LEGAL SERVICES
COMMISSION

Annual Report 2025–26



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Legal Services Commission

Postal: PO Box 10310 Brisbane Adelaide Street Qld 4001

Address: Level 30, 400 George Street Brisbane Qld 4000

Telephone: (07) 3564 7726 or 1300 655 754 (toll free for callers outside the Brisbane metropolitan area)

Email: lsc@lsc.qld.gov.au

Website: www.lsc.qld.gov.au

Office hours: 9:00am to 4:00pm Monday to Friday

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Letter of compliance

LEGAL SERVICES COMMISSION

21 October 2026

The Honourable Deb Frecklington MP
Attorney-General and Minister for Justice
Minister for Integrity
1 William Street
BRISBANE QLD 4000

Dear Attorney-General

In accordance with section 490(1) of the *Legal Profession Act 2007*, I am pleased to submit for presentation to the Parliament the Annual Report 2025–2026 and the financial statements for the Legal Services Commission.

I certify that the report complies with:

- the prescribed requirements of the *Financial Accountability Act 2009* and the *Financial and Performance Management Standards 2019,* and
- the detailed requirements set out in the *Annual report requirements for Queensland Government agencies.*

A checklist outlining the annual reporting requirements is provided at pages 61-62 of this annual report.

Yours sincerely

ML Mahon

Megan Mahon
Commissioner

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Overview

Message from the Commissioner

Reflecting on the past year, it is clear that 2025-26 was a year of both challenge and opportunity for the Commission. The Commission continued to navigate increasing demands for its services, growing complexity in complaints and investigations, and a rapidly evolving regulatory environment. At the same time, the year was characterised by significant reform and organisational change, including progress on important legislative reforms, the implementation of the Commission's new case management system, and ongoing work to ensure the Commission remains well positioned to protect the public and regulate Queensland's legal profession effectively into the future.

CMS project and disruption

One of the most significant undertakings during the year was the implementation of the Commission's new case management system, *Regis*. While often described as an IT project, it was in reality a much broader organisational change program. More than simply replacing an ageing technology platform (which was purpose-built three decades ago for regulatory functions at a time before the Commission even existed), the project represents one of the most significant changes to the Commission's operations and ways of working since its establishment. Replacing a system that had supported the Commission in its first 22 years (and the Queensland Law Society regulatory functions before that) required the Commission to review and redesign many of its business processes, workflows and practices across almost every area of the organisation. This gargantuan amount of work had an obvious and unavoidable impact on the service deliverables of the Commission in the reporting year.

While annual reports often focus on milestones and outcomes, the reality is that projects of this scale are demanding, disruptive and require a sustained commitment from staff across the organisation. The technology component is often the easiest part to see. The greater challenge lies in implementing the accompanying process changes, embedding new ways of working, managing significant change, and ensuring that people and processes evolve together. Those transformations take time to get right, often requiring testing and refinement, and the transition was not without challenges, and is ongoing.

Following its build, the implementation of *Regis* required a considerable organisational effort over an extended period. The output of the Commission’s usual business was significantly impacted by the need to pivot staff from their primary responsibilities to project focussed roles, as well as the redirection of resources away from business-as-usual functions. A significant number of staff were involved in the process at various stages, including system design, business process mapping, testing, data migration, training, and implementation activities. Given the small size of the Commission, at the peak of the project some 40% of the Commission’s staff, including all senior staff, were required to predominantly work on the roll out of the new CMS.

On top of continuing to manage substantial and increasing demands on the Commission’s services, the unavoidable reduction in productivity for those usual service deliverables has left a significant impact on the workloads of the Commission. While that investment was necessary to deliver a system that genuinely reflects the operational needs of the Commission, and provides technological agility in replacement of an end of life

platform, it inevitably affected productivity and contributed to delays in progressing some work during the reporting period. I am very cognisant of the fact that these impacts are currently being felt by complainants, respondents and the staff of the Commission, and is a matter we have prioritised to address in the next reporting period.

Despite these challenges, early benefits of the new CMS are already becoming apparent. *Regis* provides a modern platform to support the Commission's regulatory functions and positions the organisation to respond more effectively to increasing workload demands and operational complexity. Importantly, it provides a foundation for ongoing improvements in case management, reporting, information management, and service delivery. While the implementation of *Regis* represents a significant milestone, it is not the end of the journey; it was merely the first step – or perhaps the first giant leap – in the modernisation of the Commission's technology base. The completion of that first phase provides the foundation for the second phase of the project, which primarily ensures the critical integration of data between the legal profession's co-regulators. The completed project will further enhance the Commission's technological capability and deliver additional operational efficiencies in the years ahead. Further work will continue to refine business processes and enhance system capability to support the Commission and its staff into the future, and realise the full benefits of the investment over time.

As we continue to grapple with ongoing demand for our services, the Commission will explore how best to leverage these and other technological improvements to assist staff in responding in a more timely manner. Possible solutions may include call transcription software, investigation software, and artificial intelligence tools (subject to there always being a human in the loop). It is a necessity in the world of stretched resources and increasing service demands to consider other technological aids to assist in the more efficient discharge of the Commission's functions.

I sincerely thank Commission staff for their commitment, professionalism and patience throughout this process. Implementing change of this magnitude inevitably places additional demands on staff, and the successful delivery of the project is a credit to their adaptability and resilience. The work involved by the Commission's senior leadership team during the scoping and build phases of the project cannot be overstated and deserves immense recognition. Their dedication, adaptability, and resilience have been instrumental in ensuring the successful delivery of this critical project.

I am particularly grateful to the commitment, diligence and persistence of Ms Kellie Grainger, Director Professional Conduct, who has led and driven the project from its outset, being from late 2023. Kellie's resilience and stick-to-itiveness were key factors in the completion of phase 1 of the project. The significant work undertaken by or very capably led by Kellie throughout that time is immeasurable. Mr Christopher Smith commenced with the Commission as its Director Operations in November 2025 and was invaluable in keeping the project heading in the right direction and resolving many operational issues. Having commenced as our senior project manager in September 2025, Ms Sandra Hilman has also greatly contributed to the project. I am indebted to them all for their professionalism and support.

Instrumental to the support of our legacy system and assisting in the transition to Regis was Mr Stephen Pickering. Stephen's tenacity and insight were invaluable in the changeover of our CMS and I am grateful for his invaluable support and positive disposition.

I also acknowledge the considerable assistance provided by the Department's Information Technology Services, procurement and corporate teams, together with our implementation partner, whose expertise and assistance were instrumental in achieving this important phase 1 milestone.

While the development of the CMS and the present transition has presented challenges, we are confident that the long-term benefits of *Regis* will be realised in the coming months and for years to come. Additionally, the return of some staff to core work functions during the interim period between phases will assist in improving timeliness and productivity.

Law reform

With the unique perspective that being the Legal Services Commissioner provides, I advocate for and support legislative reform that relates to the delivery of legal services in Queensland whenever the opportunity arises.

The reporting year saw the introduction of the *Legal Practitioner (Strengthening Disciplinary Matters) Amendment Bill 2026* to parliament. The Bill gives effect to the recommendations of the *Queensland Civil and Administrative Tribunal (QCAT) Statutory Review 2025-26: Legal practitioner jurisdiction Report* (Report) and primarily deals with the transfer of the legal practitioner disciplinary jurisdiction (LPDJ) from QCAT back to the Supreme Court along with related procedural arrangements.

I had the benefit of engaging in extensive consultation with the Reviewer during initial consultation on the development of the Report and its recommendations, and continued that engagement and consultation with the Reviewer, the Attorney-General and the Department over several months during the development of the Bill. Over the course of the year multiple submissions were made in relation to this process and ultimately helped shape the development of the Report and Bill.

Return of the LPDJ to the Supreme Court is a matter that I have long supported and advocated for, not only because as lawyers we are all officers of the Court, but because it will undoubtedly help expedite the resolution of disciplinary matters. As mentioned in last year’s report, QCAT has been under immense pressure across its vast jurisdiction and experiencing backlogs and delays in finalising matters, including in the LPDJ. The timely resolution of these proceedings will benefit all persons involved in the disciplinary processes, including practitioners and other respondents, complainants, and the Commission.

The Bill remains before Parliament; however I am certain that following its passing and an appropriate implementation period, the benefits of this change will be felt without delay. The changes introduced in the Bill represent only part of much needed improvements to the regulatory framework of the legal profession. As part of the consultation process, and at other opportunities, I have continued to advocate for a range of improvements to Queensland regulatory framework, in order to improve the regulation of the profession and deliver improved outcomes for consumers and respondents.

I will continue to work closely with the Attorney-General and the Department to identify opportunities to improve the regulatory regime and deliver better outcomes for consumer of legal services and legal practitioners. Such improvements will ensure that appropriate standards are maintained (if not improved), consumers of legal services are protected, and the public can have confidence in the administration of justice in Queensland.

Continued growth and challenges

As was highlighted in the previous year's Annual report and touched on above, the Commission has continued to see a steady growth in demand across its services, combined with increasing complexity in the nature of the matters being dealt with. Notably, the Commission received 4,457 enquiries during the reporting period, which represents an 8.1% growth on the previous reporting year. Complaint volumes also increased by 14.4%, climbing back up to almost 1,000 new complaints received during the year, and there was an increase in referrals and other information provided to the Commission leading to a 28% increase in new investigation matters. These numbers and the issues surrounding these core business areas are explored in more detail later in this report.

The number of new matters continues to climb, despite the introduction of a more comprehensive enquiry process in July 2024, to provide the early triage of issues that are not within the Commission's jurisdiction and cannot be addressed even where they progress to a formal complaint. This ongoing increase is not the only factor contributing to challenging demands on the Commission. The complexity of matters also continues to grow, with increasingly technical issues arising, larger volumes of material being provided, and more time and effort required to assess and investigate enquiries and complaints. The increasing use of AI tools by enquirers, complainants (and sometimes respondents) has developed into a significant operational challenge for the Commission, including creating unrealistic expectations for some.

The Commission is increasingly receiving submissions, generated wholly or substantially through AI tools. While these technologies may assist individuals to prepare and organise information, their use can also significantly increase the volume of materials being provided, much of which is simply not relevant nor helpful. In some instances, enquiries are being submitted with hundreds of pages of material requiring review. AI-generated documents frequently contain inaccurate or incomplete statements of fact, misstatements of legal principles, or summaries that do not accurately reflect the underlying source material upon which a person is seeking to rely upon in making a complaint.

As is expected of the models underlying those technological tools, we have observed that AI-generated documents are often framed around the prompts provided by the user and may therefore present matters in a manner that reinforces a person's grievances or preferred narrative, rather than objectively identifying relevant facts related to possible conduct. This can make it more difficult to identify the true conduct issues and to sift through the material in order to undertake an assessment or investigation. In many cases it also makes it unclear whether the matter may even fall within the Commission's jurisdiction.

As a consequence, the use of AI in enquiries and complaints is, in many cases, increasing the time and resources required to assess and investigate matters, and ultimately delaying outcomes for complainants. These challenges have reinforced the need for the Commission to continually evaluate its service delivery model and the allocation of its limited resources. While some pressures experienced during the reporting period were amplified by the implementation of the Commission's new case management system, growing demand and complexity, and the increasing use of AI to generate submissions, have been evident for some time and are expected to continue. Consistent with our commitment to continuous improvement, the Commission will perpetually review its functions, priorities and use of technology to identify opportunities for improvement and, where necessary, ensure resources remain focused on its core regulatory responsibilities and community protection objectives.

Maintaining professional standards and the reputation of the legal profession

There were 34 disciplinary decisions delivered in the reporting year for proceedings commenced over a number of reporting years. While the conduct and sanctions varied greatly, there were 15 individuals removed from the roll (or struck off), including 11 from the Queensland roll, 1 from both the Queensland and interstate rolls, and 3 from interstate rolls. That number of strike offs is significant and while there was an increase in the number of decisions overall, 15 strike offs is the highest number of strike offs in any reporting year of the Commission. Concerningly, that number correspondingly reflects an increase in the more serious conduct that the Commission is dealing with – being serious enough that it renders a person no longer fit to be honoured with being on the roll of persons admitted to the legal profession. The corollary is that the regulation of the legal profession in Queensland is effective and remains a significant protection for ensuring the public can have confidence in the persons who engage in legal practice in Queensland.

