Submission OGPIWG Attachment1

**1. A national integrity system.**

Election 2016 – National Integrity System

*The public office, public trust principle*

The demand for a national anti-corruption commission has increased over the last decade with strong public support now for the creation of such a body. The need for it is urgent; Australia’s international reputation has already been seriously damaged.

Current lack of protection for whistle-blowers in the public and private sectors means wrong-doing and corruption go unreported and whistle-blowers are vulnerable to retribution.

It is high time the Commonwealth had a comprehensive independent integrity system, incorporating a general purpose anti-corruption agency with educative, research and policy functions and all necessary powers and subject to an inspector and parliamentary oversight.

ART seeks commitments on a National Integrity System with:

* + A corruption control commission with powers modelled on the NSW ICAC
  + A code of conduct for members of each of the House of Reps and the Senate, as recommended by the Commonwealth Parliamentary Association
  + A parliamentary integrity commissioner
  + A cooling-off period before a former minister can accept any appointment related to former ministerial responsibilities
  + Full whistle-blower protection legislation for all in the public and private sector making complaints or disclosures in relation to matters within the Commonwealth arena

**“A National Integrity system - Background**

The Commonwealth signed the UN Convention Against Corruption, and in 2013, the Open Government Partnership. Its obligations under UNCAC Article 36 and the OGP require it to establish a National Anti-Corruption Commission. Each State now has an anti-corruption body. But risk of corruption is higher when and where money, power and influence are found, and the largest quantities of each are found at the level of the Commonwealth Government.

Notwithstanding repeated demands by many bodies such as Transparency International and the Accountability Round Table and Australia’s UNCAC and OGP obligations, no Australian anti-corruption body has been established. Instead the government created a limited specialised anti-corruption body, the Australian Commission for Law Enforcement Integrity (ACLEI), which merely establishes a framework under which the few agencies covered by it must set up corruption controls and inform the Integrity Commissioner of any information that raises a corruption issue in that agency.

ACLEI’s jurisdiction and functions are completely inadequate and inappropriate for a national anti-corruption commission. ACLEI’s levels of funding are less than half of those of the NSW ICAC alone. A principal defect of the ACLEI model is that with no single body responsible, the multi-body approach and shared responsibility results in no single body having ultimate responsibility, and vast areas of Commonwealth power are completely outside ACLEI’s remit. The consequence is a succession of scandals in the Commonwealth arena, while ACLEI was the only body supposedly in charge of investigating corruption in that area.

The risks of corruption have increased in recent years for a variety of reasons, including the:

* increase in governmental control of information
* ever-increasing costs of political campaigns, and the failure to provide adequate controls and transparency,
* commercialisation of government services and projects
* development of lobbying, the inadequacies of any attempt to control that and make it transparent in a timely manner
* failure to stop or control the flow of Ministers and their staff to the lobbying industry on retirement from their positions.

 Combined with those factors there is an increased risk of corruption resulting from the impact on major commercial interests of the significant changes that will be needed to address the problems posed by climate change, and the exhaustion of natural resources. Recent events show that corporates are willing to bribe foreign governments. Why would such bodies not be prepared to act in similar fashion in Australia?

All these matters suggest that the level of commercial morality in Australia is falling at a time when authorities such as ASIC and the Australian Federal Police are failing to cope. Australia’s international reputation must be seriously damaged in these circumstances; indeed Australia’s rating has since dropped from 7th to 13th since 2012 in the International Corruption Index maintained by Transparency International. Recent developments make a further fall likely.”

**2 Political Funding**

Election 2016 – Political campaign finance reform

*The public office, public, trust principle*

*Parties are like football clubs – no matter how much money they get, they will spend it and then want more.*

Former Victorian Premier, John Cain, Oct 2006

Australia’s federal electoral system has few constraints on donations and a weak disclosure regime in which thresholds were raised in 2006 from $1,500 to $10,000 and indexed by 2016 to $13,000. There are numerous loopholes and no caps on campaign expenditure. State electoral financing rules vary enormously.

ART seeks commitments on political campaign financing reform for:

* Adoption of the NSW election financing measures (for the 2019 Federal election)
  + Caps on donations from individuals and organisations
  + Donations over $1,000 disclosed in continuous real time
  + Caps on expenditure for parties, candidates and 3rd party campaigners
* Public inquiry
  + An independent public inquiry to identify best practice for achieving transparent, accountable and cost effective election funding longer term for all Australian jurisdictions, progressed under the OGP.

