commenced by ACLEI and the ATO, and continued by the Commission after 1 July 2023, into whether a former ATO employee had abused their office by gaining unauthorised access to taxpayer records.³⁴

The investigation obtained evidence that the former ATO employee had extensively accessed various taxation records without authority between August 2020 and April 2021.

The investigation resulted in a prosecution and the employee pleaded guilty to charges related to unauthorised access to taxpayer records. On 30 January 2024, the Sydney Downing Centre Local Court imposed a fine of \$2,000 and a good behaviour bond for 18 months.

In light of the matter having been dealt with and exposed in court proceedings, the Commission finalised the matter without an investigation report, in accordance with the LEIC Act, s 42(3)(d).

³⁴ The investigation was also included in the 2023–24 annual report.

Operation Nambung

Operation Nambung was a joint investigation commenced by ACLEI and the AFP, and continued by the Commission after 1 July 2023, into whether a former AFP superintendent had abused his office by fraudulent use of a Commonwealth credit card for personal expenditure.³⁵

The investigation resulted in a prosecution and the former superintendent pleaded guilty to charges related to fraudulent use of their Commonwealth credit card involving more than \$17,000 in personal expenditure. On 1 September 2023, the Parramatta Local Court imposed a fine of \$5,000 and a good behaviour bond for 3 years.

In light of the matter having been dealt with and exposed in court proceedings, the Commission finalised the matter without an investigation report, in accordance with the LEIC Act, s 42(3)(d).

Operation Harvey

Operation Harvey was a joint investigation, commenced by ACLEI and the Department of Home Affairs, into whether an ABF officer was abusing their office and/or misusing official information by sharing ABF information with persons associated with criminal activities – specifically, persons with links to outlaw motorcycle gangs (OMCG). The investigation was transitioned to a NACC Act investigation when the Commission commenced in July 2023. The investigation obtained evidence that the ABF officer had extensive links to persons involved in transnational serious and organised crime and/or OMCG; that the officer provided false and/or misleading information to the Department of Home Affairs while applying for their position with ABF; and that the officer conducted unauthorised accesses on ABF systems in relation to his records and the records of several known associates.

The investigation resulted in a prosecution and on 7 April 2025, in the Southport Magistrates Court, the ABF officer entered pleas of guilty to 2 offences contrary to ss 137.1(1) and 478.1(1) of the Criminal Code (Cth) and one offence contrary to s 11 of the *Statutory Declarations Act 1959* (Cth). The officer was convicted and released on a recognisance in the sum of \$1,500 to be of good behaviour for a period of 9 months.

In the course of the investigation, the Commission developed and disseminated information reports, identifying risks and vulnerabilities, to ABF and the Department of Home Affairs.

In light of the matter having been dealt with and exposed in court proceedings, the Commission reconsidered the corruption issue pursuant to s 41(5) of the NACC Act and decided to take no further action so that it was finalised without an investigation report pursuant to s 41(6) of the NACC Act.

³⁵ The investigation was also included in the 2023–24 annual report.

Investigations with court outcomes

Generally, it is inappropriate to report on investigations until they have been finalised. However, where matters are in the public domain as a result of court proceedings, it is possible to report relevant developments during the reporting period, although they are yet to be the subject of a s 149 report.

Operation Pelican

An investigation led by the Commission and supported by the AFP in early 2024 obtained evidence that the former executive procurement manager at Western Sydney Airport had attempted to solicit a bribe from a company bidding for a \$5 million contract to provide automated parking systems at the future airport.

During the reporting period, the former official pleaded guilty to soliciting a corrupt commission contrary to s 249B of the *Crimes Act 1900* (NSW).

The reserved judgment on sentence was delivered shortly after the end of the reporting period, on 25 July 2025. The former official was sentenced to a 2-year term of imprisonment, to be served by way of an intensive correction order in the community, which includes the completion of 500 hours of community service.

This was the first conviction and sentence resulting from a NACC-initiated investigation.

Operation Barker

Operation Barker is an investigation commenced by ACLEI in September 2021, jointly with the ATO, NSW Police, the AFP, the Department of Home Affairs, ABF, Australian Transaction Reports and Analysis Centre (AUSTRAC) and ASIC, which was transitioned to a NACC Act investigation after 1 July 2023.

Through covert audits, telephone intercepts, controlled operations, technical surveillance, witness statements and suspect interviews, the investigation obtained evidence that:

- In May 2016, Wenfeng 'Eric' Wei was an ATO employee who was assigned to an audit into Raymond Shlemon and his then business, Global World Group Pty Ltd (GWG), to assess the unexplained wealth and taxation liabilities of Shlemon and GWG for the 2012–13 to 2014–15 financial years.
- At the same time, John Zeitoune was the Director of Asset Group Solutions Pty Ltd (Asset Group), which subcontracted work to Shlemon and GWG. GWG was one of the biggest subcontractors for Asset Group between 2012 and 2015, earning more than \$10 million in business from them over those years.
- During the ATO audit, a plan was conceived between Shlemon, Zeitoune and Wei to reduce the tax liabilities for Shlemon and GWG.
- In August 2016, Wei received a \$100,000 cash bribe from Shlemon at Granville train station. Zeitoune was also present at the handover. In return, Wei underwrote the audit in favour of Shlemon and GWG, eradicating a potential personal income, business tax, GST and penalty deficit of over \$6 million.
- Subsequent to the bribe, Wei continued to support Shlemon. In the period from February 2017 to February 2022, Wei made 522 unauthorised accesses to ATO restricted data linked with Shlemon, including ATO interest in Shlemon's other companies and his wife. Wei communicated with Shlemon before, during and after the unauthorised accesses.
- Wei was also helping another associate with his tax affairs. Between September 2017 and October 2021, Wei carried out 1,235 unauthorised accesses to ATO restricted data on entities that related to the associate.
- Wei would communicate with the associate before, during and after the unauthorised accesses and at other times arranged to meet up with the associate to provide the associate with information.

Following arrests in 2022 and Wei's conviction and sentencing in March 2024:

- Shlemon pleaded guilty to bribery of a Commonwealth public official and was sentenced to a maximum of 3 years and 14 days imprisonment, to serve at least 1 year and 6 months.
- Zeitoune pleaded guilty to aiding and abetting the bribery of a Commonwealth public official and in December 2024 was sentenced to a maximum 2 years and 10 months imprisonment, to serve at least 1 year and 5 months.

The Commission has disseminated 9 intelligence reports to other agencies arising from Operation Barker.

Operation Mint

Operation Mint is a joint investigation commenced by ACLEI with the AFP, Victoria Police and AUSTRAC, and continued by the Commission, into whether a member of the AFP engaged in abuse of office, theft and money laundering between January and April 2019.

As a result of the investigation, the person of interest was arrested and charged. The matter has been committed for trial in the Victorian County Court on charges of contraventions of s 142.2(1) of the Criminal Code (Cth) and s 74 of the *Crimes Act 1958* (Vic).

Operation Meda

Operation Meda is a joint investigation commenced by the former ACLEI and Department of Home Affairs, which transitioned to a NACC Act investigation after 1 July 2023, into whether immigration detention services officers at an immigration detention facility in Melbourne had abused their office by assisting a detainee to access drugs in exchange for payments.

As a result of the investigation, on 6 September 2024, a former immigration detention services officer was convicted of one offence of abuse of public office, contrary to s 142.2(1) of the Criminal Code (Cth), for his role in assisting a detainee in a Melbourne immigration detention centre to access drugs in exchange for payments totalling \$11,150. The officer was sentenced to 2 years and 6 months imprisonment, to be eligible for release after 6 months contingent upon a surety of \$5,000 to be of good behaviour for 30 months.

Operation Carbunup

Operation Carbunup is a joint investigation commenced by the former ACLEI and the Department of Home Affairs, and continued by the Commission from 1 July 2023, into whether a former immigration officer at the Department of Home Affairs abused their office by approving a visa application for their brother-in-law and unauthorised access to restricted data of 17 individuals held in the department's computer systems.

On 27 June 2025, following a guilty plea, the former immigration officer was convicted of one count of abuse of public office, contrary to s 142.2(2), and one count of unauthorised access to restricted data, contrary to s 478.1(1) of the Criminal Code (Cth); and was sentenced to an aggregate of 8 months imprisonment, to be released on the condition they enter into a recognisance in the sum of \$10,000 to be of good behaviour for 12 months.

Referring corruption issues to agencies

The Commission can refer corruption issues to other Commonwealth agencies for investigation (under s 41(1)(c)) or for consideration (under s 41(1)(d)). Oversight of referred investigations is the responsibility of the Agency Investigations team in the Operational Capabilities Branch.

Referrals for investigation

In deciding to refer a corruption issue to another agency for investigation, the Commissioner must be satisfied the agency has appropriate capabilities to conduct the investigation. The aim is to ensure the investigation is conducted by the more appropriate agency, having regard to the subject matter and nature of the investigation, the resources available and the investigative capabilities. Relevant factors include:

- the nature and complexity of the investigation
- the agency's ability and experience in undertaking investigations, and its investigation workload
- whether the agency has adequate investigative powers, including coercive powers
- whether an investigation independent of the agency is desirable.

In referring a corruption issue to an agency for investigation, the Commissioner may give directions about the planning or conduct of an investigation and may require progress and/or completion reports from the agency. Generally, the Commission requires a completion report where a matter may have broader and potentially systemic implications or where it is likely to provide useful intelligence.

Where the Commissioner has required a completion report, the Commissioner may comment on the report and/or make further recommendations.

During the life cycle of a referred investigation, the Commission meets regularly with agencies to ensure they are supported and their investigation case load is progressing appropriately.

Where an adequate agency investigation is already on foot, the Commission will generally only refer the matter for investigation if it is desired to oversee the investigation and/or obtain a completion report; otherwise, the Commission may simply decide to allow the agency investigation to proceed and take no further action.

At the beginning of 2024–25, the Commission was overseeing 4 agency investigations.

During the reporting period:

- the Commission referred 11 corruption issues to 6 agencies (including the AFP, the Department of Defence, the Department of Employment and Workplace Relations, the Department of Finance, Services Australia and the Treasury) for investigation, in which it decided to oversee the investigation by requiring completion reports under s 52 of the NACC Act
- 5 agency investigations were finalised (including one that had been referred before the reporting period and 4 that were referred during the reporting period).

At the end of the reporting period, the Commission was overseeing 10 agency investigations.

Referrals for consideration

During the reporting period, the Commission also referred 8 corruption issues to a Commonwealth or state or territory government entity for consideration. A referral for consideration does not oblige the agency to take any particular action in relation to the matter, but it is a means of informing an appropriate agency of a matter within its jurisdiction about which it might wish to consider taking some action.

ACLEI legacy agency investigations

As at 1 July 2024, 12 ACLEI legacy agency investigations were being monitored by the Commission, of which 7 were completed during the reporting period. These included investigations conducted by the Australian Criminal Intelligence Commission, the AFP and the Department of Home Affairs. One ACLEI legacy investigation had a completion report that was under review at the end of the reporting period. Five ACLEI legacy agency investigations will be carried forward into 2025–26. These include investigations by the AFP and the Department of Home Affairs.

Preventing corrupt conduct: corruption prevention and education

The Commission's second main line of operations is preventing corrupt conduct through education and engagement. This is the responsibility of the Corruption Prevention and Education team in the Media, Communications, Corruption Prevention and Education Branch.

The purpose of corruption prevention and education is to enhance integrity by supporting individuals and agencies to avoid deviating from the integrity track. The Commission's corruption prevention strategy aims to:

- Build resistance: Provide those who might be exposed to potentially corrupting individuals and influences with the knowledge and tools to recognise and resist them.
- Encourage reporting: Ensure those who may become aware of corrupt conduct know how to report it and are aware of their rights, obligations and protections.
- Create a culture that is intolerant of corruption: Build awareness across the public sector, officials and the public of corruption risks and vulnerabilities; and the adverse consequences of corrupt conduct for individuals, institutions and communities.

Themes

In 2024–25, the Commission continued to focus its education and prevention work on 3 themes:

- conflicts of interest
- ethical decision-making
- risks associated with elections.

Conflicts of interest

The Commission has developed guidance for Commonwealth agencies and public officials on conflicts of interest and corrupt conduct. Concurrently, the Department of Finance and the Australian Public Service Commission (APSC) have been developing guidance about conflicts of interest relevant to their areas of responsibility. In order to ensure consistent definitions, standards and language across the 3 products, which have a common audience of Commonwealth agencies and public officials, Commission staff have consulted extensively with the Department of Finance and the APSC. The consultation process has now been completed, and publication of the Commission's guidance is anticipated in the first quarter of the next reporting period.

Ethical decision-making

Recent controversies, including Robodebt, have given renewed prominence to the challenges that can confront public servants in an environment where the public service is expected to be responsive to government. It is an inevitable consequence that public servants will sometimes face difficult ethical dilemmas.

Shortly after the creation of the Commission, and informed by the outcomes of the Robodebt Royal Commission, we identified that the most important action we could take to prevent or at least materially reduce the risk of anything like it happening again was to ensure that decision-makers were equipped to exercise their functions ethically, in an environment where there can be many pressures.

Following research and consultation, on 9 July 2024 the Commission conducted an expert workshop with leading ethicists and practitioners to obtain advice and input as to how public servants could be assisted to address ethical challenges and to make ethical decisions. Having engaged in several forums to seek feedback, the Commission is now consulting with other agencies and finalising its guidance for ethical decision-making, and publication is anticipated in the first half of 2025–26.

Risks associated with elections

In anticipation of the 2025 federal election, the Commission identified corruption risks in the context of an election to be a key educational priority. On 7 March 2025, the Commissioner published an [Open letter on corruption risks and vulnerabilities in the context of an election](#).³⁶ The letter addressed relevant corruption risks, including the misuse of parliamentary resources and staff, the misuse of official information, the making of public sector appointments, the announcement of grants, government advertising, and political gifts and donations. It also cautioned against public disclosure of referrals to the Commission for inappropriate collateral purposes, including political advantage.

The letter was published on the Australian Electoral Commission's candidate portal and circulated to all current parliamentarians. Following the election, the open letter was supported by a presentation to newly elected members of the House of Representatives on the role of the Commission. The Commission is scheduled to address incoming senators in the new financial year.

36 NACC, [Open letter: Corruption risks and vulnerabilities in the context of an election](#) NACC website, 7 March 2025.

Key performance indicator for prevention and education

To provide a measure of its work in this field, for 2024–25, the Commission introduced a new KPI, with a target of delivering 100 corruption prevention and education products or engagements. Corruption prevention and education products include fact sheets, guides, e-learning modules, videos, and non-public facing correspondence to agency heads and other entities to provide information on corruption risks and prevention strategies. Engagements include Commission representatives delivering presentations and training or participating in meetings to provide information and guidance about corruption risks and vulnerabilities, how to prevent and report corrupt conduct, and the role of the Commission.

During the reporting period, the Commission completed 138 engagements and produced 11 products.

Engagements

The Commission undertook 119 engagements with domestic (Australian) audiences during the reporting period. These engagements were driven by strong interest from across the Commonwealth public sector, civil society, academia and professional organisations, which generated requests for the Commission’s education and information services.

The Commission also undertook 19 engagements with international partners or audiences. The purpose of these engagements was principally to share experience and learning and benchmark best practice in corruption investigation and prevention.

Table 2.39: Number of corruption prevention and education engagements held (2024–25)

Engagement type	Total
Domestic audience	119
International audience	19
Total	138

Domestically, the Commission prioritised engagements with agencies and entities relevant to its jurisdiction, being the Commonwealth public sector. These engagements typically provided an overview of the role and jurisdiction of the Commission, the definition of ‘corrupt conduct’, mandatory referral obligations, how to report corrupt conduct, and protections for individuals who provide information to the Commission. They also identified trends that the Commission has observed, including cronyism, nepotism and misuse of information, in the domains of procurement, recruitment and the public/private interface.

Following the conduct of the inaugural Commonwealth Integrity Survey, the Commission also met with agency heads and senior officials to discuss agency-specific results, corruption vulnerabilities and corruption prevention tools.

Each month, the Commission presented at induction sessions for incoming Senior Executive Service officials conducted by the APS Academy, introducing the role of the Commission and highlighting the role of senior leadership in setting the tone from the top for integrity and ethical leadership.

To increase awareness of its jurisdiction and role, the Commission engaged with civil society, professional associations and community groups, through events such as the Governance Institute of Australia's National Public Sector Governance Forum, Thomson Reuter's Australian Regulatory Summit, and the UN Global Compact Network Australia's Australian Dialogue on Bribery and Corruption. To encourage greater engagement from regional and First Nations communities, the Commission participated in a community outreach program at the 2024 Koori Rugby League Knockout in Tamworth, New South Wales.

The Commission continued to develop its regional and bilateral relationships with counterpart agencies by meeting with delegations and officials from Fiji, the Republic of Korea, Maldives, Vanuatu, the United Arab Emirates and France.

To support capability building and knowledge sharing, the Commission became a member of the International Association of Anti-Corruption Authorities in February 2025.

Australian Public Sector Anti-Corruption Conference

In July 2024, the Commission made a major contribution to the Australian Public Sector Anti-Corruption Conference (APSACC), hosted by the Office of the Independent Commissioner Against Corruption (Northern Territory) in Darwin. APSACC is Australia's leading anti-corruption event, attracting industry leaders and experts from across state and territory, federal, public and private sectors, as well as around the world.

As well as providing a keynote address and participating in several panels, the Commission delivered a tailored technical assistance program for 33 delegates from 11 Pacific Islands countries. This furthered the Commission's contribution to Australia's relationships with Pacific partners and implementation of the United Nations Convention against Corruption (UNCAC) and the regional anti-corruption strategy, the [Teieniwa Vision](#).