The primary purpose of regulation of legal services is the protection of the public. Disciplinary proceedings and their resultant sanctions are not intended to be punitive. While a respondent may ultimately feel punished, that is often an unavoidable consequence when the protection of the public and maintenance of the integrity of the legal profession are paramount. The intended deterrent effect of sanctions also serves those purposes.

These fundamental protections were emphasised in the decision of *Legal Services Commissioner v Tang* [2025] QCA 206. The decision observed that the serious and dishonest conduct in that matter "struck at the heart of the trust which the community must be able to place in the legal profession". Conduct of such seriousness will impact the question of probable permanent unfitness and informs the appropriate sanction to be imposed in the exercise of the disciplinary body's discretion under the Act for such orders, with close regard to the protective purposes of the Act.

Unlawful operators

Related to the rise in new matters is the increasing number of reports of persons engaging in legal practice without proper (or any) qualifications, or representing an entitlement to do so. These reports of unqualified and/or unlicensed practice by persons, statutorily referred to as unlawful operators, now represent almost one-third of all referrals for an investigation matter. In the reporting year there were 68 complaints or referrals for an investigation matter related to unlawful operators, representing a 55% increase over the previous reporting year. The growth in these numbers has been observed over the last few years and has coincided with the increasing complexity of investigations, driven in part by the increasing sophistication of these individuals and their capacity to avoid detection.

A particular concern for the Commission is the emergence of unlawful operator matters involving pseudo-law ideologies and arguments. These matters are often more resource intensive to investigate and prosecute, with individuals frequently disputing the legitimacy of regulatory and court processes, refusing to engage, or relying on large volumes of irrelevant material and unsustainable arguments. In some instances, the Commission has observed a correlation between unlawful operators with pseudo-law ideologies and AI tools being used by these individuals to respond to the Commission, including during court proceedings.

While AI use in the pseudo-law space is observable, broader AI use by unlawful operators to generate advice or legal documents remains an identifiable risk, which will be monitored going forward. Development of this risk could impact on the progression of these investigations and subsequent prosecutions, increasing demand on the

resources of the Commission and the Courts and ultimately impacting the Commission's ability to respond promptly to conduct that poses risks to consumers of legal services.

Modern technologies assist these unlawful activities by creating legitimate-looking websites, documents, written advices and other legal services that are by law the domain of licensed legal practitioners. The more readily accessible avenues for such unlawful services, including through sophisticated websites, online service platforms, chat groups, and social media, also contribute to the rise of these offences and are an ever present danger for often unsuspecting consumers and vulnerable Queenslanders.

The detection, investigation and prosecution of unlawful operators necessarily occurs in their location, wherever that may be in Queensland, all of which is undertaken by the Commission itself. Being a Brisbane-based Commission, such critical actions take considerable resources, but are a critical function in protecting consumers and the reputation of Queensland’s legal profession.

Changes at QCAT and the LPC

Before the end of the reporting year, the Honourable Justice Kerri Mellifont KC announced her retirement from the role of President of QCAT. Her Honour’s contributions to the operations of QCAT, and the regulation of the legal profession, have been significant. Her Honour has worked tirelessly to reduce the backlog of cases, including in the legal profession disciplinary proceedings list. I thank Her Honour for all she done during her tenure and wish her all the best on her full-time return to the Trial Division of the Supreme Court.

I also acknowledge the incoming President the Honourable Justice Scott McLeod KC, who commenced his three-year term on 1 August in the new reporting year.

In April, the Government appointed a new chair and members to the Legal Practice Committee for terms of five years commencing 24 April 2026. The Committee is now chaired by Mr Richard Douglas KC. I welcome Mr Douglas and the new members of the Committee. The full list of current and now former members is available later in this report.

I extend my sincere thanks to the former Chair, Ms Patricia Schmidt, and all previous serving members of the Committee for their time served. Ms Schmidt was the Chair of the Committee for some six years and her service to the community and the profession in that role was exemplary. Members whose terms concluded where Practitioner Members Martin Conroy and Barbara Houlihan and Lay Members Loretta Lynch and Alice Ruhe. The time and commitment of all who have served on the Committee is sincerely appreciated.

Further Acknowledgements

I anticipate, or at least remain hopeful, that it will be some time before there is another year quite as challenging as 2025-26. To say that it has been another demanding year for the Commission is a major understatement. Nevertheless, those demands are met with the invaluable contribution of our co-regulators, the Queensland Law Society and Bar Association of Queensland. I thank the professional member bodies, as well as their dedicated Councillors and hard-working staff, for their ongoing partnership and shared commitment to effective regulation.

I also acknowledge the important contribution of the many judicial officers, practitioner members and lay members involved in Queensland's disciplinary processes, whose work supports public confidence in both the legal profession and the administration of justice.

In addition to the specific staff acknowledgements already made, my immense gratitude also goes to the staff of the Commission whose professionalism, resilience and commitment have underpinned the Commission's work throughout the year. They all work incredibly hard, which I acknowledge and very much appreciate. Their service to the people of Queensland is to be commended.

Finally, I thank Queensland's legal profession for its continuing commitment to serving their communities and upholding the rule of law. Although the Commission's work necessarily focuses on conduct issues, those matters represent only a small part of the profession's contribution to the people, businesses and communities of this State. The vast majority of Queensland’s legal profession remain committed, hard-working and ethical practitioners, who make positive differences every day to the people of Queensland.

ML Mahon

Megan Mahon
Commissioner

1. About the Commission

The Commission is an independent statutory body that was established in 2004 and continues its existence pursuant to the Act.

The Act provides for the appointment of the Commissioner who is conferred with statutory powers and the responsibility for the functions to regulate the legal profession, and to receive, manage and investigate complaints about the conduct of legal practitioners, their employees and unlawful operators in relation to the provision of legal services in Queensland.

The Commissioner is supported by the staff of the Commission to discharge those obligations to ensure effective regulation of legal practice in Queensland in the interest of the administration of justice and for the protection of consumers of legal services and the public more generally. This includes monitoring the conduct of lawyers and legal practitioners, while also safeguarding the public and the profession from those purporting to practise law when not entitled to do so. The Commission also has a proactive function within the regulation of the profession, by identifying emerging issues and assisting and educating the profession on their ethical and legal obligations.

The Commission plays an integral role in the regulation of the legal profession in Queensland along with the Legal Practitioners Admission Board (LPAB), Bar Association of Queensland (BAQ), Queensland Law Society (QLS), the disciplinary bodies, including QCAT and the Legal Practice Committee (LPC), as well as the Supreme Court and the Court of Appeal.

The Act ensures complaints are dealt with by a statutory body that is independent from the legal profession. The Commission's approach as an effective regulator protects consumers and supports lawyers in their obligations to provide competent legal services, improved professionalism, and ethical decision making.

1.1 Protecting the public and the profession

The Commission ensures professional standards are maintained, including the obligation that barristers and solicitors conduct their matters fairly and competently. This is essential work that contributes to keeping communities safe through the prevention, detection and deterrence of unsatisfactory professional conduct and professional misconduct within the legal profession.

While every matter is unique, the Commission aims to always be fair and consistent with disciplinary and enforcement activities. The Commission monitors the wider professional environment to identify conduct within our jurisdiction that warrants the commencement of an investigation matter (IM), which is an investigation commenced by the Commissioner without a complaint.

Complainants are assisted through the complaints process as far as our resources and statutory limitations permit. They are provided with relevant, accessible information, including step-by-step guides to the complaint process.

The Commission also supports informal consumer redress for complainants where appropriate, by giving them guidance on how to achieve satisfactory outcomes in relation to disputes with their legal services provider. Redress may include adjustment of legal costs charged, release of documents and other important information belonging to them, or a full account of trust monies. Such consumer redress is limited, as the Act does not provide any power

for the Commissioner to compel redress be made. The only compulsory redress available to consumers under the Act is the possibility of a compensation order following the judicial finding of inappropriate conduct in a disciplinary proceeding.

1.2 Protecting consumers from unlicensed legal practice

As an independent statutory body, the Commission acts in the public interest and plays an important role protecting the community from those engaging in unlicensed legal practice. Members of the public must be protected from people or corporations who offer to provide legal services or undertake work that amounts to engaging in legal practice without the proper qualifications and authorisations.

Under the Act, the Commission has the power to take action to stop unlawful operators by investigating and prosecuting them. These critical functions ensure members of the public can be confident in receiving sound legal advice from competent, qualified and licensed legal practitioners. By doing so, the Commission safeguards the public from those practising law who are not qualified or entitled to do so.

This power is particularly important given the complexities of the law and the legal system, and the potentially severe and far-reaching consequences a legal outcome may have for an individual, their business or their family. Practising law without the proper qualifications and authorisations is a criminal offence.

The regulatory regime, including the preservation of legal work for those qualified and licensed to provide legal services, ensures consumers are protected through the regulatory supervision of lawyers and legal practitioners, appropriate compulsory professional indemnity insurance and other key consumer protections that are not available when engaging unlicensed offenders.

1.3 Assisting and contributing to the profession

The work of the Commission ensures legal practitioners in Queensland uphold professional standards, understand their obligations to their clients, and act appropriately when engaging with members of the public. This is achieved in two ways: by monitoring and regulating the legal profession within Queensland in accordance with the Act, and through direct engagement with and education of the profession, including delivering presentations, providing educative news and alerts throughout the year, and attending events and other functions.

Major challenges facing the legal profession are addressed by working collaboratively with members of the profession and their representative bodies to provide education, guidance and feedback on current and emerging issues.

The Commission constructively engages with the profession across a range of public and private sectors throughout Queensland and Australia to ensure that legal services are provided competently and diligently, and integrate current best practices.

1.4 Engagement with emerging professionals

It is also important to engage with future members of the profession at both the undergraduate and graduate levels. The Commission is committed to ensuring that lawyers of the future enter the profession with a strong

understanding of their ethical and professional obligations and the role of the profession's regulators, including the Commission.

The Commission looks to regularly engage with providers of legal education throughout the state, and the Commissioner aims to connect personally with universities, often presenting to their law students formally and engaging with them at relevant professional or academic events.

2. Regulatory framework

Queensland operates a co-regulatory model of the legal profession. The Commission, the BAQ and QLS, LPAB and the Supreme Court each perform certain functions under the Act.

Together, all authorities are responsible, in varying ways, for the promotion and enforcement of professional standards, competency, and honesty within the legal profession. In carrying out the regulatory functions outlined below, each authority contributes to ensuring confidence in the administration of justice and the protection of consumers of legal services.

2.1 Regulatory authorities and their key functions

Legal Services Commission	BAQ	QLS
• Peak regulatory body of the Queensland legal profession (lawyers, barristers and solicitors, and their employees). • The sole authority able to deal with complaints about the conduct of lawyers, legal practitioners and law practice employees. • Undertakes investigations and commences disciplinary proceedings where necessary. • Investigates and prosecutes individuals and corporations who are unlawfully operating. • Audits incorporated legal practices. • Responsible for the regulation of laws relating to personal injury advertising and touting restrictions, and claim farming prohibitions.	• Peak representative body of barristers in Queensland. • Responsible for the issuing and regulation of practising certificates for barristers. • Undertakes investigations into the conduct of barristers when a matter is referred to them by the Commissioner. • Responsible for making the barristers' rules.	• Peak representative body of solicitors in Queensland. • Responsible for the issuing and regulation of practising certificates for solicitors. • Regulates solicitors' trust accounts, undertakes part 3.3 investigations, and enforcement action against solicitors when required. • Manages the fidelity guarantee fund for trust property defalcations. • Responsible for making the solicitors' rules. • Provides support for the LPAB, which supports the Supreme Court in the admission of persons to the legal profession.

2.2 Disciplinary bodies and other proceedings

Once the Commissioner has made the decision to commence a disciplinary proceeding, the matter must be brought before the relevant disciplinary body. For discipline applications relating to conduct of lawyers and legal practitioners, the matter goes before either QCAT or the LPC (the latter being limited to allegations of unsatisfactory

professional conduct and not professional misconduct). Conduct matters involving non-qualified law practice employees are only able to be heard by the LPC.