**Background:**

Competition between the major parties is driving up spending on election campaigns and substantial donations are made for this purpose (particularly to the major party expected to win the election) by business and organisations with vested interests in the decisions of and contracts awarded by parliaments and governments.

|  |  |  |
| --- | --- | --- |
| **2013 Federal election** | **Labor** | **Coalition** |
| Donations | $169.2m | $198.2m |
| Public funding | $21m | $27m |

Public funding totalled $58m (plus the unknown cost to revenue forgone for tax deductions on donations up to $1,500 to parties and $1,500 to candidates).

Complete records of expenditure are not available but based on these figures, would be in the order of $450m. With 15.468m eligible voters, this is a spend of at least **$29/voter**. Canada, NZ and the UK have caps on election spending and this results in spends for each eligible voter of:

* **$5** in the 2015 Canadian election
* **$2.83** in the 2014 NZ election
* **85 pence** in the 2015 UK election

A recent Australian [survey](http://www.tandfonline.com/doi/abs/10.1080/10361146.2014.989810) shows 88% support for limits in election spending and 80% for lowering disclosure thresholds.

**Federal and state disclosure thresholds and reporting requirement comparisons:**

Federal   $13,500  annual

NSW       $1,000  annual

Vic            not required

Qld           $1,000  twice a year

WA           $2,300  annual

Tas            not required

NT             $1,500  annual

**Individual donation limits and bans**:

NSW:       $5,800/party  $2,500/candidate  tobacco, liquor and gambling donors banned

Federal and other states and territories:   no limits on donations or bans

NSW introduced caps on expenditure in 2011. The ACT does not cap donations but from 2015 restricts expenditure to $40k

3. The OAIC

*The public office, public trust principle*

*..an open, inclusive economic system backed by open, political inclusive institutions – that is the best guarantor of success”*

*David Cameron, UK Prime Minister*

Information is held by government officials in public trust for the Australian people, not for the government. It is the people’s information. For a well-functioning democracy, governments must resist the temptation to abuse their power over the information entrusted to them and ensure that it is exercised in the public interest.

The OAIC plays a crucial role in ensuring the Federal government upholds the democratic principles of openness and transparency but government cuts to funding and attempts to abolish the OAIC have seriously undermined its capacity to perform this role.

ART seeks commitments on the OAIC for

* + Sufficient additional funding to enable the OAIC to adequately discharge its strategic, policy, complaints and review functions of FOI as well as Privacy
  + Appointments to each of the three statutory Commissioner positions for FOI, Privacy and Information Policy
  + A comprehensive, independent inquiry into the operation of the OAIC since its inception, as recommended by the Hawke review

Background

In 2010 the OAIC was established to reform the then failing FOI system. This independent body was given the power to review decisions, consider complaints and promote open government.

The 2013 Hawke inquiry found good progress but, while acknowledging the OAIC’s “financial constraints”, considered it “too early” to assess future needs. But resistance in government has persisted with recent examples of senior officials arguing for more exemptions to be provided to limit the disclosure of information.

In 2014, the Government moved to abolish the OAIC. Blocked by the Senate, it achieved de facto abolition of its FOI role by reducing its funding and transferring all its FOI functions elsewhere other than the review of government decisions refusing access to information. That was “streamlined”, by enabling reviews to be conducted by the AAT. The funds expended within the OAIC on FOI work were halved in 2014 – 15. They have not been increased since then.

Privacy became its principal function. In addition, over most of that period, an Acting Information Commissioner has been appointed on 3-month terms to perform the duties of all three statutory Commissioner positions. This has handicapped the OAIC and compromised its independence. The last appointment occurred in April.

In May, all FOI functions were officially returned by Government to the OAIC but not its capacity to perform them. Funding was not materially increased and future Budget appropriations will reduce. Staff are to be increased by only three and there is still only one Acting Commissioner.

There are also other serious ongoing consequences to be addressed:

* The Government’s contravention of the fundamental constitutional principles of the separation of powers and the rule of law, and
* Australia’s breaches of its obligations as a member of the Open Government Partnership.

A detailed analysis of the situation follows.

Office of the Australian Information Commissioner

Issues and Facts

**The OAIC – The effect of the Government 2016-7 Budget**

**Introduction**

Over the last two years the Government failed in its attempt to have a Bill passed to abolish the OAIC. But for most of that time it achieved the de facto abolition of the OAIC’s FOI jurisdiction using its control of the Budget process.

