

Minutes

Prepared by: NSAP Secretariat on Friday 10 July 2026

Cleared by: Section 22 - Irrelevant Material Wednesday 22 July 2026

Endorsed by: Acting Commissioner Kilgour on Tuesday 4 August 2026

#	Minutes
1.	Introduction and apologies <u>Introduction:</u> - The meeting commenced at 1:01pm. - Acting Commissioner Kilgour welcomed members and formally welcomed the new acting Deputy Commissioners to the NSAP meeting.
2.	Conflicts of Interest Section 22 - Irrelevant Material <u>New disclosures</u> Section 22 - Irrelevant Material In relation to Section 47E - Certain operations of agencies (in the Tier 1 to Tier 2 Escalations), Acting Deputy Commissioner Shakespeare disclosed that she has worked professionally with Section 47E - Certain operations of agencies in her previous role as a Deputy Secretary at the Department of Health, Disability and Ageing. Acting Commissioner Kilgour

ruled that the disclosure does not amount to an actual or perceived conflict of interest*

Declarations:

- In relation to **Section 47E - Certain operations of agencies** Acting Deputy Commissioner Shakespeare declared a professional association with **Section 47E - Certain operations of agencies** from her time as Deputy Secretary at the Department of Health, Ageing and Disability and did consider there to be an actual conflict of interest. Deputy Commissioner Shakespeare will not participate in the discussion or consideration of this matter.

**Declaration has been added to the NSAP COI Register.*

Section 22 - Irrelevant Material

The order of these minutes is indicative of the way items were presented, and the numbers remain in the order of their position on the original agenda.

Deputy Commissioner Shakespeare left the meeting during the Action items when CAS **Section 47E - Certain operations of agencies was discussed. This early discussion on CAS **Section 47E - Certain operations of agencies** also covered the Noting of this matter and a separate conversation did not occur later in the meeting.**

Section 22 - Irrelevant Material

Minutes

Prepared by: NSAP Secretariat on Friday 16 May 2025

Cleared by: Section 22 - Irrelevant Material

Endorsed by: Commissioner Brereton on Thursday 5 June 2025

#	Minutes
1.	Introduction, conflicts of interest and apologies <u>Introduction:</u> - The meeting commenced at 10.03am - The Commissioner welcomed members to the NSAP meeting. <u>Conflicts of Interest:</u> - In relation to Section 47E - Certain operations of agencies and Section 47E - Certain operations of agencies Section 22 - Irrelevant Material - Deputy Commissioner Gauntlett declared a perceived conflict of interest in relation to Section 47E - Certain operations of agencies due to a limited previous professional association in his role as Disability Discrimination Commissioner at the Australian Human Rights Commission. Deputy Commissioner Gauntlett will not participate in deliberations on this matter.* Section 22 - Irrelevant Material <i>*Declaration has been added to the NSAP COI Register</i>
2.	Minutes of previous meeting

Minutes

Prepared by: NSAP Secretariat on Friday 20 December 2024

Cleared by: **Section 22 - Irrelevant Material** Monday 23 December 2024

Endorsed by: Commissioner Brereton on Tuesday 28 January 2025

#	Minutes
1.	Introduction, conflicts of interest and apologies <u>Introduction:</u> - The meeting commenced at 11.01 am. - The Commissioner welcomed members to the NSAP meeting. <u>Conflicts of Interest:</u> Section 22 - Irrelevant Material Section 22 - Irrelevant Material Section 22 - Irrelevant Material Section 22 - Irrelevant Material - In relation to Section 47E - Certain operations of agencies Deputy Commissioner Gauntlett declared that in his previous role as the Disability Discrimination Commissioner at the Australian Human Rights Commissioner he had met Section 47E - Certain operations of agencies on two occasions but did not consider there to be a conflict of interest.* Section 22 - Irrelevant Material <i>*Declaration has been added to the NSAP COI Register</i> Section 22 - Irrelevant Material Section 22 - Irrelevant Material Section 22 - Irrelevant Material Section 22 - Irrelevant Material

Section 22 - Irrelevant Material

- In relation to Section 47E - Certain operations of agencies, Deputy Commissioner Gauntlett referenced a previously declared professional association made on 19 December 2024 in relation to Section 47E - Certain operations of agencies. Deputy Commissioner Gauntlett did not consider there to be a conflict of interest.*
*(19 December declaration - Deputy Commissioner Gauntlett declared that in his previous role as the Disability Discrimination Commissioner at the Australian Human Rights Commissioner he had met Section 47E - Certain operations of agencies on two occasions and did not consider there to be a conflict of interest. *)*
- In relation to Section 47E - Certain operations of agencies the Commissioner declared he had recently participated in a meeting with Section 47E - Certain operations of agencies. The Commissioner did not consider there to be a conflict of interest.*

Section 22 - Irrelevant Material

*Declaration has been added to the NSAP COI Register

Section 22 - Irrelevant Material

Minutes

Prepared by: NSAP Secretariat on Friday 20 February 2026

Cleared by: Section 22 - Irrelevant Material

Endorsed by: Commissioner Brereton on Thursday 5 March 2026

#	Minutes
1.	Introduction, conflicts of interest and apologies <u>Introduction:</u> • The meeting commenced at 10.00am. • The Commissioner welcomed members to the NSAP meeting. <u>Conflicts of Interest:</u> • In relation to Section 47E - Certain operations of agencies, Deputy Commissioner Gauntlett disclosed in his previous role as Disability Discrimination Commissioner at the Australian Human Rights Commission he provided policy input to Section 47E - Certain operations of agencies. Deputy Commissioner Gauntlett has never met any of the business or officials named and has had one off meetings with the organisations involved. The Commissioner agreed that no conflict arose. Section 22 - Irrelevant Material

Notes

Agenda Item No	Notes
1.	Introduction, Conflicts of Interest and Apologies The meeting commenced at 10:00am. <u>Conflicts of Interest:</u> Section 22 - Irrelevant Material • Section 47E - Certain operators of agencies - the Commissioner has a connection to Section 47E - Certain operators of agencies from 25 years ago. Section 22 - Irrelevant Material
2.	Outcomes from Previous Meetings



National Anti-Corruption Commission

Deputy Commissioner

Ref: 26#5032DOC

9 March 2026

The Hon Michelle Rowland MP
Attorney-General

BY EMAIL: Section 22 - Irrelevant Material

Dear Attorney,

DECLARATION OF MATERIAL PERSONAL INTERESTS

The purpose of this letter is to provide you with my declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (Commission), for the purposes of section 29 of the *Public Governance, Performance and Accountability Act 2013* (Cth) and section 247 of the *National Anti-Corruption Commission Act 2022* (Cth), pursuant to which I must disclose to you any material personal interest that I have that relates to the affairs of the Commission. In accordance with that requirement, I disclose the following matters.

My last declaration to you was made on 26 March 2025 following my acceptance of an offer to become an honorary fellow of the University of Western Australia (UWA).

No material financial interests to declare

I do not have financial interests that are likely to relate to the affairs of the Commission.

Section 47F - Personal privacy
Section 47F - Personal privacy

[Redacted content]

Where any of these financial arrangements or shareholdings relate to the affairs of the Commission or the broader Commonwealth government, whether actual or perceived, I will

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ABN 47 446 409 542

P. Section 22 - Irrelevant Material
E. Section 22 - Irrelevant Material

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declare that interest in accordance with Commission's policies and ensure that conflict is appropriately managed.

Work and Employment

Before being appointed Deputy Commissioner of the Commission, I was appointed on 7 May 2019 to be the Disability Discrimination Commissioner at the Australian Human Rights Commission (AHRC) **Section 47F - Personal privacy**

[REDACTED]. Therefore, I have professional relationships and some friendships with people who are within the jurisdiction of the Commission or could do work on behalf of the Commission. To ensure transparency of these relationships, I outline my relationships with Commonwealth officials and current and former parliamentarians below.