The Supreme Court also retains its inherent jurisdiction in relation to the legal profession as officers of that Court. As referred to in the Commissioner's overview, there is presently a Bill before parliament transferring the legal profession disciplinary jurisdiction back to the Supreme Court. Once passed, disciplinary matters will no longer be commenced with QCAT.

For the prosecution of offences under the Act or *Personal Injuries and Proceedings Act 2002* (PIPA), charges are brought and heard before the Magistrates Court of Queensland. Any appeal of those prosecutions are made to the District Court, and further to the Queensland Court of Appeal. Limited appeals can subsequently be made to the High Court of Australia.

Applications for injunctions and other restrictive orders are made to the Supreme Court of Queensland, with rights of appeal to the Queensland Court of Appeal, and limited appeal to the High Court of Australia.

QCAT	Legal Practice Committee	Magistrates Court
The Commissioner may file a discipline application with QCAT for the hearing of conduct matters. These applications relate to allegations of unsatisfactory professional misconduct and professional misconduct. An appeal of a QCAT decision may be made to the Queensland Court of Appeal.	The Commissioner may make an application to the LPC for the hearing of conduct matters. These are limited to less serious allegations of unsatisfactory professional conduct (as opposed to the more serious professional misconduct) of Australian lawyers and Australian legal practitioners, as well as alleged misconduct of law practice employees. The Act requires the Commissioner to provide secretariat support to the LPC. An appeal of a LPC decision may be made to QCAT.	Complaint and summons are filed in the Magistrates Court for offences under the Act, including unlawful operators, either unlawfully providing legal services, representing that they will or are entitled to provide legal services, and other summary offences. Decisions of the Magistrates Court can be appealed in the ordinary way.

3. The Queensland legal profession

3.1 Profession overview

Legal practitioners

At 30 June 2026, there were 17,811 legal practitioners who held practising certificates in Queensland, including 21 registered foreign lawyers. This overall number is an increase of 2.35% on the previous year. Of this total, 16,572 are solicitors, including foreign registered lawyers, and 1,241 are barristers.

Of the combined total of solicitors and barristers, 9,923 legal practitioners identify as female (55.71%) and 7,861 legal practitioners identify as male (44.14%). Within the separate branches of the profession, female legal practitioners make up 57.70% of solicitors and 29.17% of barristers, and male legal practitioners make up 42.14% of solicitors and 70.83% of barristers. 27 solicitors do not specify their gender, which is 0.15% of all legal practitioners.

There are 143 Senior / King's Counsel at the Queensland Bar, comprising 18 women (12.59%) and 125 men (87.41%).

Law practices

There were 2,859 solicitor law practices, a 1.3% decrease from the last reporting period.

864 were sole practitioners or partnerships, a 5.8% decrease from the last reporting period, and represents 30.22% of all solicitor law practices.

1,977 were incorporated legal practices (ILPs), a 0.6% increase from the last reporting period, and represent 69.15% of all solicitor law practices. 18 were multi-disciplinary practices, which represents 0.6% of all solicitor law practices.

All data on solicitors and barristers in Queensland is provided to the Commission by the QLS and BAQ respectively.

Government legal officers

The above data does not include those government legal officers (GLOs) who do not hold a practising certificate. GLOs are defined in the Act and include any legal officer (whether or not they hold a practising certificate) engaged in government work in the jurisdiction. GLOs are not required to hold a practising certificate to engage in government work, but may hold a certificate if they wish or are required by their employer to do so.

Minimum Obligatory Human Resources Information (MOHRI) data as at 31 March 2026 provided by the Public Service Commission, and included in this report with their permission, shows that the government workforce included 310.12 full-time equivalent (FTE) in roles classified as Barristers, 877.00 FTE in roles classified as Solicitors, and 619.13 FTE in roles classified as Judicial and Other Legal Professionals not elsewhere classified, based on Australian and New Zealand Standard Classification of Occupations (ANZSCO) classifications.

While there are likely other admitted lawyers working in various roles in the public sector, these additional statistics help provide a better picture of the legal profession in Queensland.

3.2 Barristers

At 30 June 2026, there were 1,241 barristers with practising certificates in Queensland. This is a 2.2% increase on the previous reporting period.

Breakdown of barristers	Count
Private	1090
Employed*	151

* Refers to barrister certificate holders employed by government or a government agency, as well as in-house counsel.

Breakdown of barristers by seniority	Count
King's Counsel or Senior Counsel	143
Junior Counsel	1098

Breakdown of barristers by practising certificate type	Count
Nil conditions	1003
Readership	85
Special – reporting	2
Other	0
Employed	151
Total	**1241**

Breakdown of barristers' chambers	No. of chambers	No. of barristers
Individual chambers	230	230
Group chambers	112	1011

3.3 Solicitors

At 30 June 2026, there were 16,572 practising solicitors in Queensland, including 21 registered foreign lawyers. This is an increase of 2.37% on the previous reporting period.

Solicitors by practising certificate type	Count
Foreign lawyers*	21

Solicitors by practising certificate type	Count
Limited principal	59
Restricted employee	3,201
Restricted principal+	4
Restricted volunteer	63
Unrestricted employee	9,262
Unrestricted principal	3,904
Unrestricted volunteer	59
Total	**16,572**

* Refers to Australian Registered Foreign Lawyers registered to practice foreign law in Queensland, but who cannot practise Australian law in Queensland. These lawyers do not hold a practising certificate but are registered with the QLS. For more information see https://www.qls.com.au/practising-law-in-qld/working-as-a-solicitor/compliance/australian-registered-foreign-lawyers.

+ Refers to a conditional principal certificate issued by the Queensland Law Society to a person who has not otherwise met the requirements of a principal certificate holder.

4. Compliance and engagement

The Commissioner has powers under the Act to regulate and audit ILPs.

The Act places obligations on ILPs and their legal practitioner directors (LPDs) to implement and maintain appropriate management systems. These systems need to be designed to ensure that legal practitioners at the ILPs can maintain their professional and ethical obligations in the delivery of legal services. The Act also obliges LPDs to take reasonable steps to prevent or remedy any breach of these standards where it is apparent that a breach has occurred or may occur.

The Commission continues to work with ILPs to ensure that they are aware of their obligations to have appropriate management systems (as should every law practice regardless of structure).

An appropriate management system simply means a law practice's formal and informal management policies, procedures and controls, work culture, and habits of interaction and practice that support and encourage ethical behaviour by all employees. Importantly, there is no one best way to proceed with the implementation and maintenance of a management system and there is no single system that is suitable for all law practices. A management system that is appropriate for one law practice may not be appropriate for another, and these systems will vary from law practice to law practice dependent on location, size of practice, areas of practice and many other variables.

The Commission may conduct an audit of:

- the compliance of an ILP, its officers, and employees with the requirements of the Act, the *Legal Profession Regulation 2017* and the *Australian Solicitors Conduct Rules 2023*; and
- the management of the provision of legal services by the ILP, including the supervision of the officers and employees providing the services.

The Commission's audit programme focus is to encourage ILPs to implement and maintain appropriate management systems to promote the delivery of competent legal services to consumers and reduce the likelihood of complaints being made against the law practice. These audits are a collaborative and educative approach for the Commission to work with ILPs to identify opportunities for improvement.

While the statutory power to audit appropriate management systems is currently limited to ILPs, the Commission encourages all law practices to ensure that their systems are effective and supportive of good practice that enables the delivery of competent legal services, while providing a safe workplace for their staff and clients.

Self-assessment and compliance audits

There are two types of audits that the Commission conducts: self-assessment audits and compliance audits.

Self-assessment audits require LPDs to review their management systems and supervisory arrangements at least six months after they have given notice to the QLS of the intention to engage in legal practice as an ILP. The Commission provides the LPDs with a self-assessment audit questionnaire asking them to review the effectiveness of their management systems and address three key objectives of sound law practice management.

LPDs are encouraged to use the self-assessment audit questionnaire to describe the status of their practice management systems against the three key objectives. The questionnaire is designed to help the Commission understand the systems currently in place at the law practice. The audit aims to provide opportunities for the law practice to identify further improvements that could be implemented.

Identified deficiencies and areas for improvement are noted by the Commission and revisited in a follow-up questionnaire 12 months after the initial self-assessment audit. This provides LPDs with a further opportunity to update the Commission on the progress made and can flag where further action may be required by the Commission to ensure that there are appropriate measures in place.

Compliance audits are usually instigated to address specific and ongoing concerns of a law practice. The audit comprehensively reviews the law practice's management systems or discrete aspects of their management systems (e.g. the supervisory arrangements or their billing practices) against the professional obligations of the practice and/or its staff.

Compliance audits are a resource intensive exercise for the Commission and the law practice. The Commission conducts these audits on an 'as needs' basis, often identified through the complaints or other information received by the Commission. This may include, for example, where the Commission has received information or determined by a risk-assessment that there is reasonable suspicion that the practice, or some aspects of its practice, fall short of the expected standards or requirements.

During the reporting year, two matters were referred to the Commission compliance team to commence audits. As of 30 June 2026, the Commission had 10 open compliance audits.

Due to the operational requirements of the CMS project, ongoing high service demands and the need to address a backlog of matters, the Commission's audit functions were temporarily suspended, with all existing self-assessment audit files finalised and closed. The audit functions will recommence as soon as necessary resourcing allows, and subject to required data integration with the QLS as to ILPs.

4.1 Personal injury services regulation

The Commission has responsibility for the monitoring and enforcement of the advertising and touting restrictions for personal injuries services and the prohibitions on claim farming contained within the PIPA.

Advertising and touting restrictions

The PIPA restricts the advertising of personal injury services by legal practitioners and others. Personal injury services can only be advertised or published in accordance with sections 64, 65 and 66 of the PIPA.

The legislation also contains anti-touting provisions which prevent a person from inducing or attempting to induce another person into making a claim for personal injuries at the scene of an incident or at a hospital after the incident.

Breaches of the PIPA advertising restrictions or anti-touting provisions are summary offences and significant penalties can apply, including fines. In addition to possible prosecution of these offences, the same conduct can also result in disciplinary proceedings for legal practitioners.

The Commissioner is responsible for dealing with enquiries related to these provisions and monitoring and enforcing these offences under the PIPA. The Commission has previously published a regulatory guideline on the application of the provisions, the Commission's interpretation and the approach taken for alleged breaches. The guide has temporarily been removed from publication pending its review.

During the reporting period the Commission received and finalised 14 PIPA advertising and touting related enquiries. This number continues to be lower than previous reporting years. However, eight of those matters were referred for further action. The Commission has continued to see increased numbers of complaints and investigations related to suspected breaches of the advertising restrictions, with four complaints and IMs finalised this reporting period. The Commissioner decided to commence a disciplinary proceeding with one matter.

For the first time in the history of the Commission and the PIPA advertising restrictions, the Commissioner successfully brought two discipline applications in QCAT related to breaches of the PIPA advertising provisions. One practitioner engaged in extensive prohibited advertising on billboards, websites and social media over several years, resulting in findings of professional misconduct, fines totalling $30,000.00, a public reprimand and a costs order. The second practitioner published promotional content on a personal injury law firm website that exceeded permissible advertising under the legislation, resulting in a finding of unsatisfactory professional conduct, a public reprimand and a costs order. These decisions were significant in that they reinforce the objectives and importance of the PIPA advertising restrictions and provide clear judicial guidance on some of the types of advertising in this space that are in breach of the legislation.

As noted in the previous year, the Commission has taken an educative approach toward remedying breaches of the PIPA since the inception of the Commission. The educative approach may still be appropriate in some circumstances. However, ongoing non-compliance with the advertising restrictions and an increase in related complaints and investigations, is evidence that an educative approach alone was not effective. Consequently, disciplinary proceedings were commenced in circumstances where repeated and flagrant breaches continued, despite the regulatory involvement of the Commission over extended periods of time. The two disciplinary decisions delivered in the reporting year are reflective of this changed approach and should assist in deterring similar conduct.

Advertising of personal injury services remains a concern and is in part attributable to deficiencies in the legislation, which was drafted prior to social media and the proliferation of other online formats. As such, enforcement of the advertising restrictions under PIPA has been problematic and the provisions are arguably no longer addressing contemporary compliance challenges. The Commissioner strongly supports a fulsome review of the relevant PIPA provisions, with a view to amending the restrictions to be more effective and provide more clarity, so that these particular provisions can be strengthened and ensure the relevant objects of PIPA are met. More principle based restrictions are more likely to ensure that the law remains relevant to contemporary and evolving advertising methods and practices and addresses the objects of the PIPA.