In May this year, the Government announced in the 2016 – 17 Budget Papers that it was not proceeding with the abolition of the OAIC and was returning the FOI functions to it. It also stated that the OAIC would “have ongoing responsibility for privacy and FOI regulation”. As to funding it said that the “FOI funding is provided on the basis of the streamlined approach to FOI reviews adopted by the OAIC since the 2014–15 Budget”.

Those Budget Papers do not, however, detail:

* what the Government intended to happen in relation to the OAIC’s other major FOI responsibilities,
* whether the Budget would enable sufficient staff to be appointed to perform the FOI functions returned to it,
* whether the three vacant statutory FOI Commissioner positions would be filled.

An examination of the OAIC Annual reports, the Budget Papers relating to the OAIC and public statements, sheds light on these issues. We look first at the nature and extent of the intended return of the OAIC’s functions.

**1. The “Return” of functions to be carried out by the OAIC – what are the functions, what was removed, and what has been returned?**

* 1. ***The OAIC FOI statutory functions[[1]](#footnote-1). What are they?***

The OAIC has summarised its “three main functions” in its Annual Reports, the last being the 2014 – 15 Report, as[[2]](#footnote-2) follows;

“The three main functions of the OAIC are:

• Information Commissioner functions — providing strategic advice on information policy and practice in the Australian Government

• privacy functions — ensuring proper handling of personal information in accordance with the Privacy Act and other legislation

• freedom of information functions — protecting the public’s right of access to documents under the FOI Act.”

It continued

“The OAIC carries out a range of activities in these three core areas, including monitoring statutory compliance, investigations, assessments, complaint handling, review of decisions, education and awareness, and providing advice to and promoting responsible information handling within government and the private sector”.

The performance of these functions and activities is still the statutory responsibility of the OAIC under its Act and the Freedom of Information Act 1982.

***1.2. The statutory functions removed****.*

In the May 2014 Budget, the Government began its attempt to abolish the OAIC. In its 2014-5 Annual Report, (p 8), it reported on the functions it had performed in that financial year as follows;

“As of 30 June 2015, the Freedom of Information Amendment (New Arrangements) Bill 2014 had not been considered by the Senate. As such, the OAIC continues to undertake the full breadth of privacy functions, and to carry out the FOI IC review function.

Resources have been provided to the OAIC for the exercise of the FOI IC review function for 2015–16. Funding for the privacy functions has been appropriated to the OAIC for the period 2015–16. The OAIC’s budget allocation for 2015–16 does not include activities in the area of information policy.

The reality was that the OAIC FOI functions had been limited by the 2014 – 15 budget to cover 1 of the 9 activities identified above - conducting reviews of FOI decisions. That function came to be described by the OAIC and Government as “streamlined” – a reference to the practice of reviews being passed to the AAT.

The government having now arranged the return to the OIAC of all its statutory functions, does it intend that the OAIC will address them all? Or, may it in fact intend that the OAIC does no more than process complaints and reviews?

Other questions arise;

* What is intended to be done to ensure an adequate level of funding and staff numbers

to enable the OAIC to discharge all its FOI functions.

* What about the 3 Commissioner positions that have for some time been filled by one Acting Commissioner on three month appointments. Is it intended to restore them?

***1.3. The functions intended by government to be performed?***

There does not appear to have been a detailed public statement of the government’s intentions about the performance of the returned functions. There are, however, statements which shed light on the intention because of what is not said.

***(a) The OAIC: The 2016 – 17 Budget Paper*** [[3]](#footnote-3) – “Strategic Direction Statement”

In previous years, including 2015-16, the Budget Papers relating to the OAIC have included a “Strategic Directions Statement”.

On each occasion, the first one listed had been

* “Information Commissioner functions – performing strategic functions relating to information management in the Australian government”

It had then been followed by the Privacy function, and then

* “freedom of information FOI functions – protecting the public’s right of access to documents under the Freedom of Information Act 1982 (the FOI Act)”. [[4]](#footnote-4)

The 2016 –17 Budget Paper Statement abandoned that practice. While listing the second and third it omitted the first one listed –, [[5]](#footnote-5) “the Information Commissioner functions - performing strategic functions concerning information management in the Australian government”.

