

ANNUAL REPORT

2024–2025



Acknowledgement of Country

The Office of the Queensland Parliamentary Counsel acknowledges the Traditional Owners of the lands from across Queensland.

We pay our respect to the Elders, past and present, for they hold memories, traditions, the culture and hopes of Aboriginal and Torres Strait Islander peoples across the State.

Communication objective

This report provides information about the operations of the Office of the Queensland Parliamentary Counsel (OQPC) for 2024–25. It is prepared under section 13 of the *Legislative Standards Act 1992*.

It is not an annual report under the *Financial Accountability Act 2009* because, under that Act, OQPC is part of the Department of the Premier and Cabinet (DPC) and so OQPC's annual reporting requirements under that Act are met through DPC's annual report for 2024–25.

However, this report is prepared having regard to requirements under the *Financial Accountability Act 2009* so far as applicable. Accordingly, this report records the significant achievements against the strategies and services detailed in OQPC's Strategic Plan and Service Delivery Statement for the reporting period.

This report has been prepared for the Premier to table in Parliament.

Readers are invited to comment on this report by searching for 'annual report' on the Get Involved website at www.getinvolved.qld.gov.au/gi/

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Interpreter service

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Letter of compliance

16 September 2025

The Honourable David Crisafulli MP
Premier of Queensland and Minister for Veterans
1 William Street
Brisbane City QLD 4000

Dear Premier

I am pleased to present for tabling in the Legislative Assembly the annual report 2024–25 for the Office of the Queensland Parliamentary Counsel (OQPC), as required by section 13 of the *Legislative Standards Act 1992*.

This report is not an annual report under the *Financial Accountability Act 2009*, because under that Act, OQPC is part of the Department of the Premier and Cabinet (DPC), and so OQPC's annual reporting requirements under that Act are met through DPC's annual report for 2024–25. Accordingly, detailed information about OQPC's financial performance and strategic alignment with the government's objectives for the community can be found in the DPC annual report.

I certify that this annual report complies with the requirements of section 13(2) of the *Legislative Standards Act 1992*. While the *Financial Accountability Act 2009* does not apply to this report, it has been prepared having regard to that Act, the *Financial and Performance Management Standard 2019* and the annual report requirements under that Standard so far as applicable.

Yours sincerely

A handwritten signature in black ink, appearing to be 'A D Keyes', written in a cursive style.

A D Keyes

Queensland Parliamentary Counsel

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Highlights 2024–25



306
total legislative instruments

4,211
total pages drafted



734
total reprints

159,481
total pages reprinted



33
government Bills

1,343
drafted pages



5
private members' Bills

79
drafted pages



29
amendments during
consideration in detail

264
drafted pages



239
items of
subordinate legislation

2,525
drafted pages



12,859,245
webpage views of the Queensland legislation website

Our year in review

Message from the Parliamentary Counsel

The Office of the Queensland Parliamentary Counsel (OQPC) is a statutory office established under the *Legislative Standards Act 1992*. The core functions of the office are:

- to draft all Queensland legislation
- to make Queensland legislation accessible, including in electronic form
- to ensure the Queensland statute book is of the highest standard.

The reporting year was marked by the change of government following the October general election. The new government's legislative priorities included legislation to be enacted before Christmas 2024 and early in 2025. These included two Bills amending Brisbane 2032 Olympic and Paralympic Games legislation, two tranches of Adult Crime, Adult Time legislation, the repeal of the *Path to Treaty Act 2023*, the re-establishment of the Queensland Productivity Commission and the reform of the Crime and Corruption Commission's reporting powers. Longer term legislative business also continued, notably the passage of the *Trusts Act 2025* and approval to draft new criminal procedure legislation to replace the *Justices Act 1886*.

To fulfil the core statutory functions of the office, OQPC needs a professional and highly skilled workforce. Our staff is made up of legally qualified drafters, expert editors and publishers, information and technology experts and corporate services professionals. As noted in our 2023–24 annual report, recruitment and retention of staff is an ongoing challenge for OQPC and our Australian and New Zealand counterparts. During 2023–24, an attraction and retention incentive scheme for legislative drafting staff was approved, and fortunately the attrition of drafters experienced during 2023 has been stemmed.

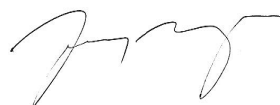
In 2024–25, OQPC continued its commitment to a healthy and inclusive workplace. OQPC maintained flexible work arrangements for all staff and regular communication through all staff forums, regular team get-togethers and a weekly newsletter.

Another important aspect of our positive workplace culture is our employee-funded and driven social calendar organised by the OQPC Fun Squad. Events have included lawn bowls and the annual Christmas party.

Throughout the year OQPC's Learning and Development Committee coordinated a varied and relevant program of continuing professional development training for all staff, and our staff took up opportunities for personal and professional development with enthusiasm. OQPC staff continued to demonstrate not just impressive professional skill, but consistent diligence and dedication to serving the people of Queensland.

OQPC collaborates with the Department of the Premier and Cabinet (DPC) and with our instructing departments to contribute to the delivery of the government's objectives for the community. Further detailed information in relation to OQPC's financial performance and strategic alignment with DPC can be found in DPC's annual report.

The office looks forward to continuing to collaborate with our instructors and partners to produce excellent legislation for Queensland in the year ahead.



Tony Keyes
Queensland Parliamentary Counsel

About our office

Our purpose

The Office of the Queensland Parliamentary Counsel (OQPC) is an independent statutory office that supports Queensland's democracy and the rule of law by delivering Queensland legislation that is effective, accessible and consistent with fundamental legislative principles (FLPs).

Our vision

Excellent legislation for Queensland.

Our role

OQPC was established as a statutory office on 1 June 1992 by the *Legislative Standards Act 1992* to ensure:

- Queensland legislation is of the highest standard
- an effective and efficient legislative drafting service is provided for Queensland
- Queensland legislation, and information about Queensland legislation, is readily available in printed and electronic form.

Our core values

People

We foster a diverse, inclusive workplace and prioritise the wellbeing of our employees. We invest in our people's professional development. We maintain strong, collaborative relationships with our partners.