Due to the impacts of the Commission's CMS project and other service demands, the review of the Commission's regulatory guide about the PIPA advertising restrictions was not finalised and published during the reporting year. Review and development of that guidance, particularly in light of the first disciplinary decisions on the restrictions, remains a key priority for the Commission in the next reporting year.

Enquiries	2025-26	2024-25	2023-24
PIPA advertising and touting	14	16	16

Claim farming

The prohibition of claim farming provisions in the *Personal Injuries Proceedings and Other Legislation Amendment Act 2022* (PIPOLA) replicates the provisions contained in the *Motor Accident Insurance Act 1994*. The amendments expanded the regulatory remit of the Commission to include oversight and enforcement of provisions designed to stop the practice of claim farming in Queensland.

The laws:

- prohibit cold calling or personally approaching another person and soliciting or inducing them to make a claim;
- make it an offence for any person to pay claim farmers for the details of potential claimants or to receive payment for a claim referral or potential claim referral;
- impose obligations on the supervising principal of a law practice who represent the injured claimants to certify during the claims process that neither they nor their associates have paid a claim farmer for the claim. These certificates are called Law Practice Certificates and will be required at different stages of the claims process;
- require law practices to refund, or not recover, fees and disbursements paid in connection with a claim that has been claim farmed;
- provide the Commission with additional powers to oversee and enforce the new claim farming provisions; and
- expand the Workers' Compensation Regulator's enforcement and investigation powers so it can effectively prosecute claim farming.

Importantly, there are offences prohibiting claim farming practices including:

- prohibiting a person from giving or receiving consideration for referring a claimant or potential claimant. This offence aims to prevent a person from paying a claim farmer for the details of potential claimants or receiving payment for a claim referral or potential claim referral; and
- prohibiting a person from personally approaching or contacting another person to solicit or induce them to make a claim. Personal approach or contact includes contact by mail, telephone, email or other forms of electronic communication. This offence aims to prohibit the act of cold calling or personally approaching another person without their consent to solicit or induce them to make a personal injury claim.

In the last reporting year, the Commission received a total of 19 claim farming related enquiries and closed 23 enquiries over the reporting year. This includes reports of suspected claim farming activity and notifications about non-compliance with the law practice certificate requirements (required at various stages of a personal injury claim). 10 matters were referred to the Commission's Professional Conduct Teams for further assessment during the year.

The increase in claim farming related enquiries was largely related to non-compliance with law practice certificate requirements by law practices. In several instances, non-compliance was reported by a party, in compliance with their mandatory reporting obligations under the PIPA, along with confirmation that the opposing party had rectified the non-compliance.

The Commission will continue to monitor reports of alleged claim farming or law practice certificate non-compliance and evaluate whether further education or awareness activities are required. Any such activities will be subject to operational restrictions from increased service demands for other functions.

At the start of the reporting period the Commission finalised work with MAIC and OIR to update the Law Practice Certificate and Claimant certificate forms. The changes aligned the forms with the Department's new Statutory Declaration Forms. The forms are available on the Commission's website.

Claim farming enquiries by outcome	2025-26	2024-25	2023-24
No further action required	13	3	23
Referred for further action	1	0	0
Referred for investigation	9	2	2
Referred to other QLD regulator	0	0	3
Total	**23**	**5**	**28**

4.2 Information access and release

The Commission is committed to providing appropriate access to information in accordance with the *Right to Information Act 2009* and in line with privacy obligations under the *Information Privacy Act 2009*. In addition to formal access applications made under the legislative framework, the Commission continues to facilitate the release of information through administrative access arrangements where appropriate. Providing information administratively, where it can be done lawfully and efficiently, promotes timely access to information, reduces administrative burden on applicants and the Commission, and supports the broader principles of transparency and open government.

As with other areas of the Commission's operations, there has been a significant growth in the number of RTI access applications received. The Commission received 16 RTI access applications during the reporting year, 10 of which were compliant or made compliant following assistance provided by the Commission. 20 applications were finalised during the reporting including a number of requests from previous reporting years. The Commission also received five requests for internal review on decisions made under the RTI Act, all of which were finalised with the decision affirmed.

The Commission responded to five requests for external review of a decision made to the Office of the Information Commissioner (OIC), all of which were ongoing at 30 June 2026. One external review by the OIC from the previous reporting year was finalised in this reporting year with the decision affirmed.

These requests often require significant amounts of work to assist applicants to make their requests compliant, along with the work required to conduct searches, collate documents and review and make a determination about release.

4.3 Engagement

The Commission continues to engage and communicate with stakeholders to increase awareness of its regulatory, education and public interest functions.

This is achieved through proactive and regular engagement with members of the profession, through the professional representative bodies, such as the BAQ and the QLS, local and district law associations, and with emerging lawyers and law students by engagement with Queensland universities and other legal training providers.

These engagements usually involve presentations or participation in panel discussions and attendance at events, ceremonies or conferences by the Commissioner or other senior staff at the Commission. In the case of legal education and ongoing professional development, engagement also involves guest lectures and presentations. The Commissioner and other staff presented on a range of topics, including professional responsibilities, current and emerging ethical challenges, and AI and other disruptors. These engagements continue to drive awareness, and in turn, improvements within the profession.

The Commission disseminated media releases and received mentions in the media for successful prosecution of unlawful operators and disciplinary outcomes.

The Commission continues to engage with our co-regulators, the BAQ and QLS, as well as the Department and other relevant agencies around the maintenance of professional standards, regulation of the legal profession, and on key areas of reform.

In October 2025, the Commission's senior leadership team attended the annual Conference of Regulatory Officers, which brings together the legal regulators from Australia and New Zealand and provides an opportunity for inter-jurisdictional cooperation and collaboration.

5. Professional conduct

The Commission receives and manages enquiries and complaints from consumers of legal services, legal practitioners and other persons who engage or interact with the legal profession. The Commission aims to deal with all parties in a fair and efficient manner, and to assist enquirers and complainants through the enquiry and complaint processes as far as resources and statutory limitations permit.

The Enquiries and Complaints Team continues to serve as the first point of contact at the Commission.

The Commission's enquiry-first approach remains central to its intake process that enables us to better serve enquirers and complainants with the early triage of enquiries. All initial contact with the Commission is managed as an initial enquiry. This process allows staff to provide more timely information to enquirers, assess jurisdiction, and guide individuals to the most appropriate pathway for their matter, which may progress to a formal complaint.

5.1 Enquiries

All matters brought to the Commission, by either members of the profession or public, begin as enquiries. By streamlining the initial contact with the enquirer, the Enquiries and Complaints Team can ascertain whether the individual's concerns can be addressed within the limits of the Commission's jurisdiction, as well as provide information about how the enquiry and/or complaint process works.

During the reporting year, 4,457 enquiries were received, which is an 8.1% increase on the previous year. The Commission responded to and finalised 4,426 enquiries, a 8.96% increase. This increase continues from the previous year and is reflective of the Commission's enquiry-first process. The increase also relates to changes in the categorisation and capture of data resulting from the implementation of Regis.

Enquiries received	2025-26	2024-25	2023-24
Total	**4457**	**4123**	**2456**

Enquiries closed	2025-26	2024-25	2023-24
Total	**4426**	**4062**	**2428**

The Commission continued to see an overall increase in the number of interactions with members of the profession and public. This includes an increase in the number of administrative and other actions on matters, such as emails and other documents produced and received, including for ongoing complaints and IMs.

The level of activity required on matters, whether enquiries or complaints and IMs, has increased significantly alongside the complexity and sophistication of matters, and continues to impact output. This increasingly upward trend has continued for the past five reporting years.

	2025-26	2024-25	2023-24	2022-23	2021-22
Calls	9,857	9,657	5,128	4,788	4,420
Documents internally generated and externally provided	26,047	19,043	19,845	20,558	13,535
Emails received	27,556	26,563	25,744	22,574	22,440
Emails sent	34,912	37,162	34,408	32,196	27,592
Total	**98,972**	**92,434**	**85,125**	**80,116**	**67,787**

5.2 Complaints and IMs

As an independent statutory body, the Commission has the responsibility of regulating the legal profession, including receiving and, where appropriate, investigating complaints about the conduct of lawyers, legal practitioners, law practice employees and unlawful operators. All complaints are dealt with as efficiently and expeditiously as practicable, and balanced with competing priorities and as resources allow.

The Commissioner has the discretion to refer professional conduct investigations involving barristers to the BAQ; all other investigations are undertaken by the Commission. Once completed, any investigation findings are reported to the Commissioner, who then makes the decision as to the initiation of any disciplinary proceeding, prosecution or dismissal of the matter.

The Act also gives the Commissioner power to pursue an IM without the need for a formal complaint being made. Under the Act, these matters are referred to as 'investigation matters.' Information may be received by the Commissioner from a variety of sources, including anonymous tip-offs, media reports and commentary, referrals from the courts, individuals or other agencies, or information that may come to light during other investigations.

Following an initial assessment of the information available, if the Commissioner believes it is reasonable to commence an investigation, a decision is made to commence an IM. IMs may relate to any of the conduct covered by the Act, including investigating contraventions of PIPA, suspected unlawful operators and other summary offences.

In total, there were 1,049 complaints and IMs on hand at the start of the reporting year. 1,176 new matters were received or initiated during the reporting year. Including summary dismissals of complaints, there were 699 complaints and IMs finalised. As a result, at 30 June 2026, there were 1,522 matters on hand. These numbers are broken down in the following pages.

5.2.1 Complaints

The year commenced with 836 open complaints on hand. The Commission received 998 complaints in the reporting year and finalised 637 matters, including 516 summary dismissals.

The Commission investigated and finalised 121 complaints, which is a 20.3% decrease in number on the previous year. The Commission acknowledges the significant impacts of its CMS project as contributing to the lower number of complaint investigations finalised. Ongoing priority measures are being actioned to address the backlog of complaints and investigations.

Of the complaint investigations finalised, the Commissioner decided to commence disciplinary proceedings in 11 matters (reported on at section 6.2).

In resolution of investigations that did not proceed to disciplinary action, the Commissioner issued 20 letters of caution and was given undertakings by eight legal practitioners. Such actions can resolve a matter where the Commissioner is satisfied that it addresses the relevant conduct and is in the public interest to proceed in that way.

At 30 June 2026, there were 1,197 open complaints on hand at various stages of progress, which represents a 43.2% growth in open complaints. This substantial increase is due to a multitude of factors, including the disruption of the CMS project, increased numbers of complaints, and increased complexity, as already referred to above.

The Commission has observed a growing use of AI tools to generate enquiries and complaints, and other submissions to the Commission, which can result in substantial volumes of repetitive, inaccurate or poorly evidenced material being provided over the course of a complaints lifecycle. This is noticeably impacting the time required to undertake assessment and investigation of complaints, with AI generated documents often making it difficult to identify the relevant issues and conduct alleged, and to verify information.

As noted earlier in this report, complainants are also using AI to generate ‘summaries’ of the various documentation or evidence that they believe supports their allegations and, when requests for documents are made as part of an investigation, they are often submitting AI generated documents rather than the actual source documents themselves. The sheer volume of the material being generated by AI tools and provided by the complainant, which is often unreliable and unhelpful, is resulting in extended timeframes for assessment and investigation. Combined with the temporary, albeit significant, impacts associated with the CMS transition, these factors have contributed to increased active cases on-hand across the Commission’s core business areas.

The Commission continues to pursue process improvements and workload management strategies to address these challenges, along with considering all relevant options to address AI use by complainants and respondents. This includes what guidance can be provided to complainants, respondents and the public more generally about how AI can appropriately be used when submitting complaints or responding to the Commission.

AI use has added another layer of complexity and volume to the Commission’s complaint handling functions, on top of the existing noticeable trends from past years. Year-on-year the Commission has observed the nature of matters becoming increasingly complex, with the associated materials related to each matter growing in volume. There has also been an increase in respondents disputing the nature of the allegations made against them or failing to respond to the Commission, often on technical grounds alone and increasingly for belligerent purposes only. This is a trend the Commission has observed regardless of the type or nature of the matter. The impacts are being felt at all stages of the complaint lifecycle with the average number of days to assess a complaint taking 167 days and the average number of days to finalise a complaint investigation rising by 22.75% to 853.15 days.