The commissioners of all Australian jurisdictions finalised and published 12 *Fundamental principles of Australian anti-corruption commissions*.³⁷ These principles provide an architecture for legislation and policy governing anti-corruption commissions. They provide a valuable consolidation of the experience of the various Australian jurisdictions, reflect a common approach to engaging with Australia's obligations under UNCAC, and can contribute to national consistency.

37 To read the 12 principles guiding Australia's anti-corruption commissions, see the [National Anti-Corruption Commission's website](#).

Products: educational resources and guides

The Commission published educational resources and guides to increase understanding of the Commission’s work, assist public officials to understand corruption risks and vulnerabilities and inform potential referrers about how to report corrupt conduct to the Commission. These resources address themes relating to corruption vulnerabilities the Commission identifies from referrals, from responses to the Commonwealth Integrity Survey, and from other interactions with jurisdictional agencies.

Additional educational resources were made available on the Commission website:

- ‘Contracted service providers, grant recipients and the NACC’ fact sheet
- ‘Information for persons interacting with the NACC’ fact sheet
- ‘Procedural fairness’ fact sheet.

The Commission relaunched an educational video product for use by Commonwealth entities. A former law enforcement official, who had been subject to an ACLEI investigation and convicted of receiving a bribe as a Commonwealth public official and unlawfully disclosing information, agreed to participate in a filmed interview giving a firsthand account of their experience of being groomed and the significant impacts of their corrupt conduct. The Commission uses the video as an educational tool in its engagement with Commonwealth agencies to assist public officials to recognise the risks and indicators of grooming and encourage them to report corrupt conduct.

Table 2.40: Number of corruption prevention and education products produced (2024–25)

Product	Total
Fact sheet	3
Guide	1
Correspondence	2
Video	2
Workshop or roundtable	3
Total	11

Corruption prevention recommendations and policy consultations

Section 271(2)(d) of the NACC Act requires that the annual report include any recommendations for changes to the laws of the Commonwealth or administrative practices of Commonwealth agencies that the Commissioner, as a result of performing the Commissioner’s functions during that year, considers should be made.

In 2024–25, the Commissioner made 3 recommendations to the Department of Home Affairs in the [Operation Kingscliff Investigation Report](#). These related to the department’s policies and processes for declaring and managing conflicts of interest in recruitment processes and mitigating the risk of improper disclosure of interview questions. The department has accepted those recommendations.

Additionally, the Commissioner has provided agency-specific advice by letter to relevant agency heads to draw attention to risks and vulnerabilities identified in their agencies following one or more investigations relating to the agency.

Matters raised in such correspondence have included:

- management of conflicts of interest
- record-keeping and transparency in decision-making
- adherence to proper procurement processes
- the need for proactive detection.

The Commission provides advice and submissions to agencies in connection with integrity policy reform and development. During the reporting period, these included:

- APS Reform Stage 2 Integrity Initiatives
- Commonwealth Integrity Strategy
- Stage 2 Public Interest Disclosure whistleblower reforms
- Proposed amendments to the APS Values and *Members of Parliament (Staff) Act 1984* (Cth)
- Handling Misconduct Guide
- Guidance in relation to Determinations under the *Parliamentary Business Resources Act 2017* (Cth) and *Members of Parliament (Staff) Act 1984* (Cth).

The Commission contributed to the Organisation for Economic Co-operation and Development (OECD) study of [Drivers of Trust in Public Institutions in Australia](#), published on 31 March 2025. The report presents findings and recommendations to enhance trust in public institutions and strengthen democratic government. The Commission participated in interviews, reviewed content and participated in a regional workshop for senior officials.

The Commissioner presented a paper to the Third Symposium to honour Professor Leslie Zines AO, and to pay tribute to the Honourable Paul Finn: Issues in Australian Constitutional Law. The paper described and discussed the role of the 'integrity branch' of the Commonwealth government; and the Commission's place in it as one of several 'guardrail institutions' which sustain confidence in the institutions of government by showing, through their existence and actions, that exercises of public power and performance of public functions are subject to independent and objective scrutiny in order to ensure that they are proper.

3

Management and accountability

Governance

Workforce management

Financial management

External scrutiny

Governance

The Commission’s governance framework is designed to ensure effective and transparent decision-making. It supports the CEO and the Commissioner in discharging their responsibilities under relevant legislation and provides assurance that the operations of the Commission are compliant with legislative requirements.

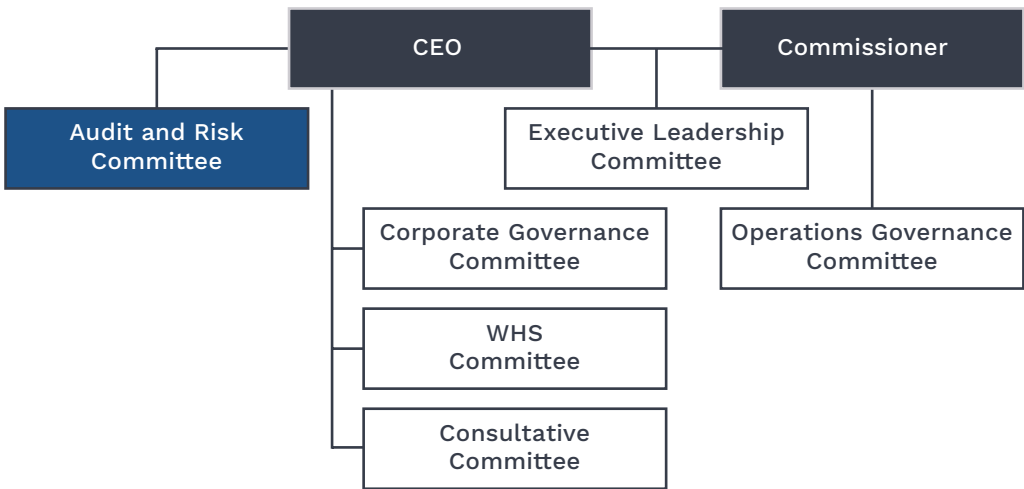
The framework is outlined at Figure 3.1 and shows 2 distinct streams:

- 1. corporate governance overseen by the CEO as the accountable authority
- 2. operational governance overseen by the Commissioner.

This framework reflects CEO and Commissioner responsibilities under the various legislation governing the Commission.

Strategic oversight of both streams occurs through the Executive Leadership Committee. Further information on the role and function of each committee is outlined in this section.

Figure 3.1: Governance framework at 30 June 2025



Executive Leadership Committee

The Executive Leadership Committee meets quarterly and is chaired by the Commissioner. Membership includes all Senior Executive Service (SES) staff and statutory office holders across operational and corporate areas.

The responsibilities of the Executive Leadership Committee are to:

- develop, set and oversee the Commission's strategic direction and priorities
- ensure that any resource constraints, either financial or staffing, and potential impacts on Commission priorities are being effectively managed
- shape the culture of the Commission
- ensure that Commission-wide risks and challenges are being effectively managed
- provide strategic oversight and guidance to subordinate committees on work associated with the implementation of agreed Commission priorities.

Corporate Governance Committee

The Corporate Governance Committee is chaired by the CEO and meets every 2 months. Monthly finance and human resources reports are distributed to the committee, along with any urgent matters, for consideration out of session.

Its functions and activities include monitoring and governing:

- financial position and performance
- human resourcing and agency workforce capability
- security and property
- information and communication technology (ICT)
- data governance and information management
- performance reporting
- strategic and business planning
- risk management and business continuity
- systems of internal control, including compliance with legislative and regulatory requirements
- organisational strategy, priorities, policies and procedures.

Operations Governance Committee

The Operations Governance Committee meets every 2 months and is chaired by the Commissioner. Its purpose is to assist the Commissioner and Deputy Commissioners with the performance of the Commissioner's functions under s 17 of the NACC Act. The committee reports to the Commissioner and Deputy Commissioners about operational matters including:

- the number and nature of and risks associated with referrals being received, triaged and assessed
- the progress, resourcing, prioritisation and overall strategic direction of corruption investigations and supporting investigative activities
- the results of preliminary and corruption investigations
- the progress of investigations referred to Commonwealth agencies for investigation
- acquisition, resourcing and deployment of technical capabilities
- the work and priorities of the Strategic Intelligence team, the Intelligence Operations team and the Corruption Prevention and Education team
- significant legal risks impacting investigations, notable legal advice provided in operational matters and the progress of investigation reports.

Consultative Committee

The Consultative Committee is established in accordance with the requirements of the National Anti-Corruption Commission Enterprise Agreement 2024–2027 (EA). The Consultative Committee facilitates consultation with staff on matters that affect them and the Commission more broadly. It discusses issues relating to:

- implementation and operation of the EA
- workplace culture and any workplace relations matters
- safety of staff
- diversity and inclusion.

Work Health and Safety Committee

The Commission is committed to the health, safety and wellbeing of its workers, including employees, contractors and visitors. The Commission is bound by employer responsibilities in the *Work Health and Safety Act 2011* (Cth) (WHS Act), the *Safety, Rehabilitation and Compensation Act 1988* (Cth) and relevant anti-discrimination legislation.

The Commission established a Work Health and Safety Committee (WHSC) in August 2023. It meets quarterly to raise, discuss and address work health and safety matters, with outcomes presented to the Corporate Governance Committee. To ensure continuous communication and improvement, the WHSC publishes minutes of its meetings internally for discussion and review.

There were 2 notifiable incidents and no investigations conducted during the reporting period under Part 10 of the WHS Act. No provisional improvement notices were issued by Comcare.

During the reporting period, the Commission provided a number of health and wellbeing initiatives, including:

- revising the Work Health and Safety Management Arrangements
- promoting the Australian Public Service Commission (APSC) e-learning module on workplace health and safety
- extending corporate citizen roles to include health and safety representatives; and the appointment of additional emergency wardens and first aid and harassment contact officers across the Canberra, Melbourne, Brisbane, Perth and Sydney offices
- providing employees with workstation ergonomic assessments, including mini ergonomic assessments conducted face to face and virtually at all new office buildings
- offering influenza vaccinations to employees through a voucher for use at various pharmacy chains across Australia, onsite skin checks, and health and financial check-ups
- providing employees with access to a suite of health and wellbeing webinars
- offering employees reimbursement for corrective optical aids and financial assistance for approved health and wellbeing equipment
- delivering due diligence training for the senior executive
- commencing work on a range of work health and safety risk assessments
- finalising the Due Diligence Framework
- providing free and confidential access to an Employee Assistance Program.

Audit and Risk Committee

The Audit and Risk Committee provides independent advice to the CEO, as the accountable authority, on the appropriateness of the Commission's:

- financial reporting
- performance reporting
- systems of risk oversight and management
- systems of internal control.

The functions of the Audit and Risk Committee are outlined in its charter (nacc.gov.au/about-nacc/accountability-and-reporting).

Table 3.1 details the membership of the Audit and Risk Committee during the reporting period.

Table 3.1: Audit and Risk Committee membership

Name	Skills and experience	Meeting attendance	Total annual remuneration (inc. GST)
Arthur Diakos (Chair)	• Senior executive experience and knowledge in financial and general management • Held senior executive roles across several New South Wales and Australian Government organisations • Awarded the Public Service Medal in recognition of outstanding public service • Fellow of the Australian Society of Certified Practising Accountants • Member of the Australian Institute of Company Directors • Bachelor of Business, with a major in accounting and sub-major in finance	5/5	\$25,000
Myra Croke	• Formerly Chief Operating Officer, Department of Parliamentary Services • Formerly Acting First Assistant Secretary, Ministerial Support Division, Department of the Prime Minister and Cabinet • Awarded Public Service Medal for outstanding public service in establishing and managing the secretariat for the National Security Committee of Cabinet (Australia Day Honours, January 2010) • Bachelor of Science, Australian National University • Graduate Diploma in Public Law, Australian National University	2/5	\$8,000

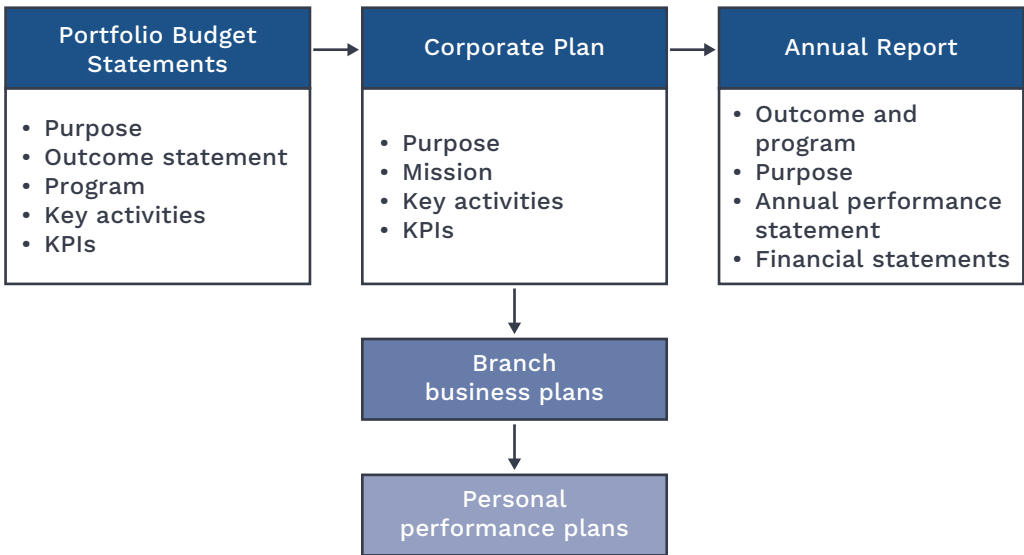
Name	Skills and experience	Meeting attendance	Total annual remuneration (inc. GST)
John Lenarduzzi	• Executive Director, Global and Commercial Operations, Cyber CX • Formerly 7 years in Senior Executive Service roles with the Australian Government • Master of Business Administration • Bachelor of Electrical and Electronic Engineering	2/5	\$8,000
Sara Watts	• Formerly Chief Finance Officer of IBM Australia/New Zealand • Formerly Vice-Principal Operations, University of Sydney • Formerly Audit Chair of Victorian Auditor-General's Office, Independent Broad-based Anti-corruption Commission, Australian Museum and Vision Australia Ltd • Current Audit Chair of Sydney Opera House Trust, Uniting NSW/ACT, Syrah Resources Ltd, Trajan Scientific and Medical Ltd, Nuix Ltd • Bachelor of Science, University of Sydney; Master of Business Administration, Macquarie Graduate School of Management; Fellow of CPA Australia; Fellow of Australian Institute of Company Directors	5/5	\$20,000
Janine McMinn	• Independent director and executive adviser with over 39 years experience in internal audit, ICT and cybersecurity • Member of 3 audit and risk committees • Experience conducting assurance and cybersecurity reviews in public and private organisations • Bachelor of Arts in Computing and Statistics, Fellow of the Australian Institute of Company Directors, Certified Information Systems Auditor and Certified Information Security Manager • Vice-President of the Australian War Memorial Voluntary Guides. • Provides mentoring and coaching support to senior executives and Computing Masters students at Australian National University.	2/5	\$8,000

Strategic planning and reporting framework

The Commission’s governance framework is underpinned by the strategic planning and reporting framework illustrated in Figure 3.2.

This framework ensures the Commission is accountable to the Parliament and the Australian public by providing a clear line of sight between the purpose of the Commission, included in its Portfolio Budget Statements and Corporate Plan, and its performance, as reported in its annual report.

Figure 3.2: Strategic planning and reporting framework



Systems of risk oversight, management and control

As the Commission continues to grow and mature, the focus has been on further developing and embedding its governance, assurance, risk management, fraud and corruption control, and integrity frameworks.

Risk management

The Commission articulates its arrangements for managing all types of risk, including enterprise, fraud and corruption and business disruptions, at all levels, in its Risk Management Policy and Framework. In addition to identifying and assessing its key risks at the enterprise level, work has been undertaken to further embed risk management practices into decision-making within both corporate and operational business areas.

The Commission has also established its Business Continuity Management Framework to ensure a systemic and strategic approach to minimising disruption and recovery of critical business functions in response to adverse events.

Fraud and corruption control

The Commission's arrangements to prevent, detect and respond to fraud and corruption, directed at the Commission or by staff, providers or suppliers, is set out in its Fraud and Corruption Control Framework and Fraud and Corruption Control Plan.

This aligns with the legislative requirements of the NACC Act, *Public Governance, Performance and Accountability Act 2013* (Cth) (PGPA Act) and s 10 of the Public Governance, Performance and Accountability Rule 2014 (Cth) (PGPA Rule) and reflects best practice.

The Commission has undertaken independent, targeted fraud and corruption risk assessments at the enterprise level and developed oversight and monitoring processes to ensure the adequacy of preventative, detective and response controls and treatments.

Accountable authority certification

In accordance with section 10 of the Public Governance, Performance and Accountability Rule 2014, I certify that I am satisfied appropriate fraud management arrangements for the 2024–2025 financial year were in place and all reasonable measures have been taken to deal appropriately with fraud relating to the agency.

The Commission has undertaken enterprise fraud and corruption risk assessments and implemented a Fraud and Corruption Control Plan as part of its Fraud and Corruption Control Framework to align with the Commonwealth Fraud and Corruption Control Framework 2024.

Mr Philip Reed

Chief Executive Officer

Integrity framework

The Commission's ability to achieve its mission – that is, to enhance integrity in the Commonwealth public sector by deterring, detecting and preventing corrupt conduct – is dependent on upholding its reputation as an independent, capable and trusted organisation that exemplifies the highest standards of integrity in everything it does.

These standards and the expectations, which apply to all staff, are outlined in the Commission's Integrity Framework. Policies and guidance related to matters of integrity include the declaration and management of interests and associations, the receiving and giving of gifts or benefits, undertaking secondary employment and contact reporting.