Quality

We are committed to accuracy and precision in producing legislation, and to maintaining the highest standards in drafting and access to legislation.

Responsibility

We perform our statutory functions with integrity and dedication. We operate transparently and use resources efficiently to serve the public. We respect, protect and promote human rights in our decision-making and actions.

Independence

We operate independently and impartially. We empower our employees by giving them the ability to take risks and lead change. We embrace technological advances and innovation to inform future practice.

Government's objectives

OQPC supports the government's objectives for the community by:

- delivering excellence in legislative drafting and access
- providing stewardship of innovation and change
- strengthening strategic engagement with partners.

As published in the strategic plan 2024–2028, OQPC supports democracy and the strategic direction of the Queensland Government and contributes to the delivery of the government's objectives for the community, which are:

- safety where you live
- a better lifestyle through a stronger economy
- health services when you need them
- a plan for Queensland's future.

Statutory obligations

The office has a broad range of functions under the *Legislative Standards Act 1992*, the *Statutory Instruments Act 1992* and the *Reprints Act 1992*, including:

- drafting all government Bills
- drafting all amendments to Bills for Ministers
- drafting all subordinate legislation, other than exempt subordinate legislation
- drafting, if asked:
 - proposed Bills for government entities other than departments and public service offices
 - private members' Bills
 - amendments of Bills for private members
 - other instruments for use in, or in connection with, the Legislative Assembly
- in performing its drafting functions, providing advice to Ministers, members and government entities about alternative ways of achieving policy objectives and the application of FLPs
- providing advice to the Governor in Council, Ministers and government entities on the lawfulness of proposed subordinate legislation
- ensuring the Queensland statute book is of the highest standard
- preparing reprints of Queensland legislation and information about Queensland legislation
- making arrangements for electronic access to Queensland legislation and information about legislation.

Organisational structure

The Parliamentary Counsel is the chief executive of OQPC and, subject to the Minister (the Premier), controls the office.

OQPC consists of the Parliamentary Counsel, Legislation Drafting Services, and Legislation and Business Services (LaBS). The Executive Management Group (EMG) manages the office.

EMG consists of the Parliamentary Counsel, the two Deputy Parliamentary Counsel (Legislative Program) and the Executive Director, LaBS. This structure optimises high-quality service delivery and exemplary work practices.

Drafting Services has four teams that are overseen by the two Deputy Parliamentary Counsel (Legislative Program). LaBS consists of the Legislation Editing and Publishing Services (LEaPS), Information and Technology Services (ITS) and Corporate Services (CS) business areas.

OQPC is located at 111 George Street, Brisbane and staff work from this location or remotely under flexible work arrangements.

The Parliamentary Counsel represents Queensland on the Australasian Parliamentary Counsel's Committee and represents the office within DPC as part of its executive governance group.

Legislation Drafting Services

The Deputy Parliamentary Counsel lead the drafting teams to provide an effective and efficient legislative drafting service to produce Queensland legislation of the highest standard.

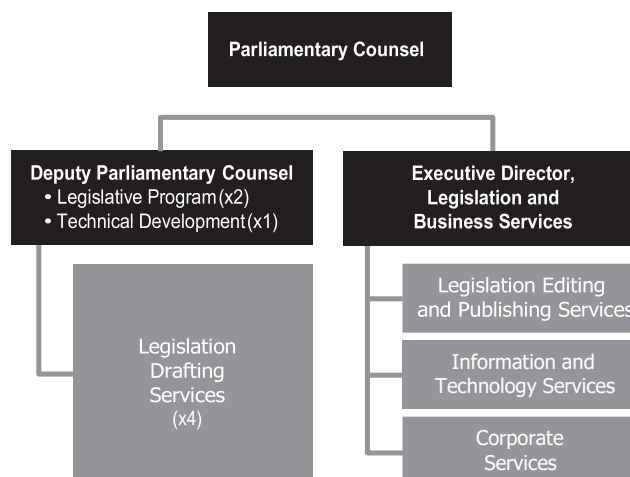
Legislation Editing and Publishing Services

The Legislation Editing and Publishing Services team edits draft legislation, prepares reprints and publishes legislation, making Queensland legislation and information relating to legislation readily accessible.

Information and Technology Services

The Information and Technology Services team are responsible for the planning and delivery of information and communications technology (ICT) services to QQPC. The team provides specialised technical and operational services that directly support and enable QQPC to deliver its core functions of managing, drafting, publishing and providing access to Queensland legislation via the Queensland Legislation website and Application Programming Interface (API). The team delivers high-quality ICT support services for QQPC's information and business systems and its staff, including project and information management, contract and vendor management, compliance, cybersecurity, audit and risk mitigation functions.

Additionally, the Information and Technology Services team offers strategic oversight, guidance, and support to existing and emerging systems development, review, implementation, and application life-cycle management activities.



Corporate Services

The Corporate Services team supports QQPC to deliver on broader strategic goals. The team has responsibility to ensure human resource management, corporate governance and finance functions are delivered in accordance with legislation, industry standards and using best practice methodology.

A review of QQPC's progress against our statutory obligations

Delivering the government's legislative program

During the reporting period, QQPC drafted all of the Queensland Government's Bills and subordinate legislation other than exempt subordinate legislation.

QQPC drafts legislation throughout each year to meet the government's legislative program. Although the total number and pages of legislation was lower than the previous year, the demand for legislative drafting services during the reporting period remained high as the former government fulfilled its large legislative program for its term, and the new government implemented key election commitments and other complex law reforms. Significant legislation delivering the government's priorities included, for example, the following new principal Acts: the *Assisted Reproductive Technology Act 2024*, the *Child Safe Organisations Act 2024*, the *Queensland Productivity Commission Act 2025*, the *Trusts Act 2025* and the *Queensland Academy of Sport Act 2025*, as well as other significant cost of living relief reforms, further domestic and family violence and community safety reforms, public accountability and integrity reforms, and other reforms to promote the Queensland economy and the health of Queenslanders.

In addition to Bills and subordinate legislation, QQPC also drafted and supplied government amendments to Bills to be moved in the Legislative Assembly.