Commonwealth Officials

At the AHRC, I had contact with many senior Commonwealth officials, including agency heads, from the Attorney-General's Department, the Department of Social Services, the National Disability Insurance Agency, the National Disability Insurance Scheme (NDIS) Quality and Safeguards Commission, the Department of Infrastructure, Transport, Regional Development and the Arts and the Department of Health. Many of these interactions were related to the Covid-19 pandemic response, to provide briefings on human rights issues relating to people with disability in Australia or assist in the formulation of disability policy and/or legislation in Australia. Often, members of civil society would be present at meetings.

Due to my former role at the AHRC, I would have a perceived conflict of interest with any referral relating to actual or former staff members or statutory officeholders of the AHRC. If, in the future, any were to be the subject of a referral to the Commission, I would declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

I worked closely with the then Age Discrimination Commissioner at the AHRC, Ms Kay Patterson AO (who is a former parliamentarian), and have met with her four times since she retired on 28 July 2023. If in the future she were the subject of a referral to the Commission, I would not participate in the decision-making process.

For other actual or former Australian Public Service members I have interacted with, should matters potentially affecting the interests of any of them come before the Commission, I will and have attempted to consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so, declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

Contacts with current and former parliamentarians

I have had limited professional contact with a number of current and former parliamentarians and know some current and former parliamentarians from growing up in Western Australia and working in the legal profession. In particular:

- Ms Michaelia Cash, who was Attorney-General for a period when I worked at the AHRC, and I know from growing up in Western Australia and working in the legal profession.
- Ms Kate Chaney, the member for Curtin, who I know from growing up in Western Australia and working in the legal profession.

- Mr Andrew Charlton, the member for Parramatta, who was a student at the University of Oxford when I studied there.
- Mr Mark Dreyfus KC, when he was Shadow Attorney-General, and more recently Attorney-General, when I worked at the AHRC and later the Commission.
- Senator Varun Ghosh, who I know from growing up in Western Australia and working in the legal profession.
- Mr Matthew Keogh, Minister for Veterans' Affairs and Minister for Defence Personnel, I know from growing up in Western Australia and working in the legal profession.
- Former Senator Kay Patterson, who was the Age Discrimination Commissioner when I worked at the AHRC.
- Mr Christian Porter, the former Attorney-General, who was Attorney-General when I was appointed to the AHRC, and I know from growing up in Western Australia and working in the legal profession.
- Senator Linda Reynolds, who was Minister for the NDIS for a period when I worked at the AHRC.
- Ms Amanda Rishworth, who was the Minister for Social Services for a period when I worked at the AHRC.
- Mr Stuart Robert, who was Minister for the NDIS for a period when I worked at the AHRC.
- Senator Anne Ruston, who was the Minister for Social Services for a period when I worked at the AHRC.
- Mr Bill Shorten, who was Minister for the NDIS and Shadow Minister for the NDIS when I worked at the AHRC.
- Senator Jordon Steele-John, Disability Spokesperson for the Greens' political party when I worked at the AHRC.

Aside from Ms Patterson, I do not have any ongoing contact with any of the parliamentarians listed above. At the AHRC, I would rarely meet with current parliamentarians. The vast majority of the meetings I attended were held online with Departmental staff and not parliamentarians.

Should matters potentially affecting the interests of any of these current and former parliamentarians otherwise come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so, declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

Section 47F - Personal privacy

[REDACTED]

[REDACTED]

Honorary UWA Fellowship

In March 2025, I accepted an offer to become an honorary fellow of UWA. This fellowship is hosted by UWA's Law School. There is no remuneration associated with the fellowship or requirement to undertake any form of teaching or research. It is possible, but entirely optional,

to supervise students and apply for research grants. I consulted with the Commission's Integrity and Risk team before accepting the role. The team informed me I was able to accept the role. UWA is not a Commonwealth agency under the *National Anti-Corruption Commission Act* but receives Commonwealth funds and participates in several Commonwealth programs. There are also obligations that honorary and adjunct staff at UWA must comply with when using their adjunct title under UWA's Code of Conduct and other policies.

Should matters potentially affecting the interests of UWA otherwise come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so, declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

Other matters

I have no family members or close personal friends who are members of the Australian Public Service or Commonwealth Parliament. It is always possible that a matter that could potentially affect the interests of some other person known to me could come before the Commission. Should that occur, I would in each case consider whether the circumstances were such as to create an actual or perceived conflict of interest, and, if so, declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

Conclusion

I note that there is a continuing duty to disclose material personal interests relating to the affairs of the Commission. Should I become aware of any material personal interest that relates to the affairs of the Commission, I will disclose it to you in accordance with the requirements in section 247 of the *National Anti-Corruption Commission Act*.

I would be happy to discuss this letter with you or your office. I can be contacted directly on

Section 22 - Irrelevant Material

Yours sincerely,

Section 47F - Personal privacy

Ben Gauntlett
Deputy Commissioner



National Anti-Corruption Commission

Deputy Commissioner

Ref: 26#16257DOC

22 July 2026

The Hon Michelle Rowland MP
Attorney-General

BY EMAIL: **Section 22 - Irrelevant Material**

Dear Attorney,

DECLARATION OF MATERIAL PERSONAL INTERESTS

The purpose of this letter is to provide you with my declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (Commission), for the purposes of section 29 of the *Public Governance, Performance and Accountability Act 2013* (Cth) and section 247 of the *National Anti-Corruption Commission Act 2022* (Cth), pursuant to which I must disclose to you any material personal interest that I have that relate to the affairs of the Commission. In accordance with that requirement, I disclose the following matters.

My last declaration to you was made on 9 March 2026.

No material financial interests to declare

I do not have financial interests that are likely to relate to the affairs of the Commission.

Section 47F - Personal privacy

[Redacted]
[Redacted]
[Redacted].

Section 47F - Personal privacy

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Section 47F - Personal privacy

Where any of these financial arrangements or shareholdings relate to the affairs of the Commission or the broader Commonwealth government, whether actual or perceived, I will declare that interest in accordance with Commission's policies and ensure that conflict is appropriately managed.

Relationships – associations

I have no family members or close personal friends who are members of the Australian Public Service or Commonwealth Parliament.

Before being appointed Deputy Commissioner of the Commission, I was appointed on 7 May 2019 to be the Disability Discrimination Commissioner at the Australian Human Rights Commission (AHRC) and **Section 47F - Personal privacy**

Therefore, I have professional relationships and some friendships with people who are within the jurisdiction of the Commission or could do work on behalf of the Commission. To ensure transparency of these relationships, I outline my relationships with Commonwealth officials and current and former parliamentarians below.

Commonwealth Officials

At the AHRC, I had contact with many senior Commonwealth officials, including agency heads, from the Attorney-General's Department, the Department of Social Services, the National Disability Insurance Agency, the National Disability Insurance Scheme (NDIS) Quality and Safeguards Commission, the Department of Infrastructure, Transport, Regional Development and the Arts and the Department of Health and Aged Care. Many of these interactions were related to the Covid-19 pandemic response, to provide briefings on human rights issues relating to people with disability in Australia or assist in the formulation of disability policy and/or legislation in Australia. Often, members of civil society would be present at meetings.

Due to my former role at the AHRC, I would have a perceived conflict of interest with any referral relating to actual or former staff members or statutory officeholders of the AHRC. If, in the future, any were to be the subject of a referral to the Commission, I would declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

I worked closely with the then Age Discrimination Commissioner at the AHRC, Ms Kay Patterson AO (who is a former parliamentarian), and have met with her four times since she

retired on 28 July 2023. If in the future she were the subject of a referral to the Commission, I would not participate in the decision-making process.