This Budget Paper also states:

“…the OAIC will have ongoing responsibility for privacy and FOI regulation. Ongoing funding for these functions is provided in the 2016 – 17 Budget. FOI Funding is provided on the basis of the streamlined approach to FOI by the OAIC since the 2014 – 15 Budget. ….. In 2016 – 17 and the forward years, the OAIC will focus on its strategic goals of:

* + promoting and upholding information access rights
* promoting and upholding information privacy rights
* achieving organisational excellence by supporting and developing the OAIC’s people, systems and processes”

The omission of the first listed “main function” and the deliberate lack of detail in the Strategic Directions Statement suggests that the reality is that the necessary funding will not be provided

Assuming that the main FOI functions are intended to be confined to “protecting the public’s right of access to documents under the Freedom of Information Act 1982”, while this is very important of course and can include a range of activities, it can also be met simply by continuing with the streamlined FOI refusal reviews.

***(b). A Statement of 4 May 2016 by the Acting Information Commissioner.***

He said

“I can confirm for you this morning that other key FOI functions will be restored to the OAIC from 1 July. So we will soon commence work on updating the FOI guidelines. We will start to handle FOI related complaints which have been handled by the Ombudsman for the last 18 months. We will take over management of the FOI statistics database and FOI reporting once our colleagues in AGD have completed the process for the 2015/16 annual report. We also have some work to do to update our website and other material to reflect these changes.

I note however that we are a much leaner version of the OAIC that existed in 2014 and so there will also be changes in how we approach these functions in this new iteration of the office. “ [[6]](#footnote-6)

While this is encouraging, the words are carefully chosen. It refers to “soon” commencing work on guidelines and starting to handle FOI related complaints. This may be contrasted with the next statement that the OAIC would “take over management” of the statistics database and FOI reporting (but that will not happen for some time). He also acknowledged that The OAIC is much “leaner” than it was in 2014 and will have to approach the delivery of the functions he mentioned accordingly.

He did not include a statement as to the appointment of people to the three Commissioner posts. If it was part of the plans for the next financial year, it would presumably have been mentioned.

All this suggests that the funding being provided in the present financial year for the performance of the FOI responsibilities is not going to be increased to bring it back to the level that existed prior to the 2014 – 15 budget which was prepared on the basis that the O AIC would be abolished by the end of 2014.

There is further evidence relevant to that.

**2. Is it intended to provide sufficient funds to enable the OAIC to do more than conduct “streamlined” FOI reviews?**

***2.1. Budgeted provisions for the OAIC***

***(a) The Budget provisions – past and future***

According to the Budget papers, the estimated actual Expenditure of the OAIC had declined from $14.356M in 2012–13[[7]](#footnote-7) to $13.183 M in 2015 – 16[[8]](#footnote-8). While the Budget estimates for 2016-17[[9]](#footnote-9) record estimated total expenses of $14.992 M, that figure is made up principally of a departmental appropriation of $10.622 million and retained revenues of $3.777 million.

The Forward estimates in that budget suggest a further decline. They propose a departmental appropriation in 2017-2018 of $10.567 million, $10.597 million in 2018-19 and $9.3 million in 2019-20 with estimated actual expenditure dropping from $11.333 million in 2017 – 18 to 9.940 million in 2019 – 20.

***(b) Statements of the Information Commissioner and the Attorney-General***

They recently described the funding reality for all the OAIC functions for the next 4 years as the provision of $37M - an average of $9.25 million each year.[[10]](#footnote-10)

The above reveals an intent that there be no real increase in funding in the next financial year and a decline in the three years that follow. We have a situation where the functions to be discharged by the OAIC are significantly increased from what they were in 2014-15 but the funding has not and is intended to decline. Sufficient funds will not be provided. In addition, it cannot be assumed that the funding available to the OAIC to discharge its FOI functions will even match the level to which it was reduced in 2014 – 15.

There is detailed information available about what occurred then.

**2.2. The reduction of the share of funds for FOI Functions in 2014 – 15**

The Annual Reports of the OAIC contain relevant details of the level of that funding in 2013 – 14 (the year prior to the attempted abolition of the OAIC) and the year of the attempted abolition (2014 – 15)

***(a) The 2013 – 14 Budget (page 159)[[11]](#footnote-11).*** The OAIC’s total expenditure was $13.634 million. It was estimated that -

* 35% of it was directed to its FOI functions ($4.772 million)
* $42,689 was “spent on processing” FOI requests made in that year
* the total departmental appropriation was $14.995 million of which $2.278 million remained unspent at the end of that financial year. (Appendix 1, page 162)

In the previous year, the appropriation received was $17.680 million of which $15.168 million was spent[[12]](#footnote-12).