Compliance with the Integrity Framework is further supported by training and education for Commission staff and the availability of advice from the internal integrity team.

In the Commission's second year of operation there has been a focus on the development of the Commission's Integrity Maturity Plan. This plan will align with other integrity initiatives that are underway across the Australian Public Service (APS). As a Commonwealth integrity agency, the Commission plays an instrumental part in embedding a strong integrity culture through its contribution to policy development and leading by example.

Internal audit

Internal audit plays a significant role in providing independent, objective assurance to the CEO and Commissioner on the Commission's operations. The Commission utilises an outsourced model of internal audit with in-house management. Internal audits are delivered by an external service provider, with the internal audit program actively managed by the Governance team and overseen by the Chief Audit Executive.

The Strategic Internal Audit Plan for 2024–27 (SIAP) identified 4 audits for 2024–25, with a further 2 management-initiated reviews being undertaken.

In May 2025, in the context of previous audit outcomes and in consideration of the Commission's operating environment and emerging risks, the SIAP was reviewed and refreshed to map the annual audit plan for 2025–26.

Implementation and ongoing monitoring of recommendations from all audit activities continues to be undertaken and reported to the Corporate Governance Committee and Audit and Risk Committee on a regular basis.

Workforce management

Resourcing

The Commission's workforce continued to experience sustained growth during the reporting period.

At 30 June 2025, the Commission's headcount was 231 employees (including the Commissioner, Deputy Commissioners, CEO and ongoing and non-ongoing employees) and 3 seconded employees. Its average staffing level (ASL) was 213 on 30 June 2025. The Commission will continue to recruit to its budgeted ASL of 266 employees.

Recruitment focused on understanding capability requirements, developing roles and responsibilities accordingly, and recruiting suitably qualified applicants to vacant roles within appropriate timeframes.

The Commission engaged seconded employees from other Australian Government agencies to assist in day-to-day operations. These employees brought experience and skills that helped mature the capability of Commission employees and increased engagement and collaboration between the agencies.

Workforce agreements and conditions of employment

The conditions of the EA commenced operation during the reporting period. All non-SES Commission employees were engaged under the EA.

All non-SES employees received an annual service allowance of \$1,972 (pro-rata for part-time) which acknowledged the special requirements of working at the Commission – for example, the need for the intrusion associated with notifying private financial and social interests; and the necessity to engage in practices to prevent targeting by unlawful elements.

Commission staff are also required to undertake high-level personal security assessments as part of the Commission's employment requisite to maintain a satisfactory security clearance.

The Commission provided a range of non-salary benefits to employees, including:

- access to the Commission's Employee Assistance Program
- influenza vaccinations
- health checks
- reimbursement for corrective optical aids
- study assistance
- conference and study leave
- financial assistance for approved health and wellbeing equipment.

The Commission promotes flexible work arrangements for its employees to:

- ensure compliance with the enhanced conditions under the new EA
- promote itself as an employer of choice through building its employee value proposition
- increase productivity
- promote wellbeing of all employees through better work-life balance.

In the reporting period, the Commission did not have a system of performance bonus payments.

Executive remuneration

The CEO sets and maintains executive remuneration arrangements for all SES employees. The remuneration of the Commissioner, Deputy Commissioners and CEO is determined by the Remuneration Tribunal (see remtribunal.gov.au).

The CEO has established an SES Remuneration Policy for SES employees of the Commission.

The SES remuneration arrangements are managed in accordance with the APS Executive Remuneration Management policy and the Public Sector Workplace Relations Policy 2023.

The Commissioner, Deputy Commissioners and CEO were key management personnel in 2024–25. The Commission had no other highly paid staff in 2024–25. No key management personnel received bonuses during the reporting period.

Table 3.2 provides information about remuneration for key management personnel.

SES remuneration

Remuneration for SES employees is established through individual determinations made under s 24(1) of the *Public Service Act 1999* (Cth) (PS Act). Salary levels for SES employees are generally set at rates within a salary band applicable to each SES classification.

At 30 June 2025, there were 6 SES employees covered by individual PS Act s 24(1) determinations.

During the reporting period, one SES employee retired and 2 staff acted in SES positions for periods longer than 3 months. An additional non-ongoing SES employee was engaged to independently reconsider the Commission’s decision on the referrals made to the Commission by the Royal Commission into the Robodebt Scheme. As the Independent Reconsideration Delegate, Mr Geoffrey Nettle AC KC was appointed as an SES Band 3 non-ongoing (irregular or intermittent) employee from 16 December 2024 until 11 February 2025. Further information about Mr Nettle’s appointment is provided under Inspector – Robodebt Royal Commission referrals on page 50.

Table 3.3 provides a breakdown of remuneration for the 10 SES employees engaged during the reporting period, including Mr Nettle’s remuneration.

Table 3.2: Remuneration for key management personnel

Name	Position title	Short-term benefits			Post-employment benefits		Other long-term benefits		Termination benefits	Total remuneration
		Base salary*	Benefits and allowances^	Other	Superannuation contributions	Long service leave†	Long-term benefits	Other		
The Hon Paul Brereton AM RFD SC (1 July 2024 to 30 June 2025)	Commissioner	808,944	–	–	30,018	10,686	–	–	–	849,648
Dr Ben Gauntlett (1 July 2024 to 30 June 2025)	Deputy Commissioner	629,451	–	–	30,018	12,701	–	–	–	672,170
Ms Kylie Kilgour (1 July 2024 to 30 June 2025)	Deputy Commissioner	611,569	–	–	30,018	14,447	–	–	–	656,034
Ms Nicole Rose PSM (1 July 2024 to 30 June 2025)	Deputy Commissioner	602,359	6,157	–	29,702	15,811	–	–	–	654,029
Mr Philip Reed (1 July 2024 to 30 June 2025)	Chief Executive Officer	466,229	–	–	30,018	11,704	–	–	–	507,951

* Base salary includes leave taken and the movement in annual leave provision (i.e. 4 weeks accrued annual leave less annual leave taken).

^ Other benefits and allowances include expenses and associated fringe benefits tax expense (e.g. provision of car parking as part of remuneration package).

† Long service leave represents the movement in long service leave provision (i.e. 9 days accrued per annum less long service leave taken).

Table 3.3: Remuneration of senior executives

Total remuneration bands	Number of SES*	Short-term benefits			Post-employment benefits		Other long-term benefits		Termination benefits	Total remuneration
		Average base salary	Average bonuses	Average other benefits and allowances	Average superannuation contributions	Average long service leave	Average long-term benefits	Average other benefits	Average termination benefits	Average total remuneration
\$0 – \$220,000	3	92,781	–	290	22,229	2,076	–	–	–	117,376
\$220,001 – \$245,000	2	105,080	–	–	16,993	152	–	–	110,332	232,557
\$245,001 – \$270,000	2	211,475	–	684	32,689	5,762	–	–	–	250,610
\$270,001 – \$295,000	3	229,399	–	1,368	41,955	6,793	–	–	–	279,515

* Data includes 2 acting arrangements, each for periods longer than 3 months.

Employee performance and development

To build a dynamic and capable workforce, the Commission has supported its employees through its Learning Management System (LMS), access to the APSC's APS Academy and various other training opportunities. Programs were developed within the Commission's LMS to facilitate induction training for new employees and to meet the agency's ongoing mandatory learning requirements.

The Commission is focused on building cross-cultural knowledge and competence for all employees, starting with mandatory Executive Level 2 training as outlined in the EA that began in 2024–25. As it matures, the Commission will continue to expand and refine its development offerings to all employees. The Commission's training is delivered online and through face-to-face forums.

The Commission also provided study assistance and development opportunities to all employees in support of individual learning and career progression. The Commission's Performance Management Policy links individual roles and development goals with organisational needs and provides the framework to assist supervisors and employees to manage individual performance.

The Commission also participates in the Women in Law Enforcement Strategy Mentor Program – a formal 12-month mentoring and leadership development program sponsored by the Criminal Justice and Law Enforcement Forum. The Commission participates by providing mentors and mentees to the program.

Diversity and inclusion

The Commission is committed to creating inclusive and accessible workplaces that are culturally safe for all employees and supported through awareness-raising activities. The Commission aims to assist its employees in building inclusivity and competence through the development and implementation of its diversity programs and activities while supporting the implementation of Australian Government diversity strategies.

In 2024–25, the Commission had 2 employees who identified as Aboriginal or Torres Strait Islander and 11 employees who identified as a person with a disability.

The Commission has been building its inclusion maturity through the celebration of diversity days of significance including:

- NAIDOC Week
- International Day of People with Disability
- International Women's Day
- Harmony Week
- National Reconciliation Week
- Pride Month.

The Commission will build and mature its inclusion practices through its memberships with the Diversity Council of Australia, Reconciliation Australia and the Australian Disability Network.

The Commission has commenced working with Reconciliation Australia to develop its first Reconciliation Action Plan.

Strategic Commissioning Framework

The Commission is focused on attracting and retaining highly skilled and motivated staff to ensure it has the capacity to effectively undertake its functions and achieve its purpose.

The Commission is committed to using in-house resources and minimising outsourcing to contractors and consultants. However, it will retain a limited number of outsourcing arrangements for some elements of its core work, particularly in the ICT sector. With a competitive labour market and skills shortages, it is not currently possible for the Commission to reduce outsourced work and bring these roles in-house.

Disability reporting

Australia's Disability Strategy 2021–2031 (the Strategy) is the overarching framework for inclusive policies, programs and infrastructure that will support people with disability to participate in all areas of Australian life.

The Strategy sets out changes to be made, where practical, to improve the lives of people with disability in Australia. It acts to ensure the principles underpinning the United Nations Convention on the Rights of Persons with Disabilities are incorporated into Australia's policies and programs that affect people with disability, their families and carers. All levels of government have committed to delivering more comprehensive and visible reporting under the Strategy.

A range of reports on progress of the Strategy's actions and outcome areas will be published and made available on the Disability Gateway website (disabilitygateway.gov.au/ads).

Disability reporting is included in the APSC's State of the Service reports and the APS Statistical Bulletin. These reports are available on the APSC's website (apsc.gov.au).

Financial management

Purchasing

The Commission undertakes all procurements in accordance with the Commonwealth Procurement Rules, the Commission's Accountable Authority Instructions, the PGPA Act and the PGPA Rule.

The Commission's purchasing framework ensures that procurements are:

- sound value for money
- ethical, economical, efficient and effective; and take account of the Commission's security needs, specialised role and size
- compliant with mandatory whole-of-government coordinated procurement (such as travel, management advisory services, legal services and property services)
- using the Commonwealth Contracting Suite for low-risk procurements valued between \$10,000 and \$200,000 (GST inclusive)
- timely in payment to suppliers, including use of payment cards when possible and appropriate
- compliant with the requirements of the Indigenous Procurement Policy (IPP) as well as considering use of Indigenous suppliers outside of the IPP Mandatory Set Aside requirements.

Through these elements and application of the broader Commonwealth Procurement Rules, the Commission seeks to support small and medium enterprise (SME) participation.

Australian National Audit Office access clauses

The Commission's use of the Commonwealth Contracting Suite ensures that all contracts for low-risk procurements valued under \$200,000 (including GST) include provisions allowing the Auditor-General to have access to contractor premises. In addition, no contracts over \$100,000 (including GST) were entered into that did not include the Australian National Audit Office access clauses.

Exempt contracts

During 2024–25, no Commission contracts or standing offers were exempted from publication in AusTender on the basis that publication would disclose exempt matters under the *Freedom of Information Act 1982* (Cth) (FOI Act).

Consultants

During 2024–25, 13 new consultancy contracts were established involving total actual expenditure of \$510,097 (including GST). In addition, 9 ongoing consultancy contracts were active during the period, involving total actual expenditure of \$514,580 (including GST).

The decision to engage a consultant is made in accordance with the PGPA Act, the PGPA Rule, the Commonwealth Procurement Rules and relevant internal policies, including the Commission’s Accountable Authority Instructions.

Consultants were engaged to investigate or diagnose a defined issue or problem, carry out defined reviews or evaluations (such as internal audits), or provide independent advice or information to assist in Commission decision-making.

When deciding to engage a consultant, the Commission requires the decision-maker to consider the abilities and resources required for the task, the skills available internally and the cost-effectiveness of engaging external expertise.

Annual reports contain information about actual expenditure on contracts for consultancies. Information on the value of contracts and consultancies is available on the AusTender website (tenders.gov.au).

The Commission supports small business participation in the Commonwealth Government procurement market. SMEs and small enterprise participation statistics are available on the Department of Finance’s website (finance.gov.au/government/procurement/statistics-australian-government-procurement-contracts). The ways in which the Commission’s purchasing framework supports small business participation are outlined under Purchasing on page 100. The effect of these practices can be readily observed in our engagement of consultants. Three of the Commission’s top 5 reportable consultancy contracts in 2024–25 were with SMEs.

Table 3.4 shows the Commission’s top 5 consultancies (by value of expenditure) during 2024–25.

Table 3.4: Organisations receiving a share of reportable consultancy contract expenditure (2024–25)

Organisations receiving a share of reportable consultancy contract expenditure 2024–25	Expenditure (\$)	Proportion of 2024–25 total spend (%)
Axiom Associates (ABN 98 121 216 662)	275,529	27
Deloitte Touche Tohmatsu (ABN 74 490 121 060)	142,744	14
Ashurst Australia (ABN 75 304 286 095)	72,491	7
Matthew Vesper (ABN 42 299 628 313)	71,798	7
Jennifer Helen Croxford (ABN 58 755 395 188)	69,160	7
Total of largest shares	631,722	62

Non-consultancy contracts

During 2024–25, the Commission entered 54 new non-consultancy contracts involving total actual expenditure of \$4,143,710 (including GST). In addition, 74 ongoing non-consultancy contracts were active during the period, involving actual expenditure of \$13,375,021 (including GST).

Table 3.5 shows the Commission's top 5 non-consultancy contracts (by value of expenditure) during 2024–25.

Annual reports contain information about actual expenditure on reportable non-consultancy contracts. Information on the value of non-consultancy contracts is available on the AusTender website (tenders.gov.au).

Significant non-compliance with finance law

Section 19 of the PGPA Act requires that agencies notify their responsible minister of any significant issue that has affected the entity. Where the issue involves non-compliance with the finance law, agencies must also notify the Minister for Finance.

The Commission has not identified any instances of significant non-compliance with finance law in 2024–25.

Advertising and market research

The Commission did not conduct any advertising campaigns or market research during the reporting period.

Table 3.5: Organisations receiving a share of reportable non-consultancy contract expenditure (2024–25)

Organisations receiving a share of reportable non-consultancy contract expenditure 2024–25	Expenditure (\$)	Proportion of 2024–25 total spend (%)
ACME Co No.4 Pty Ltd (ABN 57 631 209 526)	1,340,224	8
AMA Projects Pty Ltd (ABN 52 141 420 680)	1,038,095	6
GPT Funds Management Pty Ltd (ABN 29 116 099 631)	1,026,261	6
Distillery Software Pty Ltd (ABN 69 080 932 467)	1,003,838	6
Centorrino Technologies Pty Ltd (ABN 83 606 931 524)	798,046	5
Total of largest shares	5,206,464	31

External scrutiny

Auditor-General and parliamentary committees

The operations of the Commission were not the subject of any reports by the Auditor-General during the reporting period.

In accordance with Senate Standing Order 25(20), the Legal and Constitutional Affairs Legislation Committee examined the Commission's annual report, together with those of other portfolio agencies and departments referred for examination and assessment. The committee's report on annual reports (No. 1 of 2025) was tabled in Parliament on 24 March 2025.

A function of the Parliamentary Joint Committee on the National Anti-Corruption Commission (PJC-NACC) is to examine and report to the Parliament on any matter appearing in, or arising out of, each annual report prepared by the Commissioner under s 271 of the NACC Act. The *PJC-NACC Examination of the National Anti-Corruption Commission Annual Report 2023–24* was tabled in Parliament on 27 March 2025.

The Commission has evidence-gathering and investigative powers under the *Telecommunications (Interception and Access) Act 1979* (Cth) (TIA Act), the *Crimes Act 1914* (Cth) (Crimes Act) and the *Surveillance Devices Act 2004* (Cth) (SD Act). As a result, the Commission has statutory reporting requirements and is subject to inspections by the Commonwealth Ombudsman.

Inspector's oversight

During the reporting period, the Inspector of the National Anti-Corruption Commission (Inspector) engaged with the Commission regarding matters that members of the public or the Commission had referred to her or matters on which she was otherwise seeking further information.

Additionally, on 30 October 2024, the Inspector concluded her investigation into the Commission's decision not to investigate the referrals of 6 individuals from the Royal Commission into the Robodebt Scheme.

The Inspector found there to have been a mistake of law or process in the Commission's original decision. The Commission decided to appoint an independent person, retired High Court judge Mr Geoffrey Nettle AC KC, to reconsider the decision not to investigate. Mr Nettle decided the Commission should investigate the referrals, and this process is underway. Further details are found under Inspector – Robodebt Royal Commission referrals on page 50.

The Inspector separately prepares an annual report for Parliament detailing her oversight functions, in accordance with s 198 of the NACC Act.

Commonwealth Ombudsman

During the reporting period, the Commonwealth Ombudsman conducted routine inspections of the Commission's records and practices under the TIA Act and the SD Act.

The Ombudsman made no findings and 7 suggestions following their September 2024 inspection and are finalising the report for the June 2025 inspection. These suggestions are a mechanism to assist the Commission in enhancing its practices and procedures related to the use of powers under the TIA Act, the SD Act and the Crimes Act and the status of each suggestion forms part of the material reviewed in future inspections.

