

ORIGINAL PAPER

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25 11 2025  
CLERK: *Russell*

# General Report

Section 48 – *Independent Commissioner Against Corruption Act 2017*



Office of the  
Independent  
Commissioner  
Against  
Corruption NT



## Letter of transmittal

The Honourable Robyn Lambley MLA  
Speaker  
Legislative Assembly of the Northern Territory

Dear Speaker

I submit a report in accordance with section 48 of the *Independent Commissioner Against Corruption Act 2017* (ICAC Act).

In accordance with section 49(3) of the ICAC Act I recommend that this report be made public immediately. If you do not accept the recommendation, then I note section 49(2) of the ICAC Act requires you to table the report in the Legislative Assembly within 6 sitting days after you have received it.

Yours sincerely



Naomi Loudon  
**Acting Independent Commissioner Against Corruption**

24 November 2025

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# Snapshot of the Office of the ICAC from 1 July 2025

## Assessments

Between 1 July and 30 September 2025 inclusive, the Office of the ICAC:

- received 143 allegations of improper conduct
- completed assessments of 130 allegations of improper conduct
- referred 25 allegations to referral entities under Section 25 of the ICAC Act and is awaiting 12 reports back under Section 28 of the ICAC Act
- finalised 8 reports back from referral entities under Section 28 of the ICAC Act.

For comparison with the same time last year, between 1 July and 30 September 2024, the Office of the ICAC:

- received 55 allegations of improper conduct
- completed assessments of 78 allegations of improper conduct
- referred 11 allegations to referral entities under section 25 of the ICAC Act, 1 allegation under section 30A of the ICAC Act and was awaiting 2 reports back under section 28 of the ICAC Act
- finalised 4 reports back from referral entities under section 28 of the ICAC Act.

The number of allegations of improper conduct received and assessments completed has more than doubled for the same period last year.

## Investigations and reviews

As at 1 July 2025, 2 investigations were in progress.

As at 30 September 2025, 2 investigations remain in progress with no new investigations having commenced this quarter.

As at 1 July 2025, a total of 60 recommendations were being monitored for implementation by a public body.

Between 1 July 2025 and 30 September 2025, 9 recommendations were issued to public bodies. These have all been accepted for implementation by the relevant public bodies.

## Prevention and engagement

Between 1 July 2025 and 30 September 2025, 28 engagement and training activities have been undertaken with approximately 1150 participants across a range of public bodies.

## Updated Mandatory Reporting Directions and Guidelines for Public Officers

On 15 August 2025, the Acting Independent Commissioner Against Corruption issued updated directions and guidelines pursuant to section 22 of the *Independent Commissioner Against Corruption Act 2017* (ICAC Act).

The mandatory directions and guidelines issued in 2022 were reviewed and updated to provide clear direction for public officers and public bodies on information that must be provided when making a mandatory report to the Office of the ICAC.

Whilst most public bodies have adopted a collaborative approach with the Office of the ICAC, it was identified that on occasion public bodies have not provided all available information about suspected improper conduct.

The updated directions and guidelines makes it clear that a report of suspected improper conduct must contain sufficient particulars to enable the ICAC to properly assess the matter and discharge statutory functions under the ICAC Act.

Where known or where reasonably able to be obtained, such particulars include:

- the name or identifying details of the person(s) alleged to have engaged in the conduct
- a description of the alleged conduct and why it may amount to improper conduct
- the relevant dates, locations, and circumstances
- any supporting information or documents.

Public officers and public bodies must take reasonable steps to obtain and provide details that are readily accessible to them as reports without sufficient particulars will not satisfy the mandatory reporting obligations under these guidelines.

The updated directions and guidelines are comprehensive and provide clarity and support to public bodies to enable them to provide the required level of information about suspected improper conduct in public administration.

The [Mandatory Reporting Directions and Guidelines for Public Officers](#) are available on the ICAC website.

