

Independent Reporting Mechanism

Results Report:
Australia 2023-2025

Open
Government
Partnership



Independent
Reporting
Mechanism

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Executive Summary

Australia's third OGP action plan introduced a national plan on artificial intelligence, amended privacy legislation to address use of personal information in automated decision-making, included a government program with youth advisory groups, and took steps towards beneficial ownership transparency. This cycle renewed Australia's engagement in OGP following a period of inactivity and re-engaged the Open Government Forum. Australia can build on this momentum, completing work on automated decision-making and artificial intelligence, beneficial ownership, procurement, whistleblower protection, political advertising, and mis-information and dis-information.

Implementation

Australia's third action plan saw seven out of eight commitments completed or substantially completed, producing early results on digital governance, youth participation, and beneficial ownership. Commitment 1 introduced a new National Artificial Intelligence Plan and amended the Privacy Act (Cth) to address how personal information is used in automated decision-making. At a smaller scale, Commitment 2 continued steps to encourage civic participation through youth advisory groups. In addition, Commitment 4 passed an amendment on disclosure of information about ownership of listed entities that is expected to be followed by legislation allowing for a beneficial ownership register, potentially in 2027.

Although it is too soon to see evidence of results from the remaining commitments' implementation, stakeholders also continued to work on other outstanding elements of the action plan even after the implementation period ended in December 2025. Commitment 6 prepared a draft whistleblower protection amendment expected to progress in 2026. Commitment 8 began a program to help improve media literacy in culturally and linguistically diverse communities scheduled to be completed in June 2026. If these efforts are completed, they may produce significant results on open government in the coming years.

Participation and Co-Creation

For this action plan, Australia's OGP point of contact role transferred to the Attorney-General's Department (AGD). The appointment of a new multistakeholder Open Government Forum (OGF) and co-creation of the plan started in April 2023. This renewed Australia's engagement in OGP,

At a Glance

LEVEL OF COMPLETION

7/8

Complete or substantially complete commitments

EARLY RESULTS

3/8

Commitments with early results

0/8

Commitments with significant results

KEY OBSERVATIONS

- The third action plan cycle renewed Australia's OGP engagement.
- Commitments laid groundwork on pressing anti-corruption issues.
- The Open Government Forum lacked resources for wider advocacy on OGP.
- Government and civil society made progress on collaboration

Met the minimum requirements during implementation: Yes

following a period of inactivity after the 2018-2020 action plan. A short co-creation timeline limited public engagement, especially with non-traditional and marginalised communities, and selection of civil society-initiated commitments. During the implementation period, OGF received progress reports at regular meetings, although there was little opportunity for civil society to participate in commitment implementation. While the minimum requirements of the OGP Participation and Co-Creation Standards were not met during the co-creation period, they were met during the implementation period. Overall, a long-term government member reported that the OGF was more successful than during earlier action plans, offering a way to emphasise participation and direct consultation.¹ Moving forward, the process would benefit from more time allocated to co-creation and implementation discussions, and establishing a common government and civil society understanding of the role of OGF.

Implementation in Context

This OGP cycle benefited from ministerial support. Some OGF meetings in 2023 and 2024 saw attendance from former Attorney-General, the Hon Mark Dreyfus, and former Assistant Minister to the Attorney-General, the Hon Patrick Gorman.² To support commitments' efforts, Portfolio Ministers announced the future beneficial ownership register in October 2025 and Australia's first National Media Literacy Strategy in February 2026.³

Beyond the OGP action plan, Australia saw positive open government changes during the implementation period. These included the establishment of the National Anti-Corruption Commission,⁴ Victoria's Statewide Treaty,⁵ Western Australia's information and privacy legislation,⁶ and an extensive range of citizen assemblies for state and local governments.⁷ On the other hand, limits were set on citizens' right to protest,⁸ and growing usage of encrypted messaging applications could affect government records management.⁹ Noting these limits, alongside recent threats to Australia's social cohesion, and growing global authoritarianism, OGF members highlighted the importance of organisations like OGP, seeing efforts to increase public participation across the country as strengthening democracy.¹⁰

¹ Sarah Chidgey (OGF Government Co-chair), interview by the IRM, 11 February 2026.

² The Hon Patrick Gorman MP, "7th Open Government Forum Meeting: Valuing Democracy in Australia's Words, actions and public spaces," Prime Minister and Cabinet portfolio, 29 November 2024, <https://ministers.pmc.gov.au/gorman/2024/7th-open-government-forum-meeting>.

³ The Hon Dr Andrew Leigh MP, "Improving transparency of the true owners of companies," media release, 15 October 2025, <https://ministers.treasury.gov.au/ministers/andrew-leigh-2025/media-releases/improving-transparency-true-owners-companies>; The Hon Anika Wells MP, "Australia's first National Media Literacy Strategy a step closer," media release, 12 February 2026, <https://minister.infrastructure.gov.au/wells/media-release/australias-first-national-media-literacy-strategy-step-closer>.

⁴ "The National Anti-Corruption Commission," NACC, accessed 5 March 2026, <https://www.nacc.gov.au/>.

⁵ "Victoria's Statewide Treaty," Victoria's Treaty, 12 December 2025, <https://www.treatyvic.vic.gov.au/victorias-statewide-treaty>.

⁶ *Privacy and Responsible Information Sharing Act 2024* (WA), https://www.legislation.wa.gov.au/legislation/statutes.nsf/law_a147470.html&view=consolidated.

⁷ Vincent Barry, "Citizens Assemblies: reclaiming the normative power of law," *Law Society Journal*, 12 November 2025, <https://lsj.com.au/articles/citizens-assemblies-reclaiming-the-normative-power-of-law/>.

⁸ Amal Naser, "Explainer: What are your rights to protest in Australia," UNSW Australian Human Rights Institute, accessed 17 March 2026, <https://www.humanrights.unsw.edu.au/research/commentary/explainer-what-are-your-rights-to-protest-australia>.

⁹ Anne Twomey and Iain Walker (OGF member and OGF substitute member), interviews by the IRM, 2 and 13 February 2026.

¹⁰ Strengthening Democracy Taskforce, *Strengthening Australian democracy: A practical agenda for democratic resilience* (Department of Home Affairs, 2024), <https://www.homeaffairs.gov.au/about-us-subsite/files/strengthening-australian-democracy.pdf>.

Section I. Key Observations

The key observations below offer reflections from Australia's third action plan cycle. These lessons aim to support Australia's future commitments and broader open government journey.

Observation 1: The third action plan cycle renewed Australia's OGP engagement

When Australia decided to join the OGP, its 2013 announcement emphasised that OGP membership would complement the country's leadership internationally in promoting democracy, transparency, and good governance. It would also help the country spread the values of transparency and accountability in the Asia Pacific region.¹ In the wake of the 2022 election, following a period of inactivity after the 2018-2020 action plan, this 2023-2025 action plan has successfully renewed Australia's engagement in OGP. It re-established a dedicated Open Government Forum (OGF) of equal numbers of government and civil society members. Its OGP website² provided up-to-date access to Australia's action plans, progress reports, and the OGF oversight meetings. This provides a resilient platform to continue developing future Australian open government efforts.