Delivering legislation for other drafting clients

Five Bills drafted by QQPC during the reporting period were prepared for non-government members of the Legislative Assembly.

QQPC also supplied 13 non-government amendments to Bills to be moved in the Legislative Assembly.

QQPC makes every effort to meet requests for drafting assistance from non-government members within the timeframes set by the members. Requests for drafting assistance for amendments from non-government members are usually received shortly before debate on the relevant Bill is resumed.

Certifying subordinate legislation

QQPC drafts all Queensland subordinate legislation other than exempt subordinate legislation. The office certifies subordinate legislation it has drafted if satisfied it is lawful and has sufficient regard to FLPs.

During the reporting period, QQPC certified 239 instruments of subordinate legislation.

If QQPC refuses to certify proposed subordinate legislation, the instrument must, under the Queensland Cabinet Handbook, be submitted to Cabinet before it is made. During the reporting period, no proposed subordinate legislation was refused certification.

Managing staged expiry of subordinate legislation

A significant regulatory reform device in the maintenance of the Queensland statute book is the imposition of automatic expiry dates on subordinate legislation. The current system was established under the *Statutory Instruments Act 1992*, part 7 and provides for a 10-year cycle for review and remaking of subordinate legislation. Exemptions from expiry are strictly limited.

In August 2024, 74 instruments were exempted from expiry until specified dates. The *Statutory Instruments Regulation 2022*, schedule 2 as at 30 June 2025 listed nine instruments as exempt on the basis they were uniform subordinate legislation. Schedule 3 of the regulation as at 30 June 2025 listed 65 instruments as exempt on the basis that the Acts under which the instruments were made were subject to review. Twenty-two of the 65 exempt instruments are first exemptions.

Providing drafting support services

OQPC continued to provide drafting support services to Parliament and the Governor in Council during the reporting period.

In performing functions in the Bill-to-Act process, the office produces all versions of Bills required for their passage through the Legislative Assembly and for assent. Under instruction from the Clerk of the Parliament, OQPC incorporates into Bills amendments made during consideration in detail and consequential amendments that arise.

OQPC coordinates notification, publishing and tabling processes for subordinate legislation, including extraordinary notification of subordinate legislation for government departments.

Advice on alternative ways of achieving policy objectives

Under the *Legislative Standards Act 1992*, section 7, OQPC has a specific function to provide advice on alternative ways of achieving policy objectives when drafting legislation. The development of legislation involves collaboration between the office and those involved in policy formulation.

The responsibility for making decisions on policy issues lies with Ministers, departments and other drafting clients.

OQPC contributes to the policy development process by advising on:

- the translation of policy proposals into workable legislative schemes
- the most appropriate instrument to be used
- the types of provisions that may be used
- the established practice in relation to particular kinds of provisions
- how the presentation of a law can make it user-friendly.

Throughout the reporting period, the Deputy Parliamentary Counsel and First Assistant Parliamentary Counsel have provided executive-level advice on proposed legislation on a regular basis.

Advice on the application of Fundamental Legislative Principles

OQPC is required by the *Legislative Standards Act 1992* to advise Ministers, government entities and members of the Legislative Assembly on the application of FLPs.

The principles are defined in the *Legislative Standards Act 1992* as ‘the principles relating to legislation that underlie a parliamentary

democracy based on the rule of law’ and include the requirement that legislation has sufficient regard to the rights and liberties of individuals and the institution of Parliament.

The office consistently seeks to achieve policy objectives without infringing FLPs, noting that FLPs:

- are not absolutes and can be displaced
- may conflict with each other
- derive their force from the values they enshrine
- are not fixed.

Advice provided by the office to key stakeholders may include:

- the operation of FLPs
- the existence of a potential breach of FLPs
- the likely attitude of a portfolio committee to any particular breach of FLPs
- ways to avoid or minimise a potential breach of FLPs.

OQPC provides advice on FLPs in two main ways:

- First, OQPC provides commentary on the operation of FLPs within the drafts of legislation provided to clients. This process is particularly effective because the commentary is associated with the specific text to which it relates and becomes part of the normal consideration by clients for future drafts.
 - Second, OQPC liaises with DPC and the instructing department in relation to significant FLP issues in Bills and significant subordinate legislation. If appropriate, OQPC provides a formal briefing note to DPC and the instructing department. This process facilitates a whole-of-government decision on the operation of the FLPs concerned.
- During the reporting period, OQPC continued to work with departments to develop

provisions that achieve both policy objectives and compliance with FLPs. This approach minimised the number of matters that needed to be considered by the Legislative Assembly’s portfolio committees in reviewing legislation.

The drafting process

During the reporting period, OQPC continuously strove for high client satisfaction in relation to the processes adopted to provide drafting services by:

- promptly acknowledging instructions and confirming drafter allocation
- providing draft legislation in a timely way
- promptly responding to requests and queries, and promoting drafter availability to discuss complex legislative matters
- updating clients on the progress of legislative instruments being drafted
- providing incidental advice in relation to:
 - the drafting process
 - other relevant legislation or agencies
 - general drafting matters.

Throughout the drafting process the office maintains its duty of confidentiality to clients as required under the *Legislative Standards Act 1992*, section 9A.

The overall drafting product

During the reporting period, OQPC continued to review its practices and precedents, published comprehensive information about legislative matters and ensured the Queensland statute book is of the highest standard.

Key activities included:

- maintaining internal quality assurance processes
- continuing our commitment to plain English drafting.

In addition to drafting legislation for the government and private members in Queensland, QQPC drafted and reviewed proposed national scheme legislation.

The office is committed to keeping informed on national and international developments in drafting and publishing.

Strategic risks and challenges

QQPC works within an increasingly complex operating environment. We have identified a number of risks that could affect our ability to deliver on our vision. These include:

- challenges in planning the annual legislative program and competing expectations among clients and other stakeholders
- delays in authority to draft/prepare legislation
- challenges in resourcing, attracting and retaining suitably expert and experienced staff
- policy development responsibility increasingly moving from instructors to drafters due to long-term diminution of policy skills and corporate knowledge in client base
- cybersecurity and other threats to the Queensland legislation website, network infrastructure and data repositories.