For other actual or former Australian Public Service members I have interacted with, should matters potentially affecting the interests of any of them come before the Commission, I will and have attempted to consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so, declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

Contacts with current and former parliamentarians

I have had limited professional contact with a number of current and former parliamentarians and know some current and former parliamentarians from growing up in Western Australia and working in the legal profession. In particular:

- Ms Michaelia Cash, who was Attorney-General for a period when I worked at the AHRC, and I know from growing up in Western Australia and working in the legal profession.
- Ms Kate Chaney, the member for Curtin, who I know from growing up in Western Australia and working in the legal profession.
- Mr Andrew Charlton, the member for Parramatta, who was a student at the University of Oxford when I studied there.
- Mr Mark Dreyfus KC, when he was Shadow Attorney-General, and more recently Attorney-General, when I worked at the AHRC and later the Commission.
- Senator Varun Ghosh, who I know from growing up in Western Australia and working in the legal profession.
- Mr Matthew Keogh, Minister for Veterans' Affairs and Minister for Defence Personnel, I know from growing up in Western Australia and working in the legal profession.
- Former Senator Kay Patterson, who was the Age Discrimination Commissioner when I worked at the AHRC.
- Mr Christian Porter, the former Attorney-General, who was Attorney-General when I was appointed to the AHRC, and I know from growing up in Western Australia and working in the legal profession.
- Senator Linda Reynolds, who was Minister for the NDIS for a period when I worked at the AHRC.
- Ms Amanda Rishworth, who was the Minister for Social Services for a period when I worked at the AHRC.
- Mr Stuart Robert, who was Minister for the NDIS for a period when I worked at the AHRC.
- Senator Anne Ruston, who was the Minister for Social Services for a period when I worked at the AHRC.

- Mr Bill Shorten, who was Minister for the NDIS and Shadow Minister for the NDIS when I worked at the AHRC.
- Senator Jordon Steele-John, Disability Spokesperson for the Greens' political party when I worked at the AHRC.

Aside from Ms Patterson, I do not have any ongoing contact with any of the parliamentarians listed above. At the AHRC, I would rarely meet with current parliamentarians. Most of the meetings I attended were held online with Departmental staff and not parliamentarians.

Should matters potentially affecting the interests of any of these current and former parliamentarians otherwise come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so, declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

Section 47F - Personal privacy

[REDACTED]

[REDACTED]

Honorary UWA Fellowship

In March 2025, I accepted an offer to become an honorary fellow of UWA. This fellowship is hosted by UWA's Law School. There is no remuneration associated with the fellowship or requirement to undertake any form of teaching or research. It is possible, but entirely optional, to supervise students and apply for research grants. I consulted with the Commission's Integrity and Risk team before accepting the role. The team informed me I was able to accept the role. UWA is not a Commonwealth agency under the *National Anti-Corruption Commission Act* but receives Commonwealth funds and participates in several Commonwealth programs. There are also obligations that honorary and adjunct staff at UWA must comply with when using their adjunct title under UWA's Code of Conduct and other policies.

Should matters potentially affecting the interests of UWA otherwise come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so, declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

Other matters

It is always possible that a matter that could potentially affect the interests of some other person known to me could come before the Commission. Should that occur, I would in each case consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so, declare it in accordance with the Commission's procedures and ensure the conflict is properly managed.

Conclusion

I note that there is a continuing duty to disclose material personal interests relating to the affairs of the Commission. Should I become aware of any material personal interest that relates to the affairs of the Commission, I will disclose it to you in accordance with the requirements in section 247 of the *National Anti-Corruption Commission Act*.

In accordance with the Commission's Protocol, *Disclosure of Interests by Statutory Office Holders* (issued by the CEO on 19 June 2026 under rule 16 of the *Public Governance, Performance and Accountability Rule 2014*), I will provide a copy of this disclosure to each of the other statutory office holders and a meeting of office holders will be convened to discuss the declaration.

I would be happy to discuss this letter with you or your office. I can be contacted directly on

Section 22 - Irrelevant Material

Yours sincerely,

Section 47F - Personal privacy

Ben Gauntlett

Deputy Commissioner



National Anti-Corruption Commission

Acting Deputy Commissioner

Ref: 26/438-02

16 July 2026

The Hon Michelle Rowland MP
Attorney-General

BY EMAIL: **Section 22 - Irrelevant Material**

Dear Attorney

DECLARATION OF MATERIAL PERSONAL INTERESTS

The purpose of this letter is to provide you with my declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (Commission), for the purposes of section 29 of the *Public Governance, Performance and Accountability Act 2013* (Cth) and section 247 of the *National Anti-Corruption Commission Act 2022* (Cth) (NACC Act), pursuant to which I must disclose to you any material personal interest that I have that relate to the affairs of the Commission. In accordance with that requirement, I disclose the following matters.

No material financial interests to declare

I do not have any financial interests that are likely to relate to the affairs of the Commission.

Section 47F - Personal privacy

[Redacted text block]

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Section 22 - Irrelevant Material

Section 22 - Irrelevant Material_u

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Relationships – associations

As a long standing Commonwealth public servant, I have professional relationships with people who are within the jurisdiction of the Commission. This will be particularly the case for current and former Health Ministers, Secretaries and senior officials from the Department of Health, Disability and Ageing. I have also had oversight of a number of Health portfolio agencies, including professional working relationships with statutory office holders (SOHs) and senior officials and, in some cases, board chairs and members for the following agencies/SOHs:

- Australian Centre for Disease Control
- Australian Digital Health Agency
- Australian Organ and Tissue Authority
- National Blood Authority
- National Rural Health Commissioner
- Pharmaceutical Benefits Advisory Committee.

Section 47F - Personal privacy

I do not have any other family members or close personal friends who are members of the Australian Public Service or Commonwealth Parliament.

Other matters

It is always possible that a matter that could potentially affect the interests of some other person known to me could come before the Commission. Should that occur, I would in each case consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so, declare it in accordance with the Commission's procedures and ensure the conflict is properly managed.

Conclusion

I note that there is a continuing duty to disclose material personal interests relating to the affairs of the Commission. Should I become aware of any material personal interest that relates to the affairs of the Commission, I will disclose it to you in accordance with the requirements in section 247 of the NACC Act.

In accordance with the Commission's Protocol, *Disclosure of Interests by Statutory Office Holders* (issued by the CEO on 19 June 2026 under rule 16 of the *Public Governance*,

Performance and Accountability Rule 2014), I will provide a copy of this disclosure to each of the other NACC SOHs and a meeting will be convened to discuss the declaration.

I would be happy to discuss this letter with you or your office. I can be contacted directly on

Section 22 - Irrelevant Material

Yours sincerely

Section 47F - Personal privacy

Penny Shakespeare

Acting Deputy Commissioner



National Anti-Corruption Commission

Deputy Commissioner

14 October 2024

The Hon Mark Dreyfus KC MP
Attorney-General

BY EMAIL: **Section 22 - Irrelevant Material**

Dear Attorney,

DECLARATION OF MATERIAL PERSONAL INTERESTS

The purpose of this letter is to provide you with my declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (Commission), for the purposes of s 29 of the *Public Governance, Performance and Accountability Act 2013* (Cth) and s 247 of the *National Anti-Corruption Commission Act 2022* (Cth), pursuant to which I must disclose to you any material personal interest that I have that relate to the affairs of the Commission. In accordance with that requirement, I disclose the following matters.

Financial Matters

Section 47F - Personal privacy

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Where any of these financial arrangements or shareholdings relate to the affairs of the Commission or the broader Commonwealth government, whether actual or perceived, I will declare that interest in accordance with Commission's policies and ensure that conflict is appropriately managed.

GPO Box 605
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ABN 47 446 409 542

P. **Section 22 - Irrelevant Material**
E. **Section 22 - Irrelevant Material**

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Work and Employment

Before being appointed Deputy Commissioner of the Commission, I was the Disability Discrimination Commissioner at the Australian Human Rights Commission Section 47F - Personal privacy

[REDACTED]. I have professional relationships and some friendships with people who are within the jurisdiction of the Commission or could do work on behalf of the Commission.

If an allegation were made to the Commission or a decision to engage someone by the Commission in relation to someone who I have a conflict of interest, whether actual or perceived, I will declare that interest in accordance with Commission's policies and ensure that conflict is appropriately managed.

Section 47F - Personal privacy

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

I note that this duty to disclose is an ongoing duty and should I become aware during this year of any material personal interest that relates to the affairs of the Commission, I will disclose it to you in accordance with the requirements in section 247 of the *National Anti-Corruption Commission Act 2022* (Cth).