These timeframes are also reflective of the fact that a growing proportion of cases investigated and finalised are older (primarily those over two years old) and more complex files. Approximately 59% of complaint investigations finalised this year fell within this category.

These compounding trends, along with the prioritisation of older investigations and/or more serious conduct, have significantly increased workloads for staff. A jurisdictional scan has identified that the staff of the Commission handling complaints and investigations carry a significantly higher file load (almost 4 times higher) than their interstate counterparts. This heightened workload has had flow-on impacts throughout the workplace, including greater pressure on staff to meet the rising expectations (and demands) of enquirers and complainants.

Additionally, we have observed that enquirers and complainants have greater expectations as to what constitutes the expeditious handling of their matters and the reach of the Commission's powers, causing staff to also receive a greater number of engagements as individuals continually follow-up by phone and email on the progress of their matters or seeking specific interventions or outcomes from the Commission. The Commission is exploring all available options, including how best to utilise new technology, to assist staff in responding to complaints and to reduce timeframes for completion.

Complaints investigated

Complaints by outcome	2025-26	2024-25	2023-24
s.446(2)(a) - commence in Mag Courts	0	2	2
s.446(2)(d) - no further action	1	12	14
s.447 - decision to refer to LPC	0	1	2
s.447 - decision to refer to QCAT	11	29	41
s.448(1)(a) - Dismissed - no reasonable likelihood	47	70	201
s.448(1)(b) - dismissed - no public Interest	62	38	75
Total	**121**	**152**	**335**

Complaints by area of law	2025-26	2024-25	2023-24
Administrative Law	1	0	4
Bankruptcy and Insolvency	0	1	3
Building /Construction Law	0	5	7
Commercial /Company Law	5	10	20
Conduct not in the practice of law	2	3	7
Conveyancing	9	21	23
Criminal Law	9	13	23
Deceased Estates or Trusts	25	25	55
Family Law	29	23	63

Complaints by area of law	2025-26	2024-25	2023-24
Immigration	2	2	13
Industrial Law	2	1	6
Law Practice Management	2	3	6
Leases /Mortgages	0	3	3
Litigation	20	15	41
Personal Injuries /Workcover Litigation	7	10	14
Property Law	3	9	23
Unknown	0	0	1
Z - Other	5	8	24
Total	**121**	**152**	**336**

Complaints by matter nature	2025-26	2024-25	2023-24
Communication	15	13	31
Compliance	3	20	21
Costs	21	22	39
Documents	3	2	12
Ethical Matters	6	18	55
Ethical Matters - communication	8	3	13
Ethical Matters - disclosure	10	13	27
Ethical Matters - dishonesty	15	8	17
Ethical Matters -pressuring/threatening	2	0	4
Personal Conduct	2	3	12
PIPA	0	1	0
Quality of Service	27	36	69
Trust Funds	6	5	19
Z - Other	4	8	16
Total	**121**	**152**	**335**

Complaints by complainant type	2025-26	2024-25	2023-24
Beneficiary	1	5	3
Client/Former Client	74	77	199
Executor	0	0	2
Government	0	1	1
Non Client	19	31	56
Other Queensland regulatory body	0	0	1
Solicitor	6	17	20
Solicitor for Client	7	11	16
Third Party	14	10	37
Total	**121**	**152**	**335**

Summary dismissals

Summary dismissals by outcome	2025-26	2024-25	2023-24
Referred to interstate regulator	8	0	0
s.430(2)(b) - conduct was more than 3 years ago	12	4	4
s.432(1)(a) - failed to comply with s.431 Notice	48	44	95
s.432(1)(b)(i) - not chapter 4 conduct	19	20	30
s.432(1)(b)(ii) - does not disclose UPC or PM	380	398	546
s.432(1)(c) - lacking in substance, vexatious, etc.	7	1	8
s.432(1)(d) - subject of previous complaint	3	4	6
s.432(1)(e) - already struck off	4	0	8
s.432(2) - no further investigation required	12	17	32
s.433 - withdrawn	23	22	40
Total	**516**	**510**	**769**

Summary dismissals by area of law	2025-26	2024-25	2023-24
Administrative Law	22	3	10

Summary dismissals by area of law	2025-26	2024-25	2023-24
Bankruptcy and Insolvency	7	5	7
Building /Construction Law	8	5	25
Commercial /Company Law	38	22	33
Conduct not in the practice of law	1	2	4
Conveyancing	38	30	41
Criminal Law	37	34	59
Deceased Estates or Trusts	53	50	90
Family Law	156	166	203
Immigration	0	1	11
Industrial Law	6	15	18
Law Practice Management	3	1	0
Leases / Mortgages	0	1	2
Litigation	65	95	99
Personal Injuries / Workcover Litigation	38	36	66
Property Law	26	19	41
Trust Account Breaches	5	8	16
Unknown	13	17	44
Other	**516**	**510**	**769**

Summary dismissals by matter nature	2025-26	2024-25	2023-24
Communication	76	57	96
Compliance	9	7	15
Costs	68	65	82
Documents	4	10	20
Ethical Matters	2	1	12
Ethical Matters - communication	18	11	23
Ethical Matters - disclosure	51	32	52

Summary dismissals by matter nature	2025-26	2024-25	2023-24
Ethical Matters - dishonesty	102	88	95
Ethical Matters -pressuring/threatening	12	8	7
Personal Conduct	6	9	52
PIPA	0	2	11
Quality of Service	148	158	206
Trust Funds	4	13	21
Z - Other	17	49	76
Total	**516**	**510**	**769**

Summary dismissals by complainant type	2025-26	2024-25	2023-24
Anonymous	1	1	0
Barrister	1	0	2
Beneficiary	10	8	11
Client/Former Client	263	316	449
Executor	4	1	4
Government	0	2	2
Lay Observer	0	0	1
Member of Parliament	0	1	0
Non Client	198	137	197
Solicitor	22	13	28
Solicitor for Client	6	2	6
Third Party	11	29	69
Total	**516**	**510**	**769**

5.2.2 Investigation matters (IMs)

An IM is commenced when the Commissioner believes that an investigation about a matter should be started into the conduct of an Australian legal practitioner, law practice employee or unlawful operator. Once investigated, the matter can be dismissed or proceed further. Regulatory responses may include proceeding with a discipline application, or if the conduct related to an unlawful operator, by complaint and summons to criminally prosecute

the respondent in the Magistrates Court. Other statutory protection measures may be pursued where warranted, such as an injunction or banning order by application to the Supreme Court.

The Commission had 213 IMs on hand at the start of the reporting period and 178 new referrals for investigation were made throughout the year. 62 matters were able to be finalised during the reporting period, including 24 files where the decision was made not to commence an investigation following a detailed assessment. This is a 44.6% decrease in finalisation of IMs from the previous year. As with complaints, finalisation of IMs was also impacted by the Commission's CMS project. In instances where further action was not commenced, the Commissioner issued seven letters of caution, one cease and desist letter, and was given one undertaking by a legal practitioner to address the alleged conduct. At 30 June 2026, there were 329 IM files open for assessment or investigation.

Unlawful operators / unlicensed practice

Concerningly, reports of suspected unlawful operators now represent over one-third of all referrals for an IM.

As is discussed in more detail at section 6.4 of this report, the Commission has observed a growing number of unlawful operator matters where the individual involved is aligned with pseudo-legal ideologies and presents these arguments when engaging with the Commission. These matters frequently involve large volumes of documents, repetitive or irrelevant submissions, and assertions that lack a proper legal foundation. As a result, additional investigative resources are often required to conduct the investigation and identify relevant evidence or issues raised during the investigation process. This emerging trend has contributed to increased complexity, longer investigation timeframes and higher resource demands in unlawful operator matters.

The Commissioner remains concerned that limitations in the application of certain investigative powers to unlawful operator matters can result in significant delays and inefficiencies, particularly where parties are unwilling to voluntarily provide relevant information or documentation. The Commissioner continues to advocate for legislative amendments to ensure appropriate investigative powers are available in unlawful operator investigations and to support the timely and effective prosecution of offending conduct.

Investigations involving suspected unlawful operators who are not lawyers have the added complexity of no compulsive powers applying to those persons under the Act. Not being officers of the court, these individuals are not subject to any duties to cooperate, and other formal processes are required to progress the investigation. The Commission is usually limited to obtaining search warrants, which may be executed on the subject respondent or other entities who may hold relevant evidence. Execution of search warrants is more often required to be carried out in regional areas and places outside of Brisbane. Likewise, any resultant prosecution of the person or entity is required to be filed and heard in the local district where the person lives or the conduct is alleged to have occurred. These requirements also add to the time, complexity and substantial resources required to identity, investigate and ultimately prosecute suspected offences of unlawful practice.

In addition to the increasing complexity and time taken to deal with these investigations, persons engaging in unlawful practice are often recalcitrant and unresponsive, if not obstructionist, further delaying the progress of investigations. The delays and difficulty obtaining information, if substantial enough, can impact the ability of the Commissioner to commence Magistrates Court proceedings within the limited statutory timeframe that applies to these summary offences. Additional and often unnecessary interlocutory processes are also utilised by respondents to delay or hinder the progression of a matter.

The impact of this is seen in the timeframes for investigation. The average number of days to finalise an IM in the reporting year increased to 837 days, with a third of finalised investigation matters relating to cases that were over two years old.

These investigations remain fundamental to community protection, ensuring the public can have confidence in the legal profession and the administration of justice. In particular, the investigation and prosecution of suspected unlawful operators remains critical to the protection of the public from persons unqualified, unlicensed and uninsured to provide legal services. As observed above, these persons often prey on the most vulnerable in our community, who often unwittingly engage with these offenders. Despite their unqualified and unlawful advice or other services, substantial fees are often charged, and the services often provide poor outcomes for the individual, leaving them out of pocket and with no real avenue for recourse.

IM by outcome	2025-26	2024-25	2023-24
IM not commenced	25	32	37
s.446(2)(a) - commence in Mag Courts	3	5	4
s.446(2)(b) - refer to police	0	0	1
s.446(2)(d) - no further action	1	11	10
s.447 - decision to refer to QCAT	7	29	29
s.448(1)(a) - Dismissed - no reasonable likelihood	8	13	37
s.448(1)(b) - dismissed - no public Interest	19	22	34
Total	**62**	**112**	**152**

IM by area of law	2025-26	2024-25	2023-24
Administrative Law	2	6	0
Bankruptcy and Insolvency	1	1	0
Building /Construction Law	0	1	2
Commercial /Company Law	2	4	1
Conduct not in the practice of law	7	13	21
Conveyancing	3	4	9
Criminal Law	6	9	12
Deceased Estates or Trusts	4	4	14
Family Law	3	4	7
Immigration	0	1	1

IM by area of law	2025-26	2024-25	2023-24
Industrial Law	2	3	1
Law Practice Management	9	10	3
Litigation	4	12	15
Personal Injuries /Workcover Litigation	8	18	15
Property Law	0	1	7
Trust Account Breaches	0	2	3
Unknown	2	3	1
Z - Other	9	16	40
Total	**62**	**112**	**152**

IM by matter nature	2025-26	2024-25	2023-24
Communication	2	7	3
Compliance	19	57	60
Costs	2	2	10
Documents	0	0	0
Ethical Matters	4	8	21
Ethical Matters - communication	0	0	0
Ethical Matters - disclosure	2	2	4
Ethical Matters - dishonesty	7	7	4
Ethical Matters -pressuring/threatening	2	0	0
Personal Conduct	10	4	19
PIPA	4	10	10
Quality of Service	3	3	12
Trust Funds	4	8	4
Z - Other	4	4	5
Total	**62**	**112**	**152**

5.3 Offence investigations

The Commission classifies investigations into suspected summary offences under the Act, other than alleged unlawful operators, as “offence investigations”. This largely relates to suspected breaches of the offence provisions in the Act applicable to ILPs, disqualified persons or confidentiality obligations. These investigations may arise from information received from a variety of sources, including referrals from courts and other agencies, members of the public, media reports, or the Commission’s own inquiries.