To mitigate risk, QQPC identified the following opportunities to strengthen organisational strategies:

- build stronger relationships with key partners towards a process for the clear ordering of whole-of-government legislative priorities
- engage with clients about individual departments' legislative priorities
- continuously review the QQPC-specific strategic workforce plan to identify measures to better align establishment and capability with medium-long term legislative program demand

- better communicate risks to QQPC, DPC and the Government of shortcomings in quality and timeliness of legislative submissions and instruction
- brief actively, early and consistently on under-developed legislative submissions
- improve understanding, communication and trust between instructors and QQPC
- proactively identify and address potential cybersecurity threats (e.g. participate in cyber exercises, audits etc).

Key stakeholders and partners

QQPC's key stakeholders and partners include instructing departments, agencies and private members, the Queensland Parliamentary Service, the secure printers, DPC, the judiciary, the legal profession, law students, the Supreme Court Library, other law librarians and members of the public.

QQPC works collaboratively with all stakeholders to uphold the rule of law and ensure that Queensland legislation is of the highest standard and easily accessible.

Drafting and advisory clients

Clients of drafting services are those providing instructions on proposed legislation and include the Premier, Cabinet, Ministers, government departments, government entities, parliamentary committees and members of the Legislative Assembly.

Executive government is a major client because it sponsors most Bills in the Parliament. However, the *Legislative Standards Act 1992*, section 10 states that any member of the Legislative Assembly may request drafting services. The Parliamentary Counsel must comply with the request unless it is

considered that complying with the request would significantly and adversely affect the government's legislative program.

To strengthen stakeholder engagement with drafting clients, OQPC facilitates instructor training sessions to provide:

- information relevant for preparing high quality, clear and effective drafting instructions
- a greater understanding of the drafting process, including:
 - learning about the roles and responsibilities of the instructor and the drafter in the drafting process
 - the interaction between an instructor and a drafter in the drafting process
- a greater understanding of OQPC's functions, the way it operates and what legislative drafting entails
- a range of practical scenarios.

Due to the demand of the legislative program in the reporting period, the ability to deliver more than one formalised instructor training session with key stakeholders was hindered. However, OQPC continued to maintain and develop professional working relationships with instructing agencies.

Publishing clients

Clients of OQPC's publishing services are stakeholders who access legislation published on the Queensland legislation website. These clients include government departments, the courts, the legal profession and members of the public.

OQPC provides specific publishing services to Parliament, government departments and government entities by:

- producing the versions of Bills required for their passage through the Legislative Assembly to assent
- producing indicative reprints for particular Acts amended by Bills introduced in the Legislative Assembly
- providing certified copies of subordinate legislation
- coordinating notification, publication and tabling processes for subordinate legislation.

Assisting the Queensland Youth Parliament

The YMCA Queensland Youth Parliament is a Queensland Curriculum and Assessment Authority accredited education program for young Queenslanders in years 11 and 12 to experience first-hand the workings of the parliamentary process. With the consent of the Speaker of the Legislative Assembly, the Youth Parliament conducts its sittings in Parliament House. OQPC attended the 2024 Youth Parliament opening ceremony.

The Youth Parliament provides young Queenslanders with the opportunity to:

- express their views, through a State forum, on matters important to them
- provide the Queensland Government with 'Youth Acts' that express youth concerns and expectations that could be acted on by the government
- develop speaking and listening skills critical to being a leader
- develop an interest in the parliamentary system through their involvement in a simulated parliamentary process.

During the reporting period, the office provided support for the Youth Parliament by:

- providing general drafting and editing advice about legislative drafting

- helping develop and format Youth Bills for introduction into the Youth Parliament
- supplying Youth Bills to the Youth Parliament
- formatting and supplying amendments to Youth Bills for consideration when the Youth Parliament is sitting
- helping with the Bill-to-Act process for Youth Bills passed by the Youth Parliament.

Significant policy affecting service delivery

There are no identified significant initiatives or policy changes that have affected or are likely to affect service delivery.

Financial summary

Under the *Financial Accountability Act 2009*, the Director-General of DPC is the accountable officer for OQPC. For planning, performance management and reporting purposes under that Act, OQPC is represented as a service area of DPC known as ‘Legislative Drafting and e-Publishing’. This is reported in DPC’s annual report 2024–25 Statement of Comprehensive Income by Major Departmental Services and Statement of Assets and Liabilities by Major Departmental Services.

In compliance with AASB 1052 Disaggregated Disclosures, the statement of assets and liabilities for OQPC is included in DPC’s annual report 2024–25. Section 77(2)(b) of the *Financial Accountability Act 2009* requires the chief finance officer of DPC to verify the department’s financial controls are operating efficiently, effectively and economically.

In support of that function, the Parliamentary Counsel conducts biannual reviews and provides assurance that:

- the financial records of OQPC have been

properly maintained in accordance with prescribed requirements

- the internal compliance and control systems of OQPC relating to financial management have been operating efficiently, effectively and economically.

Since balance date, there have been no material changes that may affect the risk management and internal compliance and control systems of OQPC.

For the financial year ended 30 June 2025, a statement assessing OQPC’s financial internal controls has been provided by the Parliamentary Counsel to the chief finance officer of DPC. The statement was prepared in accordance with section 54 of the *Financial and Performance Management Standard 2019*.

Further information is provided in DPC’s annual report 2024–25.

Attraction and Retention Incentive Scheme

OQPC’s legislative drafting, editing and publishing functions under the *Legislative Standards Act 1992* are mandatory, not discretionary, and their performance is critical to the government’s ability to deliver on its policy and legislative agenda and to the maintenance of the rule of law and public access to the law.

The relevant aptitudes and skillsets required by legislative drafting staff are highly specialised and not readily available in the employment market. In recent years, OQPC has faced growing competition from legislative drafting offices in other jurisdictions.

A jurisdictional benchmarking analysis was conducted in 2023–24 which highlighted the need for an attraction and retention incentive (ARI) scheme.

The QQPC ARI scheme supports the attraction and retention of critical legislative drafting employees and puts QQPC on a more comparable basis with other Australian legislative drafting offices.