***(b) The 2014 – 15 Budget, (page 138****)[[13]](#footnote-13)* During the first year of the attempted abolition, significant funding reduction occurred in relation to the FOI functions. The OAIC’s total expenditure was $13.430 million, very close to the previous year. there had, however, been significant changes to the level of expenditure for the FOI functions. The Report stated

“From January 2015, in accordance with the proposed legislative change outlined previously, the OAIC’s FOI functions were reduced commensurate with resources”.

The following estimates were made;

* 18% of its resources were directed towards its FOI functions ($2.417 million)
* $14,158 was spent on processing FOI requests (down 67%)
* the total departmental appropriation was $16.843 million of which $4.560 million remained at the end of that financial year. (Appendix 1, page 140)

Thus, total expenditure over the year on the FOI functions, was halved as the FO I functions were transferred and expenditure on the “processing” of FOI reviews was reduced by two thirds, presumably helped by the “streamlining”.

It would appear that the bulk of the work being done by the OAIC from at least 2013-4 concerned its Privacy function. It was stated in the 2014 – 15 Report (P8) that as of 30 June 2015, the OAIC “continues to undertake the full breadth of privacy functions, and to carry out the FOI IC review function”. It was also stated that, the OAIC budget allocation for 2015 – 16 “does not include activities in the area of information policy” and that additional funding had been provided for additional Privacy functions.

Unless there is information pointing to, for example, some other plan to secure a significant increase in staff members, it appears the OAIC will not have the capacity to discharge more than the FOI functions it was able to in 2014 – 15.

**3. Past, present and future staff numbers**

What light do the records of staff numbers shed on the staff needed, and the availability of staff this year, and in the future, to pick up and work on the returned FOI functions?

According to the Budget papers, the highest staff number, 85, occurred in the year 2012 – 13. In the first abolition year, 2014 – 15, the number fell to 64 and in 2015 – 16 it rose to 72. In both those periods, however, the reality was that the FOI work being done concerned the review of FOI decisions and that had been streamlined. As revealed in the Budget Papers and elsewhere, including the OAIC website, since the addition in March 2014 of the Privacy functions, there has been a profound shift of focus from the OAIC’s FOI responsibilities to its Privacy responsibilities and that is likely to continue.

But it appears that it is proposed to increase the staff in the current financial year. Will that enable all the FOI statutory functions to be performed?

The Budget staff prediction for 2016–17; 3 additional staff, from 72 to 75 an increase of 1.7%. There does not appear to be a statement about their intended role. It cannot be assumed that they would all be allocated to FOI work; for there will be competition for them between the demands of the Privacy and FOI functions. But even if all three were allocated to FOI work, how would that be enough to enable the OAIC to make a serious impression on the work it needs to do in performing all the FOI functions. And the experience appears to have been that the demand for the OAIC services has constantly grown.

If the current financial plan is maintained, it would appear inevitable that the staff needed by the OAIC to discharge both its statutory Privacy and FOI functions will not be provided. Further, assuming the proposed three staff will focus entirely on the returned FOI functions, that is likely to be ineffective in enabling the OAIC to address the returned functions.

**Conclusion**

Appropriately resourced and staffed, the OAIC would significantly strengthen the openness and accountability of our Commonwealth Government

The reality appears to be that if matters are left as they are

* the proposed funding
* the addition of only 3 staff and
* the provision of only one Commissioner,

will prevent the OAIC discharging most, if not all, of its returned statutory functions this year and significantly limit its performance of those functions that it attempts to perform. At best, the experience of the last 2 years for our Commonwealth FOI system will continue.

There are practical limits to what can be done by “streamlining”. Its use is limited unless outsourcing is used (as had been done with the Ombudsman, the Attorney- General and the AAT since late 2014). Only the AAT outsourcing has been mentioned as continuing.

The information available, including the government statements, point to the processing of FOI reviews as the primary FOI function that will be carried out. The other functions are likely to receive little or no attention.

Until significant sufficient additional funding is provided, the effective de facto abolition of the OAIC as an independent statutory FOI body created by the Parliament will continue. The FOI system will remain in its failed state and severely weaken open and accountable government.

It also needs to be borne in mind that there have been other serious consequences flowing from the two-year de facto abolition of the FOI role of the OAIC. It has resulted in the ongoing breach of

* the ethical and common-law public office public trust principle that applies to all holders of public office[[14]](#footnote-14)and
* Australia’s commitments under the international agreement, the Open Government Partnership,[[15]](#footnote-15) in particular, the commitments of
* ‘promoting increased access to this and also the link information and disclosure about governmental activities’
* ‘providing access to effective remedies when information or the corresponding records are improperly withheld’ and
* Making” concrete commitments that are ambitious and go beyond a country’s current practice” [[16]](#footnote-16)

There is also another serious concern – breach of the fundamental constitutional principles of the Separation of Powers and the Rule of Law[[17]](#footnote-17).