Where there is a reasonable suspicion that an offence may have been committed, an offence investigation may be commenced to determine whether there is evidence to prove an offence has or is being committed. Either during or at the conclusion of the investigation, the Commissioner will decide whether to commence a prosecution of the alleged offence/s in the Magistrates Court, and / or any other regulatory action.

There were 10 offence investigations on-hand at the start of the reporting year. Throughout the year, seven new referrals for assessment and investigation were made and one matter was finalised. At 30 June 2026 there were 16 open offence investigations at various stages of progression.

Offence investigations often require a significant amount of resourcing and must be completed in a timely manner to allow proceedings to be brought within the limited statutory timeframe that applies to summary offences. As is the situation for suspected unlawful operators, the Commission is limited by the investigative and compulsive powers available for the conduct of these investigations where the respondent is not a lawyer. Notably, while search warrants may be obtained in these matters, more targeted powers such as the ability to issue compulsive notices are not available. These investigations also remain fundamental to community protection and ensure the public can have confidence in the legal profession and the administration of justice.

5.4 PIPA investigations

The Act provides for the Commissioner to investigate the conduct of an external entity (entities other than lawyers and law practices) suspected of contravening the claim farming provisions or Chapter 3, Part 1 of the PIPA. These investigations are Chapter 5A investigations. They are conducted with all the same powers available under Chapter 6 of the Act. In certain circumstances the Commissioner may also appoint a special investigator under Chapter 6A to undertake a Chapter 5A investigation.

There were three PIPA investigations on hand at the start of the reporting year. Three new cases were referred to the Commission’s investigations team throughout the year. No cases were finalised. At 30 June 2026 there were six open PIPA investigations on-hand.

5.5 Sexual harassment reporting

The Commission's sexual harassment reporting tool remains available to individuals who wish to report sexual harassment or related conduct within the legal profession. Reports may be made anonymously, which will restrict what action, if any, can be taken but looks to provide a channel for the reporter to be heard. Reports may also be made through the Commission's enquiries process, which may be escalated to a formal complaint if the reporter is supportive of that occurring. Regardless of how a report is received, matters involving sexual harassment or

similar conduct are managed by the Commission's Sexual Harassment Response Team using a trauma-informed approach, with a focus on supporting and involving the affected person throughout the process.

During the reporting period, the Commissioner and staff of the Commission delivered presentations to the profession regarding sexual harassment reporting and the Commission's approach to receiving and responding to such reports. Following that engagement, the Commission observed an increase in reports concerning sexual harassment and related conduct being raised through its enquiry and complaints pathways. This response suggests that awareness of the issue and avenues for addressing inappropriate conduct is still necessary.

A notable trend since the launch of the reporting tool has been a change in the way reports are being made. Following the reporting tool's introduction, there was strong initial uptake, although many reports concerned matters outside the legal profession and therefore outside the Commission's jurisdiction. During the current reporting period, no relevant reports were received through the anonymous reporting tool. Instead, reports involving sexual harassment within the legal profession were raised through the Commission's standard enquiries and complaints processes, including instances where legal practitioners assisted clients to bring concerns to the Commission.

While the number of reports received remains relatively low, the allegations raised have, in some instances, involved serious conduct. The change in reporting behaviour may indicate a growing understanding of the Commission's role and reporting processes, and an increased willingness of individuals to engage directly with the Commission. The Commission continues to take all reports of sexual harassment seriously and will continue to engage with the profession to promote awareness of available reporting pathways and the importance of addressing inappropriate conduct within the legal profession.

5.6 Internal reviews

While there is no obligation under the Act to conduct an internal review of a decision, it is considered to be good public decision-making practice and in the public interest to reconsider a statutory decision when an appropriate request is made. Requests for an internal review may be accepted where there are sufficient and appropriate grounds for a review of the decision made. Relevant considerations when determining whether to accept a request include, but are not limited to, the time elapsed between the decision and request, whether there is fresh or compelling evidence provided that was not available at the time the original decision was made, or whether there are substantial grounds for review, including on the basis of administrative law.

Following the publication of the Commission's *Policy and Procedure on Internal Reviews*, the Commission contacted all persons who had an open internal review to notify them of the process applied to internal reviews and the current delays in dealing with these matters. This included that internal reviews were conducted in the order in which the request was received. There were 56 internal review requests on hand at the start of the reporting year and a further 68 requests for an internal review were received throughout the year. 45 requests were resolved during the reporting period, including requests that had been received in previous reporting periods. Of the 45 matters resolved, 38 requests were not accepted for review as they did not meet the criteria set out in the Commission's Policy document, with three resulting in the original decision being affirmed following review, three review requests being withdrawn and one matter accepted as a new complaint, given additional information that was provided with the request. At the end of the reporting period there were 79 open requests for internal review on-hand.

The Commission's capacity to undertake internal reviews was significantly impacted by the unexpected and protracted leave of a key staff member responsible for these reviews, and the subsequent difficulties in backfilling that role. While an internal review is considered to support good public decision making, given the multiple layers of review already made prior to the statutory decision being made, as well as resourcing challenges impacting the timely dealing of requests for internal review, the Commission is currently reviewing how best to manage such requests.

6. Litigation

The Commissioner has the sole authority to bring disciplinary proceedings against lawyers, legal practitioners and law practice employees in relation to conduct matters under the Act. These proceedings can be commenced before one of the two disciplinary bodies in Queensland, which are QCAT and LPC. Unlike other jurisdictions, the Commissioner has no ability to make determinations in relation to conduct, and under the current legislation, the only disciplinary course to deal with inappropriate conduct is by commencing a disciplinary proceeding.

The Commissioner also seeks to protect the public and the profession from those purporting to practise law without the necessary qualifications and/or a valid practising certificate (unlawful operators). Engaging in legal practice, or representing an entitlement to do so, without the necessary qualifications is a criminal offence. The Commissioner can commence proceedings in the Magistrates Court for these and other offences within the Commission's jurisdiction.

In addition to these actions, the Commissioner also has authority to commence other litigation and proceedings, such as seeking injunctions, restraints or banning orders. This regulatory activity requires significant resourcing and time. However, these functions are critical to the protection of all Queenslanders and consumers of legal services, as well as the reputation of the legal profession (particularly given that consumers often unwittingly engage such offenders, not knowing that they are not qualified or licensed to provide legal services). It is for these reasons, among others, that warrant such matters taking priority over disciplinary matters.

In all matters relating to litigation and legal advice, the Commissioner is supported by our in-house Litigation Team and by external legal consultants, including barristers and solicitors, where resourcing challenges have necessitated their engagement. In more complex or significant matters, external counsel is often briefed.

There were 115 litigation matters on hand at the start of the reporting year. Throughout the year, 24 new matters were commenced and 59 matters were finalised with varying outcomes as set out below. The number finalised includes disciplinary decisions delivered in the reporting year for matters heard in previous reporting years. At the end of the reporting period there were 80 active litigation files on-hand. These numbers are broken down below.

Litigation (all categories)	2025-26	2024-25	2023-24
On-hand 1 July	115	118	82
Received/Opened	24	45	72
Finalised/Closed	59	46	38
On-hand 30 June	**80**	**115**	**116**

Litigation - outcomes	2025-26	2024-25	2023-24
Appeal dismissed	1	0	0
Appeal upheld	1	0	0
Application withdrawn	0	1	1
Charges withdrawn	1	2	0
Discontinued	3	3	1
Dismissed	3	1	4
No application made	**0**	1	5
No proceedings commenced	4	1	**3**
One or more charges proved	38	21	19
Order made	0	2	1
Reconsidered (no DA filed)	7	6	1
Withdrawn (after originating process)	1	8	**3**
Total	**59**	**46**	**38**

6.1 Discipline applications

The year commenced with 97 discipline application files on-hand. 12 new matters were opened during the reporting period and 12 new discipline applications were filed with QCAT. 46 matters were finalised (through various outcomes), including 34 disciplinary decisions being delivered by QCAT, which is double the number of decisions than the previous reporting year.

The number of matters filed in QCAT this reporting year, while lower than the previous year, reflects the necessary shift in focus Commission's litigation team to finalisation of the significant volume of discipline applications filed in previous years, and the additional time and resources now required to progress a matter. This is in part due to an increase in interlocutory matters and uncooperative, and sometimes unresponsive, respondents.

At the end of the previous reporting period there were 72 discipline applications filed with QCAT at different stages of progression and a further 31 matters awaiting filing. As the number of matters heard in the reporting year increased, a greater focus was required on undertaking court work and related appearances rather than the filing of new discipline applications. During the reporting year there were 37 final hearings related to discipline applications. This number does not include the significant number of directions hearings and interlocutory matters that occurred related to the discipline applications. Importantly in all of the 34 decisions handed down during the reporting year, the Commission was successful in obtaining a finding of unsatisfactory professional conduct and/or professional misconduct on one or more of the charges brought in all matters.

The Commission has observed an increase in respondents bringing a growing number of interlocutory applications that are outside the ordinary procedural matters. These interlocutory applications were predominantly strike-out, dismissal or stay applications, all of which were unsuccessful. Other miscellaneous applications included requests to quash criminal charges, grant leave to cross-examine the Attorney-General, to remove the Tribunal President due to an alleged conflict of interest, seek recusal and reconstitution of the Tribunal on grounds of apprehended bias, remove counsel and Commission lawyers from proceedings, and withdraw admissions already made or filed in the proceeding by a respondent.

As noted, these are interlocutory applications that are outside the ordinary procedural matters, such as applications for leave to cross-examine witnesses, discovery, notices to produce, witness hearing notices, non-publication orders and routine adjournments, which are routinely brought as part of disciplinary proceedings. During the reporting period, interlocutory applications were brought in seven different matters, with several making multiple interlocutory applications.

The interlocutory applications resulted in significant delays to the substantive resolution of the discipline applications they related to. In one matter, six interlocutory applications filed from January 2025 remain ongoing and have delayed the matter by approximately 19 months to date. In other matters, interlocutory applications resulted in delays ranging from approximately five weeks to 10 months before proceedings could progress.

In one notable example, a large and complex proceeding involving a substantial volume of correspondence and documentary material, between November 2021 and the final hearing in June 2026, more than 15 interlocutory applications were made by the respondent to the discipline application. All interlocutory applications were dismissed. While unsuccessful, the applications contributed significantly to the duration and complexity of the proceeding before it ultimately progressed to final hearing.

These matters demonstrate the considerable impact interlocutory applications can have on the timely and efficient progression of disciplinary proceedings before QCAT. In addition to extending the time required to achieve final resolution, interlocutory disputes consume significant tribunal and party resources and can substantially increase the overall costs and duration of proceedings, which are often ultimately not recoverable, even if ordered, due to the impecuniosity of the respondent. This not only has financial implications for the Commission and its public resources, but also takes up invaluable time that could be more productively spent on progressing other matters.

The Commission has continued its work from the 2024-25 reporting year, developing a more streamlined approach to QCAT proceedings. At 30 June 2026, there were 16 matters where a decision to commence disciplinary proceedings has been made, that are yet to be filed. Filing of these matters is being managed in the overall context of ensuring that the Commission is able to adequately resource all matters at various stages of their progression once they are filed with the disciplinary bodies.

As at 30 June 2026, 63 discipline application files were on-hand at varying stages of progression. 41 applications are presently filed with QCAT and are awaiting hearing and/or decision.

Discipline application - outcomes	2025-26	2024-25	2023-24
Discontinued	2	0	0
Dismissed	0	0	4

Discipline application - outcomes	2025-26	2024-25	2023-24
No proceedings commenced	2	0	0
One or more charges proved	34	17	16
Reconsidered (no DA filed)	7	6	1
Withdrawn (after originating process)	**1**	8	2
Total	**46**	**31**	**23**

Discipline application – area of law	2025-26	2024-25	2023-24
Building /Construction Law	1	0	0
Commercial /Company Law	3	0	0
Conduct not in the practice of law	6	4	4
Conveyancing	2	1	2
Criminal Law	4	2	1
Deceased Estates or Trusts	3	1	2
Family Law	9	6	5
Industrial Law	1	0	1
Litigation	2	1	3
Personal Injuries /Workcover Litigation	7	1	0
Property Law	1	2	0
Trust Account Breaches	0	1	0
Z - Other	7	12	5
Total	**46**	**31**	**23**

Discipline application – matter nature	2025-26	2024-25	2023-24
Communication	4	3	3
Compliance	5	5	5
Costs	2	0	1
Documents	2	0	0

Discipline application – matter nature	2025-26	2024-25	2023-24
Ethical Matters	2	3	4
Ethical Matters - dishonesty	5	9	2
Ethical Matters -pressuring/threatening	1	0	0
ILP	1	0	0
Personal Conduct	10	3	3
PIPA	4	1	0
Quality of Service	3	2	3
Trust Funds	4	1	1
Z - Other	3	3	1
Total	**46**	**31**	**23**

6.2 QCAT decisions

QCAT delivered 34 decisions during the reporting year, which represents a significant increase on the previous year. These included decisions delivered for matters commenced and heard in previous reporting years. These decisions are available to download from the Queensland Judgments' website at https://www.queenslandjudgments.com.au/caselaw/qcat. Decisions resulting in "discipline action" as defined under the Act are published on the Discipline Register (reported further below at 6.3).