The QQPC ARI Scheme is temporary and subject to annual review. During 2024–25, an annual review was conducted and determined that the QQPC ARI scheme has supported the retention of QQPC’s legislative drafting staff and it was retained.

Human rights

The *Human Rights Act 2019* commenced on 1 January 2020.

QQPC continues to promote employee awareness of their responsibilities through participation in training sessions.

No human rights complaints were received by QQPC within the reporting period.

A review of OQPC's progress against strategic objectives

Strategic objectives

This section reports on OQPC's strategic objectives under the strategic plan 2024–2028.

The strategic objectives align with OQPC's service area objective presented in the Service Delivery Statement (SDS) to draft and provide access to Queensland legislation of the highest standard.

Those services support government and democracy in Queensland by drafting legislation, ensuring the statute book is of the highest standard, and arranging public access to legislation and legislative information.

OQPC makes a significant contribution by advising on the application of FLPs to ensure legislation has sufficient regard to the rights and liberties of individuals and the institution of Parliament.

Strategic objective 1

Excellence in legislative drafting and access

1. Identify and adopt best practice in drafting Bills, amendments of Bills and proposed subordinate legislation, having regard to fundamental legislative principles and compatibility with human rights.
2. Identify and adopt best practice in making Queensland legislation easy to find, easy to understand and easy to use.
3. Ensure timely access to Bills, legislation and related information, and maintain open data arrangements.

Measures of success

- The SDS effectiveness measure targets for the legislative drafting and e-publishing service area were:
 - 90 per cent client satisfaction with legislative drafting services provided by OQPC
 - 90 per cent client satisfaction with the quality of access to legislation available online.
- The annual client survey identified that the overall satisfaction with both legislative drafting services and access to legislation was 100 per cent in the reporting period. Surveyed clients are Ministers, Chiefs of Staff, Directors-General and their departments' Cabinet Legislation and Liaison Officers and senior policy officers.
- In addition to the SDS effectiveness and efficiency measures, the OQPC strategic plan 2024–2028 includes a timeliness measure that legislative consolidations (reprints) be published within three days of commencement.
- There were 734 authorised reprints (159,481 pages) published in the reporting period and 97.86 per cent were published within three days of commencement.
- The legislation program was delivered on time and produced:
 - 33 government Bills (1,343 pages)
 - 5 private members' Bills (79 pages)
 - 16 government amendments during consideration in detail (217 pages)

- 13 private members' amendments during consideration in detail (47 pages)
- 239 instruments of subordinate legislation (2,525 pages)
- Open data arrangements for the release of Queensland legislation were maintained consistently throughout the reporting period.

Key achievements during the reporting period

Some significant legislation drafted and introduced within the reporting period included:

- *Crime and Corruption (Reporting) Amendment Bill 2024*
- *Brisbane Olympic and Paralympic Games Arrangements and Other Legislation Amendment Bill 2024*
- *Queensland Productivity Commission Bill 2024*
- *Making Queensland Safer Bill 2024*
- *Revenue Legislation Amendment Bill 2024*
- *Trusts Bill 2025*
- *Queensland Academy of Sport Bill 2025*
- *Crime and Corruption (Restoring Reporting Powers) Amendment Bill 2025*
- *Education (General Provisions) Amendment Bill 2025*
- *Making Queensland Safer (Adult Crime, Adult Time) Amendment Bill 2025*
- *Domestic and Family Violence Protection and Other Legislation Amendment Bill 2025*
- *Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025*
- *Revenue and Other Legislation Amendment Bill 2025.*

Some significant subordinate legislation drafted and made in the reporting period included:

- *Water and Other Legislation Amendment Regulation 2024*
- *Planning and Other Legislation Amendment Regulation 2024*
- *Major Events (Pacific Airshow Gold Coast) Regulation 2024*
- *Tow Truck Regulation 2024*
- *Justice (Decriminalising Sex Work) and Other Legislation Amendment Regulation 2024*
- *Civil Proceedings Regulation 2024*
- *Work Health and Safety (Sexual Harassment) Amendment Regulation 2024*
- *Corrective Services (Searches and Testing) Amendment Regulation 2024*
- *Criminal Practice (Subsequent Appeals) Amendment Rule 2024*
- *Electoral Regulation 2024*
- *Forestry Regulation 2024*
- *Nature Conservation (Protected Areas Management) Regulation 2024*
- *Recreation Areas Management Regulation 2024*
- *Body Corporate and Community Management (Body Corporate Certificates) and Other Legislation Amendment Regulation 2024*
- *Major Events (British and Irish Lions Tour) Regulation 2025*
- *Fire Services and Other Legislation Amendment Regulation 2025*
- *Right to Information Regulation 2025.*

Strategic objective 2

A skilled, flexible and resilient workforce

1. Continuously review the OQPC-specific strategic workforce plan to attract, develop and retain a highly skilled and high-performing workforce.
2. Better alignment of establishment and ongoing resources with legislative program demands.
3. Provide our people with a range of opportunities for ongoing professional and personal development.
4. Continue supporting the focus on mental health and wellbeing.
5. Improve the effectiveness of our performance development processes.
6. Encourage and facilitate the sharing of learnings within and between teams.

Measures of success

- strategic workforce plan reviewed annually
- increased identification of, and allocation of resources to support, career and professional development opportunities
- increased identification of, and allocation of resources to support, learning and development opportunities
- overall employee satisfaction in the learning and development metrics in the Working for Queensland (WfQ) survey.

Key achievements during the reporting period

The strategic workforce plan was reviewed during 2024–25 and updated as required.

OQPC engaged in employee-led initiatives to strengthen key areas to deliver:

- professional development opportunities
- comprehensive learning and development blogs
- a professional library maintained and promoted by staff
- regular drafters' forums
- quarterly legislation and business services forums
- regular all staff forums
- informal feedback to allow the sharing of learnings from training and conference attendance.