Observation 2: Commitments laid initial groundwork on pressing anti-corruption issues

Australia is among the top countries in global rankings on anti-corruption,³ although its position showed some decline in the 2025 Corruption Perceptions Index, dropping from 10th to 12th place. The 2022 and 2025 federal elections gave the government a strong public mandate to take action on anti-corruption issues.⁴ Transparency International Australia and media analysis note that Australia faces a continued need to address risks of big money in politics, gaps in whistleblower systems, and weaknesses in public officials' accountability, capacity, and independence.⁵ The third OGP action plan took up this effort, with more than half of its initiatives (Commitments 3-7) focused on important anti-corruption areas. Commitments took first steps in developing an integrity strategy for the public sector, beginning early work towards a public beneficial ownership register, updating grant and procurement rules, and progressing draft whistleblower protection legislation. While it is too soon to see the impact of these reforms on corruption, their activities continue beyond the two-year plan. Following the government's strong reforms since 2022, civil society stakeholders encouraged Australia to renew its anti-corruption reforms and continue steps to complete this action plan's efforts through future OGP commitments.

Observation 3: The Open Government Forum lacked resources for wider advocacy on OGP

During the third action plan, the OGF met regularly and the Attorney-General's Department published updates on the progress of the commitments on the OGP website. However, all OGF civil society members observed a low level of awareness of OGP within the public service and across other sectors of civil society outside of the OGF. The OGF's Terms of Reference expect civil society members to engage with wider community networks on existing or potential future Australian open government commitments.⁶ The government co-chair noted tight departmental funding. In the future, OGF administrative support could extend to assisting members to raise awareness of OGP among wider civil society and public service stakeholders. OGF public advocacy can increase public knowledge and understanding of how Australia's OGP reforms contribute towards sustaining democratic values in Australia.

Observation 4: Government and civil society made progress on collaboration

When releasing this action plan, then Attorney-General Mark Dreyfus emphasised that OGP provides Australia an important model for government-civil society dialogue on key reforms.⁷ The new OGF marked a renewal of this dialogue. The action plan cycle made progress on collaboration – while the minimum requirements of the OGP Participation and Co-Creation Standards were not met during the co-creation period, they were met during the implementation period. This surfaced opportunities to continue deepening co-design and co-implementation of future commitments and using collaborative processes such as working groups when initially drawing up potential commitments. During the next co-creation process, together with the OGF, the Attorney-General’s Department can provide advanced notice of the co-creation timeline and reasoned response to stakeholders on how their contributions were considered. There are also opportunities for more civil society oversight of implementation. As this action plan cycle identified differing understandings of civil society members’ co-creation and implementation roles, when drawing up the next OGF’s new Terms of Reference, members could deliberate on these roles and reach an agreement on how to fully utilise civil society expertise during co-creation and implementation of the next plan. They could also clarify government members’ wider open government roles beyond reporting on their commitments’ progress.

¹ The Hon Mark Dreyfus MP, “Australia joins the Open Government Partnership,” media release, 22 May 2013, <https://markdreyfus.com/media/media-releases/australia-joins-open-government-partnership-mark-dreyfus-qc-mp/>.

² “Australia’s Open Government Partnership,” Attorney-General’s Department, accessed 17 March 2026, <https://www.ag.gov.au/integrity/australias-open-government-partnership>.

³ Tom Ravlic, “Australia does well in annual trust, ethics, democracy report cards,” *The Mandarin*, 17 December 2025, https://www.themandarin.com.au/305073-australia-does-well-in-annual-trust-ethics-democracy-report-cards/?utm_campaign=TheJuice&utm_medium=email&utm_source=newsletter

⁴ “The Albanese Government’s Integrity Report Card,” The Centre for Public Integrity, 28 October 2025, <https://publicintegrity.org.au/the-albanese-governments-integrity-report-card/>.

⁵ “Australia drops in corruption ranking amid global backslide,” Transparency International Australia, 10 February 2026, <https://transparency.org.au/australia-drops-in-corruption-ranking-amid-global-backslide/>; AJ Brown, “Australians are right to ask ‘is this good enough?’ when it comes to the Nacc’s final robodebt report,” *The Guardian*, 13 March 2026, <https://www.theguardian.com/commentisfree/2026/mar/13/nacc-final-robodebt-report-corruption-australia-reaction-ntwnfb>.

⁶ “Open Government Forum - Terms of Reference,” Attorney-General’s Department, 28 June 2024, <https://www.ag.gov.au/rights-and-protections/publications/open-government-forum-terms-reference>.

⁷ Melissa Coade, “Open Government Partnership promise commits to integrity, honesty and accountability,” *The Mandarin*, 15 December 2023, <https://www.themandarin.com.au/236708-ogp-promise-commits-to-integrity-honesty-accountability/#:~:text=In%20a%20statement%2C%20Dreyfus%20said,%2C%20digital%20governance%2C%20and%20Justice>.

Section II. Early Results

This section analyses commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

Table 1. Commitments with Early Results

Commitment 1: Automated Decision-Making and Artificial Intelligence Transparency: This commitment made progress towards transparency and accountability of automated decision-making and artificial intelligence used by government, introducing a new National Artificial Intelligence Plan and amending the Privacy Act.

Commitment 1: Automated Decision-Making and Artificial Intelligence Transparency

Implementers: Attorney-General's Department (AGD) Administrative Law Branch and Privacy Reform Taskforce; Department of Industry, Science and Resources (DISR); Digital Transformation Agency (DTA).

Context and Objectives

This commitment aimed to improve transparent, safe, and responsible government use of automated decision-making (ADM) and artificial intelligence (AI) across the Commonwealth, whilst facilitating innovation. It responds to the 2023 Royal Commission Report on the Robodebt Scheme's recommendation 17.1.¹ It sought to introduce a new policy and consistent legal framework to govern ADM by agencies, and to enhance protections for personal information handling by entities subject to the Privacy Act 1988 (Cth). In 2023, before the action plan's implementation period, the government released interim guidance on using public generative AI tools for agencies and responded to the Privacy Act Review report and Royal Commission's Robodebt report.²

Early Results: Moderate Results

This commitment moderately improved transparency and accountability in government use of AI and ADM. Its milestones were substantially completed, introducing a new National AI Plan, an AI Safety Institute, and an amended Privacy Act, although little progress was made on ADM and AI legislative and regulatory frameworks during the implementation period.