The year saw good progress made in reducing the current backlog of disciplinary matters currently with QCAT. However, there are still large numbers of matters filed and at various stages of progression.

The growing concern is that while professional conduct matters are not able to be addressed by QCAT in a timely way, due to competing demands on resources, there is less deterrence achieved, both personal and general. This in turn appears to be resulting in increased conduct challenges, with greater risks to members of the public and consumers of legal services. The Commission is optimistic that the return of the LPDJ to the Supreme Court will allow the backlog and delays to be addressed.

Legislative amendment allowing the Commissioner to deal with less serious conduct by way of determination would also improve the timeliness of outcomes for disciplinary matters, for the benefit of consumers and respondents alike. Given the Commissioner only has power to either bring a proceeding or dismiss the matter, there is much conduct (albeit the less serious conduct) that goes unaddressed in a formal sense, leading to less effective deterrence than what may otherwise be addressed with improved legislative powers and/or resourcing. Being able to support stronger maintenance of standards of the legal profession, if not improved standards to what is currently being observed, ensures that the public can have confidence and trust in the legal profession, which significantly contributes to confidence in the broader administration of justice.

All 34 decisions delivered in the reporting year found that the respondent had engaged in professional misconduct and/or unsatisfactory professional conduct. Some of the sanctions imposed in these decisions included:

- 18 respondents receiving a reprimand
- 15 respondents removed from the local roll / struck off
- 11 respondents ordered to pay a pecuniary penalty
- three respondents disqualified from applying for a practising certificate for a specified period

Of the 15 respondents removed from the roll, five were as a result of convictions for serious criminal offences, including serious dishonesty and sex offences. One strike off was ordered by the Court of Appeal as a result of the Commissioner's appeal of a Tribunal decision where the conduct involved fraudulent and dishonest conduct that had resulted in serous convictions of the respondent. The remaining 10 respondents engaged in a range of serious misconduct, including practising without a practising certificate, providing false or misleading information to regulatory authorities, conflicts of interest, trust account breaches, failures in the management and supervision of legal practices, non-compliance with regulatory notices, misleading the court, inadequate and incompetent legal services, direct brief rule breaches, and other conduct that brought the profession into disrepute.

6.3 Discipline register

The Commission maintains a public register of disciplinary action as required by the Act. The purpose of the register is to provide public access to the names of lawyers and legal practitioners whose conduct has been found to be of a more serious level of conduct, being professional misconduct. Disciplinary action of this kind is required to be reported on the register and the relevant party identified by law, regardless of any non-publication order.

In accordance with the Act, disciplinary findings of the lesser categorisation of unsatisfactory professional conduct are currently not entered in the register, unless they are included in decisions dealing with professional misconduct, the conduct still results in removal from the roll, or attracts a practising certificate related consequence (such as suspension, cancellation, refusal to grant). However, as all orders of QCAT and LPC are required by the Act to be filed with the Supreme Court, the outcome of all disciplinary proceedings become a matter of public record and are freely searchable, unless subject to a non-publication order.

The register can be viewed on the Commission's website at: https://www.lsc.qld.gov.au/queensland-discipline-register.

The Commission remains concerned about the ongoing operation of the discipline register, which requires disciplinary action taken against a practitioner to remain on the register indefinitely. While the transparency objectives of the register are acknowledged, the absence of a mechanism to review, amend or remove entries over time may produce outcomes that are disproportionate, particularly for less serious conduct. The Commissioner continues to advocate for legislative reform to provide a more equitable and fairer approach to the management of register entries, including the introduction of a discretion to amend or remove entries in appropriate circumstances, such as less serious conduct occurring at a substantial time ago. The Commissioner also continues to support the removal of practitioners' dates of birth from the register, noting the increased risks associated with identity theft and the limited public benefit of publishing that information.

6.4 Unlawful operator and summary offences

As referred to at paragraph 5.2.2 above, the Act makes it an offence for a person to engage in legal practice or hold themselves out as entitled to do so if they do not hold a valid practising certificate. These summary offences are investigated and prosecuted by the Commission on behalf of the Commissioner.

The Commissioner relies on reports from members of the public, legal practitioners and the courts to identify these activities for potential investigation. Investigation of these matters involves gathering sufficient evidence to meet the higher burden of proof required to successfully criminally prosecute alleged offenders.

Prosecutions of offences are actively pursued to ensure that consumers are protected from the serious harms that can result from engaging unlawful operators (often without knowing that they are not qualified), and so that the legal profession's reputation and standards are upheld. Such harms can be exacerbated by an unlawful operator not being insured and unwilling 'clients' then having little to no recourse against them when things do go wrong. Unlawful operators are not only unlicensed to practise, but they very often also have no formal legal qualifications at all. The increased use (and abuse) of AI in these offences often assist an offender to appear legitimate.

The Commission successfully prosecuted four individuals, discontinued two matters and filed one further summary offence prosecution complaint for prosecution for unlawful practice. During the reporting period, there was one matter which was appealed on conviction and sentence to the District Court. The appeal was dismissed, and the conviction and sentence upheld. The individual has subsequently appealed to the Court of Appeal, with the matter ongoing in the reporting year (and the appeal subsequently dismissed by the time of this report).

Overall, the Commission has continued to observe an upward trend in the number of matters involving unlawful operators. These matters vary in gravity, from offences involving a single letter or email being written on someone's behalf in a legal matter, to more sophisticated offending of a much more serious nature by persons who were providing a broad range of legal services and unlawfully engaging in legal practice and holding themselves out as entitled to do so. The continued use of digital platforms, such as Airtasker and Facebook, are still being utilised by unlawful operators, who offer services and complete all types of legal work for users of these platforms.

Similar to complaint and investigation matters, the prosecution of unlawful operators is becoming increasingly complex and resource intensive. A growing feature of some matters is the adoption of pseudo-legal ideologies and arguments, including challenges to the legitimacy of regulatory and judicial processes. Individuals advancing these positions frequently decline to engage with established processes in a meaningful way, resulting in prolonged court proceedings and delays. These matters tend to be characterised by large volumes of material and increased procedural or interlocutory applications. These challenges place additional demands on both Commission and court resources, diverting effort from other regulatory work and delaying the resolution of matters that are often directed towards protecting members of the public from unqualified legal service providers.

6.5 Injunctions, warrants and contempt proceedings

6.5.1 Injunctions

Injunctions can be sought under section 703 of the Act. They are another regulatory tool available under the Act to take swift action against persons who are engaging in unlawful conduct, or attempting to, and may be harmful to the consumers of legal services in Queensland. Injunctions are only sought where it is in the public interest to do

so and provide a means to prevent harmful action from continuing while an investigation is undertaken and/or other legal proceeding commenced.

The Commissioner did not apply for any injunctions during this reporting period. The appeal against an interim injunction order made during the previous reporting year continued, with the hearing of the final injunction application still pending the outcome of the appeal as at the end of the reporting year. Contempt proceedings were also commenced with respect to the individual the subject of the ongoing injunction appeal, in relation to the interim injunction.

6.5.2 Search warrants and rights of entry

The Commission respects the rights of all individuals and understands that the use of search warrants and other coercive powers under the Act can impact on, and limit, the rights of individuals. In particular, a person's right to privacy and reputation, and property rights may be limited by the exercise of these powers. As a result, these decisions are made where any limitation of rights is reasonable and justifiable.

While such powers may at times impact the rights of individuals, the exercise of the powers are nevertheless an important mechanism available to the Commissioner in the discharge of her statutory functions to regulate the legal profession and the delivery of legal services in Queensland, particularly in relation to alleged offences.

In addition to the impact on the rights of an individual, search warrants are a costly and resource intensive exercise, reinforcing their use in limited or exceptional circumstances. Execution of a search warrant requires coordination with the Queensland Police Service and forensic technology experts, and the costs can be significant and vary depending on factors such as travel requirements.

The Commission obtained and executed one search warrant during the reporting period in relation to an alleged unlawful operator.

7. Operations, policy and strategy

The Commission publishes information and guidance to the profession and the public in discharge of responsibilities under the Act, and consistent with the Commission's approach to regulation and its regulatory remit. This may include the publication of information sheets to aid the public's understanding of processes under the Act, as well as policies and regulatory guidelines to assist the profession.

As the peak regulatory body for the legal profession in Queensland, the Commission also has a role in pursuing and assisting in legislative reform that relates to the objects of the Act and the Commission's responsibilities under the Act. This includes participating in the development and consultation processes surrounding proposed legislation or amendments affecting relevant laws and, where changes impact the Commission's regulatory remit, implementing those amendments and changes, including undertaking awareness campaigns.

7.1 Policy and strategy

Progress on the review and development of the Commission's PIPA regulatory guide was delayed during the reporting year, largely due to the impacts and workload associated with the Commission's CMS project. This policy project will require extensive engagement with key stakeholders but aims to provide clearer guidance about compliance with these regulations and the Commission's position, particularly in light of recent judicial decisions relevant to the area. The review of this regulatory guide remains a key priority for the next reporting year.

The Commission engaged with QLS over an extended period to develop a new regulatory guide concerning the use of particular titles within the legal profession. The development of this guide came off the back of growing concerns about the use of potentially misleading titles with the profession. Regulatory guides provide important guidance to the profession about how the Commission interprets and applies the law and existing obligations, and how the Commission may deal with complaints about certain conduct. Publication of the guide was deferred given the necessary implementation and preparedness the profession was required to undertake for the commencement of the AML/CTF tranche 2 regime. As at the date of this report, the guide has been published to the profession and is available on the Commission's website. More will be reported about that process in the next reporting period.

The Commission undertook further review of its service delivery complaints handling policy and procedure following a range of feedback on the draft policy from the Queensland Ombudsman. The Commission aims to finalise this work in the next reporting period and publish updated website content imminently. The changes also reflect operational changes for the handling of feedback and complaints and provides staff and consumers with comprehensive details about how the process works and what they could expect from it.

7.1.1 QCAT Act review

As part of the QCAT Act Review, the Reviewer was asked to investigate whether the legal profession disciplinary jurisdiction (LPDJ) should remain with QCAT or should be returned the Supreme Court The. Commission engaged extensively with the QCAT Act Reviewer over the reporting year in relation to the development of the *Queensland Civil and Administrative Tribunal (QCAT) Statutory Review 2025-26: Legal practitioner jurisdiction Report* (Report) and the recommendations contained within it. The opportunity to engage in those process was valuable and allowed the Commission to advocate strongly for changes to the LPDJ that

would not only be beneficial for the regulation of the legal profession, but ultimately provide improved outcomes for consumers of legal services and the public more broadly.

Following publication of the report, the Commission continued to engage with the Reviewer, and subsequently, the Attorney-General and Department on the development of draft legislation to give effect to its recommendations. The *Legal Practitioner (Strengthening Disciplinary Matters) Amendment Bill 2026* which was introduced to parliament during the reporting year was the outcome of extensive consultation and gives effect to the recommendations of the Report. Ultimately the Bill will see the return of the LPDJ to the Supreme Court which will alleviate the backlog and other pressures being experienced by QCAT, delivering speedier resolution of disciplinary matters brought by the Commission. Importantly the Bill retains important features of the current disciplinary process by replicating procedural provisions, ensuring proceedings will be conducted largely in the same way they are currently conducted.