Strategic objective 3

A healthy and inclusive workplace

1. Further develop a workplace culture that fosters the health, happiness, flexibility and fulfilment of our people.
2. Continue to deliver regular internal communications to increase awareness, provide access to support mechanisms and destigmatise mental health issues in the workplace.
3. Implement cultural capability action plan and disability service plan actions.
4. Improve regular internal communication with a pro-disclosure bias, for example, by seeking views, listening to staff, clearly communicating and explaining management decisions, and openly discussing issues as they arise.
5. Encourage greater office-wide cohesion, for example, by having regular office events and encouraging cross-team projects.
6. Continue supporting flexible work arrangements.

Measures of success

- employees trained as both first aid and mental health first aid officers
- compliance with ISO45003 [Occupational health and safety management – Psychological health and safety at work]
- 5% increase in number of staff who have completed employee cultural capability training each year
- overall employee satisfaction in the workload and health metrics in the WfQ survey
- maintenance of high overall employee satisfaction in the WfQ survey.

Key achievements during the reporting period

- OQPC continues to support flexible work arrangements under the *Industrial Relations Act 2016*, chapter 2, part 3, division 4.
- OQPC has further developed and maintained a healthy workplace culture in which respectful workplace behaviour and collegiality are consistently demonstrated.
- Ongoing support for training and re-accreditation of first aid and mental health first aid officers.
- Ongoing communications shared through the internal newsletter and the 'Our Health and Safety' page on the intranet to destigmatise mental health in the workplace.
- Psychosocial hazard risk assessment regularly reviewed by teams and leadership and updated as required.
- Ongoing consideration in recruitment to ensure the OQPC's diversity targets are progressed.

Strategic objective 4

Strategic engagement with partners

1. Build stronger functional relationships and open channels of communication with DPC, the Table Office, client departments and other partners.
2. Finalise written understanding with DPC of respective governance roles and responsibilities between OQPC and DPC.
3. Continue to work with key partners towards a process for the clear ordering of priorities within the Government's legislative program.
4. Work with stakeholders to continuously improve the quality of access to Queensland legislation through initiatives such as instructor training and legislation website training.

Measures of success

- governance arrangements between OQPC and DPC documented
- ongoing delivery of instructor training sessions
- ongoing delivery of legislation website training sessions
- facilitation of stakeholder reference group meetings.

Key achievements during the reporting period

- OQPC continued to work with DPC and other key partners toward a process for the clear ordering of priorities within the government's legislative program.

- OQPC maintained and developed professional working relationships with instructing agencies through one key instructor training session and other strategic engagement.
- OQPC engaged formally and informally with the Clerk of the Parliament and Table Office staff about legislative procedure.
- Three online Queensland legislation website training sessions were delivered to more than 100 people across the public sector and the community.

Strategic objective 5

Stewardship of innovation and change

1. Identify and adopt best practice in making Queensland legislation easy to find, easy to understand and easy to use.
2. Make effective use of our technological resources and explore future drafting and publishing solutions to enhance the services we provide.
3. Utilise the Technology Advisory Group (TAG) to generate, review and recommend current and future system enhancements.
4. Continually review existing, emerging and future technological trends and systems to advance OQPC business systems.

Measures of success

- regular meetings of TAG
- ongoing engagement with national and international peers in relation to other relevant cross-jurisdictional developments and innovations.

Key achievements during the reporting period

- OQPC made effective use of our technological resources to enhance the services we provide. The Queensland Integrated Legislation Lifecycle System (QuILLS) has continued to evolve in ways that minimise manual processes, reduce the scope for human error, and optimise timely and accurate access to legislation and legislative information.
- OQPC continued to monitor international developments and will explore future development opportunities when circumstances permit.
- TAG has met on six occasions during the reporting period to generate, review and recommend system enhancements.

Future direction

OQPC's priorities in 2025–26, as published in the OQPC strategic plan 2025–29, are to:

1. pursue excellence in legislative drafting and access
2. cultivate a skilled, flexible and resilient workforce
3. foster a healthy and inclusive workplace
4. strengthen strategic engagement with partners
5. foster stewardship of innovation and change.

Service delivery statement

Service Area: Legislative Drafting and e-Publishing	2024–25 Target/Est.	2024–25 Actual
Effectiveness measures		
Overall client satisfaction with legislative drafting services provided by the Office of the Queensland Parliamentary Counsel	90%	100%
Overall client satisfaction with the quality of access to legislation available online	90%	100%
Efficiency measures		
Average cost per hour of legislative drafting and publishing output	\$180	\$181

Our governance

Executive management group

The Executive Management Group (EMG) of OQPC comprises the Parliamentary Counsel, two Deputy Parliamentary Counsel (Legislative Program) and the Executive Director, Legislation and Business Services.

The EMG is primarily a strategic forum that focuses on the future direction of the office by:

- supporting the Parliamentary Counsel in decision-making and advising on matters of strategic importance
- identifying and reporting on emerging governance issues and major activities
- providing assurance on the effectiveness of governance arrangements
- reviewing and approving corporate policies and processes
- acting as a forum for strategic information sharing
- embedding risk management activities and managing risk mitigation strategies
- ensuring robust business continuity and disaster recovery frameworks are in place and regularly reviewed and tested
- considering impacts of whole-of-government initiatives on OQPC's activities.

Tony Keyes — Parliamentary Counsel

Tony Keyes was appointed as Parliamentary Counsel on 15 October 2018. Tony studied law and arts at the University of Queensland and was admitted as a solicitor of the Supreme Court of Queensland in 1990.

Tony has had a long and varied legal career, including private and community-sector

practice, policy and investigative work at the Criminal Justice Commission, the Ombudsman's Office and the Law Reform Commission, working in law and justice policy for DPC, and serving for almost 10 years as Senior Deputy Crown Solicitor at Crown Law.

Sandra Lawson — Deputy Parliamentary Counsel

Sandra Lawson has more than 20 years' experience drafting legislation. She was appointed Deputy Parliamentary Counsel in July 2018, having worked in various drafting roles at OQPC since 2001.

Before joining OQPC, Sandra was a drafter in the New Zealand Parliamentary Counsel Office. Sandra obtained an LLB (Hons) from the Victoria University of Wellington and was admitted as a barrister and solicitor of the High Court of New Zealand in 1995.

Sandra also worked as a solicitor in private practice, before discovering that legislation is her true calling.