Following the September 2024 inspection, the Commonwealth Ombudsman made note of the Commission's progress and continuous improvements relevant to their oversight responsibilities. In particular, they 'found the governance and compliance framework to be robust' and that the Commission 'demonstrated a robust framework to oversee the use of the powers within investigations, including continual re-evaluation of the use of the powers against the objectives of the investigation'.

Annual reports on significant powers

The Commission reports annually (and in the case of controlled operations every 6 months) to the relevant minister and the Commonwealth Ombudsman on its use of powers under the SD Act, the TIA Act and the Crimes Act. Crimes Act reporting relates to application of the controlled operations framework (Part IAB) as well as the integrity testing under Part IAA of the Crimes Act.

The Commission's annual report for integrity testing is tabled by the Attorney-General. The Commission's annual report for controlled operations is tabled by the responsible minister. For the 2024–25 reporting period this will be the Minister for Home Affairs. The Commission's annual reporting requirements under the TIA Act and the SD Act for this period will be coordinated by the Department of Home Affairs and tabled by the Minister for Home Affairs.

Significant judicial decisions

There were no significant judicial decisions or decisions of administrative tribunals or by the Australian Information Commissioner made during the period that have had, or may have, a significant effect on the operations of the Commission.

Capability reviews

There were no capability reviews of the Commission released during the reporting period.

Freedom of information

The Commission is subject to the FOI Act and must comply with the Information Publication Scheme (IPS) requirements. Information about the Commission's IPS can be found on its website (nacc.gov.au/about-nacc/accountability-and-reporting).

Ecologically sustainable development and environmental performance

Australian Government agencies are required to report on their performance in relation to the environment and ecologically sustainable development in line with section 516A of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act).

While the Commission does not undertake activities with direct implications for ecologically sustainable development, it observes the principles set out in the EPBC Act in its daily activities. The Commission strives to be environmentally responsible, including by making efficient use of resources and managing waste effectively.

The Commission is committed to reducing its impact on the environment through ongoing minimisation strategies and new technologies and resources, including:

- using electronic document management systems including the implementation of a secure file sharing platform that allows government, law enforcement and private enterprise to transfer large files
- using video and telephone conferencing where possible to reduce the need for local and interstate travel
- reviewing leased buildings and encouraging owners to improve their buildings' energy performance
- ensuring that new leases entered into comply with the Australian Government's energy policy by using whole-of-government leasing procurement

- providing recycling facilities in breakout areas across all Commission tenancies.

The integration of energy efficiency practices and planning allows the Commission to reduce its energy costs and its consumption of valuable resources.

Each Commission tenancy includes access to end-of-trip facilities, allowing staff to utilise alternative non-motored forms of transport to commute to the office.

Where possible, the Commission used recycled paper products and purchased local or Australian made products where it was financially reasonable and within procurement rules.

Commission offices have waste management systems in place that include different waste streams. The Commission will develop guidelines to inform its waste management planning and will begin monitoring its refuse by waste stream.

Emissions reduction plan

The Commission published its inaugural Emissions Reduction Plan (ERP) in August 2024 and reviewed it in August 2025. Updates have been made to reflect the Commission's long-term property footprint, the change in whole-of-government property management arrangements and the impact these changes have on emissions reductions.

The ERP outlines the Commission's priorities and actions to continue reducing operational emissions and contribute to the APS Net Zero 2030 target. The updated plan was published in September 2025.³⁸

³⁸ The updated Emissions Reduction Plan is available on the Commission's [Accountability and reporting webpage](#).

APS Net Zero 2030

APS Net Zero 2030 is the Australian Government’s policy for the APS to reduce its greenhouse gas emissions to net zero by 2030 and transparently report on its emissions. As part of the Net Zero in Government Operations Strategy, non-corporate Commonwealth entities, corporate Commonwealth entities and Commonwealth companies are required to report on their operational greenhouse gas emissions.

Table 3.6 presents greenhouse gas emissions over the 2024–25 period. Results are presented based on carbon dioxide equivalent (CO₂-e) emissions. Greenhouse gas emissions have been calculated in line with the APS Net Zero Emissions Reporting Framework, consistent with the Australian Government approach as part of the APS Net Zero 2030 policy.

Table 3.7 provides the total emissions for electricity.

Table 3.6: Greenhouse gas emissions inventory 2024–25

Emission source	Scope 1 t CO ₂ -e	Scope 2 t CO ₂ -e	Scope 3 t CO ₂ -e	Total t CO ₂ -e
Electricity (location based approach)	N/A	68.33	7.32	75.66
Natural gas	–	N/A	–	–
Solid waste	–	N/A	–	–
Refrigerants	–	N/A	N/A	–
Fleet and other vehicles	–	N/A	–	–
Domestic commercial flights	N/A	N/A	241.97	241.97
Domestic hire car	N/A	N/A	4.25	4.25
Domestic travel accommodation	N/A	N/A	51.64	51.64
Other energy	–	N/A	–	–
Total t CO₂-e*	–	68.33	305.18	373.52

* Solid waste data could not be separated from landlord data and has not been included.
Note: This table presents emissions related to electricity usage using the location-based accounting method.
CO₂-e = carbon dioxide equivalent.

Table 3.7: Electricity greenhouse gas emissions 2024–25

Emission source	Scope 2 t CO ₂ -e	Scope 3 t CO ₂ -e	Total t CO ₂ -e	Electricity kWh
Electricity (location based approach)	68.33	7.32	75.66	103,480.50
Market-based electricity emissions	59.25	8.05	67.29	73,144.17
Total renewable electricity consumed	N/A	N/A	N/A	30,336.33
Renewable power percentage*	N/A	N/A	N/A	18,828.28
Jurisdictional renewable power percentage ^{^ †}	N/A	N/A	N/A	11,508.05
GreenPower [^]	N/A	N/A	N/A	–
Large-scale generation certificates [^]	N/A	N/A	N/A	–
Behind the meter solar [#]	N/A	N/A	N/A	–
Total renewable electricity produced	N/A	N/A	N/A	–
Large-scale generation certificates [^]	N/A	N/A	N/A	–
Behind the meter solar	N/A	N/A	N/A	–

* Listed as mandatory renewables in 2023–24 Annual Reports. The renewable power percentage (RPP) accounts for the portion of electricity used, from the grid, that falls within the Renewable Energy Target (RET).

[^] Listed as voluntary renewables in 2023–24 Annual Reports.

[†] The Australian Capital Territory is currently the only state with a jurisdictional renewable power percentage (JRPP).

[#] Reporting behind the meter solar consumption and/or production is optional. The quality of data is expected to improve over time as emissions reporting matures.

Note: This table presents emissions related to electricity usage using both the location-based and the market-based accounting methods. CO₂-e = carbon dioxide equivalent. Electricity usage is measured in kilowatt hours (kWh).

4

Report on financial performance

Financial overview

Independent Auditor's Report

Statement by the Chief Executive Officer
and Chief Financial Officer

Financial statements

Financial overview

The Commission is an independent Commonwealth entity and receives ongoing funding from the Australian Government to provide independent assurance to the Australian community that corrupt conduct involving Commonwealth public officials is prevented, detected, investigated, and responded to appropriately. The Commission also provides education to the public service, and the public, about corruption risks and prevention.

For the 2024–25 financial year, the Commission recognised an operating surplus of \$5.1 million, including depreciation and amortisation. This operating surplus is due to lower than anticipated employee and supplier expenses as the Commission continued to focus on workforce investment and operational capability as the Commission’s establishment phase progressed. The Commission ended the year with an ASL of 213 and continues to recruit towards its budgeted ASL of 266.

The Commission is in a sound financial position as at 30 June 2025, with financial assets of \$53.1 million, which is in excess of total liabilities of \$27.8 million. The equity position of \$75.3 million includes an increase of \$1.6 million relating to the revaluation of non-financial assets.

The budget presented in the 2024–25 Portfolio Budget Statements has been included in the financial statements for variance commentary purposes.

Independent Auditor's Report



INDEPENDENT AUDITOR'S REPORT

To the Attorney-General

Opinion

In my opinion, the financial statements of the National Anti-Corruption Commission (the Entity) for the year ended 30 June 2025:

- (a) comply with Australian Accounting Standards – Simplified Disclosures and the *Public Governance, Performance and Accountability (Financial Reporting) Rule 2015*; and
- (b) present fairly the financial position of the Entity as at 30 June 2025 and its financial performance and cash flows for the year then ended.

The financial statements of the Entity, which I have audited, comprise the following as at 30 June 2025 and for the year then ended:

- Statement by the Chief Executive Officer and Chief Financial Officer;
- Statement of comprehensive income;
- Statement of financial position;
- Statement of changes in equity;
- Cash flow statement; and
- Notes to and forming part of the financial statements, comprising material accounting policy information and other explanatory information.

Basis for opinion

I conducted my audit in accordance with the Australian National Audit Office Auditing Standards, which incorporate the Australian Auditing Standards. My responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of my report. I am independent of the Entity in accordance with the relevant ethical requirements for financial statement audits conducted by the Auditor-General and their delegates. These include the relevant independence requirements of the Accounting Professional and Ethical Standards Board's APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* (the Code) to the extent that they are not in conflict with the *Auditor-General Act 1997*. I have also fulfilled my other 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.

Accountable Authority's responsibility for the financial statements

As the Accountable Authority of the Entity, the Chief Executive Officer is responsible under the *Public Governance, Performance and Accountability Act 2013* (the Act) for the preparation and fair presentation of annual financial statements that comply with Australian Accounting Standards – Simplified Disclosures and the rules made under the Act. The Chief Executive Officer is also responsible for such internal control as the Chief Executive Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Chief Executive Officer is responsible for assessing the ability of the Entity to continue as a going concern, taking into account whether the Entity's operations will cease as a result of an administrative restructure or for any other reason. The Chief Executive Officer is also responsible for disclosing, as applicable, matters related to going concern and using the going concern basis of accounting, unless the assessment indicates that it is not appropriate.

GPO Box 707, Canberra ACT 2601
38 Sydney Avenue, Forrest ACT 2603
Phone (02) 6203 7300

Auditor's responsibilities for the audit of the financial statements

My objective is to obtain reasonable assurance about whether the financial statements as a whole are 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 National Audit Office 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 the financial statements.

As part of an audit in accordance with the Australian National Audit Office 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 statements, 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 the Entity's internal control;
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Accountable Authority;
- conclude on the appropriateness of the Accountable Authority'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 the Entity'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 statements 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 the Entity to cease to continue as a going concern; and
- evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

I communicate with the Accountable Authority 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.

Australian National Audit Office



Fiona Sheppard
Executive Director

Delegate of the Auditor-General

Canberra
23 September 2025

Statement by the Chief Executive Officer and Chief Financial Officer

In our opinion, the attached financial statements for the year ended 30 June 2025 comply with subsection 42(2) of the *Public Governance, Performance and Accountability Act 2013* (Cth) (PGPA Act), and are based on properly maintained financial records as per subsection 41(2) of the PGPA Act.

In our opinion, at the date of this statement, there are reasonable grounds to believe that the National Anti-Corruption Commission (the Commission) will be able to pay its debts as and when they fall due.



Philip Reed

Chief Executive Officer

23 September 2025



Karen Michelle

Chief Financial Officer

23 September 2025

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Statement of comprehensive income

for the period ended 30 June 2025

	Notes	2025 \$'000	2024 \$'000	Original budget \$'000
NET COST OF SERVICES				
Expenses				
Employee benefits	1.1A	35,291	30,520	39,927
Suppliers	1.1B	15,235	16,937	21,994
Depreciation and amortisation	2.2A	8,815	5,692	8,283
Finance costs	1.1C	675	413	248
Write-down and impairment of other assets	2.2A	476	3,825	–
Total expenses		60,492	57,387	70,452
Own-source income				
Own-source revenue				
Other revenue	1.2A	70	153	90
Total own-source revenue		70	153	90
Gains				
Other gains		–	168	–
Total gains		–	168	–
Total own-source income		70	321	90
Net cost of services		(60,422)	(57,066)	(70,362)
Revenue from Government	3.1A	65,551	57,533	65,551
Surplus/(Deficit) attributable to the Australian Government		5,129	467	(4,811)
OTHER COMPREHENSIVE INCOME				
Items not subject to subsequent reclassification to net cost of services				
Changes in asset revaluation reserve		1,586	(58)	–
Total comprehensive income/(loss)		6,715	409	(4,811)

The above statement should be read in conjunction with the accompanying notes.

Statement of financial position

as at 30 June 2025

	Notes	2025 \$'000	2024 \$'000	Original budget \$'000
ASSETS				
Financial assets				
Cash and cash equivalents		1,978	60	–
Trade and other receivables	2.1A	51,079	44,302	46,318
Total financial assets		53,057	44,362	46,318
Non-financial assets				
Buildings ¹	2.2A	15,679	18,936	27,873
Leasehold improvements	2.2A	27,760	29,946	27,581
Plant and equipment	2.2A	4,431	4,413	1,200
Computer software	2.2A	79	–	11,318
Prepayments		2,143	631	860
Total non-financial assets		50,092	53,926	68,832
Total assets		103,149	98,288	115,150
LIABILITIES				
Payables				
Suppliers	2.3A	1,655	664	1,759
Other payables	2.3B	1,082	689	1,063
Total payables		2,737	1,353	2,822
Interest bearing liabilities				
Leases	2.4A	16,642	19,433	29,778
Total interest bearing liabilities		16,642	19,433	29,778
Provisions				
Employee provisions	4.1A	8,426	7,535	10,229
Other provisions	2.5A	–	650	944
Total provisions		8,426	8,185	11,173
Total liabilities		27,805	28,971	43,773
Net assets		75,344	69,317	71,377
EQUITY				
Contributed equity		60,690	61,378	63,070
Reserves		2,361	775	833
Retained surplus		12,293	7,164	7,474
Total equity		75,344	69,317	71,377

The above statement should be read in conjunction with the accompanying notes.

1. Right-of-use assets are included in 'Buildings'.

Statement of changes in equity

for the period ended 30 June 2025

	Notes	2025 \$'000	2024 \$'000	Original budget \$'000
CONTRIBUTED EQUITY				
Opening balance				
Balance carried forward from previous period		61,378	29,913	61,378
Adjusted opening balance		61,378	29,913	61,378
Transactions with owners				
Distributions to owners				
Return of contributed equity		(11,695)	–	–
Contributions by owners				
Equity injection		11,007	31,465	1,692
Total transactions with owners		(688)	31,465	1,692
Closing balance as at 30 June		60,690	61,378	63,070
RETAINED EARNINGS				
Opening balance				
Balance carried forward from previous period		7,164	6,697	12,285
Adjusted opening balance		7,164	6,697	12,285
Comprehensive income				
Surplus/(Deficit) for the period		5,129	467	(4,811)
Total comprehensive income		5,129	467	(4,811)
Closing balance as at 30 June		12,293	7,164	7,474
ASSET REVALUATION RESERVE				
Opening balance				
Balance carried forward from previous period		775	832	833
Adjusted opening balance		775	832	833
Comprehensive income				
Other comprehensive income		1,586	(58)	–
Total comprehensive income		1,586	(58)	–
Closing balance as at 30 June		2,361	775	833
Total equity		75,344	69,317	71,377

The above statement should be read in conjunction with the accompanying notes.

Accounting policy

Equity injections

Amounts appropriated which are designated as 'equity injections' for a year (less any formal reductions) and Departmental Capital Budgets (DCBs) are recognised directly in contributed equity in that year.

Restructuring of administrative arrangements

Net assets received from or relinquished to another government entity under a restructuring of administrative arrangements are adjusted at their book value directly against contributed equity. Refer to Note 6.2.

Other distributions to owners

The *Public Governance, Performance and Accountability (Financial Reporting) Rule 2015* (FRR) requires that distributions to owners be debited to contributed equity unless it is in the nature of a dividend.

Cash flow statement

for the period ended 30 June 2025

	Notes	2025 \$'000	2024 \$'000	Original budget \$'000
OPERATING ACTIVITIES				
Cash received				
Appropriations		60,360	49,444	62,714
Net GST received		2,051	3,953	–
Other		2,422	2,017	–
Total cash received		64,833	55,414	62,714
Cash used				
Employees		35,467	30,044	38,864
Suppliers		18,433	22,018	20,235
Interest payments on lease liabilities		645	389	144
Section 74 receipts transferred to the Official Public Account		4,473	5,970	–
Total cash used		59,018	58,421	59,243
Net cash from/(used by) operating activities		5,815	(3,007)	3,471
INVESTING ACTIVITIES				
Cash used				
Purchase of property, plant and equipment		2,183	30,835	1,692
Purchase of computer software		105	–	–
Total cash used		2,288	30,835	1,692
Net cash used by investing activities		(2,288)	(30,835)	(1,692)
FINANCING ACTIVITIES				
Cash received				
Contributed equity		1,255	36,106	1,692
Total cash received		1,255	36,106	1,692
Cash used				
Principal payments of lease liabilities		2,864	2,204	3,471
Total cash used		2,864	2,204	3,471
Net cash from/(used by) financing activities		(1,609)	33,902	(1,779)
Net increase in cash held		1,918	60	–
Cash and cash equivalents at the beginning of the reporting period		60	–	–
Cash and cash equivalents at the end of the reporting period		1,978	60	–

The above statement should be read in conjunction with the accompanying notes.

Budget variance commentary

The following provides an explanation of major variances between the original budget as presented in the Portfolio Budget Statements 2024–25 and actual expenditure, net asset position and cash flows for 2024–25.

Variances are considered to be ‘major’ where it is considered important for the reader’s understanding or is relevant to an assessment of the discharge of accountability and to provide an analysis of the performance of the Commission.