Our Democracy and its guiding principles, and Australia’s reputation, are being damaged as long as this situation is allowed to continue. It is critical that it be addressed soon as is possible.

We seek the listed commitments concerning the OAIC to ensure that these issues will be properly examined and rectified as a matter of priority in the new Parliament.

1. see also; Australian Information Commissioner Act 2010 - sections 7, 8, and 10 [↑](#footnote-ref-1)
2. E.g. OAIC 2013 – 14 Annual Report (Chapter 2 p 12 – repeated in the 2014-15 Report, p 10) [↑](#footnote-ref-2)
3. Section 1, p261. [↑](#footnote-ref-3)
4. If it was intended to use the term "information Commissioner functions" as defined in the Australian Information Commissioner Act section 2010, s7 it would also include statutory definition of "freedom of information functions" and together would appear to cover all of the statutory functions confirmed on the Commissioner at the head of the OAIC. [↑](#footnote-ref-4)
5. This pattern can be observed elsewhere in the same budget papers where they address outcomes and performance. [↑](#footnote-ref-5)
6. Speech to an FOI and Privacy forum by Acting Commissioner Pilgrim; <https://www.oaic.gov.au/media-and-speeches/speeches/the-value-of-public-sector-information>

   [↑](#footnote-ref-6)
7. <https://www.ag.gov.au/Publications/Budgets/Budget2013-14/Pages/PortfolioBudgetStatements201314.aspx> [↑](#footnote-ref-7)
8. <https://www.ag.gov.au/Publications/Budgets/Budget2016-17/Documents/Portfolio-budget-statements/PBS-OAIC-2016-17.pdf> [↑](#footnote-ref-8)
9. ibid [↑](#footnote-ref-9)
10. (<https://www.oaic.gov.au/media-and-speeches/statements/oaic-forward-funding-in-2016-17-federal-budget>

    Office of the Australian Information Commissioner

    The Government has decided not to proceed with the new arrangements for privacy and Freedom of Information (FOI) regulation, including the proposed changes to the Office of the Australian Information Commissioner (OAIC).

    Accordingly, the OAIC will receive ongoing funding of $37 million over four years to continue its privacy and FOI functions. FOI funding is provided on the basis of the streamlined approach to FOI reviews adopted by the OAIC since the 2014–15 Budget.

    <https://www.attorneygeneral.gov.au/Mediareleases/Pages/2016/SecondQuarter/3-May-2016-Attorney-Generals-Portfolio-Budget-Measures-2016-17.aspx> [↑](#footnote-ref-10)
11. <https://www.oaic.gov.au/images/documents/about-us/corporate-information/annual-reports/annual-report-2013-14/Office-of-the-Australian-Information-Commissioner-Annual-report-2013-14.pdf> [↑](#footnote-ref-11)
12. <https://www.oaic.gov.au/images/documents/about-us/corporate-information/annual-reports/Annual-report-2012-13/Complete_pdf_AR_2012-13.pdf> [↑](#footnote-ref-12)
13. <https://www.oaic.gov.au/resources/about-us/corporate-information/annual-reports/oaic-annual-report-201415/oaic-annual-report-2014-15.pdf> [↑](#footnote-ref-13)
14. <http://www.accountabilityrt.org/integrity-awards/sir-gerard-brennan-presentation-of-accountability-round-table-integrity-awards-dec-2013/> ; <http://www.accountabilityrt.org/public-office-public-trust-a-new-contribution-by-david-lusty/> . [↑](#footnote-ref-14)
15. <http://www.opengovpartnership.org/Articles> [↑](#footnote-ref-15)
16. Ibid, 3, 17 [↑](#footnote-ref-16)
17. <http://icjvictoria.com.au/wp-content/uploads/2015/08/OAIC-letter.pdf> and <http://www.theguardian.com/australia-news/2015/aug/17/george-brandis-urged-to-respect-rule-of-law-by-former-liberal-attorney-general>; <http://www.canberratimes.com.au/comment/senates-last-chance-to-save-foi-watchdog-and-protect-the-rule-of-law-20150618-ghr6vw> . [↑](#footnote-ref-17)