Katy Le Roy — Deputy Parliamentary Counsel

Katy Le Roy was appointed Deputy Parliamentary Counsel in July 2018. Prior to joining OQPC, Katy had served as a Parliamentary Counsel in the New Zealand Parliamentary Counsel Office and as the head of the Nauru Parliamentary Counsel Office.

Katy was admitted as a barrister and solicitor of the Supreme Court of Victoria in 1999. She obtained her LLB (Hons) and PhD from the University of Melbourne, where she later lectured and worked as a research fellow.

Katy also has experience as a solicitor in private practice, as in-house counsel, and as a consultant legal advisor. She teaches a graduate subject on Legislation and Legislative Drafting at the Australian National University.

Nicola Busch — Executive Director, Legislation and Business Services

Nicola Busch was appointed as Executive Director, Legislation and Business Services in August 2021.

Prior to joining OQPC, Nicola served as Director, Office of the Commissioner, Queensland Ambulance Service. Nicola's public sector career has been strongly oriented towards stakeholder engagement, corporate governance, business improvement and executive services functions.

Nicola holds an Executive Master of Public Administration (ANZSOG/Griffith University) and is a certified practising accountant (CPA). She also has a Bachelor of Business (Accountancy) and a Graduate Certificate in Public Sector Management from the Queensland University of Technology.

Governance framework

OQPC's corporate governance framework supports strategic and operational planning and mandated reporting aligned to the Queensland Government Performance Management Framework.

Business continuity

OQPC's Business Continuity Plan (BCP) is a functional plan for managing disruptions to operations and service delivery. The plan ensures business continuity in the event of a

critical incident. The BCP complies with the DPC Business Continuity Management Policy which aims to ensure that the department can prevent, prepare for, respond and recover from critical activities in the context of a business continuity event.

The OQPC BCP Working Group meets on a quarterly basis to review operationalisation of OQPC's BCP and discuss desktop scenarios to ensure the plan remains contemporary and fit-for-purpose. OQPC regularly ensures the contact information in the BCP is current, and participates in debrief sessions both internally and with the department post the deactivation of the BCP after an event.

Committee and working group membership

OQPC provides a valuable contribution to the government's objectives through membership on the following committee structures and working groups within DPC:

- executive governance group
- finance, performance and planning, and risk subcommittee
- information steering subcommittee
- people and culture subcommittee
- diversity, inclusion and belonging subcommittee.

Other governance matters

Other governance matters as they relate to OQPC are addressed in the DPC Annual Report. The following governance matters relate specifically to OQPC.

Information systems

Since 2016, for drafting and publishing legislation, the office has used QuILLS, a complete end-to-end proprietary system to create, manage, publish and store authorised versions of Queensland legislation.

OQPC continues to advance the features and services of the product to further enhance access to Queensland legislation.

QuILLS also offers a dynamic, database-driven website for access to Queensland legislation via the Queensland legislation website, and in 2022 the office expanded access to Queensland legislation by offering programmatic access via a dedicated Application Programming Interface (API) website offering.

Recordkeeping

QuILLS, OQPC's legislative drafting and publishing system, is the published document repository for legislative documents drafted by the office and information related to legislation drafting projects.

OQPC ensures QuILLS and other recordkeeping systems and processes comply with the *Public Records Act 2023*, policies under that Act and Queensland Government Enterprise Architecture information standards.

Workforce planning

OQPC's EMG continuously engages in strategic workforce planning. The EMG is committed to building an inclusive, agile and capable workforce to ensure the office is well-positioned to achieve objectives and meet future business needs and the expectations of its stakeholders.

During 2024–25, OQPC:

- encouraged inclusive staff engagement through the OQPC intranet to promote activities organised by the OQPC social club
- invested in employee wellbeing by supporting Queensland Mental Health Week and R U OK? Day, and promoting awareness of stress management techniques
- contributed to DPC's workplace health and safety committee
- contributed to DPC-led initiatives that focused on multi-dimensional aspects of staff wellbeing (physical, financial, psychological, social and work) such as the blood drive, flu vaccinations and skin cancer assessments
- encouraged employees to participate in domestic and family violence awareness events and initiatives, including the Darkness to Daylight Challenge, White Ribbon Day and Domestic and Family Violence Prevention Month
- continued to progress the flex-connect principles encouraging employees to successfully access and implement flexible work arrangements
- advertised vacant roles using the new flexible options on the SmartJobs website to attract job applicants from diverse backgrounds
- continued to support commitments and implement initiatives in the cultural capability action plan to strengthen an inclusive, diverse and culturally capable workforce
- supported LGBTIQ+ events and initiatives, including wearing rainbow lanyards to show support for LGBTIQ+ employees
- participated in NAIDOC initiatives, including walking tours and cultural capability training.

Workforce profile data

The following is a snapshot of the workforce profile for 2024–25 based on June 2025 Minimum Obligatory Human Resources Information (MOHRI) data.

Workforce profile

Total Staffing	Headcount	Paid FTE
Office of the Queensland Parliamentary Counsel	54	51.80

Occupation types by FTE	
Corporate	8.69%
Frontline and frontline support	91.31%

Appointment type by FTE	
Permanent	84.56%
Temporary	0.00%
Casual	0.00%
Contract	15.44%

Employment status by headcount	
Full-time	87.04%
Part-time	12.96%
Casual	0.00%

Figure 1: Gender

Gender*	Headcount	%
Woman	31	57.41%
Man	22	40.74%
Non-binary	<5	<5
Another Term	<5	<5

* Where data available

Figure 2: Diversity target group data

Diversity groups*	Headcount	%
Women	31	57.41%
Aboriginal Peoples and Torres Strait Islander Peoples	<5	<5
People with disability	<5	<5
Culturally and Linguistically Diverse – Speak a language at home other than English^	<5	<5

* To ensure privacy, in tables where there are less than 5 respondents in a category, specific numbers are replaced by <5.

^ This includes Aboriginal and Torres Strait Islander languages or Australian South Sea Islander languages spoken at home.