Major variances and explanations	Affected line items
Operational activities The Commission’s 2025 results reflect a continued focus on workforce investment and operational capability as the Commission’s establishment phase progressed. Total employee expenses accounted for 57% of overall expenditure, demonstrating the Commission’s commitment to building and maintaining a skilled and capable workforce. The Commission ended the year with an average staffing level (ASL) of 213 and continues to recruit towards its budgeted ASL of 266. With lower than anticipated employee results, supplier expenses were also lower than budget (with additional prepayments recognised) in line with the maturing state of the Commission. This has resulted in higher appropriation receivable. Cash at bank was also higher than budget due to the timing of operational payments to be made in early July.	<u>Statement of comprehensive income</u> • Employee benefits • Suppliers <u>Statement of financial position</u> • Cash and cash equivalents • Trade and other receivables • Prepayments • Employee provisions <u>Cash flow statement</u> • Appropriations • Employees • Suppliers
Leases Lease arrangements entered into as part of the Commission’s establishment activities were recognised based on final calculations made as part of the 2024 financial statement process. This occurred after the original budget was finalised, resulting in variances compared to budget.	<u>Statement of financial position</u> • Buildings • Leases • Other provisions <u>Cash flow statement</u> • Principal payments of lease liabilities
Non-financial assets In 2025, the Commission engaged an independent valuer to assess the fair value of the Commission’s property, plant and equipment assets. An increase in asset values recognised mainly relates to current replacement cost assumptions used, based on market impacts. Valuation impacts are not estimated in the budget. In addition to valuation impacts, asset capitalisation outcomes finalised after publication of the original budget include: • Capital works were completed in 2025 relating to the Commission’s laptop refresh and property works in the Melbourne office. • Equity injection appropriations received from ACLEI lapsed on 1 July 2024 and could not be used for 2025 capital projects due to timing. • The budget assumed the Commission’s IT network would be capital in nature; however, the implementation resulted in a Software as a Service arrangement and was expensed.	<u>Statement of comprehensive income</u> • Changes in asset revaluation reserves <u>Statement of financial position</u> • Leasehold improvements • Plant and equipment • Software <u>Statement of changes in equity</u> • Contributed equity • Asset revaluation reserve

Overview

The National Anti-Corruption Commission (the Commission) is a non-corporate Commonwealth entity for the purpose of the *Public Governance, Performance, and Accountability Act 2013* (Cth) (PGPA Act).

The Commission is an independent Commonwealth entity established under the *National Anti-Corruption Commission Act 2022* (Cth) to provide independent assurance to the Australian community that corrupt conduct involving Commonwealth public officials is prevented, detected, investigated, and responded to appropriately.

The basis of preparation

The financial statements are required by section 42 of the PGPA Act.

The financial statements have been prepared in accordance with the:

- a. *Public Governance, Performance and Accountability (Financial Reporting) Rule 2015* (FRR); and
- b. Australian Accounting Standards and Interpretations – including simplified disclosures for Tier 2 Entities under AASB 1060 issued by the Australian Accounting Standards Board (AASB) that apply for the reporting period.

The financial statements have been prepared on an accrual basis and in accordance with the historical cost convention, except for certain assets and liabilities at fair value. Except where stated, no allowance is made for the effect of changing prices on the results or the financial position.

The financial statements are presented in Australian dollars and rounded to the nearest thousand dollars unless otherwise specified.

New accounting standards

All new, revised or amending standards that were issued prior to the sign-off date and are applicable to the current reporting period did not have a material impact on the Commission's financial statements.

Taxation

The Commission is exempt from all forms of taxation except Fringe Benefits Tax (FBT) and the Goods and Services Tax (GST).

Events after the reporting period

There are no known events occurring after the reporting period for the year ending 30 June 2025.

Breach of section 83 of the Constitution

There have been no known breaches of Section 83 of the Constitution for the reporting period.

1. Financial performance

This section analyses the financial performance of the Commission for the year ended 2025.

1.1 Expenses

	2025 \$'000	2024 \$'000
1.1A: Employee benefits		
Wages and salaries	27,176	22,926
Superannuation		
Defined contribution plans	3,587	2,922
Defined benefit plans	1,111	873
Leave and other entitlements	3,194	3,799
Separation and redundancies	223	–
Total employee benefits	35,291	30,520

Accounting policy

Accounting policies for employee related expenses are contained in the 'People and relationships' section.

1.1B: Suppliers		
Goods and services supplied or rendered		
Business operating expenses	2,907	2,416
Information and communication expenses	7,075	11,067
Professional and legal expenses	3,154	1,343
Travel and employee development	1,834	1,395
Other	204	361
Total goods and services supplied or rendered	15,174	16,582
Goods supplied	429	368
Services rendered	14,745	16,214
Total goods and services supplied or rendered	15,174	16,582
Other suppliers		
Workers compensation expenses	61	60
Short-term leases	–	295
Total other suppliers	61	355
Total suppliers	15,235	16,937

1.1C: Finance costs		
Interest on lease liabilities ¹	645	389
Other interest payments	3	–
Unwinding of discount	27	24
Total finance costs	675	413

1. This lease disclosure should be read in conjunction with the accompanying notes 2.2A and 2.4A.

Accounting policy

All borrowing costs are expensed as incurred.

1.2 Income

	2025 \$'000	2024 \$'000
1.2A: Other revenue		
Resources received free of charge		
Remuneration of auditors	70	75
Other ¹	–	78
Total other revenue	70	153

1. In 2024, 'Other' relates to reimbursement from Diners of credit card holder account credits.

Accounting policy

Resources received free of charge

Resources received free of charge are recognised as gains when, and only when, a fair value can be reliably determined and the services would have been purchased if they had not been donated. Use of those resources is recognised as an expense. Resources received free of charge are recorded as either revenue or gains depending on their nature.

2. Financial position

This section analyses the Commission's assets used to conduct its operations and the operating liabilities incurred as a result. Employee related information is disclosed in the People and Relationships section.

2.1 Financial assets

	2025 \$'000	2024 \$'000
2.1A: Trade and other receivables		
Goods and services receivables		
Goods and services	15	967
Total goods and services receivables	15	967
Appropriation receivables		
Ordinary annual services	40,477	30,813
Equity Injection – Appropriation	9,752	11,695
Total appropriation receivables	50,229	42,508
Other receivables		
Statutory receivables – GST	835	827
Total other receivables	835	827
Total trade and other receivables	51,079	44,302

Credit terms for goods and services were within 20 days (2024: 20 days).

Accounting policy

Financial assets

Trade receivables, loans and other receivables that are held for the purpose of collecting contractual cash flows where the cash flows are solely payments of principal and interest that are not provided at below-market interest rates are subsequently measured at amortised cost using the effective interest method, adjusted for any loss allowance.

2.2 Non-financial assets

2.2A: Reconciliation of the opening and closing balances of property, plant and equipment and intangibles

	Buildings \$'000	Leasehold improvements \$'000	Plant and equipment \$'000	Computer software \$'000	Total \$'000
As at 1 July 2024					
Gross book value	26,811	34,442	5,328	–	66,581
Accumulated depreciation, amortisation and impairment	(7,875)	(4,496)	(915)	–	(13,286)
Total as at 1 July 2024	18,936	29,946	4,413	–	53,295
Additions					
Purchase or internally developed	–	1,194	989	105	2,288
Right-of-use assets	71	–	–	–	71
Revaluations and impairments recognised in other comprehensive income	–	1,241	345	–	1,586
Impairments recognised in net cost of services	–	(158)	(39)	–	(197)
Impairments on right-of-use assets recognised in net cost of services	(279)	–	–	–	(279)
Depreciation and amortisation	–	(4,463)	(1,277)	(26)	(5,766)
Depreciation on right-of-use assets	(3,049)	–	–	–	(3,049)
Total as at 30 June 2025	15,679	27,760	4,431	79	47,949
Total represented by:					
Gross book value	23,571	27,760	4,433	105	55,869
Accumulated depreciation, amortisation and impairment	(7,892)	–	(2)	(26)	(7,920)
Total as at 30 June 2025	15,679	27,760	4,431	79	47,949
Carrying amount of right-of-use assets	15,679	–	–	–	15,679

No property, plant and equipment (PPE) and intangibles are expected to be sold within the next 12 months. Assets relating to terminated leases resulted in the disposal of leasehold improvements and plant and equipment assets.

Contractual commitments for the acquisition of property, plant, equipment and intangible assets

The Commission has contractual commitments for the acquisition of property, plant, equipment as at 30 June 2025 of \$0.023 million (2024: \$0.325 million).

Accounting policy

Assets are recorded at cost on acquisition except as stated below. The cost of acquisition includes the fair value of assets transferred in exchange and liabilities undertaken. Non-financial assets are initially measured at their fair value plus transaction costs where appropriate.

Assets acquired at no cost, or for nominal consideration, are initially recognised as assets and income at their fair value at the date of acquisition, unless acquired as a consequence of restructuring of administrative arrangements. In the latter case, assets are initially recognised as contributions by owners at the amounts at which they were recognised in the transferor's accounts immediately prior to the restructuring.

Asset recognition threshold

Purchases of PPE are recognised initially at cost in the statement of financial position, except for purchases costing less than \$2,000, which are expensed in the year of acquisition (other than where they form part of a group of similar items which are significant in total).

The initial cost of an asset includes an estimate of the cost of dismantling and removing the item and restoring the site on which it is located. This is particularly relevant to 'make good' provisions in property leases taken up by the Commission where an obligation exists to restore the property to its original condition. These costs are included in the value of the Commission's leasehold improvements with a corresponding provision for the 'make good' recognised.

Leased right-of-use (RoU) assets

Leased RoU assets are capitalised at the commencement date of the lease and comprise the initial lease liability amount and initial direct costs incurred when entering into the lease, less any lease incentives received. These assets are accounted for by Commonwealth lessees as separate asset classes to corresponding assets owned outright, but included in the same column as that in which the corresponding underlying assets would be presented if they were owned.

Revaluations

Following initial recognition at cost, PPE (excluding RoU assets) are carried at fair value (or an amount not materially different from fair value) less subsequent accumulated depreciation and accumulated impairment losses. Valuations are conducted with sufficient frequency to ensure that the carrying amounts of assets do not differ materially from the assets' fair values as at the reporting date. The regularity of independent valuations depends upon the volatility of movements in market values for relevant assets.

Revaluation adjustments are made on a class basis. Any revaluation increment is credited to equity under the heading of asset revaluation reserve except to the extent that it reversed a previous revaluation decrement of the same asset class that was previously recognised in the surplus/deficit. Revaluation decrements for a class of assets are recognised directly in the surplus/deficit except to the extent that they reverse a previous revaluation increment for that class.

Any accumulated depreciation as at the revaluation date is eliminated against the gross carrying amount of the asset, and the asset is restated to the revalued amount.

An independent valuation was undertaken of the Commission's assets as at 30 June 2025 by Jones Lang LaSalle Advisory Services Pty Ltd. Refer to Note 5.3 for further information on the fair value measurement of assets including methodologies used.

Depreciation

Depreciable PPE are written off to their estimated residual values over their estimated useful lives to the Commission using, in all cases, the straight-line method of depreciation.

Depreciation rates (useful lives), residual values and methods are reviewed at each reporting date and necessary adjustments are recognised in the current, or current and future, reporting periods, as appropriate.

Depreciation rates applying to each class of depreciable asset are based on the following useful lives:

Asset class	2024–25	2023–24
Buildings	Lease term	Lease term
Leasehold improvements	Lower of useful life or lease term	Lower of useful life or lease term
Plant and equipment	3 to 19 years	3 to 19 years
Computer software	3 years	3 years

Impairment

All assets were assessed for impairment at 30 June 2025. Where indications of impairment exist, the asset's recoverable amount is estimated and an impairment adjustment made if the asset's recoverable amount is less than its carrying amount.

The recoverable amount of an asset is the higher of its fair value less costs of disposal and its value in use. Value in use is the present value of the future cash flows expected to be derived from the asset. Where the future economic benefit of an asset is not primarily dependent on the asset's ability to generate future cash flows, and the asset would be replaced if the Commission were deprived of the asset, its value is taken to be its depreciated replacement cost.

Impairment expense has been recognised in 2025 relating to RoU assets that were surplus to the needs of the Commission of \$0.279 million, along with PPE assets of \$0.197 million disposed of on finalisation of lease arrangements in Canberra.

Derecognition

An item of PPE is derecognised upon disposal when no further future economic benefits are expected from its use or disposal.

Intangibles

The Commission's intangible assets comprise purchased software. These assets are carried at cost less accumulated amortisation and accumulated impairment losses.

All software assets were assessed for indications of impairment as at 30 June 2025.

2.3 Payables

	2025 \$'000	2024 \$'000
2.3A: Suppliers		
Trade creditors and accruals	1,655	664
Total suppliers	1,655	664
Payment settlement terms for suppliers were within 20 days (2024: 20 days).		
2.3B: Other payables		
Salaries and wages	925	585
Superannuation	145	94
Other	12	10
Total other payables	1,082	689

2.4 Interest bearing liabilities

	2025 \$'000	2024 \$'000
2.4A: Leases		
Lease liabilities	16,642	19,433
Total leases	16,642	19,433
Maturity analysis – contractual undiscounted cash flows		
Within 1 year	3,053	3,491
Between 1 to 5 years	11,674	12,198
More than 5 years	4,509	6,974
Total leases	19,236	22,663

Total cash outflow for leases for the year ended 30 June 2025 was \$3.509 million (2024: \$2.593 million). During the 2025 financial year the Commission, in its capacity as lessee, leased office accommodation under seven lease arrangements including two leases that ended during the financial year. Lease payments are paid on a monthly basis and subject to annual increases in accordance with the lease agreements.

The lease liability represents the present value of the remaining lease payments, discounted using the incremental borrowing rate (IBR) determined at the commencement of the lease. The IBR is the rate at which a similar borrowing could be obtained from an independent creditor under comparable terms and condition at that point in time.

The above lease disclosures should be read in conjunction with the accompanying notes 1.1C and 2.2A.

Accounting policy

For all new contracts entered, the Commission 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’. Once it has been determined that a contract is, or contains, a lease, the lease liability is initially measured at the present value of the lease payments unpaid at the commencement date, discounted using the interest rate implicit in the lease, if that rate is readily determinable, or the entity’s incremental borrowing rate.

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 of the lease. When the lease liability is remeasured, the corresponding adjustment is reflected in the RoU asset or profit and loss depending on the nature of the reassessment or modification.

2.5 Other provisions

	2025 \$'000	Total \$'000
2.5A: Other provisions		
Provision for restoration		
As at 1 July 2024	650	650
Amounts used	(677)	(677)
Unwinding of discount	27	27
Total as at 30 June 2025	-	-

A deed of settlement was entered into before 30 June 2025 to pay an agreed makegood amount on exiting two Canberra leases. In addition to the provision, the settlement included an additional expense of \$0.041 million.

Accounting policy

Provisions are recognised when the Commission has a present obligation (legal or constructive):

- as a result of a past event;
- where it is probable that an outflow of economic resources will be required to settle the obligation; and
- where the value of the obligation can be reliably estimated.

If the effect of the time value of money is material, provisions are discounted using a rate that reflects the risks specific to the liability. When discounting is used, the increase in the provision due to the unwinding of the discount or change in the discount rates is recognised in the statement of comprehensive income.

Accounting judgements and estimates

The provision for restoration obligations relates to leased accommodation where the Commission is required to restore the premises upon termination of the lease. The estimate of future costs associated with restoration obligations is determined by an independent valuation and discounted to the present value.

The Commission has no agreements for lease of accommodation with such a provision at 30 June 2025 (2024: 2).

3. Funding

This section identifies the Commission's funding structure.

3.1 Appropriations

3.1A: Annual appropriations ('recoverable GST exclusive')

Annual appropriations for 2025

	Annual appropriation ¹ \$'000	Adjustments to appropriation ² \$'000	Total appropriation \$'000	Appropriation applied in 2025 (current and prior years) \$'000	Variance ³ \$'000
Departmental					
Ordinary annual services	65,551	4,473	70,024	(58,442)	11,582
Other services					
Equity injections	11,007	–	11,007	(1,255)	9,752
Total departmental	76,558	4,473	81,031	(59,697)	21,334

1. No current year annual appropriations have been withheld under section 51 of the PGPA Act or quarantined for administrative purposes.
2. Adjustments to appropriations relate to PGPA Act section 74 receipts including \$2.051 million in retainable GST repayments. In 2024, retainable GST under section 74 of the PGPA Act was excluded.
3. In 2025, the variance relates to the Commission not reaching its budgeted ASL of 266, resulting in reduced expenditure on operational activities. The Commission's equity variance relates to the need to carry forward funding for office fit-outs in 2026 and 2027.

Annual appropriations for 2024

	Annual appropriation ¹ \$'000	Adjustments to appropriation ² \$'000	Total appropriation \$'000	Appropriation applied in 2024 (current and prior years) \$'000	Variance ³ \$'000
Departmental					
Ordinary annual services	57,533	2,017	59,550	(45,431)	14,119
Capital budget ⁴	–	–	–	(13,435)	(13,435)
Other services					
Equity injections	31,465	–	31,465	(22,671)	8,794
Total departmental	88,998	2,017	91,015	(81,537)	9,478

1. No annual appropriations relating to 2024 have been withheld under section 51 of the PGPA Act or quarantined for administrative purposes.
2. Adjustments to appropriations are for PGPA Act section 74 receipts.
3. In 2024, the variance relates to lower than anticipated operating expenditure due to time delays in recruitment and the continued implementation of the new agency. Capital expenditure (including both DCB and equity injections) was higher due to the establishment of the Commission's offices in Canberra, Perth and Brisbane in 2024.
4. DCBs are appropriated through Appropriation Acts (No. 1, 3 and 5). They form part of ordinary annual services and are not separately identified in the Appropriation Acts.