The commitment saw new AI policy and institutions announced. The National AI Plan, released in December 2025, seeks legislative and regulatory frameworks that mitigate AI harms and ensure Australians benefit from AI's opportunity across all regions, industries, and communities.³ It intends to monitor progress by drawing on national data collections, sector-specific reporting, and stakeholder feedback. In early 2026, the Australian Artificial Intelligence Safety Institute will commence work to respond to AI-related risks and harms, and support the approach outlined in the National AI Plan.⁴ It will monitor and test AI systems, analyse emerging technology risks, and ensure legislation and regulation keeps pace with technological advancement. It will also participate in the International Network of AI Safety Institutes' work to progress the science of AI

safety internationally. Notably, it will not have enforcement powers, act as a regulator, be a public advisory or complaints service, or duplicate the responsibilities of agencies with established policy and regulatory functions.⁵ Several government agencies have also released guidance on safe and responsible use of AI.⁶

Regarding the Privacy Act, the first tranche of privacy reform passed in 2024 and included provisions related to ADM. This will take effect from 10 December 2026. Regulated entities' privacy policies must detail how personal information is used in substantially automated decisions significantly affecting individuals' rights or interests.⁷ These amendments did not cover the government's agreement with the Privacy Act Review to provide individuals with a right to request information about how ADM decisions are made. AGD advises that this is being considered, and the government has committed to delivering a second tranche of reform.⁸ There is public concern that this has stalled.⁹ Since consultation in January 2025, there has been little progress drawing up the ADM legislation and regulation, including rights to request a human review of decisions.¹⁰ AGD continues to consult with Commonwealth agencies to understand their operational requirements,¹¹ address any unintended consequences of an ADM legislative framework approach,¹² and consider safeguards such as human involvement in ADM.¹³

Australia did not produce a new AI regulatory framework during the implementation period. According to AGD, the government is working to ensure that existing legal and regulatory frameworks remain the foundation for addressing and mitigating AI-related risks.¹⁴ Given the pace of AI adoption across Australia, OGF civil society members noted that there remains an acute need to address legislative and regulatory gaps on AI and ensure transparency and protection of personal information.¹⁵

AGD advises that this commitment has promoted awareness of best practice principles when ADM is used to make administrative decisions.¹⁶ OGF civil society members recorded genuine efforts by the public service to improve how government uses ADM technology, commenting that this usage is now transparent, and no longer hidden.¹⁷ Progress on transparency remains underway. In January 2026, the Office of the Australian Information Commissioner (OAIC) published a report on the 23 agencies that have one or more ADM enabling provisions in the legislation relating to their agency. OAIC identified four agencies that disclosed ADM use, 74% that could not be identified as using the technology through publicly available information, and that no agency has published guidelines or policies on ADM use.¹⁸

Looking Ahead

The Australian government will continue to assess the suitability of existing laws for AI in accordance with the National AI Plan. It has responded to AI threats with specific legislation, including through committing to act against 'nudify' apps and criminalise the nonconsensual sharing of sexually explicit material, and will continue to take further action as required.¹⁹

Australia sees a continued need for this work on ADM, privacy reform, and AI. Media reported in February 2026 that the Australian Taxation Office was considering collaborating with Services Australia to revisit the core cross-agency automation function that Robodebt used.²⁰ Analysts have suggested that avoiding another Robodebt requires the government to look at broader reform to government automated decision-making and measures to strengthen the public service.²¹ The IRM recommends that future OGP commitments continue this work, with milestones

to address legal, policy, and technical issues, and increase the government’s own technical ADM and AI capabilities.

¹ The Royal Commission into the Robodebt Scheme, *Report*, Volume 1 (The Royal Commission into the Robodebt Scheme, 2023), <https://robodebt.royalcommission.gov.au/publications/report>.

² “Australia Action Plan Review 2023–2025,” Open Government Partnership, 12 July 2024, <https://www.opengovpartnership.org/documents/australia-action-plan-review-2023-2025/>.

³ “National AI Plan,” Department of Industry, Science and Resources, 2 December 2025, <https://www.industry.gov.au/publications/national-ai-plan>.

⁴ “Australia to establish new institute to strengthen AI safety,” Department of Industry, Science and Resources, 25 November 2025, <https://www.industry.gov.au/news/australia-establish-new-institute-strengthen-ai-safety>.

⁵ “OGP – Commitment Update Reports – 30 November 2025,” Attorney-General’s Department, 18 December 2025, <https://www.ag.gov.au/integrity/publications/ogp-commitment-update-reports-30-november-2025>.

⁶ “Protective Security Policy Advisories under the PSPF,” Department of Home Affairs, accessed 5 March 2026, <https://www.protectivesecurity.gov.au/protective-security-directions-under-pspf/protective-security-policy-advisories>; Digital Transformation Agency, “DTA releases new guidance: Australian Government use of public generative AI tools,” media release, 13 October 2025, <https://www.dta.gov.au/media-releases/dta-releases-new-guidance-australian-government-use-public-generative-ai-tools>; “National Artificial Intelligence Centre,” Department of Industry, Science and Resources, accessed 5 March 2026, <https://www.industry.gov.au/national-artificial-intelligence-centre>.

⁷ *Privacy and Other Legislation Amendment Act 2024 (No. 128)* (Cth), <https://www.legislation.gov.au/C2024A00128/asmade/text>.

⁸ “OGP – Commitment Update Reports – 31 December 2025,” Attorney-General’s Department, emailed to the IRM, 26 February 2026.

⁹ John Pane, EFA Chair, “Freedom of Information Amendment Bill 2026 withdrawn,” Electronic Frontiers Australia, 6 March 2026, <https://efa.org.au/foi-amendment-bill-withdrawn/>.

¹⁰ Kate Auty, Anne Twomey, Tania Penovic, Anooshe Mushtaq, and Kyle Redman (OGF members), interviews by the IRM, 2 February to 11 February 2026.

¹¹ Attorney-General’s Department Commitment 1 Leads, correspondence with the IRM, 24 February 2026.

¹² “Commitment Update Reports – 31 December 2025,” Attorney-General’s Department.

¹³ Attorney General’s Department, pre-publication comments, 7 May 2026.

¹⁴ Attorney General’s Department, pre-publication comments, 7 May 2026.

¹⁵ Auty, Twomey, Penovic, Mushtaq, and Redman, interviews.

¹⁶ Attorney-General’s Department Commitment 1 Leads, correspondence.

¹⁷ Auty, Twomey, Penovic, Mushtaq, and Redman, interviews.

¹⁸ “Automated decision-making and public reporting under the Freedom of Information Act,” Office of the Australian Information Commissioner, 21 January 2026, <https://www.oaic.gov.au/freedom-of-information/information-commissioner-decisions-and-reports/foi-reports/Automated-decision-making-and-public-reporting-under-the-Freedom-of-Information-Act#section-report-summary>; “Agencies Fail Transparency Test on Decision Systems,” IDM, 29 January 2026, <https://idm.net.au/article/0015469-agencies-fail-transparency-test-decision-systems>.

¹⁹ “Commitment Update Reports – 30 November 2025,” Attorney-General’s Department.

²⁰ Julian Bajkowski, “ATO looks to re-engage Services Australia on data,” *The Mandarin*, 24 February 2026, https://www.themandarin.com.au/308032-ato-looks-to-re-engage-service-australia-on-earnings-data/?utm_campaign=TheJuice&utm_medium=email&utm_source=newsletter.