## Strategic Intelligence and Reviews

A core function of the ICAC is to prevent, detect and respond to improper conduct by gathering and analysing intelligence. This involves the systematic collection, processing and assessment of information to identify patterns and draw informed conclusions. A particular area of focus has been the development of educational resources to support public bodies in the effective management of conflicts of interest.

## Outside Employment

An ongoing trend in conflict of interest reports is the prevalence of issues arising from outside employment. Outside employment may give rise to a real, potential or perceived conflict of interest, especially if it has not been declared. There may also be specific high-risk employment categories, activities or situations that have been identified as exposing NT public sector employees to situations where they may be targeted, cultivated or coerced into engaging in improper conduct.

Concerns have been raised with the ICAC in relation to the controls and oversight mechanisms available to government agencies to validate the delegated authority of approvers when online outside employment forms are used.

The Strategic Intelligence and Reviews Unit intends to obtain access to key information sources to assess and identify areas where there may be a risk of improper conduct, with the findings used to gain valuable insights and inform improvements to systems, processes and practices.

## **Recruitment and Selection**

Recruitment and selection practices have long presented challenges across public bodies and remain a key area of risk for improper conduct. The Strategic Intelligence and Reviews Unit is currently examining these practices across a range of public bodies and, while this work is ongoing, it is already evident that clearly defined roles and responsibilities between operational areas and centralised service providers are critical. Concerns have been identified regarding the lack of controls and validation of the delegated authority of individuals approving selections, highlighting the importance of maintaining robust oversight mechanisms to ensure critical controls are not overlooked.

## **Education and Training**

### **Integrity Advocates Program**

Between 2023 and 2025, the Office of the Independent Commissioner Against Corruption (ICAC) delivered the Integrity Advocates Program (IAP). The program was designed to provide Northern Territory public officers with a deeper understanding of integrity in public administration and to apply this knowledge through the implementation of integrity projects within their agencies.

The program comprised two phases:

- Phase 1: Six seminars of two hours each, delivered monthly.
- Phase 2: Completion of a final integrity project or assessment of an integrity case study, followed by a presentation. Participants were given six months to complete this phase.

At the conclusion of the second cohort, the ICAC determined that the program would be discontinued. This decision was informed by several factors, including machinery-of-government changes, inter-agency staff movements, limited participant uptake during Phase 2, the requirement for tasks to be completed outside of work hours which added to participants workload and the program's non-accredited status. Collectively, these factors affected the program's sustainability and long-term viability. It was determined that there is a more effective way in which educational material can be delivered to public officers which will result in improved outcomes without increasing workload. This will be achieved through the delivery of topic specific sessions throughout the year.

### **Targeted Training for Nominated Recipients**

In 2026, the Office of the ICAC will prioritise the delivery of targeted training and support to nominated recipients within public bodies. Under Section 97 of the ICAC Act, nominated recipients are employees selected by the Chief Executive Officer of a public body to receive protected communications concerning suspected improper conduct. These individuals are identified based on their capacity to appropriately receive and manage such reports.

The targeted training will aim to enhance the knowledge and skills of nominated recipients in identifying, addressing, and responding to improper conduct within their respective agencies. The program will include:

- a 3-hour forum held at the beginning of the year, and
- 6 x 1-hour topical sessions delivered throughout the year.

In addition to skill development, the training will serve as a platform for nominated recipients to exchange insights, strengthen their response capabilities, and foster appropriate engagement with the Office of the ICAC. To enrich the learning experience, the Office will collaborate with other integrity agencies, ensuring that nominated recipients benefit from expertise provided by subject matter experts.

## **eLearning course**

Throughout 2025, there has been a significant uptake by public officers of the Office of the ICAC's virtual Introduction to ICAC and Mandatory Reporting course.

The office has engaged a provider to develop an eLearning course to replace the virtual presentation. The new course will enable public officers to access the training at any time and from any location with internet connection via the NTG MyLearning platform. The new course will also enable participants to interact with the content. It is anticipated that the new course will be available to public officers through the MyLearning platform by July 2026.