Accounting policy

Revenue from Government

Amounts appropriated for departmental appropriations for the year (adjusted for any formal additions and reductions) are recognised as 'Revenue from Government' when the Commission gains control of the appropriation, except for certain amounts that relate to activities that are reciprocal in nature, in which case revenue is recognised only when it has been earned. Appropriations receivables are recognised at their nominal amounts.

3.1B: Unspent annual appropriations ('recoverable GST exclusive')

	2025 \$'000	2024 \$'000
Departmental		
Appropriation Act (No. 1) 2021–2022 – Operating ¹	–	18,260
Appropriation Act (No. 1) 2021–2022 – DCB ¹	–	198
Appropriation Act (No. 2) 2022–2023 – Equity injections ¹	2,380	2,380
Appropriation Act (No. 1) 2023–2024 – Operating	–	30,813
Appropriation Act (No. 1) 2023–2024 – Cash	–	60
Appropriation Act (No. 2) 2023–2024 – Equity injections ²	9,315	9,315
Appropriation Act (No. 1) 2024–2025 – Operating	40,477	–
Appropriation Act (No. 1) 2024–2025 – Cash	1,978	–
Appropriation Act (No. 2) 2024–2025 – Equity injections	437	–
Appropriation Act (No. 4) 2024–2025 – Equity injections ²	9,315	–
Total departmental unspent appropriations	63,902	61,026

- On 1 July 2024, *Appropriation Act (No. 1) 2021–2022* was repealed. On 1 July 2025, *Appropriation Act (No. 2) 2022–23* will be repealed.
- Annual appropriations that have been withheld under section 51 of the PGPA Act include \$9,315 million in *Appropriation Act (No. 2) 2023–2024*, which has been reappropriated in *Appropriation Act (No. 4) 2024–2025* as part of a movement of funds process.

3.2 Net cash appropriation arrangements

	2025 \$'000	2024 \$'000
Total comprehensive income – as per the statement of comprehensive income	6,715	409
Plus: depreciation/amortisation of assets funded through appropriations (departmental capital budget funding and/or equity injections) ¹	5,766	3,176
Plus: depreciation of right-of-use assets ²	3,049	2,516
Less: lease principal repayments ²	(2,864)	(2,204)
Net cash operating surplus	12,666	3,897

- From 2010–11, the Government introduced net cash appropriation arrangements whereby revenue appropriations for depreciation/amortisation expenses of non-corporate Commonwealth entities and selected corporate Commonwealth entities were replaced with a separate capital budget provided through equity appropriations. Capital budgets are to be appropriated in the period when cash payment for capital expenditure is required.
- The inclusion of depreciation/amortisation expenses related to RoU leased assets and the lease liability principal repayment amount reflects the impact of AASB 16 Leases, which does not directly reflect a change in appropriation arrangements.

4. People and relationships

This section describes a range of employment and post-employment benefits provided to our people, and our relationships with other key people.

4.1 Employee provisions

	2025 \$'000	2024 \$'000
4.1A: Employee provisions		
Leave	8,426	7,535
Total employee provisions	8,426	7,535

Accounting policy

Liabilities for short-term employee benefits and termination benefits expected within 12 months of the end of the reporting period are measured at their nominal amounts.

Other long-term employee benefits are measured as the net total of the present value of the defined benefit obligation at the end of the reporting period minus the fair value at the end of the reporting period of plan assets (if any) out of which the obligations are to be settled directly.

Leave

The liability for employee benefits includes provision for annual leave and long service leave.

The leave liabilities are calculated on the basis of employees' remuneration at the estimated salary rates that will be applied at the time the leave is taken, including the Commission's employer superannuation contribution rates to the extent that the leave is likely to be taken during service rather than paid out on termination.

The liability for long service leave has been determined using the shorthand model developed by the Australian Government Actuary. The estimate of the present value of the liability takes into account attrition rates and pay increases through promotion and inflation.

Superannuation

The Commission's staff are members of the Commonwealth Superannuation Scheme (CSS), the Public Sector Superannuation Scheme (PSS), or the PSS accumulation plan (PSSap), or other superannuation funds held outside the Australian Government.

The CSS and PSS are defined benefit schemes for the Australian Government. The PSSap is a defined contribution scheme.

The liability for defined benefits is recognised in the financial statements of the Australian Government and is settled by the Australian Government in due course. This liability is reported in the Department of Finance's administered schedules and notes.

The Commission makes employer contributions to the employees' defined benefit superannuation scheme at rates determined by an actuary to be sufficient to meet the current cost to the Government. The Commission accounts for the contributions as if they were contributions to defined contribution plans.

The liability for superannuation recognised as at 30 June represents outstanding contributions.

Accounting judgements and estimates

In the process of applying accounting policies detailed in these financial statements, the Commission has made the following judgements that have the most significant impact on the amounts recorded for this note.

Leave provisions involve assumptions based on the likely tenure of existing staff, patterns of leave claims and payouts, future salary movements and future discount rates. The appropriate Commonwealth bond rate has been used in determining the future discount rate.

4.2 Key management personnel

Key management personnel (KMP) are those persons having authority and responsibility for planning, directing and controlling the activities of the Commission, directly or indirectly. In 2025, the Commission has determined the KMP to be the statutory office holders, including the Commissioner, Deputy Commissioners and the Accountable Authority (the Chief Executive Officer).

KMP remuneration is reported in the table below:

4.2 Key management personnel remuneration

	2025 \$'000	2024 \$'000
Short-term employee benefits	3,125	2,783
Post-employment benefits	150	227
Other long-term employee benefits	65	72
Total key management personnel remuneration expenses	3,340	3,082

The total number of KMP included in the above table is 5 individuals (2024: 6 individuals).

The above KMP remuneration excludes the remuneration and other benefits of the Portfolio Minister. The Portfolio Minister's remuneration and other benefits are set by the Remuneration Tribunal and are not paid by the Commission.

4.3 Related party disclosures

Related party relationships

The Commission is an Australian Government controlled entity. Related parties to the Commission are:

- key management personnel of the Commission and their close family members, and entities controlled or jointly controlled by either;
- the Attorney-General and cabinet ministers; and
- all other Australian Government entities.

Transactions with related parties

Given the breadth of government activities, related parties may transact with the government sector in the same capacity as ordinary citizens. These transactions have not been separately disclosed in this note.

Significant transactions with related parties can include:

- purchases of goods and services;
- asset purchases, sales transfers or leases; and
- debts forgiven.

Giving consideration to relationships with related entities, and transactions entered into during the reporting period by the Commission, it has been determined that there are no related party transactions to be disclosed other than KMP remuneration disclosed in Note 4.2.

5. Managing uncertainties

This section analyses how the Commission manages financial risks within its operating environment.

5.1 Contingent assets and liabilities

As at 30 June 2025 the Commission has no quantifiable or unquantifiable contingent liabilities or contingent assets (2024: nil).

Accounting policy

Contingent liabilities and contingent assets are not recognised in the statement of financial position but are reported in the notes. They may arise from uncertainty as to the existence of a liability or asset or represent an asset or liability in respect of which the amount cannot be reliably measured. Contingent assets are disclosed when settlement is probable but not virtually certain, and contingent liabilities are disclosed when the chance of settlement is greater than remote.

5.2 Financial instruments

5.2A: Categories of financial instruments

	2025 \$'000	2024 \$'000
Financial assets at amortised cost		
Cash and cash equivalents	1,978	60
Goods and services	15	967
Total financial assets at amortised cost	1,993	1,027
Financial liabilities		
Financial liabilities measured at amortised cost		
Trade creditors	1,655	664
Total financial liabilities measured at amortised cost	1,655	664

Accounting policy

Financial assets

In accordance with AASB 9 Financial Instruments, the Commission classifies its financial assets in the following categories:

- financial assets at fair value through profit or loss;
- financial assets at fair value through other comprehensive income; and
- financial assets measured at amortised cost.

The classification depends on both the Commission's business model for managing the financial assets and contractual cash flow characteristics at the time of initial recognition. Financial assets are recognised when the entity becomes a party to the contract and, as a consequence, has a legal right to receive or a legal obligation to pay cash, and derecognised when the contractual rights to the cash flows from the financial asset expire or are transferred upon trade date.

Financial assets at amortised cost

Financial assets included in this category need to meet two criteria:

1. the financial asset is held in order to collect the contractual cash flows; and
2. the cash flows are solely payments of principal and interest (SPPI) on the principal outstanding amount.

Amortised cost is determined using the effective interest method.

Effective interest method

Income is recognised on an effective interest rate basis for financial assets that are recognised at amortised cost.

Financial liabilities

Financial liabilities are classified as either financial liabilities ‘at fair value through profit or loss’ or other financial liabilities. Financial liabilities are recognised and derecognised upon ‘trade date’.

Financial liabilities at amortised cost

Financial liabilities, including borrowings, are initially measured at fair value, net of transaction costs. These liabilities are subsequently measured at amortised cost using the effective interest method, with interest expense recognised on an effective interest basis.

Supplier and other payables are recognised at amortised cost. Liabilities are recognised to the extent that the goods or services have been received (and irrespective of having been invoiced).

5.3 Fair value measurement

5.3: Fair value measurement

	2025 \$'000	2024 \$'000
Non-financial assets		
Leasehold improvements	27,760	29,946
Plant and equipment	4,431	4,413
Total non-financial assets	32,191	34,359

Accounting policy

The Commission engages an independent valuer to undertake an asset valuation and fair value assessment on a triennial basis unless there is volatility of movements in market values for relevant assets. Refer to the revaluation policy in Note 2.2A.

The Commission engaged the services of Jones Lang LaSalle Advisory Services Pty Ltd to conduct a valuation of PPE assets as at 30 June 2025.

Asset class	Fair value measurement
Leasehold improvements	Level 3 – Depreciated replacement cost
Plant and equipment – furniture and fittings and office equipment	Level 2 – Market approach
Plant and equipment – furniture and fittings and office equipment	Level 3 – Depreciated replacement cost

The market approach has been utilised to determine fair value of the plant and equipment class except for safes, compactus and workstations.

The market approach considered transactions and pricing data that have occurred in the principal market in arriving at fair value. The depreciated replacement cost (DRC) approach has been utilised to determine fair value.

The DRC approach reflects the amount a market participant would be prepared to pay to acquire or construct a substitute asset of comparable utility, adjusted for physical depreciation and obsolescence.

The Commission's policy is to recognise transfers into and transfers out of fair value hierarchy levels as at the end of the reporting period.

6. Other information

6.1. Current/non-current distinction for assets and liabilities

6.1A: Current/non-current distinction for assets and liabilities

	2025 \$'000	2024 \$'000
Assets expected to be recovered in:		
No more than 12 months		
Cash and cash equivalents	1,978	60
Trade and other receivables	51,079	44,302
Prepayments	2,137	631
Total no more than 12 months	55,194	44,993
More than 12 months		
Buildings	15,679	18,936
Leasehold improvements	27,760	29,946
Plant and equipment	4,431	4,413
Computer software	79	–
Prepayments	6	–
Total more than 12 months	47,955	53,295
Total assets	103,149	98,288
Liabilities expected to be settled in:		
No more than 12 months		
Suppliers	1,655	664
Other payables	1,082	689
Leases	2,475	2,848
Employee provisions	3,514	3,283
Other provisions	–	650
Total no more than 12 months	8,726	8,134
More than 12 months		
Leases	14,167	16,585
Employee provisions	4,912	4,252
Total more than 12 months	19,079	20,837
Total liabilities	27,805	28,971

6.2 Restructuring

The Commission was established on 1 July 2023 under the *National Anti-Corruption Commission Act 2022* (Cth) and the *National Anti-Corruption Commission (Consequential and Transitional Provisions) Act 2022* (Cth).

6.2A: Restructuring

		Australian Commission for Law Enforcement Integrity – All functions ¹	
		2025 \$'000	2024 \$'000
FUNCTIONS ASSUMED			
Assets recognised			
Trade and other receivables	–		33,667
Buildings	–		4,266
Leasehold improvements	–		4,129
Plant and equipment	–		1,074
Computer software	–		5,322
Prepayments	–		860
Total assets recognised	–		49,318
Liabilities recognised			
Suppliers payable	–		1,564
Other payables	–		605
Leases	–		4,632
Employee provisions	–		4,338
Other provisions	–		736
Total liabilities recognised	–		11,875
Net assets recognised²	–		37,443

1. In accordance with the *National Anti-Corruption Commission Act 2022* (Cth) and the *National Anti-Corruption Commission (Consequential and Transitional Provisions) Act 2022* (Cth), ACLEI ceased to exist, and the Commission was established on 1 July 2023. Also, as part of the consequential and transitional provisions, the assets and liabilities of the former ACLEI, and reporting responsibility for the functions assumed, transferred to the Commission.
As the net assets of the former ACLEI are reported as part of the Commission's financial statements, a nil restructuring amount is reported in the statement of changes in equity.
2. The total net assets assumed in 2024 from ACLEI of \$37.443 million were transferred to the Commission for no consideration.

5

Appendices

Appendix A: Assumed identities annual report

Appendix B: Finalising the operations of ACLEI

Appendix C: Employee statistics

Appendix D: Resources and expenses
for outcome

Appendix E: Corrections to the previous
annual report

Appendix A: Assumed identities annual report

This report is pursuant to s 15LD(1) of the *Crimes Act 1914* (Cth).

Table A1: Assumed identities data for 2024–25

<i>Crimes Act 1914</i> (Cth) section	Description	Outcomes for 2024–25
s 15LD(1)(a)	Number of authorities granted by the Commissioner or their delegate during the year	6
s 15LD(1)(b)	General description of the activities undertaken by authorised civilians and authorised law enforcement officers when using assumed identities under Part IAC	Investigation of and/or intelligence gathering concerning criminal activity related to NACC’s functions.
s 15LD(1)(c)	Number of applications for authorities that were refused	None
s 15LD(1)(d)	Number of authorities of which control was transferred by the Commissioner or their delegate under s 15KV	None
s 15LD(1)(e)	Number of authorities of which control was transferred to the Commissioner or their delegate under s 15KV	None
s 15LD(1)(f)	Statement whether or not any fraud or other unlawful activity was identified by an audit under s 15LG	Audits undertaken pursuant to s 15LG did not identify any fraud or other unlawful activity.
s 15LD(1)(g)	Other information relating to authorities and assumed identities and the administration of Part IAC that the NACC Minister considers appropriate	Not applicable

Appendix B: Finalising the operations of ACLEI

The *National Anti-Corruption Commission (Consequential and Transitional Provisions) Act 2022* (Cth) (C&T Act) repealed the *Law Enforcement Integrity Commissioner Act 2006* (Cth) (LEIC Act) with effect from 1 July 2023, so that its last day of operation was 30 June 2023.

This had the effect of abolishing the Australian Commission for Law Enforcement Integrity (ACLEI) and the Commission inheriting all ACLEI matters underway at transition time (ACLEI legacy matters). This included:

- 32 open referral assessments
- 22 investigations at varying stages
- 46 agency investigations subject to various oversight or reporting requirements.

Applicable pathways for how the Commission could deal with ACLEI legacy matters at varying stages are outlined in Schedule 2 of the C&T Act. The C&T Act required the Commissioner to consider all ACLEI legacy matters to determine the most appropriate way to manage or conduct them. This included whether the matter:

- was to be transitioned, to be dealt with under the NACC Act (transitioned matter)
- remained under the LEIC Act but continued as a matter conducted by the Commission (LEIC Act matter).

The Commissioner became responsible for the monitoring and closure of ACLEI's outstanding legislative compliance obligations, including a requirement to prepare the final *Public Governance, Performance and Accountability Act 2013* (Cth) (PGPA Act) annual report for ACLEI. This was tabled in November 2023 and is available on the Commission website and the Transparency Portal.

Under s 70 of the Public Governance, Performance and Accountability Rule 2014 (Cth) and s 40(2) of the C&T Act, the Commission must continue to report on any ACLEI legacy matters until they are completed, as part of the Commission's PGPA Act annual report.

For more information on how performance information for ACLEI legacy matters is reported, see Performance information in this report on page 14.

Tables B1 to B3 provide a summary of the Commission's progress in finalising ACLEI legacy matters to 30 June 2025.

ACLEI legacy referrals

Table B1: Status of ACLEI legacy referrals (at 30 June 2025)

Status of ACLEI legacy referrals	Total
Ongoing	1
Finalised by 2024–25	3
Finalised by 2023–24	28
Total ACLEI legacy referrals	32

ACLEI legacy investigations

The Commission inherited 22 ongoing ACLEI investigations.

Six³⁹ that had investigative activity underway at 1 July 2023 transitioned to the NACC Act. Of these:

- 5 were transitioned to the NACC Act in 2023–24
- one initially remained under the LEIC Act and was transitioned to the NACC Act in 2024–25.⁴⁰

One further investigation that had investigative activity underway at 1 July 2023 was not transitioned and continued under the LEIC Act.

The remaining 15 investigations continued under the LEIC Act, given the matters were nearing completion. They remained ongoing because further activities, such as prosecution for offences or final reporting – including procedural fairness processes – were underway at transition time.

Table B2 shows the status of ACLEI legacy investigations at 30 June 2025.

The Commission publishes information about matters before the court and convictions arising from ACLEI legacy matters on its website. The following public reports relating to ACLEI legacy matters have been released since the commencement of the Commission and are available on the Commission’s website (nacc.gov.au/investigation-reports):

- Operation Bannister (published 9 October 2024)
- Operation Wilson (published 17 February 2025)
- Operation Elektra (published 11 June 2025).

39 Including one investigation which also had 2 active prosecutions before the court.

40 This means that it was reported that there had been 5 transitioned and 2 LEIC Act active investigations in the 2023–24 annual report, which was correct at the time of reporting.

