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**Government of South Australia**  
Department for Child Protection

Executive Services

Level 1 East  
31 Flinders St  
ADELAIDE SA 5000

GPO Box 1072  
ADELAIDE SA 5001

Tel (08) 8124 4185

[www.childprotection.sa.gov.au](http://www.childprotection.sa.gov.au)

Ms Ann Vanstone KC  
Commissioner  
Independent Commission Against Corruption (ICAC)  
GPO Box 11066  
ADELAIDE SA 5001

**Via Email Only:** [prevention@icac.sa.gov.au](mailto:prevention@icac.sa.gov.au)

Dear Ms Vanstone

**RE: LOBBYING AND INFLUENCE DISCUSSION PAPER**

I write in response to the letter of 13 July 2023 from the Honourable Michael David KC, then Acting Commissioner, relating to the release of the discussion paper *Lobbying and Influence* by the Independent Commission Against Corruption (ICAC).

The Department for Child Protection (DCP) welcomes the opportunity to provide submissions with respect to the paper, and recognises the importance of appropriate measures to minimise the potential for corruption in the interactions between lobbying and lobbyists.

With respect to the definitions of 'lobbying' and/or 'lobbyist', the department notes the discussion paper's comments and prompt questions, about whether a legitimate distinction can be drawn between corporate lobbying and activities employed by charitable organisations, including the NGO sector. Given the nature of DCP's remit, the latter category is much more closely aligned with our work. As an agency we partner closely with the NGO sector in the delivery of core activities, for example, provision of residential care services. In these instances, extensive procurement and contract management processes are undertaken, with appropriate transparency and probity.

On this basis, DCP does believe it is important to be clear in the scope and definition of lobbying within any proposed regulation. It is imperative to ensure that the definition does not confuse advocacy from a particular interest group (eg. foster and kinship carers), with lobbying intended for pursuit of a corporate benefit.

I trust this information assists in your review of lobbying and influencing activities. Any further information sought on this matter can be directed to Ms Billie-Jo Barbara, Chief Human Resources Officer via [billie-jo.barbara@sa.gov.au](mailto:billie-jo.barbara@sa.gov.au).

Yours sincerely

A handwritten signature in black ink that reads 'Jackie Bray'.

Jackie Bray  
**CHIEF EXECUTIVE**

31 August 2023