## **Protections pages and factsheet**

One of the ICAC's functions is to protect people who assist in detecting, preventing, investigating or otherwise responding to improper conduct.

Additional information outlining the protections that can be put in place to support people who make a report to the ICAC is now available on the ICAC's website under [Protections](#). This information outlines what a protected person is, what protected communications and protected actions are, and how a person may be protected if they make a report of suspected improper conduct.

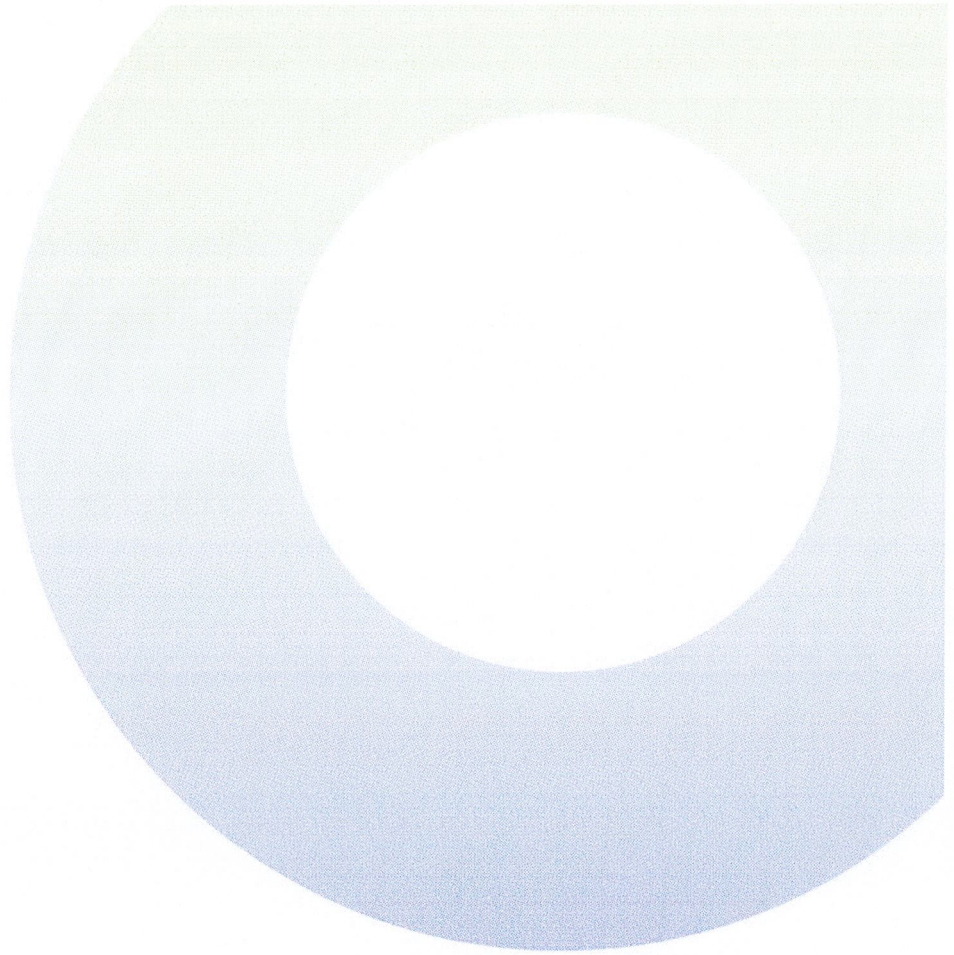
A factsheet on [protecting the identity of a protected person](#) can also be found on ICAC website.

## **Short educational videos**

On 12 November 2025, the ICAC released a short educational video for all Territorians. Using animation, the video provides information relating to the ICAC's functions and how the public can engage with and report to the ICAC.

The video is accessible for non-NT Government public officers, public bodies, and the general public on the [Independent Commissioner Against Corruption \(ICAC\)](#) website.

Further animated educational videos are under development for planned release in 2026.



**Contact the ICAC**

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