I would be happy to discuss this letter with you or your office. I can be contacted directly on Section 22 - Irrelevant Material

Yours sincerely,

Section 47F - Personal privacy

[REDACTED]

Ben Gauntlett
Deputy Commissioner



Australian Government
National Anti-Corruption Commission

Ref:

7 August 2023

Hon Mark Dreyfus KC, MP
Attorney-General
PO Box 6022
Parliament House
CANBERRA ACT 2600

Dear Attorney-General,

The purpose of this letter is to provide you with my annual declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (**NACC**).

Under s 29 of the *Public Governance, Performance and Accountability Act 2013* and s 247 of the *National Anti-Corruption Commission Act 2022*, I must disclose to you any material personal interests that relate to the affairs of the NACC. I disclose the following matters to you in accordance with that requirement.

Financial Matters

Section 47F - Personal privacy [REDACTED].

Section 47F - Personal privacy [REDACTED]

Section 47F - Personal privacy [REDACTED]

Section 47F - Personal privacy [REDACTED]

[REDACTED] Where any of these financial arrangements or shareholdings relate to the affairs of the NACC or the broader Commonwealth government, whether actual or perceived, I will declare that interest in accordance with NACC's policies and ensure that conflict is appropriately managed.

Work and Employment

Before being appointed Deputy Commissioner of the NACC, I was the Disability Discrimination Commissioner at the Australian Human Rights Commission [REDACTED] Section 47F - Personal privacy

[REDACTED] I have professional

relationships and some friendships with people who are within the jurisdiction of the NACC or could do work on behalf of the NACC.

If an allegation were made to the NACC or a decision to engage someone by the NACC in relation to someone who I have a conflict of interest, whether actual or perceived, I will declare that interest in accordance with NACC's policies and ensure that conflict is appropriately managed.

Section 47F - Personal privacy

[REDACTED]

[REDACTED]

I note that this duty to disclose is an ongoing duty and should I become aware during this year of any material personal interest that relates to the affairs of the NACC, I will disclose it to you in accordance with the requirements in section 247 of the *National Anti-Corruption Commission Act 2022*.

I would be happy to discuss this letter with you or your office. I can be contacted directly on

Section 22 - Irrelevant Material

Yours sincerely,

Section 47F - Personal privacy

[REDACTED]

Ben Gauntlett
Deputy Commissioner



National Anti-Corruption Commission

Deputy Commissioner

26 March 2025

The Hon Mark Dreyfus KC MP
Attorney-General

BY EMAIL: **Section 22 - Irrelevant Material**

Dear Attorney,

DECLARATION OF MATERIAL PERSONAL INTERESTS

The purpose of this letter is to provide you with my declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (Commission), for the purposes of section 29 of the *Public Governance, Performance and Accountability Act 2013* (Cth) and section 247 of the *National Anti-Corruption Commission Act 2022* (Cth), pursuant to which I must disclose to you any material personal interest that I have that relate to the affairs of the Commission. In accordance with that requirement, I disclose the following matters.

My last declaration to you was made on 14 November 2024. Following consultation with Commission staff, I have revised the previous declaration provided to you to disclose that I have accepted an Honorary Fellowship with the University of Western Australia (UWA) earlier this month. The details of this Honorary Fellowship are below. I have also made some minor changes to reflect changes in financial interests and to clarify the nature of my relationships with Commonwealth officials.

No material financial interests to declare

I do not have financial interests that are likely to relate to the affairs of the Commission.

Section 47F - Personal privacy

[Redacted content]

Section 47F - Personal privacy**Work and Employment**

Before being appointed Deputy Commissioner of the Commission, I was appointed on 7 May 2019 to be the Disability Discrimination Commissioner at the Australian Human Rights Commission (AHRC) **Section 47F - Personal privacy**

Therefore, I have professional relationships and some friendships with people who are within the jurisdiction of the Commission or could do work on behalf of the Commission. To ensure transparency of these relationships, I outline my relationships with Commonwealth officials and current and former parliamentarians below.

Commonwealth Officials

At the AHRC, I had contact with many senior Commonwealth officials, including agency heads, from the Attorney-General's Department, the Department of Social Services, the National Disability Insurance Agency, the NDIS Quality and Safeguards Commission, the Department of Infrastructure, Transport, Regional Development and the Arts and the Department of Health. Many of these interactions were related to the Covid-19 pandemic response, to provide briefings on human rights issues relating to people with disability in Australia or assist in the formulation of disability policy and/or legislation in Australia. Often, members of civil society would be present at meetings.

Due to my former role at the AHRC, I would have a perceived conflict of interest with any referral relating to actual or former staff or statutory officeholders of the AHRC. If, in the future, any were to be the subject of a referral to the Commission, I would declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

I worked closely with the then Age Discrimination Commissioner at the AHRC, Ms Kay Patterson AO (who is a former parliamentarian), and have met with her three times since she retired on 28 July 2023. If in the future she were the subject of a referral to the Commission, I would not participate in the decision-making process.

For other actual or former Australian Public Service members I have interacted with, should matters potentially affecting the interests of any of them come before the Commission, I will and have attempted to consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so, declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

Contacts with current and former parliamentarians

I have had limited professional contact with a number of current and former parliamentarians and know some current and former parliamentarians from growing up in Western Australia and working in the legal profession. In particular:

- Ms Michaelia Cash, who was Attorney-General for a period when I worked at the AHRC, and I know from growing up in Western Australia and working in the legal profession.
- Ms Kate Chaney, the member for Curtin, who I know from growing up in Western Australia and working in the legal profession.
- Mr Andrew Charlton, the member for Parramatta, who was a student at the University of Oxford when I studied there.
- Senator Varun Ghosh, who I know from growing up in Western Australia and working in the legal profession.
- Mr Matthew Keogh, Minister for Veterans' Affairs and Minister for Defence Personnel, I know from growing up in Western Australia and working in the legal profession.
- Former Senator Kay Patterson, who was the Age Discrimination Commissioner when I worked at the AHRC.
- Mr Christian Porter, the former Attorney-General, who was Attorney-General when I was appointed to the AHRC, and I know from growing up in Western Australia and working in the legal profession.
- Senator Linda Reynolds, who was Minister for the National Disability Insurance Scheme (NDIS) for a period when I worked at the AHRC.
- Ms Amanda Rishworth, who was the Minister for Social Services for a period when I worked at the AHRC.
- Mr Stuart Robert, who was Minister for the NDIS for a period when I worked at the AHRC.
- Senator Anne Ruston, who was the Minister for Social Services for a period when I worked at the AHRC.
- Mr Bill Shorten, who was Minister for the NDIS and Shadow Minister for the NDIS when I worked at the AHRC.
- Senator Jordon Steele-John, Disability Spokesperson for the Greens' political party when I worked at the AHRC.
- Yourself, when you were Shadow Attorney-General, and more recently Attorney-General, when I worked at the AHRC.

Aside from Ms Patterson, I do not have any ongoing contact with any of the parliamentarians listed above. At the AHRC, I would rarely meet with current parliamentarians. The vast majority of meetings were held with Departmental staff and not parliamentarians.

Should matters potentially affecting the interests of any of these current and former parliamentarians otherwise come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so, declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

Section 47F - Personal privacy

[REDACTED]

[REDACTED]

Section 47F - Personal privacy



Honorary UWA Fellowship

As noted above, earlier this month, I accepted an offer to become a fellow of UWA. This fellowship is hosted by UWA's Law School. There is no remuneration associated with the fellowship or requirement to undertake any form of teaching or research. It is possible, but entirely optional, to supervise students and apply for research grants. I have consulted with the Commission's Integrity and Risk team who informed me I was able to accept the role. UWA is not a Commonwealth agency under the *National Anti-Corruption Commission Act* but receives Commonwealth funds and participates in several Commonwealth programs. There are obligations that Honorary and adjunct staff at UWA must comply with when using their adjunct title under UWA's Code of Conduct and other policies.