Table B2: Status of ACLEI legacy investigations (at 30 June 2025)

Status of investigation	Transitioned	LEIC	Total
Ongoing	5	7	12
Finalised by 2024–25	1	8	9
Finalised by 2023–24	–	1	1
Total	6	16	22

ACLEI legacy agency investigations

Of the 46 ACLEI legacy agency investigations, 15 were subject to transitional determinations in 2023–24, which meant that they did not require a completion report to be provided to the Commission. The remaining 31 ACLEI legacy agency investigations continued to be subject to oversight requirements. Of these:

- 19 continued under the LEIC Act
- 12 were transitioned to the NACC Act.

All ACLEI legacy agency activities are referred to as investigations monitored by the Commission, rather than overseen, to distinguish them from new agency investigations commenced under the NACC Act since 1 July 2023.

The status of ACLEI legacy agency investigations monitored by the Commission at 30 June 2025 is in Table B3.

Table B3: Status of ACLEI legacy agency investigations (at 30 June 2025)

Status of monitored agency investigation	Transitioned	LEIC	Total
Ongoing	5	0	5
Finalised by 2024–25	4	3	7
Finalised by 2023–24	3	16	19
Total	12	19	31

Appendix C: Employee statistics

As at 30 June 2025, the Commission did not have any staff who identified as non-binary or who did not want to report their gender. No Commission employees were located in the Northern Territory, external territories or overseas.

The Commission has 5 statutory office holders who are not *Public Service Act 1999* (Cth) employees. They are only included in the number of all non-ongoing employees at Table C3.

Table C1: All ongoing employees (2024–25)

	Male			Female			Total
	Full-time	Part-time	Total male	Full-time	Part-time	Total female	
NSW	17	–	17	15	1	16	33
Qld	11	1	12	18	–	18	30
SA	–	–	–	–	–	–	–
Tas	–	–	–	–	–	–	–
Vic	11	1	12	25	1	26	38
WA	9	–	9	9	–	9	18
ACT	42	–	42	47	9	56	98
NT	–	–	–	–	–	–	–
Total	90	2	92	114	11	125	217

Table C2: All ongoing employees (2023–24)

	Male			Female			Total
	Full-time	Part-time	Total male	Full-time	Part-time	Total female	
NSW	18	2	20	14	1	15	35
Qld	11	–	11	16	1	17	28
SA	–	–	–	–	–	–	–
Tas	–	–	–	–	–	–	–
Vic	17	1	18	18	2	20	38
WA	6	–	6	9	1	10	16
ACT	37	1	38	39	9	48	86
NT	–	–	–	–	–	–	–
Total	89	4	93	96	14	110	203

Table C3: All non-ongoing employees (2024–25)

	Male			Female			Total
	Full-time	Part-time	Total male	Full-time	Part-time	Total female	
NSW	1	–	1	1	–	1	2
Qld	1	–	1	–	–	–	1
SA	–	–	–	–	–	–	–
Tas	–	–	–	–	–	–	–
Vic	2	–	2	2	–	2	4
WA	–	–	–	1	–	1	1
ACT	3	–	3	1	2	3	6
NT	–	–	–	–	–	–	–
Total	7	–	7	5	2	7	14

Table C4: All non-ongoing employees (2023–24)

	Male			Female			Total
	Full-time	Part-time	Total male	Full-time	Part-time	Total female	
NSW	1	–	1	1	–	1	2
Qld	–	–	–	–	–	–	–
SA	–	–	–	–	–	–	–
Tas	–	–	–	–	–	–	–
Vic	1	–	1	2	–	2	3
WA	–	–	–	–	–	–	–
ACT	5	–	5	5	2*	7	12
NT	–	–	–	–	–	–	–
Total	7	–	7	8	2	10	17

* Includes one casual employee

Table C5: Australian Public Service Act ongoing employees (2024–25)

	Male			Female			Total
	Full-time	Part-time	Total male	Full-time	Part-time	Total female	
SES 3	–	–	–	–	–	–	–
SES 2	–	–	–	–	–	–	–
SES 1	4	–	4	2	–	2	6
EL 2	11	1	12	11	–	11	23
EL 1	39	–	39	40	5	45	84
APS 6	21	1	22	44	3	47	69
APS 5	14	–	14	14	2	16	30
APS 4	1	–	1	3	1	4	5
APS 3	–	–	–	–	–	–	–
APS 2	–	–	–	–	–	–	–
APS 1	–	–	–	–	–	–	–
Other	–	–	–	–	–	–	–
Total	90	2	92	114	11	125	217

Table C6: Australian Public Service Act ongoing employees (2023–24)

	Male			Female			Total
	Full-time	Part-time	Total male	Full-time	Part-time	Total female	
SES 3	–	–	–	–	–	–	–
SES 2	–	–	–	–	–	–	–
SES 1	5	–	5	3	–	3	8
EL 2	15	–	15	10	1	11	26
EL 1	34	2	36	32	7	39	75
APS 6	24	1	25	34	3	37	62
APS 5	9	–	9	12	2	14	23
APS 4	3	–	3	4	1	5	8
APS 3	–	–	–	1	–	1	1
APS 2	–	–	–	–	–	–	–
APS 1	–	–	–	–	–	–	–
Other	–	–	–	–	–	–	–
Total	90	3	93	96	14	110	203

Table C7: Australian Public Service Act non-ongoing employees (2024–25)

	Male			Female			Total
	Full-time	Part-time	Total male	Full-time	Part-time	Total female	
SES 3	–	–	–	–	–	–	–
SES 2	–	–	–	–	–	–	–
SES 1	–	–	–	–	–	–	–
EL 2	–	–	–	–	–	–	–
EL 1	1	–	1	–	1	1	2
APS 6	1	–	1	1	–	1	2
APS 5	1	–	1	1	–	1	2
APS 4	–	–	–	1	–	1	1
APS 3	1	–	1	–	1	1	2
APS 2	–	–	–	–	–	–	–
APS 1	–	–	–	–	–	–	–
Other	–	–	–	–	–	–	–
Total	4	–	4	3	2	5	9

Table C8: Australian Public Service Act non-ongoing employees (2023–24)

	Male			Female			Total
	Full-time	Part-time	Total male	Full-time	Part-time	Total female	
SES 3	–	–	–	–	–	–	–
SES 2	–	–	–	–	–	–	–
SES 1	–	–	–	–	–	–	–
EL 2	1	–	1	–	–	–	1
EL 1	1	–	1	1	1	2	3
APS 6	1	–	1	2	1*	3	4
APS 5	–	–	–	1	–	1	1
APS 4	–	–	–	2	–	2	2
APS 3	1	–	1	–	–	–	1
APS 2	–	–	–	–	–	–	–
APS 1	–	–	–	–	–	–	–
Other	–	–	–	–	–	–	–
Total	4	–	4	6	2	8	12

* Includes one casual employee

Table C9: Australian Public Service Act employees by full-time and part-time status (2024–25)

	Ongoing			Non-ongoing			Total
	Full-time	Part-time	Total ongoing	Full-time	Part-time	Total non-ongoing	
SES 3	–	–	–	–	–	–	–
SES 2	–	–	–	–	–	–	–
SES 1	6	–	6	–	–	–	6
EL 2	22	1	23	–	–	–	23
EL 1	79	5	84	1	1	2	86
APS 6	65	4	69	2	–	2	71
APS 5	28	2	30	2	–	2	32
APS 4	4	1	5	1	–	1	6
APS 3	–	–	–	1	1	2	2
APS 2	–	–	–	–	–	–	–
APS 1	–	–	–	–	–	–	–
Other	–	–	–	–	–	–	–
Total	204	13	217	7	2	9	226

Table C10: Australian Public Service Act employees by full-time and part-time status (2023–24)

	Ongoing			Non-ongoing			Total
	Full-time	Part-time	Total ongoing	Full-time	Part-time	Total non-ongoing	
SES 3	–	–	–	–	–	–	–
SES 2	–	–	–	–	–	–	–
SES 1	8	–	8	–	–	–	8
EL 2	24	1	25	1	–	1	26
EL 1	66	9	75	2	1	3	78
APS 6	58	4	62	3	1*	4	66
APS 5	21	3	24	1	–	1	25
APS 4	7	1	8	2	–	2	10
APS 3	1	–	1	1	–	1	2
APS 2	–	–	–	–	–	–	–
APS 1	–	–	–	–	–	–	–
Other	–	–	–	–	–	–	–
Total	185	18	203	10	2	12	215

* Includes one casual employee

Table C11: Australian Public Service Act employment type by location (2024–25)

	Ongoing	Non-ongoing	Total
NSW	33	1	34
Qld	30	–	30
SA	–	–	–
Tas	–	–	–
Vic	38	3	41
WA	18	1	19
ACT	98	4	102
NT	–	–	–
Total	217	9	226

Table C12: Australian Public Service Act employment type by location (2023–24)

	Ongoing	Non-ongoing	Total
NSW	35	2	37
Qld	28	–	28
SA	–	–	–
Tas	–	–	–
Vic	38	2	40
WA	16	–	16
ACT	86	8*	94
NT	–	–	–
Total	203	12	215

* Includes one casual employee

Table C13: Australian Public Service Act Indigenous employment (2024–25)

	Total
Ongoing	2
Non-ongoing	–
Total	2

Table C14: Australian Public Service Act Indigenous employment (2023–24)

	Total
Ongoing	1
Non-ongoing	–
Total	1

Table C15: Australian Public Service Act employment arrangements (2024–25)

	SES	Non-SES	Total
Section 24(1) Determination	6	–	6
National Anti-Corruption Commission Enterprise Agreement 2024–2027	–	220	220
Total	6	220	226

Table C16: Australian Public Service Act employment arrangements (2023–24)

	SES	Non-SES	Total
Section 24(1) Determination	6	–	6
National Anti-Corruption Commission Enterprise Agreement 2024–2027	–	209	209
Total	6	209	215

Table C17: Australian Public Service Act employment salary ranges by classification level (minimum/maximum) (2024–25)

	Minimum salary (\$)	Maximum salary (\$)
SES 3	–	–
SES 2	–	–
SES 1	208,000	286,000
EL 2	145,737	164,217
EL 1	118,549	144,065
APS 6	94,563	106,769
APS 5	86,059	91,809
APS 4	77,154	83,775
APS 3	69,228	74,718
APS 2	60,781	67,397
APS 1	55,772	59,355
Other	–	–
Minimum/maximum range	55,772	286,000

Table C18: Australian Public Service Act employment salary ranges by classification level (minimum/maximum) (2023–24)

	Minimum salary (\$)	Maximum salary (\$)
SES 3	–	–
SES 2	–	–
SES 1	200,000	269,902
EL 2	140,402	158,205
EL 1	114,209	138,791
APS 6	90,199	102,860
APS 5	82,908	87,913
APS 4	74,329	80,708
APS 3	66,694	71,983
APS 2	58,556	64,930
APS 1	53,663	57,182
Other	–	–
Minimum/maximum range	53,663	269,902

Appendix D: Resources and expenses for outcome

Table D1: Entity resource statement 2024–25

Entity resource statement 2025

	Actual available appropriation for 2024–25 \$'000 (a)	Payments made 2024–25 \$'000 (b)	Balance remaining 2024–25 \$'000 (a) – (b)
Departmental			
Annual appropriations – ordinary annual services*	70,024	27,569	42,455
Prior year appropriations available – ordinary annual services	30,873	30,873	–
Annual appropriations – other services – non-operating^	11,007	1,255	9,752
Prior year appropriations available – other services – non-operating	11,695	–	11,695
Total departmental annual appropriations	123,599	59,697	63,902
Total departmental resourcing	123,599	59,697	63,902
Total resourcing and payments for the Commission	123,599	59,697	63,902
* Appropriation Act (No. 1) 2024–25 and s 74 external revenue. ^ Appropriation Act (No. 2) 2024–25 and Appropriation Act (No. 4) 2024–25.			

Table D2: Expenses by outcome

Expenses for outcome 1

Outcome 1: Independent assurance to the Australian community that corrupt conduct involving Commonwealth public officials is prevented, detected, investigated and responded to appropriately.	Budget* 2024–25 \$'000 (a)	Actual expenses 2024–25 \$'000 (b)	Variation 2024–25 \$'000 (a) – (b)
Program 1.1: Detect and investigate serious or systemic corrupt conduct involving Commonwealth public officials; assist Australian Government entities to manage corruption risks through corruption prevention education and information.			
Departmental expenses			
Departmental appropriation	62,079	46,658	15,421
s 74 external revenue*	–	4,473	(4,473)
Expenses not requiring appropriation in the Budget year^	8,373	9,361	(988)
Departmental total	70,452	60,492	9,960
Total expenses for Program 1.1	70,452	60,492	9,960

* Estimated expenses incurred in relation to receipts retained under s 74 of the PGPA Act.

^ Expenses not requiring appropriation in the Budget year are made up of depreciation and amortisation expenses, impairment expenses and audit fees.

Table D3: Average staffing level

	Budget 2024–25	Actual 2024–25
Average staffing level (number)	266	213

Appendix E: Corrections to the previous annual report

Table E1: Corrections to the 2023–24 Annual Report

2023–24 Annual Report page reference	Error and correction
22	Under Key activity 4, the number of LEIC Act investigations was incorrectly recorded as 16, where it should have been 17.
26 and 31	In Table 6 on page 26, the number of corruption issues referred for investigation under s 41(1)(c) was incorrectly recorded as 12, where the correct figure is 11. This relates to one referral for investigation subject to oversight which was mistakenly included in 2023–24 as 'referral underway' when the decision to refer was actually made in 2024–25. This also reduces the total corruption issues dealt with from 266 to 265 in the text on page 26, and in Table 6. This also requires corrections to page 31 under Agency investigations as follows: 1. It was incorrectly recorded that 12 corruption issues were referred for investigation, including 7 with oversight. The correct figures are 11 corruption issues referred, including 6 with oversight. 2. It was recorded that 2 agency investigations were underway at the end of the reporting period. This figure also appears in Table 13 as 'Referral underway, Subject to oversight' and in Table 14 the figure of 'Not applicable'. The correct figure is 1.
31	In Table 14 on page 31, the figure for 'No report required' was incorrectly recorded as 6, where it should have been 5 (as per the subtotal for 'no oversight applied' in Table 5).

6

Aids to access

List of requirements

Acronyms and abbreviations

Glossary of data terms

Index

List of requirements

Table 6.1: List of requirements

PGPA Rule reference	Description	Requirement	Page
17AD(g)	Letter of transmittal		
17AI	A copy of the letter of transmittal signed and dated by accountable authority on date final text approved, with statement that the report has been prepared in accordance with section 46 of the Act and any enabling legislation that specifies additional requirements in relation to the annual report.	Mandatory	iv
17AD(h)	Aids to access		
17AJ(a)	Table of contents (print only).	Mandatory	vi
17AJ(b)	Alphabetical index (print only).	Mandatory	172
17AJ(c)	Glossary of abbreviations and acronyms.	Mandatory	166
17AJ(d)	List of requirements.	Mandatory	160
17AJ(e)	Details of contact officer.	Mandatory	Imprint
17AJ(f)	Entity’s website address.	Mandatory	Imprint
17AJ(g)	Electronic address of report.	Mandatory	Imprint
17AD(a)	Review by accountable authority		
17AD(a)	A review by the accountable authority of the entity.	Mandatory	12
17AD(b)	Overview of the entity		
17AE(1)(a)(i)	A description of the role and functions of the entity.	Mandatory	02
17AE(1)(a)(ii)	A description of the organisational structure of the entity.	Mandatory	05
17AE(1)(a)(iii)	A description of the outcomes and programmes administered by the entity.	Mandatory	03
17AE(1)(a)(iv)	A description of the purposes of the entity as included in the corporate plan.	Mandatory	04
17AE(1)(aa)(i)	Name of the accountable authority or each member of the accountable authority	Mandatory	04
17AE(1)(aa)(ii)	Position title of the accountable authority or each member of the accountable authority	Mandatory	04
17AE(1)(aa)(iii)	Period as the accountable authority or member of the accountable authority within the reporting period	Mandatory	04
17AE(1)(b)	An outline of the structure of the portfolio of the entity.	Portfolio departments mandatory	N/A
17AE(2)	Where the outcomes and programs administered by the entity differ from any Portfolio Budget Statement, Portfolio Additional Estimates Statement or other portfolio estimates statement that was prepared for the entity for the period, include details of variation and reasons for change.	If applicable, mandatory	N/A

PGPA Rule reference	Description	Requirement	Page
17AD(c)	Report on the Performance of the entity		
	<i>Annual Performance Statements</i>		
17AD(c)(i); 16F	Annual performance statement in accordance with paragraph 39(1)(b) of the Act and section 16F of the Rule.	Mandatory	11
17AD(c)(ii)	<i>Report on Financial Performance</i>		
17AF(1)(a)	A discussion and analysis of the entity's financial performance.	Mandatory	110
17AF(1)(b)	A table summarising the total resources and total payments of the entity.	Mandatory	155
17AF(2)	If there may be significant changes in the financial results during or after the previous or current reporting period, information on those changes, including: the cause of any operating loss of the entity; how the entity has responded to the loss and the actions that have been taken in relation to the loss; and any matter or circumstances that it can reasonably be anticipated will have a significant impact on the entity's future operation or financial results.	If applicable, mandatory	N/A
17AD(d)	Management and Accountability		
	<i>Corporate Governance</i>		
17AG(2)(a)	Information on compliance with section 10 (fraud and corruption systems)	Mandatory	91
17AG(2)(b)(i)	A certification by accountable authority that fraud and corruption risk assessments and fraud and corruption control plans have been prepared.	Mandatory	91
17AG(2)(b)(ii)	A certification by accountable authority that appropriate mechanisms for preventing, detecting incidents of, investigating or otherwise dealing with, and recording or reporting fraud and corruption that meet the specific needs of the entity are in place.	Mandatory	91
17AG(2)(b)(iii)	A certification by accountable authority that all reasonable measures have been taken to deal appropriately with fraud and corruption relating to the entity.	Mandatory	91
17AG(2)(c)	An outline of structures and processes in place for the entity to implement principles and objectives of corporate governance.	Mandatory	84
17AG(2)(d) – (e)	A statement of significant issues reported to Minister under paragraph 19(1)(e) of the Act that relates to non-compliance with Finance law and action taken to remedy non compliance.	If applicable, mandatory	N/A
	<i>Audit Committee</i>		
17AG(2A)(a)	A direct electronic address of the charter determining the functions of the entity's audit committee.	Mandatory	88