²¹ Yee-Fui Ng, “NACC investigation into Robodebt reveals public service corruption, but it will take much more to fix the system,” *The Conversation*, 11 March 2026, <https://theconversation.com/nacc-investigation-into-robodebt-reveals-public-service-corruption-but-it-will-take-much-more-to-fix-the-system-278076>.

Section III. Participation and Co-Creation

This cycle renewed Australia’s engagement in OGP following a period of inactivity and re-engaged the Open Government Forum. While the minimum requirements of the OGP Participation and Co-Creation Standards were not met during the co-creation period, they were met during the implementation period. Moving forward, the process would benefit from more time allocated to co-creation and implementation discussions and establishing a common government and civil society understanding of the Open Government Forum’s role.

OGP in Australia

After the May 2022 federal election, Australia’s OGP point of contact role transferred from the Department of the Prime Minister and Cabinet to the Secretariat in the Attorney-General’s Department (AGD). The appointment of a new multistakeholder Open Government Forum (OGF) and co-creation of the third action plan started in April 2023. This renewed Australia’s engagement in OGP, following a period of inactivity after the 2018-2020 action plan.

The OGF had two co-chairs and 18 members, reflecting equal civil society and government representation and relative gender parity. Government members were appointed from the Senior Executive Service,¹ and included government departments and independent statutory bodies. The government co-chair and one other member had prior OGF experience. Civil society members applied for selection and were appointed by the Attorney-General for their ability to engage with broad and diverse community networks, work with and influence government, and reflect emerging open government priorities.² The government co-chair and several government members changed during implementation due to personnel changes in the relevant positions. There was also a civil society membership vacancy. Members noted the lack of Aboriginal, Torres Strait, and youth representation and are taking ongoing action to address this gap.³

AGD did not provide administrative support for OGF civil society members to engage externally on open government priorities or global policy areas,⁴ as it saw its role as oversight of commitments.⁵ Some members felt this hindered their role, while some government members saw the OGF as no different from other consultation platforms and their role only as representing their agency’s particular commitment. This reflected differing interpretations of the purpose of OGF. Yet, a long-term government member reported that the OGF was more successful than during earlier action plans, offering a way to emphasise participation and direct consultation.⁶ Another long-term government member proposed that AGD continues to develop its approach to participation on OGP.⁷ The IRM suggests that the new OGF jointly writes its new Terms of Reference to ensure ongoing collaboration and understanding between all members and to meet the OGP’s renewed vision for more open and democratic governments that meet citizens’ expectations.⁸

Action Plan Co-Creation

During co-creation, two OGP Participation and Co-Creation Standards minimum requirements were not met. The timeline for the co-creation process was published after the process had started, and the public’s suggestions for the action plan did not receive reasoned response. There was a tight co-creation timetable as the OGP required Australia to release its third action plan before 31 December 2023 to comply with OGP process. To gather public input on the action plan, the AGD Consultation Hub opened two online surveys (from 21 August to 17 September, and from 9 to 22 November), but only received 32 responses and 10 responses respectively.

Over six weeks in August and September, three OGF working groups, consulting with mainly academic external stakeholders, co-created 12 commitment proposals. The groups focused on public participation and engagement in government, strengthening government and corporate sector integrity, and enhancing Australia’s democratic processes. OGF selected eight final commitments of mostly existing priorities already resourced by the government and endorsed them on 4 December 2023. Proposals that did not progress included: proactive disclosure culture, public sector board appointments, open data, public engagement skills, protection of rights, National Anti-Corruption Commission hearings, decisions to go to war, work to counter violent extremism, lobbying, citizens’ budgets, and peoples’ ability to move between the public and private sectors.

An information webinar and AGD social networks publicised opportunities to participate in co-creation. Civil society members noted a need for stronger outreach or a media campaign to elicit wider engagement across Australia. External groups representing non-traditional and marginalised communities appeared unaware of the AGD’s open government website, Consultation Hub, and social media sites.⁹

Participation During Implementation

During implementation, all OGP Participation and Co-Creation Standards minimum requirements were met. The OGF received progress reports at five meetings and participated in question-and-answer sessions. Publicly available meeting minutes recorded whether the government had responded to matters raised. The government co-chair advised that such matters were discussed at department level, and then directly with the civil society members.¹⁰ All civil society members reported low government uptake of their suggestions and little opportunity to participate in commitment implementation.¹¹

There were some participation highlights during implementation. For Commitment 3, after OGF members discussed the draft Integrity Strategy, they saw their input thoroughly incorporated.¹² In terms of accountability, Transparency International Australia’s Commitment Tracker was an effective mechanism, raising the action plan’s profile. For instance, a Minister made a query about a commitment that was marked with a Red Traffic Light, meaning it had showed little progress.¹³ Additionally, early ministerial support for the action plan was displayed when then Attorney-General Mark Dreyfus attended OGF meetings in December 2023¹⁴ and June 2024, and Assistant Minister Patrick Gorman made a statement of support at the November 2024 meeting.¹⁵ To support commitments’ efforts, Portfolio Ministers announced the future beneficial ownership register and Australia’s National Media Literacy Strategy.¹⁶

Table 2. Compliance with Minimum Requirements

The IRM uses the OGP Participation and Co-Creations Standards to assess countries’ participatory practices throughout the action plan cycle.¹⁷ Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.¹⁸ The OGP Criteria and Standards Subcommittee determines if a country has acted according to OGP process.¹⁹

Minimum requirement	Co-creation	Implementation
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1.1 Space for dialogue: The Open Government Forum - Australia's OGP multi-stakeholder forum - held five meetings during implementation, scheduled at least every six months. The Terms of Reference for the forum and working groups are published on Australia's OGP website. ²⁰	Yes	Yes
2.1 OGP website: Australia's OGP website is on the Integrity Section of the Attorney-General's Department website. The OGP website contains all three of Australia's national action plans, the Open Government Forum Terms of Reference, and meeting agendas and minutes. ²¹	Yes	Yes
2.2 Repository: OGP documents are published on Australia's OGP website, which is updated at least twice a year. It offers details of the co-creation and implementation of the third action plan. ²² It has not transferred information about the first and second action plans from Australia's previous OGP website.	Yes	Yes
3.1 Advanced notice: See the Action Plan Review. ²³	No	Not applicable
3.2 Outreach: See Action Plan Review. ²⁴	Yes	Not applicable
3.3 Feedback mechanism: See Action Plan Review. ²⁵	Yes	Not applicable
4.1 Reasoned response: See Action Plan Review. ²⁶	No	Not applicable
5.1 Open implementation: At the five Open Government Forum meetings during implementation, the government presented implementation progress against milestones and civil society members had the opportunity to comment. ²⁷	Not applicable	Yes

¹ The Hon Mark Dreyfus MP, "Appointment of Open Government Forum members," media release, 5 April 2023, <https://markdreyfus.com/media/media-releases/appointment-of-open-government-forum-members-mark-dreyfus-kc-mp/>.

² "Open Government Forum - Terms of Reference," Attorney-General's Department, 28 June 2024, <https://www.ag.gov.au/rights-and-protections/publications/open-government-forum-terms-reference>.