Figure 3: Target group data for Women in Leadership Roles

	Headcount	Percentage of total Leadership Cohort (calculated on headcount)
Senior Officers (Classified, s122 and s155 combined)	3	60.00%
Senior Executive Service, High-level senior executives and Chief Executives (Classified, s122 and s155 combined)	7	77.78%

Glossary

ARI	Attraction and Retention Incentive	DPC	Department of the Premier and Cabinet
BCP	Business Continuity Plan	OQPC or the office	Office of the Queensland Parliamentary Counsel
DPC	Department of the Premier and Cabinet	QILLs	Queensland Integrated Legislation Lifecycle System
EMG	Executive Management Group	SDS	Service Delivery Statements
FLPs	Fundamental Legislative Principles	TAG	Technology Advisory Group
FTE	Full-time equivalent	WfQ	Working for Queensland
ITS	Information Technology Services	YMCA	Young Men's Christian Association
LaBS	Legislation and Business Services		
LEaPs	Legislation Editing and Publishing Services		
MOHRI	Minimum Obligatory Human Resources Information		

Financial information

Department of the Premier and Cabinet
Statement of Comprehensive Income
Office of the Queensland Parliamentary Counsel for the year ended 30 June 2025

	2025	2024
	\$'000	\$'000
Income		
appropriation revenue	19,371	18,069
user charges and fees	60	73
grants and other contributions	—	—
other revenue	202	227
Total revenue	19,633	18,369
Expenses		
employee expenses	13,545	12,276
supplies and services	5,125	5,866
grant and subsidies	756	—
depreciation and amortisation	161	202
other expenses	46	25
Total expenses	19,633	18,369
Total comprehensive income	—	—

Note:
The Office of the Queensland Parliamentary Counsel is included in the Department of the Premier and Cabinet financial statements as a major departmental service unit. Refer to notes in the financial statements in the Department of the Premier and Cabinet Annual Report 2024–2025 for relevant accounting policies and related information.

Compliance checklist

Summary of requirements		Basis for requirement	Annual report reference
Letter of compliance	<ul style="list-style-type: none"> A letter of compliance from the accountable officer or statutory body to the relevant Minister/s 	ARRs – section 7	page ii
Accessibility	<ul style="list-style-type: none"> Table of contents Glossary 	ARRs – section 9.1	page iii page 23
	<ul style="list-style-type: none"> Public availability 	ARRs – section 9.2	page i
	<ul style="list-style-type: none"> Interpreter service statement 	<i>Queensland Language Services Policy</i> ARRs – section 9.3	page i
	<ul style="list-style-type: none"> Copyright notice 	<i>Copyright Act 1968</i> ARRs – section 9.4	page i
	<ul style="list-style-type: none"> Information Licensing 	<i>QGEA – Information licensing</i> ARRs – section 9.5	page i
General information	<ul style="list-style-type: none"> Introductory information 	ARRs – section 10	page 2-4
Non-financial performance	<ul style="list-style-type: none"> Government's objectives for the community and whole-of-government plans/specific initiatives 	ARRs – section 11.1	page 5-11
	<ul style="list-style-type: none"> Agency objectives and performance indicators 	ARRs – section 11.2	page 12-16
	<ul style="list-style-type: none"> Agency service areas and service standards 	ARRs – section 11.3	page 17
Financial performance	<ul style="list-style-type: none"> Summary of financial performance 	ARRs – section 12.1	page 24
Governance – management and structure	<ul style="list-style-type: none"> Organisational structure 	ARRs – section 13.1	page 3-4
	<ul style="list-style-type: none"> Executive management 	ARRs – section 13.2	page 18-19
	<ul style="list-style-type: none"> Government bodies (statutory bodies and other entities) 	ARRs – section 13.3	nil
	<ul style="list-style-type: none"> Public Sector Ethics 	<i>Public Sector Ethics Act 1994</i> ARRs – section 13.4	DPC annual report 2024–25
	<ul style="list-style-type: none"> Human Rights 	<i>Human Rights Act 2019</i> ARRs – section 13.5	page 11
	<ul style="list-style-type: none"> Queensland public sector values 	ARRs – section 13.6	DPC annual report 2024–25
Governance – risk management and accountability	<ul style="list-style-type: none"> Risk management 	ARRs – section 14.1	DPC annual report 2024–25
	<ul style="list-style-type: none"> Audit committee 	ARRs – section 14.2	DPC annual report 2024–25
	<ul style="list-style-type: none"> Internal audit 	ARRs – section 14.3	DPC annual report 2024–25
	<ul style="list-style-type: none"> External scrutiny 	ARRs – section 14.4	DPC annual report 2024–25
	<ul style="list-style-type: none"> Information systems and recordkeeping 	ARRs – section 14.5	page 20
	<ul style="list-style-type: none"> Information Security attestation 	ARRs – section 14.6	DPC annual report 2024–25
Governance – human resources	<ul style="list-style-type: none"> Strategic workforce planning and performance 	ARRs – section 15.1	page 20-22
	<ul style="list-style-type: none"> Early retirement, redundancy and retrenchment 	<i>Directive No. 04/18 Early Retirement, Redundancy and Retrenchment</i> ARRs – section 15.2	DPC annual report 2024–25
Open Data	<ul style="list-style-type: none"> Statement advising publication of information 	ARRs – section 16	DPC annual report 2024–25
	<ul style="list-style-type: none"> Consultancies 	ARRs – section 31.1	https://www.data.qld.gov.au/
	<ul style="list-style-type: none"> Overseas travel 	ARRs – section 31.2	https://www.data.qld.gov.au/
	<ul style="list-style-type: none"> Queensland Language Services Policy 	ARRs – section 31.3	https://www.data.qld.gov.au/
Financial statements	<ul style="list-style-type: none"> Certification of financial statements 	FAA – section 62 FPMS – sections 38, 39 and 46 ARRs – section 17.1	DPC annual report 2024–25
	<ul style="list-style-type: none"> Independent Auditor's report 	FAA – section 62 FPMS – sections 46 ARRs – section 17.2	DPC annual report 2024–25

FAA *Financial Accountability Act 2009*

FPMS *Financial and Performance Management Standard 2019*

ARRs Annual report requirements for Queensland Government agencies