Should matters potentially affecting the interests of UWA otherwise come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so, declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

Other matters

I have no family members or close personal friends who are members of the Australian Public Service or Parliament. It is always possible that a matter that could potentially affect the interests of some other person known to me could come before the Commission. Should that occur, I would in each case consider whether the circumstances were such as to create an actual or perceived conflict of interest, and, if so, declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it.

Conclusion

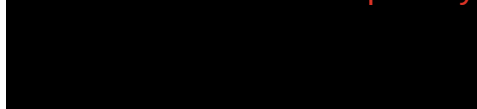
I note that there is a continuing duty to disclose material personal interests relating to the affairs of the Commission. Should I become aware of any material personal interest that relates to the affairs of the Commission, I will disclose it to you in accordance with the requirements in section 247 of the *National Anti-Corruption Commission Act*.

I would be happy to discuss this letter with you or your office. I can be contacted directly on

 .

Yours sincerely,

Section 47F - Personal privacy



Ben Gauntlett
Deputy Commissioner

39		Thursday, 19 December 2024	NSAP	Deputy Commissioner Gauntlett	Section 47E - Certain operations of agents	Section 47E - Certain operations of agents there to be any conflict of interest. In relation to Deputy Commissioner Gauntlett declared that in his previous role as the Disability Discrimination Commissioner at the Australian Human Rights Commissioner he had on two occasions but did not consider there to be a conflict of interest.	Determined not to be a COI	Verbal / Meeting Minutes	25#2688DOC	
		Thursday, 19 December 2024	NSAP	Deputy Commissioner Rose	CASE2024754	In relation to CASE2024754 Deputy Commissioner Rose	Determined not to be a COI	Verbal / Meeting	25#2688DOC	

	Thursday, 19 February 2026	NSAP	Deputy Commissioner Gauntlett	Section 47E - Certain operations of agencies	Section 47E - Certain operations of agencies In relation to Section 47E - Certain operations of agencies Deputy Commissioner Gauntlett disclosed in his previous role as Disability Discrimination Commissioner at the Australian Human Rights Commission he provided policy input to Section 47E - Certain operations of agencies Deputy Commissioner Gauntlett has never met any of the business or officials named and has had one off meetings with the organisations involved. The Commissioner agreed that no conflict arose.	Determined not to be a COI	Verbal / Meeting Minutes	26#4946DOC
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Thursday, March 21, 2024	NSAP	Commissioner	Section 47E - Certain operations of agencies	Section 47E - Certain operations of agencies	Determined not to be a COI	Verbal / Meeting Minutes	24#41357DOC
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Details

Identifier	NOTE Section 47E - Certain op
Type	General
Author	
Title	COI Declaration - NSAP - 19 February 2026
Content	In relation to Section 47E - Certain operatio Deputy Commissioner Gauntlett disclosed in his previous role as Disability Discrimination Commissioner at the Australian Human Rights Commission he provided policy input to Section 47E - Certain operations of agencies but has never met any of the business or officials named and has had one off meetings with the agencies involved. The Commissioner agreed that no conflict arose.
Date	20/02/2026 16:04

			Section 47E - Certain operations of agencies	not consider there to be a conflict of interest.			
51		Deputy Commissioner Gauntlett	Section 47E - Certain operations of agencies Section 47E - Certain operations of agencies	Section 47E - Certain operations of agencies In relation to Deputy Commissioner Gauntlett referenced a previously declared professional association made on 19 December 2024 in relation to Deputy Commissioner Gauntlett did not consider there to be a conflict of interest.	Determined not to be a COI	Verbal / Meeting Minutes	25#5566DOC
52		Commissioner	Section 47E - Certain operations of agencies	Section 47E - Certain operations of agencies In relation to the Commissioner declared he had recently participated in a meeting with as The Commissioner did not consider there to be a conflict of interest.	Determined not to be a COI	Verbal / Meeting Minutes	25#5566DOC
		Commissioner	Section 22 - Irrelevant Material				

Details

Identifier	NOTE Section 47E - Certain
Type	Conflict of Interest
Author	
Title	NSAP COI Declaration - 8 July 2026
Content	Acting Deputy Commissioner Shakespeare declared a professional association with Section 47E - Certain operations of agencies from her time as Deputy Secretary at the Department of Health, Ageing and Disability and did consider there to be a conflict of interest. Deputy Commissioner Shakespeare will not participate in the discussion or consideration of this matter.*
Date	08/07/2026 12:39

Details

Identifier	Section 47E - Certain operations of
Type	Conflict of Interest
Author	Section 22 - Irrelevant Matter
Title	Conflict of Interest - A/DC Penny Shakespeare
Content	
Date	10/07/2026 14:28

Details

Identifier	Section 47E - Certain operations
Type	General
Author	Section 22 - Irrelevant Material
Title	Request to restrict Commissioner's access to this record
Content	ICT received a request from Ops to restrict Commissioner Brereton's access to this matter. Request was approved by Ops GM. (Copy of email request received is attached)
Date	23/01/2025 13:15

Section 22 - Irrelevant Material

From: [redacted]
Sent: Thursday, 23 January 2025 12:14 PM
To: NACC - Argus CMS
Cc: [redacted]
Subject: **Section 22 - Irrelevant Material**
Section 4/E - Certain operations of agencies - Possible Conflict of Interest [SEC=PROTECTED]

PROTECTED

Good afternoon Argus guru's,

In accordance with the senior approval/direction below, can you please restrict Commissioner Brereton's access to [redacted]

To clarify, Commissioner Brereton is to have no access to the Argus investigation or its contents.

Happy to discuss,

Kind regards,

[redacted]
A/g Director (ACT 1)

[redacted]



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National Anti-Corruption Commission

We **acknowledge** the Traditional Owners and Custodians of Country throughout Australia.

We **recognise** their continuing connection to land, waters and community.

We **pay our respects** to the people, the cultures and the Elders past, present and emerging.

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.

From: Section 22 - Irrelevant Material

Sent: Thursday, 23 January 2025 10:16 AM

To: Section 22 - Irrelevant Material

Cc: Section 22 - Irrelevant Material; Section 22 - Irrelevant Material

Section 22 - Irrelevant Material .au>

Subject: Section 47F - Personal privacy, Section 47E - Certain operations of agencies - Possible Conflict of Interest
[SEC=PROTECTED]

PROTECTED

Hi [redacted], just closing the loop on this can you please action the first two of [redacted] dot points in her email below? Thanks.

- ACT 1 block the Commissioner's access to [redacted] in ARGUS and CM
- ACT 1 note the Commissioner's previously declared COI in regards to [redacted] and note this again in ARGUS in the [redacted]

Section 22 - Irrelevant Material

General Manager Operations

M. [redacted]

E. Section 22 - Irrelevant Material

E.A. Section 22 - Irrelevant Material



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National Anti-Corruption Commission

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.

Section 22 - Irrelevant Material

From: Penny Shakespeare
Sent: Friday, 10 July 2026 2:48 PM
To: [REDACTED]
Cc: NACC – [REDACTED]
Subject: RE: [REDACTED] [SEC=OFFICIAL]

OFFICIAL

Thanks [REDACTED]

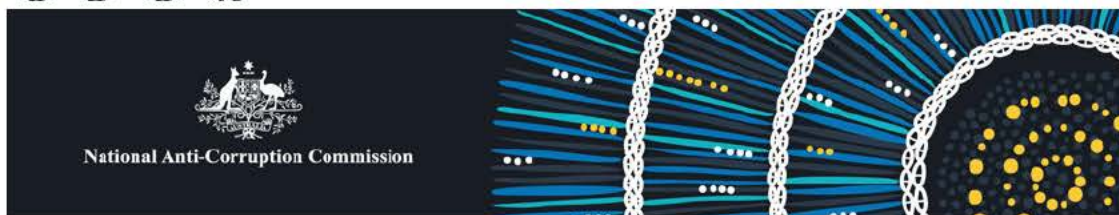
I am looking forward to working with you and the team on agency investigations, and happy to talk in more detail about this when you are back from leave.