PGPA Rule reference	Description	Requirement	Page
17AG(2A)(b)	The name of each member of the entity's audit committee.	Mandatory	88
17AG(2A)(c)	The qualifications, knowledge, skills or experience of each member of the entity's audit committee.	Mandatory	88
17AG(2A)(d)	Information about the attendance of each member of the entity's audit committee at committee meetings.	Mandatory	88
17AG(2A)(e)	The remuneration of each member of the entity's audit committee.	Mandatory	88
External Scrutiny			
17AG(3)	Information on the most significant developments in external scrutiny and the entity's response to the scrutiny.	Mandatory	103
17AG(3)(a)	Information on judicial decisions and decisions of administrative tribunals and by the Australian Information Commissioner that may have a significant effect on the operations of the entity.	If applicable, mandatory	N/A
17AG(3)(b)	Information on any reports on operations of the entity by the Auditor General (other than report under section 43 of the Act), a Parliamentary Committee, or the Commonwealth Ombudsman.	If applicable, mandatory	103
17AG(3)(c)	Information on any capability reviews on the entity that were released during the period.	If applicable, mandatory	N/A
Management of Human Resources			
17AG(4)(a)	An assessment of the entity's effectiveness in managing and developing employees to achieve entity objectives.	Mandatory	93
17AG(4)(aa)	Statistics on the entity's employees on an ongoing and non-ongoing basis, including the following: (a) statistics on full time employees; (b) statistics on part time employees; (c) statistics on gender; (d) statistics on staff location.	Mandatory	147
17AG(4)(b)	Statistics on the entity's APS employees on an ongoing and non-ongoing basis; including the following: • Statistics on staffing classification level; • Statistics on full time employees; • Statistics on part time employees; • Statistics on gender; • Statistics on staff location; • Statistics on employees who identify as Indigenous.	Mandatory	149
17AG(4)(c)	Information on any enterprise agreements, individual flexibility arrangements, Australian workplace agreements, common law contracts and determinations under subsection 24(1) of the <i>Public Service Act 1999</i> .	Mandatory	93, 153

PGPA Rule reference	Description	Requirement	Page
17AG(4)(c)(i)	Information on the number of SES and non SES employees covered by agreements etc identified in paragraph 17AG(4)(c).	Mandatory	93, 153
17AG(4)(c)(ii)	The salary ranges available for APS employees by classification level.	Mandatory	154
17AG(4)(c)(iii)	A description of non salary benefits provided to employees.	Mandatory	93
17AG(4)(d)(i)	Information on the number of employees at each classification level who received performance pay.	If applicable, mandatory	N/A
17AG(4)(d)(ii)	Information on aggregate amounts of performance pay at each classification level.	If applicable, mandatory	N/A
17AG(4)(d)(iii)	Information on the average amount of performance payment, and range of such payments, at each classification level.	If applicable, mandatory	N/A
17AG(4)(d)(iv)	Information on aggregate amount of performance payments.	If applicable, mandatory	N/A
Assets Management			
17AG(5)	An assessment of effectiveness of assets management where asset management is a significant part of the entity's activities	If applicable, mandatory	N/A
Purchasing			
17AG(6)	An assessment of entity performance against the Commonwealth Procurement Rules.	Mandatory	100
Reportable consultancy contracts			
17AG(7)(a)	A summary statement detailing the number of new reportable consultancy contracts entered into during the period; the total actual expenditure on all such contracts (inclusive of GST); the number of ongoing reportable consultancy contracts that were entered into during a previous reporting period; and the total actual expenditure in the reporting period on those ongoing contracts (inclusive of GST).	Mandatory	101
17AG(7)(b)	A statement that <i>"During [reporting period], [specified number] new reportable consultancy contracts were entered into involving total actual expenditure of \$[specified million]. In addition, [specified number] ongoing reportable consultancy contracts were active during the period, involving total actual expenditure of \$[specified million]."</i>	Mandatory	101
17AG(7)(c)	A summary of the policies and procedures for selecting and engaging consultants and the main categories of purposes for which consultants were selected and engaged.	Mandatory	101

PGPA Rule reference	Description	Requirement	Page
17AG(7)(d)	A statement that “Annual reports contain information about actual expenditure on reportable consultancy contracts. Information on the value of reportable consultancy contracts is available on the AusTender website.”	Mandatory	101
Reportable non-consultancy contracts			
17AG(7A)(a)	A summary statement detailing the number of new reportable non-consultancy contracts entered into during the period; the total actual expenditure on such contracts (inclusive of GST); the number of ongoing reportable non-consultancy contracts that were entered into during a previous reporting period; and the total actual expenditure in the reporting period on those ongoing contracts (inclusive of GST).	Mandatory	102
17AG(7A)(b)	A statement that “Annual reports contain information about actual expenditure on reportable non-consultancy contracts. Information on the value of reportable non-consultancy contracts is available on the AusTender website.”	Mandatory	102
17AD(daa)	Additional information about organisations receiving amounts under reportable consultancy contracts or reportable non-consultancy contracts		
17AGA	Additional information, in accordance with section 17AGA, about organisations receiving amounts under reportable consultancy contracts or reportable non-consultancy contracts.	Mandatory	101, 102
Australian National Audit Office Access Clauses			
17AG(8)	If an entity entered into a contract with a value of more than \$100 000 (inclusive of GST) and the contract did not provide the Auditor General with access to the contractor’s premises, the report must include the name of the contractor, purpose and value of the contract, and the reason why a clause allowing access was not included in the contract.	If applicable, mandatory	N/A
Exempt contracts			
17AG(9)	If an entity entered into a contract or there is a standing offer with a value greater than \$10 000 (inclusive of GST) which has been exempted from being published in AusTender because it would disclose exempt matters under the FOI Act, the annual report must include a statement that the contract or standing offer has been exempted, and the value of the contract or standing offer, to the extent that doing so does not disclose the exempt matters.	If applicable, mandatory	N/A
Small business			

PGPA Rule reference	Description	Requirement	Page
17AG(10)(a)	A statement that “[Name of entity] supports small business participation in the Commonwealth Government procurement market. Small and Medium Enterprises (SME) and Small Enterprise participation statistics are available on the Department of Finance’s website.”	Mandatory	101
17AG(10)(b)	An outline of the ways in which the procurement practices of the entity support small and medium enterprises.	Mandatory	100, 101
17AG(10)(c)	If the entity is considered by the Department administered by the Finance Minister as material in nature—a statement that “[Name of entity] recognises the importance of ensuring that small businesses are paid on time. The results of the Survey of Australian Government Payments to Small Business are available on the Treasury’s website.”	If applicable, mandatory	N/A
Financial Statements			
17AD(e)	Inclusion of the annual financial statements in accordance with subsection 43(4) of the Act.	Mandatory	115
Executive Remuneration			
17AD(da)	Information about executive remuneration in accordance with Subdivision C of Division 3A of Part 2 3 of the Rule.	Mandatory	96, 97
17AD(f) Other Mandatory Information			
17AH(1)(a)(i)	If the entity conducted advertising campaigns, a statement that “During [reporting period], the [name of entity] conducted the following advertising campaigns: [name of advertising campaigns undertaken]. Further information on those advertising campaigns is available at [address of entity’s website] and in the reports on Australian Government advertising prepared by the Department of Finance. Those reports are available on the Department of Finance’s website.”	If applicable, mandatory	N/A
17AH(1)(a)(ii)	If the entity did not conduct advertising campaigns, a statement to that effect.	If applicable, mandatory	102
17AH(1)(b)	A statement that “Information on grants awarded by [name of entity] during [reporting period] is available at [address of entity’s website].”	If applicable, mandatory	N/A
17AH(1)(c)	Outline of mechanisms of disability reporting, including reference to website for further information.	Mandatory	99
17AH(1)(d)	Website reference to where the entity’s Information Publication Scheme statement pursuant to Part II of FOI Act can be found.	Mandatory	104
17AH(1)(e)	Correction of material errors in previous annual report	If applicable, mandatory	157
17AH(2)	Information required by other legislation	Mandatory	21, 105, 106, 140

Acronyms and abbreviations

ACLEI

Australian Commission for Law
Enforcement Integrity

ABF

Australian Border Force

AFP

Australian Federal Police

APS

Australian Public Service

APSACC

Australian Public Sector
Anti-Corruption Conference

APSC

Australian Public Service Commission

ASIC

Australian Securities and
Investments Commission

ASL

average staffing level

ATO

Australian Taxation Office

AUSTRAC

Australian Transaction Reports and
Analysis Centre

C&T Act

*National Anti-Corruption Commission
(Consequential and Transitional Provisions)
Act 2022 (Cth)*

CEO

Chief Executive Officer

CDPP

Commonwealth Director of
Public Prosecutions

CIMF

Commonwealth Integrity
Maturity Framework

CO₂-e

carbon dioxide equivalent

Commission, the

National Anti-Corruption Commission

Commissioner, the

National Anti-Corruption Commissioner

Commissioner's annual report

Report required under s 271 of the
NACC Act

Crimes Act

Crimes Act 1914 (Cth)

DAWE

Department of Agriculture, Water
and the Environment

EA

*National Anti-Corruption Commission
Enterprise Agreement 2024–2027*

EPBC Act

*Environment Protection and Biodiversity
Conservation Act 1999 (Cth)*

FOI Act

Freedom of Information Act 1982 (Cth)

GST

Goods and Services Tax

GWG

Global World Group Pty Ltd

Home Affairs

Department of Home Affairs

ICT

information and communication technology

IDC

Immigration Detention Centre

Inspector

Inspector of the National Anti-Corruption Commission

IPP

Indigenous Procurement Policy

IPS

Information Publication Scheme

KPI

key performance indicator

LEIC Act

Law Enforcement Integrity Commissioner Act 2006 (Cth)

LMS

learning management system

NACC Act

National Anti-Corruption Commission Act 2022 (Cth)

NACC Regulations

National Anti-Corruption Commission Regulations 2023

OMCG

outlaw motorcycle gangs

PBS

Portfolio Budget Statements

PGPA Act

Public Governance, Performance and Accountability Act 2013 (Cth)

PGPA Rule

Public Governance, Performance and Accountability Rule 2014

PJC-NACC

Parliamentary Joint Committee on the National Anti-Corruption Commission

PS Act

Public Service Act 1999 (Cth)

SD Act

Surveillance Devices Act 2004 (Cth)

SES

Senior Executive Service

SIAP

Strategic Internal Audit Plan

SME

small and medium enterprise

t CO₂-e

carbon dioxide equivalent (tonnes)

TIA Act

Telecommunications (Interception and Access) Act 1979 (Cth)

UNCAC

United Nations Convention against Corruption

WHS Act

Work Health and Safety Act 2011 (Cth)

WHSC

Work Health and Safety Committee

Glossary of data terms

Sections of legislation referenced in this glossary are from the NACC Act.

ACLEI legacy matter

A matter commenced by ACLEI that was ongoing at the commencement of the Commission on 1 July 2023.

Active (investigation status)

A corruption investigation when the Commission has commenced a corruption investigation and is still undertaking investigative activities.

Agency consideration

Where the Commissioner refers a corruption issue to a jurisdictional agency or state or territory government entity under s 41(1)(d), for consideration. Such a referral does not require the agency or entity to investigate the corruption issue, although they may choose to do so.

Agency investigation

Where the Commissioner refers a corruption issue to a jurisdictional agency under s 41(1)(c), for investigation. Such a referral requires the agency to conduct an investigation.

Before the court (investigation status)

A corruption investigation when court proceedings resulting from it are ongoing.

Commencement date

The date an investigation is recorded as having commenced. A NACC investigation formally commences when a decision minute has been approved by the Commissioner or delegate. For an agency investigation, the commencement date is the date of formal notification to the agency of the referral (see 'date referred' or 'referred to agency').

Completion report

A report an agency is required to provide to the Commission upon completion of an agency investigation.

Confiscation proceeding

A court proceeding commenced under proceeds of crime legislation for the confiscation of property, money or other assets used in or derived from the commission of a criminal offence.

Corruption finding

A finding of corrupt conduct within s 8, made as authorised by s 149(2)(a) and s 150.

Corruption investigation

An investigation of one or more corruption issues. This includes investigations conducted by the Commission under s 41(1)(a), or jointly with another agency under s 41(1)(b).

Corruption issue

A viable hypothesis that a person has engaged, is engaging or will engage in corrupt conduct within the Commission's jurisdiction.

Corruption prevention and education (CPE) product or engagement

CPE products include published fact sheets, guides, e-learning modules and videos available on the Commission website, and non-public facing correspondence to agency heads and other entities to provide information about corruption risks and prevention strategies. CPE engagements include Commission representatives delivering presentations or training, or participating in meetings to deliver messages about corrupt conduct, how to prevent and report it and the role of the Commission.

Date referred

The date when an agency is formally notified of the referral to it of a corruption issue for consideration or investigation. Also 'referred to agency'.

Decision date

The date the decision (under s 41) of how to deal with a corruption issue is made.

Directions

Directions given by the Commissioner to an agency under s 51 about the planning and conduct of an agency investigation.

Disclosure

A disclosure of relevant information by the Commission to another appropriate agency for information, under s 229(2). This is not the same as a referral of a corruption issue for agency consideration, under s 41(1)(d).

Enquiry

Contacts or questions from the public or agencies which are not referrals and may or may not be related to existing referrals or operations. Enquiries are most often handled by the Commission's Intake and Triage team but are not considered referrals.

Finalisation or reporting underway (investigation status)

An investigation when active investigation has been completed and a recommendation for how to finalise the investigation is in progress, or an investigation report (where applicable) is being prepared.

Joint investigation

A corruption investigation conducted by the Commission jointly with another Commonwealth agency or state or territory entity (also referred to as a partner agency).

LEIC Act matter

An ACLEI legacy matter that the Commission continues to investigate under the LEIC Act (and does not transition to a NACC Act investigation).

Mandatory referral

A referral of information made to the Commission under s 33 (mandatory Commonwealth agency other than intelligence agencies), s 34 (mandatory Commonwealth agency – intelligence agency), or s 35 (mandatory public interest disclosure officers).

Monitored agency investigation

An ACLEI legacy agency investigation that was subject to oversight or reporting requirements under the LEIC Act. To avoid confusion with new NACC Act overseen investigations, both LEIC Act agency investigations and transitioned agency investigations are referred to as monitored agency investigations.

Multi-outcome issue

A decision to deal with a single corruption issue in more than one way.

NACC investigation

A corruption investigation conducted by the Commission under s 41(1)(a). Note: This is different from NACC corruption investigations conducted by the Inspector.

No corruption issue

The outcome of a referral assessment, preliminary investigation, or corruption investigation where, based on the information at hand, a determination is made that there is not a viable hypothesis that a person has engaged, is engaging or will engage in corrupt conduct within the Commission's jurisdiction.

No further action

The outcome of a referral assessment, preliminary investigation, or corruption investigation where a determination is made that the Commission will take no further action in relation to a corruption issue. This decision can be made for any number of reasons, including the historic nature of a matter, the lack of investigatory pathways, the unlikelihood that corrupt conduct would be found, and that the matter is being or has been investigated by another agency.

Own initiative

A corruption issue considered by the Commission of its own initiative, without a referral.

Overseen agency investigation

An agency investigation in respect of which the Commissioner has given directions under s 51, and/or required progress reports and/or a completion report under s 52.

Partner agency

A Commonwealth agency or a state or territory entity that the Commission is conducting a joint investigation with under s 41(1)(c).

Pending investigation (investigation status)

A proposed investigation under scoping, following closure of the assessment of the referral but prior to a formal decision to commence an investigation under s 41(1).

Preliminary investigation

An investigative process in assessing a referral, to confirm whether a corruption issue exists and to assist in determining whether and how to deal with a corruption issue, in which the Commission can use some of its coercive information gathering powers, not otherwise available in the initial assessment stage, to require agencies or individuals to provide certain information and documents (see s 42).

Progress report

A report an agency is required to provide to the Commission from time to time during the conduct of an agency investigation.

Reconsider a corruption issue or reconsideration

A decision under s 41(5) to reconsider how a corruption issue is dealt with.

Referral assessment duration

The time taken to assess referrals, based on the number of calendar days between when the referral was received and when the assessment of the referral was closed in the Commission's case management system.

Referral underway

An agency investigation, where the Commission has decided to refer the matter to an agency for investigation or consideration, but the formal notification to the agency of the referral has not yet occurred.

Referred to agency

An agency investigation, where the Commission has decided to refer the matter to an agency for investigation or consideration, and where formal notification to the agency has occurred.

Split corruption issue

A decision to deal with multiple corruption issues separately or in more than one way.

Transitioned matter

An ACLEI legacy matter in respect of which the Commissioner has made a transitional determination so that the Commission investigates it under the NACC Act.

Voluntary referral

A referral of information made to the Commission under s 32. Anyone can refer a matter to the Commission. The subtypes of voluntary referrals are voluntary Commonwealth agency and voluntary public report.

With CDPP (investigation status)

An investigation when a brief has been referred to the Commonwealth Director of Public Prosecutions (CDPP) for consideration on whether to commence court proceedings.

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