³ Kate Auty, Anooshe Mushtaq, Anne Twomey, Clancy Moore, Charles Sampford, Kyle Redman, Tania Penovic, and Tim Lo Surdo (OGF members), interviews by the IRM, 2 February to 11 February 2026.

⁴ Sarah Chidgey (OGF Government Co-chair), interview by the IRM, 11 February 2026.

⁵ Attorney General's Department, pre-publication comments, 7 May 2026.

⁶ Chidgey, interview.

⁷ Elizabeth Tydd (OGF Member), interview by the IRM, 3 February 2026.

⁸ "OGP Strategy 2023-2028," Open Government Partnership, accessed 5 March 2026, <https://www.opengovpartnership.org/strategy-2023-2028/>.

⁹ "Australia Action Plan Review 2023-2025," Open Government Partnership, 12 July 2024, <https://www.opengovpartnership.org/documents/australia-action-plan-review-2023-2025/>.

¹⁰ Chidgey, interview.

¹¹ Auty, Mushtaq, Twomey, Moore, Sampford, Redman, Penovic, and Surdo, interviews.

¹² "Open Government Forum Meeting #10 – Minutes," Open Government Partnership Australia, 18 December 2025, <https://www.ag.gov.au/sites/default/files/2026-01/minutes-10th-open-government-forum-meeting-18-dec-2025.pdf>.

¹³ Clancy Moore (OGF member and Transparency International Australia CEO), interview by the IRM, 6 February 2026.

¹⁴ Melissa Coade, "Open Government Partnership promise commits to integrity, honesty and accountability," *The Mandarin*, 15 December 2023, <https://www.themandarin.com.au/236708-ogp-promise-commits-to-integrity-honesty-accountability/#:~:text=In%20a%20statement%2C%20Dreyfus%20said,%2C%20digital%20governance%2C%20and%20justice>.

¹⁵ The Hon Patrick Gorman MP, "7th Open Government Forum Meeting: Valuing Democracy in Australia's Words, actions and public spaces," Prime Minister and Cabinet portfolio, 29 November 2024, <https://ministers.pmc.gov.au/gorman/2024/7th-open-government-forum-meeting>.

¹⁶

¹⁷ "OGP Participation and Co-Creation Standards," Open Government Partnership, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.

¹⁸ “IRM Guidelines for the Assessment of OGP’s Minimum Requirements,” Open Government Partnership, 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf.

¹⁹ “Resolution of the Criteria & Standards Subcommittee regarding the Temporary Suspension of the Enforcement of Time-Bound Minimum Requirements for Participation and Co-Creation,” Open Government Partnership, 1 August 2025, <https://www.opengovpartnership.org/wp-content/uploads/2025/08/Resolution-of-CS-on-the-Temporary-Suspension-of-the-Enforcement-of-Time-Bound-Minimum-Requirements-2.pdf>; For information on the OGP Procedural Review Policy see: <https://www.opengovpartnership.org/procedural-review/#IC>.

²⁰ “Open Government Forum - Terms of Reference,” Attorney-General’s Department, 28 June 2024, <https://www.ag.gov.au/rights-and-protections/publications/open-government-forum-terms-reference>.

²¹ “Australia’s Open Government Partnership,” Attorney-General’s Department, accessed 17 March 2026, <https://www.ag.gov.au/integrity/australias-open-government-partnership>.

²² “Australia’s Third National Action Plan,” Attorney-General’s Department, 15 December 2023, <https://www.ag.gov.au/integrity/australias-open-government-partnership/australias-third-national-action-plan>.

²³ “Australia Action Plan Review 2023–2025,” Open Government Partnership, 12 July 2024, <https://www.opengovpartnership.org/documents/australia-action-plan-review-2023-2025/>.

²⁴ “Australia Action Plan Review 2023–2025,” Open Government Partnership.

²⁵ “Australia Action Plan Review 2023–2025,” Open Government Partnership.

²⁶ “Australia Action Plan Review 2023–2025,” Open Government Partnership.

²⁷ “Australia’s Third National Action Plan Commitment Progress Reports,” Attorney-General’s Department, accessed 17 March 2026, <https://www.ag.gov.au/integrity/australias-open-government-partnership/australias-third-national-action-plan#commitment-progress-reports>.

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.¹

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.² The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector,
 - enhancing the enabling environment to build trust between citizens and the state.

- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Keitha Booth and was reviewed by Mary Francoli, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM’s International Experts Panel (IEP).³ For more information, refer to IRM webpage⁴ or the glossary of IRM and OGP terms.⁵

¹For definitions of OGP terms, such as co-creation and promising commitments, see “OGP Glossary,” <https://www.opengovpartnership.org/glossary/>.

² The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses “Potential for Results” and “Early Results” at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

³“International Experts Panel,” Open Government Partnership, Independent Reporting Mechanism, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>.

⁴ “IRM Overview,” Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview/>.

⁵ “OGP Glossary,” Open Government Partnership, <https://www.opengovpartnership.org/glossary/>.

Annex I. Commitment Data¹

Commitment 1: Automated Decision-Making and Artificial Intelligence Transparency	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Substantial 	<ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate results
This commitment is assessed in Section II above.	
Commitment 2: Youth Advisory Groups	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Unclear 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate results
<p>The Office for Youth (OFY) completed this commitment on its Youth Advisory Groups, with moderate early results from its youth engagement with government program. During the implementation period, 11 groups provided advice and feedback on government policies, programs and education resources, up to 50 participants each year. The groups focused on a range of topics, including civic engagement, climate change and water, creative industries, First Nations, prevention of gender-based violence, and employment. To illustrate, the 2024 Civic Engagement Youth Advisory Group discussed youth in emergency management volunteer roles, informing the National Resilience Taskforce; worked with the Museum of Australian Democracy and the Department of Home Affairs on civic education resources; and contributed to the Joint Standing Committee on Electoral Matters’ inquiry into civic education, engagement, and participation.²</p> <p>The OFY reported increased civic participation with the Australian government and stronger capacity across government to engage with youth. In its 2025 survey, 92% of partner agency staff reported opportunities to meaningfully collaborate with these young people often or very often during their partnership with the Office.³ Moving forward, the government reported that OFY will continue to deliver the Youth Advisory Group program, under its three-year youth engagement strategy. It intends for five Youth Advisory Groups per year, along with other engagement opportunities.⁴ OGF members endorsed this participatory work with youth, expressed concern about the program’s small scope, and recommended its expansion. They also proposed work to develop a broader government strategy to raise public participatory deliberation and to determine where that function should sit.⁵ This is in line with feedback from an external expert who was critical of the narrow focus of this commitment, saw the OFY’s work with Youth Advisory Groups as only mentoring, and strongly recommended larger-scale consultative work in the regions with randomly selected young people using citizens assembly-type processes.⁶</p>	
Commitment 3: Integrity Strategy for the Commonwealth Public Sector	