Regarding [REDACTED], while I don't know any of the individuals involved, I have discussed with Kylie and the other DCs, and we have agreed the best approach is for me not to be involved in any Department of Health, Disability and Ageing matters given my length of work and seniority there. So this one will need to be considered by either Ben or Jamie.

Kind regards

Penny Shakespeare
Acting Deputy Commissioner
M [REDACTED]
E [REDACTED]

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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.

From: Section 22 - Irrelevant Material
Sent: Friday, 10 July 2026 1:00 PM
To: Penny Shakespeare Section 22 - Irrelevant Material
Cc: NACC – Section 22 - Irrelevant Material Section 22 - Irrelevant Material
Section 22 - Irrelevant Material
Subject: RE: FOR REVIEW: Section 22 - Irrelevant Material [SEC=OFFICIAL]

OFFICIAL

Hi Penny

I understand Section 22 - Irrelevant Material mentioned a possible briefing for you on Agency Investigations and we are in the process of setting that up for week of 20th July when the whole team is here.

With regard to the matter below, if you wish to proceed more quickly (and you are happy no conflict exists), Section 22 - Irrelevant Material (one of the agency investigations team) is back on Monday and will be very happy to talk you through it. Alternatively, I can pop up this afternoon.

Thank you again and look forward to working with you on this tranche of work.

Kind regards.

Section 47F

From: Section 22 - Irrelevant Material
Sent: Wednesday, 8 July 2026 9:14 AM
To: Penny Shakespeare Section 22 - Irrelevant Material
Cc: NACC – Agency Investigations Section 22 - Irrelevant Material
Subject: FW: FOR REVIEW: DRAFT s41(c) outgoing correspondence [SEC=OFFICIAL]

Morning Penny

I'm sending this to you on the back of Kylie's advice that you are going to be our allocated deputy for the agency investigations team.

I'll talk to you about this later today, and also wondered whether it was worth getting the team to give you a quick briefing but, in short, there are a few parts to the process and the email with hyperlinks below is a good example of the first stage.

The case Section 47E - Certain operations of agencies (those are ARGUS references) Section 22 - Irrelevant Material
from the Department of Health, Disability and Ageing. Section 22 - Irrelevant Material

Section 22 - Irrelevant Material

Section 22 - Irrelevant Material

Next steps

I'm conscious that, as this matter relates to your substantive department, you may wish to consider whether a Conflict of Interest arises. If it does, we will reallocate this case after discussion with Kylie.

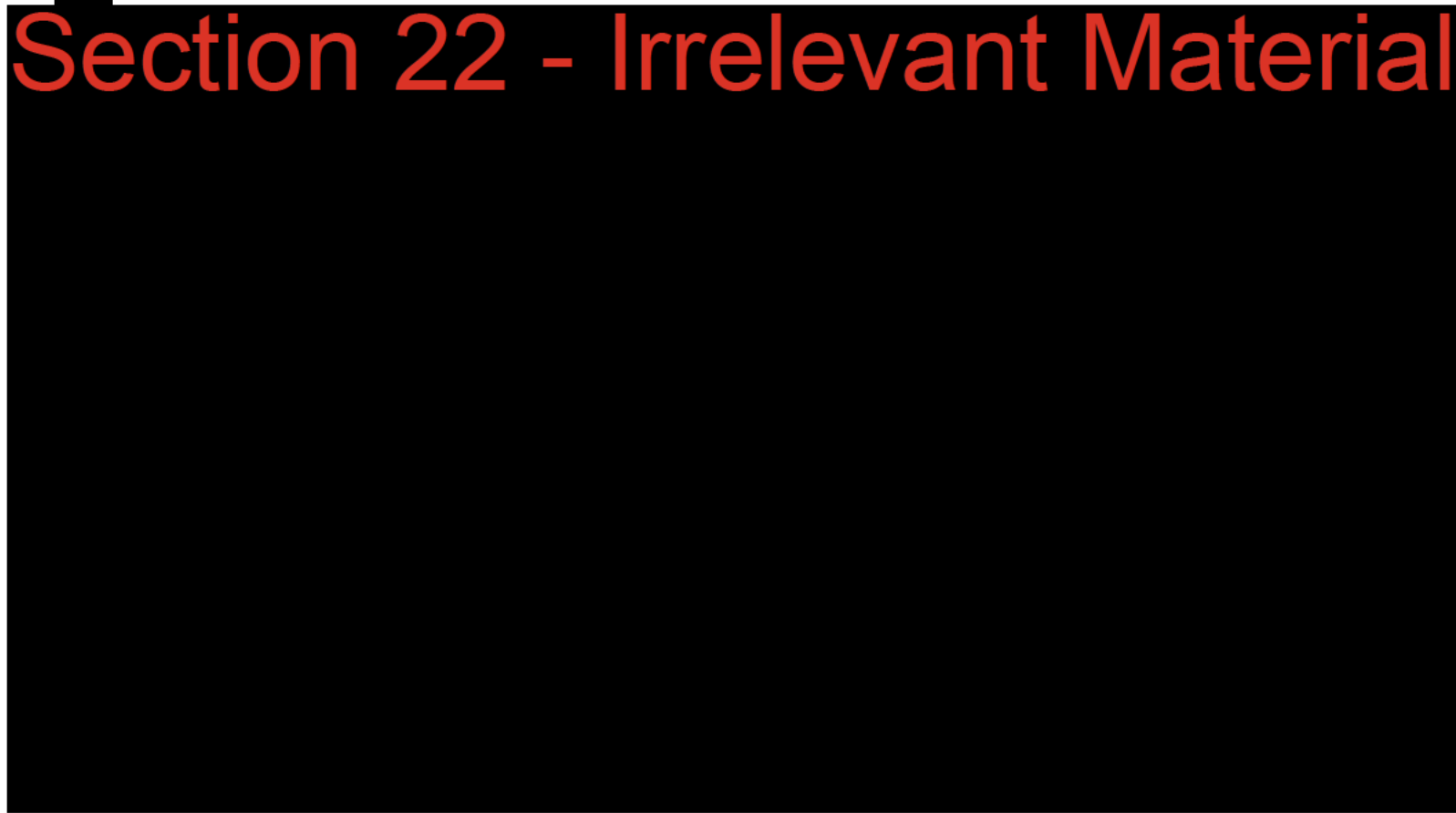
If no Col exists, we will:

- a) Redraft the letter for your signature;
- b) Workflow it to you in ARGUS and let you know;
- c) Once you have reviewed and signed, we arrange for it to be sent out.

Section 22 - Irrelevant Material



Section 22 - Irrelevant Material





National Anti-Corruption Commission

Commissioner

Ref: 25#31381

22 October 2025

The Hon Michelle Rowland MP
Attorney-General

BY EMAIL: Section 22 - Irrelevant Material

Dear Attorney,

DECLARATION OF MATERIAL PERSONAL INTERESTS

The purpose of this letter is to provide you with my declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (Commission), for the purposes of section 29 of the *Public Governance, Performance and Accountability Act 2013* (Cth) and section 247 of the *National Anti-Corruption Commission Act 2022* (Cth), pursuant to which I must disclose to you any material personal interest that I have that relate to the affairs of the Commission. In accordance with that requirement, I disclose the following matters.

No material financial interests to declare

I do not have any financial interests that are likely to relate to the affairs of the Commission. The trustee of my self-managed superannuation fund, Section 47F - Personal privacy, has shareholdings in a range of public listed entities. None of those shareholdings amounts to a "substantial shareholding" within the meaning of the *Corporations Act*. The shareholdings are not substantial interests in those entities. It is conceivable that one or more of those entities could be or become a contractor to the Commonwealth. Should a matter potentially affecting the interests of any of those entities come before the Commission, I would consider whether Section 47F - Personal shareholding was such as to create a material conflict of interest, and if so what mitigations should be put in place to deal appropriately with it.