<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: No notable results
<p>This commitment was completed in December 2025, publishing an Integrity Strategy for the public sector, as well as supporting resources. It was developed with participation across government and the OGF.⁷ The strategy is an initial point of reference and does not impose further requirements. It encourages practitioners to use it to build the foundation of integrity across their agencies. It lists initiatives to strengthen integrity and compliance tools, including appointing integrity champions at a deputy-secretary level in all Commonwealth agencies, a community of practice, and mandatory integrity training for all new public officials.</p> <p>By the end of the implementation period, there were no notable early results from the strategy. AGD advised that the strategy was published in the week of the tragic Bondi Beach terrorist attack in December 2025, meaning communications were necessarily more muted than planned.⁸ In March 2026, AGD and the Australian Public Service Commission shared the strategy on LinkedIn and Facebook.⁹ In terms of the strategy’s scope, OGF civil society members were largely satisfied with the strategy, although some expected it to be more substantive.¹⁰ The OGF government co-chair explained that it took a light-touch approach and said that introducing binding reporting would add unnecessary bureaucracy, as measurement is already included in binding regulatory frameworks.¹¹ OGF civil society suggested a future OGP commitment for agencies to measure and report on uptake of the strategy.¹² Under a related project, AGD and the Australia Public Service Commission are considering opportunities to improve integrity reporting and measurement.¹³</p>	
<p>Commitment 4: Beneficial Ownership Reform</p>	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Unclear 	<ul style="list-style-type: none"> ● Completion: Limited ● Early results: Moderate
<p>This commitment made limited progress towards a public beneficial ownership register, with associated draft legislation and technical work at early stages. During the implementation period, one step forward was royal assent of the Treasury Laws Amendment (Strengthening Financial Systems and Other Measures) Act 2025 (Cth) on 4 December 2025. Schedule 1, <i>Disclosure of information about ownership of listed entities</i>, includes amendments to enhance the substantial holding and tracing notice provisions in the Corporations Act 2001 (Cth). Its obligations will come into effect on 4 December 2026.¹⁴ The 2025-26 Budget provided additional funding for the Australian Securities and Investments Commission (ASIC) of \$207 million over 2025-26 to 2026-27 to continue to build the capacity of the companies register.¹⁵</p> <p>Implementation continued beyond the action plan period. The Assistant Minister for Productivity, Competition, Charities and Treasury advised that the program will move from a</p>	

two-stage process where companies were going to initially be required to hold their own beneficial ownership information, to a one stage process that will directly implement a central Commonwealth-operated register for unlisted companies. Next steps are revising materials and drafting requirements for the register and the stabilisation and uplift of the technology underpinning the ASIC’s companies register to ensure it can accept and make available beneficial ownership information.¹⁶ Consultation on Registry Stabilisation and Uplift draft legislation closed on 11 February 2026.¹⁷ OGF civil society and the Law Council of Australia commended the legislation, the Associate Minister’s commitment to cover trusts, and the next stages planned.¹⁸

Commitment 5: Procurement and Grants Integrity and Accountability

- | | |
|---|---|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens?
Yes ● Potential for results: Unclear | <ul style="list-style-type: none"> ● Completion: Complete ● Early results: No notable results |
|---|---|

This commitment on procurement and grants integrity was completed as planned. The Pathways to Procurement program was piloted, new Commonwealth Procurement Rules¹⁹ took effect in November 2025, and the websites for Procurement,²⁰ Selling to Government,²¹ and Procurement Policy²² were updated. New Commonwealth Grants Rules and Principles 2024²³ came into effect in October 2024, including mandatory requirements for Commonwealth ministers and agency officials to disclose and record material personal interests in relation to grants administration. GrantConnect was enhanced to reflect these new reporting requirements.²⁴ GrantConnect and AusTender²⁵ act as the online primary, public-facing, and centralised sources for information. Officials attended 18 online grants trainings, and a new online community of practice was set up for grants administrators.²⁶ Whether grants training was offered to the business sector is unknown.

Some OGF civil society members reflected that, while the updated 2024 grants rules show marginal change, the risk for corruption remains.²⁷ This perspective is echoed in public concerns.²⁸ In October 2025, the Australian National Audit Office reported that audits of grants administration and procurement still had the highest share of adverse conclusions, at 23% and 19%, respectively. Notably, 55% of grants administration audits resulted in negative conclusions (adverse or partly effective).²⁹ These findings suggested gaps in agency capability, recordkeeping, adherence to guidelines, and willingness to apply the spirit as well as the letter of the rules. At this stage, it is too soon to record results from the November 2025 Commonwealth Procurement Rules. Moving forward, Commonwealth and state jurisdictions in Australia are planning to strengthen probity and administrative requirements.³⁰

Commitment 6: Whistleblower Protections

- | | |
|--|--|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens?
Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: No notable results |
|--|--|

This commitment made substantial progress towards improved protections for whistleblowers, but had not completed new legislation by the end of the implementation period. The government consulted publicly on Stage 2 reforms to the Public Interest Disclosure Act 2013 (Cth) (PID Act) in November 2023, and an exposure draft of the Public Interest Disclosure and Other Legislation Amendment (Whistleblower Protections) Bill³¹ in late 2025, including with targeted civil society organisations, government agencies, and law firms. The exposure draft proposed a new Whistleblower Ombudsman function within the Office of the Commonwealth Ombudsman. Submissions on the exposure draft emphasised the importance of an independent body to protect whistleblowers, functions to enable it to adequately protect whistleblowers, a ‘no wrong doors’ approach to making a public interest disclosure, and appropriate resourcing for the Whistleblower Ombudsman.³² Completion of the agencies’ work was anticipated to be in 2026.³³ AGD noted that the timing of legislation is a matter for government.

OGF civil society members endorsed this progress but queried whether the work has stalled. They support the need for a Whistleblower Ombudsman and acknowledge that it is complicated to establish a system that can deal with national security and false claims.³⁴ The Centre for Public Integrity welcomed the exposure draft. It also reported civil society views that the draft could go further to protect whistleblowers, particularly by ensuring the independence and resourcing of the Whistleblower Ombudsman.³⁵

Commitment 7: Political Donations and Truth in Political Advertising

- | | |
|---|---|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens?
Yes ● Potential for results: Substantial | <ul style="list-style-type: none"> ● Completion: Complete ● Early results: No notable results |
|---|---|

This commitment aimed to address political donations and truth in political advertising to assist voters make informed judgements about federal elections. This 2022 Federal election commitment was subsequently endorsed through bipartisan recommendations of the Joint Standing Committee on Electoral Matters (JSCEM) in its interim report of its inquiry into the 2022 federal election.³⁶

The components of the commitment focused on political donations were completed. The Electoral Legislation Amendment (Electoral Reform) Act (Cth) passed in February 2025³⁷ and the response to the final report of the JSCEM inquiry was tabled the following month.³⁸ After January 2027, the new act will reduce the monetary disclosure threshold and introduce a new timeline for reporting and publishing electoral donations.³⁹ Public views on the act vary. Some see it as increasing public transparency, strengthening access to information about political campaign funding. Others note its benefits but also reflect that it has failed to address deficiencies in the original bill.⁴⁰ OGF civil society members expressed concerns about the impact of these changes on minority parties.⁴¹ An OGF civil society member suggested that any future process to review political donations rules be led by an independent body.⁴² Legal challenges to the donations’ caps were underway by February 2026.⁴³