Relationships with Defence officials

As I have previously declared, as a result of my service in the ADF Reserve (in which I retain my commission as a Major General, as noted in the then Attorney-General's letter to me of 30 March 2023), many members of the Australian Defence Force and the Department of Defence are known to me. There are some with whom I have, or have had, a close connection. I also have an affiliation with some units or agencies (in particular, the Royal New South Wales Regiment and the University of New South Wales Regiment, of which I remain (honorary) Colonel Commandant; the Sydney University Regiment (of which I remain a member of the Regimental Council); and the Inspector-General of the ADF (IGADF) (to whom I continue,

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from time to time, on an informal and voluntary basis, to provide advice and respond to requests for information relating to the Afghanistan Inquiry Report, in accordance with the arrangements described in the then Attorney-General's letter to me of 30 March 2023).

To date, and in accordance with the arrangements described in your predecessor's letter of 30 March 2023, I have taken the approach that should a matter potentially affecting any Defence or ADF unit or individual with whom I am or have been associated in a way that might reasonably be perceived to create a conflict come before the Commission, I do not participate in decision-making and I delegate it to a Deputy Commissioner.

Henceforth, however, in relation to any future matter potentially affecting any Defence or ADF individual or unit that comes before the Commission, I propose to delegate it to a Deputy Commissioner and not participate, regardless of whether it might reasonably be perceived to involve a conflict. I am taking this measure, although I regard it as unnecessary from the perspective of properly managing conflicts, in order to avoid the Commission being distracted by further controversy.

Relationship with Section 47F - Personal privacy

In particular, as I have previously declared, Section 47F - Personal privacy Section 47F - Personal privacy is one of those with whom I have had a close professional association Section 47F - Personal privacy, such as could give rise to a perceived conflict of interest. If Section 47F - Personal privacy were to be the subject of a referral to the Commission, I would not be the decision-maker, and would allocate the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Relationships with other senior Commonwealth officials

In the course of my tenure as National Anti-Corruption Commissioner, I have had contact with a number of senior Commonwealth officials, including agency heads. I do not regard any of those contacts as being likely to create a potential conflict in relation to matters that might come before the Commission. However, should matters potentially affecting the interests of any of them come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Section 47F - Personal privacy

Section 47F - Personal privacy, a jurisdictional agency. In the unlikely event that any matter involving Section 47F - Personal privacy or potentially affecting her interests were to come before the Commission, I would not be the decision-maker and would allocate the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Contacts with parliamentarians and former parliamentarians

I have had purely professional contact with a number of Commonwealth parliamentarians or former parliamentarians, as a result of my senior ADF Reserve roles, chiefly in the course of providing briefings on ADF Reserve issues or on the Afghanistan Inquiry, and more recently as Commissioner, in particular:

- Mr David Feeney, when he was Parliamentary Secretary for Defence;
- Mr Stuart Robert, when he was Assistant Minister for Defence (he also called on me to introduce himself when he was Shadow Assistant Minister, and as Assistant Minister he participated with me in the launch of Project SUAKIN when I was Head of Reserves);
- Ms Marise Payne, when she was Minister for Defence;
- Mr Christopher Pyne, when he was Minister for Defence;
- Mr Christian Porter, when he was Attorney-General;
- Ms Linda Reynolds, when she was Minister for Defence (I also had contact with her when she was serving in the Army Reserve as Commanding Officer, 5th Brigade Administrative Support Battalion when I was Chief of Staff 5th Brigade);
- Mr Richard Marles MP, when he was Shadow Minister for Defence, and more recently while he had been Deputy Prime Minister and Minister for Defence;
- Mr Mark Dreyfus KC MP, when he was Shadow Attorney-General, and more recently while he was Attorney-General;
- Mr Matt Thistlethwaite MP, in his capacity as Minister Assisting the Minister for Defence; and
- Yourself, in your capacity as Attorney-General.

I do not regard any of those contacts as being likely to create a potential conflict in relation to matters that might come before the Commission. However, should matters potentially affecting the interests of any of them come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Other matters

It is always possible that a matter that could potentially affect the interests of some other person known to me could come before the Commission. Should that occur, I would in each case consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Conclusion

I note that there is a continuing duty to disclose material personal interests relating to the affairs of the Commission. Should I become aware of any material personal interest that relates to the affairs of the Commission, I will disclose it to you in accordance with the requirements in section 247 of the *National Anti-Corruption Commission Act 2022* (Cth).

I would be happy to discuss this letter with you or your office. I can be contacted directly on [Section 22 - Irrelevant Material](#) [u.](#)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'PLG Brereton', followed by a horizontal line.

The Hon PLG Brereton AM RFD SC
Commissioner

Details

Identifier	NOTE2[REDACTED]
Type	Conflict of Interest
Author	
Title	NSAP COI Declaration - 8 July 2026
Content	Deputy Commissioner Shakespeare disclosed that she has worked professionally with [REDACTED] in her previous role as a Deputy Secretary at the Department of Health, Disability and Ageing. Acting Commissioner Kilgour ruled that the disclosure does not amount to a real, apparent or perceived conflict of interest*
Date	08/07/2026 12:42



National Anti-Corruption Commission

Commissioner

Ref: 24#36457DOC

14 October 2024

The Hon Mark Dreyfus KC MP
Attorney-General

BY EMAIL: **Section 22 - Irrelevant Material**

Dear Attorney,

DECLARATION OF MATERIAL PERSONAL INTERESTS

The purpose of this letter is to provide you with my declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (Commission), for the purposes of s 29 of the *Public Governance, Performance and Accountability Act 2013* (Cth) and s 247 of the *National Anti-Corruption Commission Act 2022* (Cth), pursuant to which I must disclose to you any material personal interest that I have that relate to the affairs of the Commission. In accordance with that requirement, I disclose the following matters.

No material financial interests to declare

I do not have any financial interests that are likely to relate to the affairs of the Commission. The trustee of my self-managed superannuation fund, **Section 47F - Personal privacy**, has shareholdings in a range of public listed entities. None of those shareholdings amounts to a "substantial shareholding" within the meaning of the *Corporations Act*. The shareholdings are not substantial interests in those entities. It is conceivable that one or more of those entities could be or become a contractor to the Commonwealth. Should a matter potentially affecting the interests of any of those entities come before the Commission, I would consider whether **Section 47F - Personal privacy** shareholding was such as to create a material conflict of interest, and if so what mitigations should be put in place to deal appropriately with it.

Relationships with Defence officials

As I have previously declared, as a result of my service in the ADF Reserve, many members of the Australian Defence Force and the Department of Defence are known to me. There are some with whom I have, or have had, a close connection. I also have an affiliation with some units or agencies (in particular, the Royal New South Wales Regiment and the University of New South Wales Regiment, of which I remain (honorary) Colonel Commandant; the Sydney University Regiment (of which I remain a member of the Regimental Council); and the Inspector-General of the ADF). Should a matter potentially affecting the interests of an

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E. **Section 22 - Irrelevant Material** u

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individual with whom I have had or have a close association, or a unit or agency with which I have an affiliation, come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Section 47F - Personal privacy

In particular, as I have previously declared, the **Section 47F - Personal privacy** is one of those with whom I have had a close professional association **Section 47F - Personal privacy**, such as could give rise to a perceived conflict of interest. If in the future she were to be the subject of a referral to the Commission, I would not be the decision-maker, and would allocate the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Relationships with other senior Commonwealth officials

In the course of my tenure as National Anti-Corruption Commissioner, I have had contact with a number of senior Commonwealth officials, including agency heads. I do not regard any of those contacts as being likely to create a potential conflict in relation to matters that might come before the Commission. However, should matters potentially affecting the interests of any of them come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Section 47F - Personal privacy

Section 47F - Personal privacy In the unlikely event that any matter involving **Section 47F - Personal privacy** or potentially affecting her interests were to come before the Commission, I would not be the decision-maker and would allocate the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Contacts with parliamentarians and former parliamentarians

I have had purely professional contact with a number of parliamentarians or former parliamentarians, as a result of my senior ADF Reserve roles, chiefly in the course of providing briefings on ADF Reserve issues or on the Afghanistan Inquiry, and more recently as Commissioner, in particular:

- Mr David Feeney, when he was Parliamentary Secretary for Defence;
- Mr Stuart Robert, when he was Assistant Minister for Defence (he also called on me to introduce himself when he was Shadow Assistant Minister, and as Assistant Minister he participated in the launch of Project SUAKIN with me when I was Head of Reserves);
- Senator Marise Payne, when she was Minister for Defence;
- Mr Christopher Pyne, when he was Minister for Defence;
- Mr Christian Porter, when he was Attorney-General;
- Senator Linda Reynolds, when she was Minister for Defence (I also had contact with her when she was serving in the Army Reserve as Commanding Officer, 5th Brigade Administrative Support Battalion when I was Chief of Staff 5th Brigade);
- Mr Richard Marles MP, when he was Shadow Minister for Defence, and more recently;
- Yourself, when you were Shadow Attorney-General, and more recently; and

- Mr Matt Thistlethwaite MP, in his capacity as Minister Assisting the Minister for Defence.

I do not regard any of those contacts as being likely to create a potential conflict in relation to matters that might come before the Commission. However, should matters potentially affecting the interests of any of them come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Other matters

It is always possible that a matter that could potentially affect the interests of some other person known to me could come before the Commission. Should that occur, I would in each case consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Conclusion

I note that there is a continuing duty to disclose material personal interests relating to the affairs of the Commission. Should I become aware of any material personal interest that relates to the affairs of the Commission, I will disclose it to you in accordance with the requirements in section 247 of the *National Anti-Corruption Commission Act 2022* (Cth).

I would be happy to discuss this letter with you or your office. I can be contacted directly on Section 22 - Irrelevant Material, or mobile 0408 965 356, or by email at Section 22 - Irrelevant Material

Yours sincerely,



The Hon PLG Brereton AM RFD SC
Commissioner



National Anti-Corruption Commission

Commissioner

Ref: 25#15750DOC

16 September 2025

The Hon Michelle Rowland MP
Attorney-General

BY EMAIL: **Section 22 - Irrelevant Material**

Dear Attorney,

DECLARATION OF MATERIAL PERSONAL INTERESTS

The purpose of this letter is to provide you with my declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (Commission), for the purposes of s 29 of the *Public Governance, Performance and Accountability Act 2013* (Cth) and s 247 of the *National Anti-Corruption Commission Act 2022* (Cth), pursuant to which I must disclose to you any material personal interest that I have that relate to the affairs of the Commission. In accordance with that requirement, I disclose the following matters.

No material financial interests to declare

I do not have any financial interests that are likely to relate to the affairs of the Commission. The trustee of my self-managed superannuation fund, **Section 47F - Personal privacy**, has shareholdings in a range of public listed entities. None of those shareholdings amounts to a "substantial shareholding" within the meaning of the *Corporations Act*. The shareholdings are not substantial interests in those entities. It is conceivable that one or more of those entities could be or become a contractor to the Commonwealth. Should a matter potentially affecting the interests of any of those entities come before the Commission, I would consider whether **Section 47F - Personal privacy** shareholding was such as to create a material conflict of interest, and if so what mitigations should be put in place to deal appropriately with it.

Relationships with Defence officials

As I have previously declared, as a result of my service in the ADF Reserve, many members of the Australian Defence Force and the Department of Defence are known to me. There are some with whom I have, or have had, a close connection. I also have an affiliation with some units or agencies (in particular, the Royal New South Wales Regiment and the University of New South Wales Regiment, of which I remain (honorary) Colonel Commandant; the Sydney University Regiment (of which I remain a member of the Regimental Council); and the

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Section 22 - Irrelevant Materialnacc.gov.au

Inspector-General of the ADF). Should a matter potentially affecting the interests of an individual with whom I have had or have a close association, or a unit or agency with which I have an affiliation, come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Section 47F - Personal privacy

In particular, as I have previously declared, Section 47F - Personal privacy is one of those with whom I have had a close professional association Section 47F - Personal privacy, such as could give rise to a perceived conflict of interest. If she were to be the subject of a referral to the Commission, I would not be the decision-maker, and would allocate the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Relationships with other senior Commonwealth officials

In the course of my tenure as National Anti-Corruption Commissioner, I have had contact with a number of senior Commonwealth officials, including agency heads. I do not regard any of those contacts as being likely to create a potential conflict in relation to matters that might come before the Commission. However, should matters potentially affecting the interests of any of them come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Section 47F - Personal privacy

. In the unlikely event that any matter involving Section or potentially affecting her interests were to come before the Commission, I would not be the decision-maker and would allocate the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Contacts with parliamentarians and former parliamentarians

I have had purely professional contact with a number of Commonwealth parliamentarians or former parliamentarians, as a result of my senior ADF Reserve roles, chiefly in the course of providing briefings on ADF Reserve issues or on the Afghanistan Inquiry, and more recently as Commissioner, in particular:

- Mr David Feeney, when he was Parliamentary Secretary for Defence;
- Mr Stuart Robert, when he was Assistant Minister for Defence (he also called on me to introduce himself when he was Shadow Assistant Minister, and as Assistant Minister he participated with me in the launch of Project SUAKIN when I was Head of Reserves);
- Ms Marise Payne, when she was Minister for Defence;
- Mr Christopher Pyne, when he was Minister for Defence;
- Mr Christian Porter, when he was Attorney-General;
- Ms Linda Reynolds, when she was Minister for Defence (I also had contact with her when she was serving in the Army Reserve as Commanding Officer, 5th Brigade Administrative Support Battalion when I was Chief of Staff 5th Brigade);

- Mr Richard Marles MP, when he was Shadow Minister for Defence, and more recently while he had been Deputy Prime Minister and Minister for Defence;
- Mr Mark Dreyfus KC MP, when he was Shadow Attorney-General, and more recently while he was Attorney-General;
- Mr Matt Thistlethwaite MP, in his capacity as Minister Assisting the Minister for Defence; and
- Yourself, in your capacity as Attorney-General.

I do not regard any of those contacts as being likely to create a potential conflict in relation to matters that might come before the Commission. However, should matters potentially affecting the interests of any of them come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Other matters

It is always possible that a matter that could potentially affect the interests of some other person known to me could come before the Commission. Should that occur, I would in each case consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Conclusion

I note that there is a continuing duty to disclose material personal interests relating to the affairs of the Commission. Should I become aware of any material personal interest that relates to the affairs of the Commission, I will disclose it to you in accordance with the requirements in section 247 of the *National Anti-Corruption Commission Act 2022* (Cth).

I would be happy to discuss this letter with you or your office. I can be contacted directly on **Section 22 - Irrelevant Material** or by email at **Section 22 - Irrelevant Material**

Yours sincerely,



The Hon PLG Brereton AM RFD SC
Commissioner

	Wednesday, 8 July 2026	NSAP	A/g Deputy Commissioner Shakespeare	Deputy Commissioner Shakespeare disclosed that she has worked professionally with [redacted] in her previous role as a Deputy Secretary at the Department of Health, Disability and Ageing. Acting Commissioner Kilgour ruled that the disclosure does not amount to a real, apparent or perceived conflict of interest*	Determined not to be a COI	Verbal / Meeting Minutes	Agency: DHDA
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6					and allocated the case to Acting Deputy Commissioner Shakespeare.		
					Acting Deputy Commissioner Shakespeare declared a professional association with [REDACTED] from her time as Deputy Secretary at the Department of Health, Ageing and Disability and did consider there to be a conflict of interest. Deputy Commissioner Shakespeare will not participate in the discussion or consideration of this matter.*	COI - was not present for decision	Verbal / Meeting Minutes
	Wednesday, 8 July 2026	NSAP	A/g Deputy Commissioner Shakespeare	[REDACTED]			

Thursday, 15 May 2025	NSAP	Deputy Commissioner Gauntlett	Section 47E - Certain operations of a	Deputy Commissioner Gauntlett declared a perceived conflict of interest in relation to Section 47E - Certain operations Section 47E - Certain operations due to a limited previous professional association in his role as Disability Discrimination Commissioner at the Australian Human Rights Commission. Deputy Commissioner Gauntlett will not participate in deliberations on this matter.*	COI - was not present for decision	Verbal / Meeting Minutes	25#17867DOC
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