Work on truth in political advertising saw bills introduced, but these were not passed into law due to lack of parliamentary support. In 2024, these included the government’s Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2024⁴⁴ and the Electoral Legislation Amendment (Electoral Communications) Bill 2024.⁴⁵ If passed, these would have combated seriously harmful content on digital platforms and prohibited authorisation of certain inaccurate and misleading electoral and referendum communications. There was no subsequent legislative progress from government. The Independent Senator David Pocock’s Electoral Communications Bill, which was similar to the government’s Electoral Communications Bill, was still pending as of March 2026.⁴⁶

Commitment 8: Countering Mis- and Dis-information in Culturally and Linguistically Diverse Communities

- | | |
|---|--|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens?
Yes ● Potential for results: Unclear | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: No notable results |
|---|--|

Under this commitment, the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCSA) provided grant funding to the Federation of Ethnic Communities’ Councils of Australia (FECCA) for a program to help improve media literacy in culturally and linguistically diverse (CALD) communities. The commitment started during the implementation period, but its completion timeline was moved to June 2026 due to delays by both parties.⁴⁷ DITRDCSA has advised that it might have to extend the timeline for another year.⁴⁸ 22 organisations across all eight states and territories were selected to participate in the program and receive small grants to lead their own media literacy initiatives. FECCA’s education partner, Media Diversity Australia designed a media literacy training package, informed by consultation with the 22 organisations, with an anticipated reach of more than 2,000 community members across Australia.⁴⁹ DITRDCSA also reported that Australia’s first National Media Literacy Strategy⁵⁰ is expected to incorporate lessons from this commitment’s work. Moving forward, OGF civil society members⁵¹ and the Public Interest Journalism Initiative noted the need for larger scale work on media literacy for all communities.⁵²

¹ Editorial notes:

1. Commitments’ short titles may have been edited for brevity. For the complete text of commitments, please see Australia’s action plan: <https://www.opengovpartnership.org/documents/australia-action-plan-2023-2025-december/>.
2. For more information on the assessment of the commitments’ design, see Australia’s Action Plan Review: https://www.opengovpartnership.org/wp-content/uploads/2024/07/Australia_Action-Plan-Review_2024-2025.pdf.

² “Past Youth Advisory Groups,” Office for Youth, accessed 5 March 2026, <https://www.youth.gov.au/office-youth/youth-advisory-groups/past-youth-advisory-groups>.

³ Office for Youth, correspondence with the IRM, 5 February 2026.

⁴ Attorney General’s Department, pre-publication comments, 7 May 2026.

⁵ Kyle Redman and Iain Walker (OGF members), interviews by the IRM, 11 and 12 February 2026.

⁶ External advocate for children and young people, interview by the IRM, 16 March 2026.

- ⁷ “Commonwealth Integrity Strategy,” Attorney-General’s Department and Australian Public Service Commission, December 2025, <https://www.ag.gov.au/sites/default/files/2025-12/commonwealth-integrity-strategy-december-2025.pdf>.
- ⁸ Attorney-General’s Department Commitment 3 Lead, correspondence with the IRM, 24 February 2026.
- ⁹ Attorney-General’s Department, “We have developed a Commonwealth Integrity Strategy,” Facebook, 10 March 2026, <https://www.facebook.com/attorneygeneralsdepartment/posts/pfbid0W1nWREhVJbTks773P2H9WxqrCZFaAmjuSyisySRTzouvheWLUYesmF2JqPkz6CdZl?rldid=TpzyesWsGnBIS5Xb#>; Attorney-General’s Department, “We have developed a Commonwealth Integrity Strategy,” LinkedIn, March 2026, <https://www.linkedin.com/feed/update/urn:li:activity:7437273016205520897>; Australian Public Service Commission, “The Strategy brings together key guidance and resources,” LinkedIn, March 2026, https://www.linkedin.com/posts/apsc_commonwealth-integrity-strategy-carousel-activity-7437633092112044033-F3hw.
- ¹⁰ Kate Auty, Anooshe Mushtaq, Anne Twomey, Clancy Moore, Charles Sampford, Kyle Redman, Tania Penovic, and Tim Lo Surdo (OGF members), interviews by the IRM, 2 February to 11 February 2026.
- ¹¹ Sarah Chidgey (OGF Government Co-chair), interview by the IRM, 11 February 2026.
- ¹² Auty, Mushtaq, Twomey, Moore, Sampford, Redman, Penovic, and Surdo, interviews.
- ¹³ Chidgey, interview.
- ¹⁴ *Treasury Laws Amendment (Strengthening Financial Systems and Other Measures) Act 2025 No. 72* (Cth), <https://www.ato.gov.au/law/view/pdf/acts/20250072.pdf>.
- ¹⁵ “OGP Commitment – implementation update (November 2025),” Attorney-General’s Department, 18 December 2025, <https://www.ag.gov.au/sites/default/files/2026-01/ogp-commitment-implementation-updates-november-2025.docx>.
- ¹⁶ The Hon Dr Andrew Leigh MP, “Improving transparency of the true owners of companies,” media release, 15 October 2025, <https://ministers.treasury.gov.au/ministers/andrew-leigh-2025/media-releases/improving-transparency-true-owners-companies>.
- ¹⁷ “Registry stabilisation and uplift – draft legislation consultation,” The Treasury, accessed 6 March 2026, <https://consult.treasury.gov.au/c2025-726278>.
- ¹⁸ Auty, Mushtaq, Twomey, Moore, Sampford, Redman, Penovic, and Surdo, interviews; “Registry stabilisation and uplift draft legislation – consultation,” Law Council of Australia, 11 February 2026, <https://lawcouncil.au/resources/submissions/registry-stabilisation-and-uplift-draft-legislation-consultation>.
- ¹⁹ “Commonwealth Procurement Rules,” Department of Finance, 17 November 2025, <https://www.finance.gov.au/government/procurement/commonwealth-procurement-rules>.
- ²⁰ “Procurement,” Department of Finance, 26 March 2026, <https://www.finance.gov.au/government/procurement>.
- ²¹ “Selling to Government,” Department of Finance, accessed 17 March 2026, <https://sellingtogov.finance.gov.au/>.
- ²² “Procurement Framework,” Department of Finance, 19 December 2025, <https://www.finance.gov.au/government/procurement/commonwealth-procurement-rules/procurement-framework>.
- ²³ *Commonwealth Grants Rules and Principles 2024* (Cth), <https://www.legislation.gov.au/F2024L00854/latest/versions>.
- ²⁴ “Grant Award List,” GrantConnect, accessed 9 March 2026, https://www.grants.gov.au/Ga/ViewByPublishDate?Weekly=08-Mar-2026%2C14-Mar-2026&Weekly_Submit=.
- ²⁵ “Reports,” AusTender, accessed 9 March 2026, <https://www.tenders.gov.au/Reports/List>.
- ²⁶ “OGP – Commitment Update Reports – 31 December 2025,” Attorney-General’s Department, emailed to the IRM, 26 February 2026.
- ²⁷ Auty, Mushtaq, Twomey, Moore, Sampford, Redman, Penovic, and Surdo, interviews.
- ²⁸ “Helping governments design better grants programs in a new era of public scrutiny,” OCM, accessed 20 February 2026, <https://weareocm.com/helping-governments-design-better-grants-programs-in-a-new-era-of-public-scrutiny/#:~:text=The%20acquittal%20stage%20is%20where,both%20agencies%20and%20the%20executive>.
- ²⁹ Australian National Audit Office, *2024–25 Performance Audit Outcomes*, Auditor-General Report No. 4 2025-26, (ANAO, 2025), https://www.anao.gov.au/sites/default/files/2025-10/Auditor-General_Report_2025-26_4.pdf.
- ³⁰ “Helping governments design better grants programs,” OCM.
- ³¹ *Exposure draft - Public Interest Disclosure and Other Legislation Amendment (Whistleblower Protections) Bill 2025* (Cth), https://consultations.ag.gov.au/integrity/public_sector_whistleblower_reforms/user_uploads/exposure_draft_bill_public_sector_whistleblower_reform.pdf.
- ³² “Public sector whistleblower reforms,” Attorney-General’s Department, Feedback updated 21 November 2025, https://consultations.ag.gov.au/integrity/public_sector_whistleblower_reforms/; “Submission to Public Interest Disclosure and Other Legislation Amendment (Whistleblower Protections) Bill 2025,” Human Rights Law Centre, accessed 6 March 2026, <https://www.hrlc.org.au/submissions/submission-to-pid-reform-2025/>; “Joint Civil Society Submission – Public Interest Disclosure and Other Legislation Amendment (Whistleblower Protections) Bill 2025,”

Human Rights Law Centre, accessed 6 March 2026, <https://www.hrlc.org.au/app/uploads/2025/10/PID-Bill-Joint-Civil-Society-Submission.pdf>.

³³ Attorney-General's Department Commitment 6 Lead, correspondence with the IRM, 17 February 2026; "OGP – Commitment Update Reports – 31 December 2025," Attorney-General's Department, emailed to the IRM, 26 February 2026.

³⁴ Auty, Mushtaq, Twomey, Moore, Sampford, Redman, Penovic, and Surdo, interviews.

³⁵ "The Albanese Government's Integrity Report Card," The Centre for Public Integrity, October 2025, 10, <https://publicintegrity.org.au/wp-content/uploads/2025/10/Albanese-Governments-Integrity-Report-Card-27-Oct-2025.pdf>.

³⁶ Attorney-General's Department Commitment 7 Lead, correspondence with the IRM, 24 February 2026.

³⁷ "Changes to electoral laws," AECMedia, 21 February 2025, [https://www.aec.gov.au/media/2025/02-21.htm#:~:text=New%20electoral%20reforms%20have%20recently,passed%20by%20the%20Australian%20Parliament.&text=The%20Electoral%20Legislation%20Amendment%20\(Electoral,on%2C%20Thursday%2020%20February%2025](https://www.aec.gov.au/media/2025/02-21.htm#:~:text=New%20electoral%20reforms%20have%20recently,passed%20by%20the%20Australian%20Parliament.&text=The%20Electoral%20Legislation%20Amendment%20(Electoral,on%2C%20Thursday%2020%20February%2025).

³⁸ Australian Government, *Australian Government response to the Joint Standing Committee on Electoral Matters report: Conduct of the 2022 federal election and other matters – Final Report*, (Department of Finance, 2025), <https://www.finance.gov.au/publications/government-responses/final-government-response-to-the-jscem-final-report-on-the-conduct-of-the-2022-federal-election-and-other-update>.

³⁹ "Electoral laws," AECMedia; Senator the Hon Don Farrell, "Implementation of Funding and Disclosure Reform," media release, 31 March 2026, <https://ministers.finance.gov.au/smos/media-release/2026/03/31/implementation-funding-and-disclosure-reform>.

⁴⁰ Joo-Cheong Tham, "Parliament has passed landmark election donation laws. They may be a 'stitch up' but they also improve Australia's democracy," *The Conversation*, 13 February 2025, <https://theconversation.com/parliament-has-passed-landmark-election-donation-laws-they-may-be-a-stitch-up-but-they-also-improve-australias-democracy-249588>.

⁴¹ Kate Auty, Anne Twomey, Clancy Moore, Kyle Redman (OGF members), interviews by the IRM, 2 February to 11 February 2026.

⁴² Kyle Redman (OGF member), interview by the IRM, 12 February 2026.

⁴³ Dan Jervis-Bardy, "Former independents launch high court challenge to electoral laws they say favour Labor and Coalition," *The Guardian*, 15 December 2025, <https://www.theguardian.com/australia-news/2025/dec/15/high-court-challenge-electoral-laws-independents>.

⁴⁴ *Communications Legislation Amendment (Combating Misinformation and Disinformation) Bill 2024* (Cth), Parliament of Australia, https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=r7239; The Hon Michelle Rowland MP, "Communications Legislation Amendment (Combating Misinformation and Disinformation) Bill 2024 (Cth)," media release, 24 November 2024, <https://minister.infrastructure.gov.au/rowland/media-release/communications-legislation-amendment-combating-misinformation-and-disinformation-bill-2024>.

⁴⁵ "Bill assessments: Electoral Legislation Amendment (Electoral Communications) Bill 2024," Parliament of Australia, accessed 14 May 2026, https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Human_Rights/Bill_assessments/assessments/r7279.

⁴⁶ Senator David Pocock, Electoral Legislation Amendment (Electoral Communications) Bill 2025 (No. 2) (Cth), https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=s1461#:~:text=Summary,authorisation%20of%20certain%20electoral%20and.

⁴⁷ "OGP – Commitment Update Reports – 31 December 2025," Attorney-General's Department, emailed to the IRM, 26 February 2026.

⁴⁸ Andrew Verdon, Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, interview with IRM Researcher, 11 February 2026.

⁴⁹ Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts Commitment 8 Lead, correspondence with the IRM, 6 February 2026, and "OGP – Commitment Update Reports – 31 December 2025," Attorney-General's Department, emailed to the IRM, 26 February 2026.

⁵⁰ The Hon Anika Wells MP, "Australia's first National Media Literacy Strategy a step closer," media release, 12 February 2026, <https://minister.infrastructure.gov.au/wells/media-release/australias-first-national-media-literacy-strategy-step-closer>.

⁵¹ Kate Auty and Anooshe Mushtaq (OGF members), interviews by the IRM, 2 and 3 February 2026.

⁵² Sezen Bakan, "Why Australia's media literacy must improve," *Public Interest Journalism Initiative*, 1 September 2025, <https://piji.com.au/blog/combating-disinformation-media-literacy/>.