The Commission strongly advocated for further amendments to be included in the Bill to address other issues causing delays in the progression of disciplinary matters, including amendments which the Commission has advocated for over the last few years. The Commission will continue to engage with the Attorney-General and the Department to find opportunities to progress these amendments which we consider will improve the regulation of the legal profession for the benefit of the profession, consumers of legal services and the public more generally.

7.1.2 LSC CMS project

The Commission completed the first phase of its Case Management System (CMS) Project during the reporting period, with the successful implementation of Regis in May 2026. The project replaced a legacy system that had supported the Commission's operations for more than 30 years and no longer met the requirements of an increasingly complex regulatory environment.

The new system supports the Commission's core regulatory functions and is expected to deliver long-term benefits through:

- improved case management and workflow capability
- enhanced reporting and data analytics
- better accessibility and availability of information
- reduced reliance on manual processes and system workarounds
- a more sustainable technology platform to support future operations.

The implementation of Regis was a significant organisational undertaking that required substantial Commission resources over an extended period. Staff across the organisation contributed to system design, testing, data migration, training and implementation activities, often alongside demanding business-as-usual workloads. While extensive planning, contingency arrangements and phased implementation activities were undertaken to minimise disruption, the transition inevitably affected productivity and contributed to delays in progressing some work during the reporting period.

Phase 2 of the project is currently being scoped with an intention to commence in the next reporting year, subject to operational constraints.

7.2 Governance and organisational structure

A copy of the Commission's Organisation Chart can be found at Appendix B.

7.2.1 Commissioner

The Commissioner is an independent statutory officer appointed under the Act by the Governor-in-Council. The Commissioner reports to the Attorney-General and Minister for Justice and Minister for Integrity (the Attorney-General).

Being responsible for the Commission in the discharge of its statutory duties, the Commissioner ensures complaints made to the Commission are dealt with as efficiently and expeditiously as resources and service demands permit.

Commissioner Mahon was appointed as Commissioner on 16 October 2019 and holds a Bachelor of Laws with Honours and, on completion of five-year articles, was admitted as a Solicitor of the Supreme Court of Queensland.

In 2011, Commissioner Mahon was appointed a Notary Public, and the following year became a Fellow of the Australian Academy of Law. On announcing Commissioner Mahon's appointment, the Attorney-General acknowledged the Commissioner's distinguished career in private practice for more than 20 years (at that time) and her Women Lawyers Association of Queensland 2009 'Woman Lawyer of the Year' award. Commissioner Mahon was also the 2017 recipient of the QLS President's Medal.

In October 2023, Commissioner Mahon was re-appointed as Commissioner for a further five-year term.

7.2.2 The Commission's senior leadership team

In addition to the Commissioner, the Commission's Senior Leadership Team comprises the following roles and persons:

Deputy Commissioner - currently vacant

The Commissioner continues to advocate for the reinstatement of the Deputy Commissioner position to reflect the senior experience required for this role to support the Commissioner in their discharge of the functions of the Commission and to ensure better continuity of operations.

Director Professional Conduct - Kellie Grainger

The Director Professional Conduct leads the Commission's teams responsible for the intake and assessment of enquiries and complaints, the investigation of complaints and IMs, as well as investigations about possible offences under the Act (e.g. unlawful operators) and under PIPA (e.g. claim farming and PIPA advertising breaches). The role is also responsible for overseeing the Commission's compliance team and functions such as audits and review of claim farming notifications.

Kellie joined the Commission in August 2020, having previously worked at the regulator for the legal profession in the Northern Territory, the Law Society Northern Territory, for eight years. She holds a Bachelor of Laws and a Bachelor of Commerce. Following her admission in 1996, she worked in private practice in regional Queensland for over 16 years.

Special Counsel Litigation - Melissa Wilson

The Special Counsel leads the Commission's in-house Litigation team, responsible for conducting disciplinary proceedings, offence prosecutions and other enforcement action, and general litigation on behalf of the Commissioner.

Mel commenced with the Commission on secondment from the Office of the Director of Public Prosecutions (ODPP) in March 2026. During her 19-year career with the ODPP, she held a variety of legal roles, including 13 years as a Crown Prosecutor.

Director Operations - Christopher Smith

The Director Operations is responsible for overseeing the Commission's business operations, statutory obligations and service deliverables. This role also manages the development and implementation of policies and procedures for people management, governance and risk, finance, and systems.

Christopher joined the Commission in November 2025, with over ten years' senior leadership experience in the public sector leading corporate and governance functions. Christopher is a Certified Practising Accountant, a graduate of the Australian Institute of Company Directors, and holds a Graduate Diploma in Strategic Leadership.

7.2.3 Staff of the Commission

The Commission comprises the Commissioner and a full-time equivalent (FTE) team of 41 staff as at 30 June 2026. This includes permanent and temporary staff. This reporting year, staffing levels included 5 staff seconded from other departmental agencies, 3 staff appointed to higher duties, 4 staff members on extended leave and 4 staff on reduced working hours.

The Commission was granted limited life funding to continue 8 temporary appointments for the next reporting year. These temporary FTEs are included in the above Commission staff numbers.

7.2.4 Organisation change and workforce planning

The Commission continues to review its workforce, structure and operating model to ensure they remain aligned to its statutory responsibilities and operational demands. As demand for the Commission's services continues to grow, together with the size and complexity of matters being dealt with, the Commission remains focused on ensuring available resources are directed to areas of greatest need and regulatory impact.

During the reporting period, the Commission continued to invest in workforce capability through higher duties opportunities, job enrichment, cross-functional experience and targeted professional development. These initiatives

have supported staff development, broadened organisational knowledge and increased flexibility in the deployment of resources across the Commission.

The Commission is also reviewing how work is organised and delivered to identify opportunities to improve efficiency and address increasing work on hand. This includes examining existing processes, resource allocation and service delivery arrangements to ensure the Commission is well positioned to respond to ongoing demand and emerging challenges.

As part of the Commission's CMS Project, the Commission partnered with its implementation provider to deliver a comprehensive change management and training program in support of the new case management system. Training and implementation support were provided across the organisation to assist staff in adapting to new processes and ways of working. The Commission continues to monitor the implementation of the system and identify opportunities for further training, communication and support to help staff optimise use of the platform and realise improvements in workflow, reporting and service delivery.

The Commission will continue to explore opportunities to leverage technology and process improvements to support staff and reduce administrative burden. Together with the implementation of the new case management system, these initiatives are intended to support more efficient work practices and assist the Commission in responding to increasing demand as best it can within existing resource constraints.

7.2.5 Code of conduct

As an independent statutory body, the Commission currently employs legal officers and other staff who remain officers of the Department and public sector employees. In addition to the Commission’s professional, legal and ethical obligations, all staff adhere to the Code of Conduct for the Queensland Public Sector and the Department’s Charter. As a term of employment, the lawyers employed at the Commission are also subject to the professional obligations of all lawyers, including professional rules of conduct. All staff of the Commission are provided ethics and code of conduct training through the Department when onboarded and undertake refresher courses at intervals determined by the Department.

7.3 Performance reporting

The Commissioner’s performance criteria remained unchanged and are set out in the below table with the results for the reporting year.

As highlighted throughout the report, the Commissions performance against these service delivery targets have been impacted by a number of factors. The decrease in service deliverables is attributable to the continued growth in demand on the Commissions services, including the growing complexity of matters and volume of material, and the operational challenges present by the growing use of AI tools by persons engaging with the Commission. Service delivery performance was also significantly impacted by the CMS project and the redirection of resourcing toward project work at various points throughout the year. The Commission is focussed on reducing the timeframes for completion of complaints and investigations and undertaking a range of activities to assist with this in the next reporting period.

Service	Performance Target	2025-26
Enquiries: informal queries or enquiries that are made by telephone, writing, email or in person.	Respond to all enquiries in a timely manner.	
	Enquiries received:	**4,457**
	Response times	
	• 100% within 14 working days of receipt:	**87.91%**
Complaints: new complaints received.	Respond to all complaints received in a timely manner, giving users of legal services an independent, timely, effective, fair and reasonable means of redress for complaints.	**1,001**
	Complaints on hand at 30 June 2025:	**1,195**
Summary dismissals: number of complaints assessed and finalised by way of summary dismissal	Number of summary dismissals:	**515**
	Assess and finalise complaints that are deemed summary dismissals:	
	• 70% within four months:	**42.33%**
	• 100% within six months:	**66.60%**
IMs: investigation matters commenced by the Commissioner.	Commence own motion investigations where information comes to the attention of the Commissioner and is in the public interest to commence an investigation.	**178**
Investigate and finalise complaints and IMs.	Investigations finalised: number of complaints and IMs investigated and finalised (this figure does not include complaints that are summarily dismissed – set out above).	
	Number of investigations completed:	**158**
	Finalised	
	• 60% of investigations within 18 months:	**25.95%**
	• 100% within 24 months:	**42.41%**
Internal Reviews: there is no power or obligation under the Act to reconsider a matter. However, it is considered to be in the public interest to reconsider a statutory decision when requested, if the matter has not previously been reviewed, even though it has a significant resourcing impact.	Number of requests received:	**68**
	Number of requests accepted and reviewed where appropriate:	**4**
	• Decision affirmed:	**3**
	• Request not accepted:	**38**
	• Withdrawn:	**3**
Litigation matters: including disciplinary matters, summary offence prosecutions, other enforcement action and other civil proceedings.	Number of new litigation files opened:	**24**
	Number of matters finalised:	**59**

Service	Performance Target	2025-26
Disciplinary proceedings:	Number of decisions to commence a proceeding: Number of discipline applications filed: Number of discipline applications finalised (either application withdrawn or decision delivered):	**12** **12** **46**
Summary offence prosecutions (unlawful operators):	Number of new prosecution complaints filed: Prosecutions finalised: Successful convictions: Discontinued:	**1** **7** **4** **2**
ILP Compliance: ensure all LPDs of an ILP are contacted shortly after commencement of practice.	Number of initial self–assessment letters sent to directors of newly notified ILPs:	**0**
External Engagement: number of engagements with users of legal services, lawyers and stakeholders to help improve standards of conduct in the provision of legal services.	Complete 6 engagements per year: Continually review website and publications for both content and accessibility	**50** **Ongoing**

7.4 Financial reporting

The cost of administering the system for dealing with complaints in 2025-26 compared to the prior reporting year:

Legal Services Commission	2025-26 Original Budget $	2025-26 Amended Budget $	2025-26 Actual $	2026-27 Approved Budget[1] $
Employment Costs	5,878,700.00	5,890,500.00	5,594,527.31	6,108,00.00
Other Costs	4,558,200.00	5,442,600.00	5,618,635.16	3,477,000.00
Total	**10,436,900.00**[2]	**11,333,100.00**[2]	**11,213,162.47**[2]	**9,585,00.00**

1 CBRC approved $1.632 million in 2026-27 to support the Legal Services Commission to address demand for services. Funding of, $458,000 for phase two of the Case Management System was deferred from FY 2025-26 to FY 2026–27.

2 Includes funding for the Commission's Case Management System project that was carried over pending completion of phase 1 of the project.

External legal services costs

External legal services costs incurred in the reporting year include all costs of external legal service providers engaged by the Commission during the reporting period. The costs include briefing counsel, engagement of solicitors, and other legal services, as has been necessary to manage increased workloads and complex matters.

The services predominantly relate to the litigation of disciplinary proceedings and unlawful operator offence prosecutions.

The external legal services costs for the relevant periods were:

2025-26	2024-25
$778,936	$675,926

Penalties and costs

The penalties and costs received pursuant to orders of QCAT / LPC / Courts for the relevant periods were:

Orders	QCAT $	LPC $	Courts $	2025-26 total $	2024-25 total $
Penalties (QCAT/LPC/Courts)					
Ordered	74,000		4,000	78,000	11,000
Payments received (paid to consolidated revenue)	66,500		-	66,500	11,000
Written off	-	-	-		-
Payments pending at 30 June	14,000	-	1,500	15,500	4,000
Costs (QCAT/LPC/Courts)					
Ordered, agreed or assessed	(174,974)+	-	30,750	(149,224)+	45,000
Payments received	226,650	-	30,750	257,400	111,650
Written off	-	-	-		-
Payments pending at 30 June	136,499		19,650	156,149	104,999

*Courts – include matters heard in the Magistrates, District and Court of Appeal

+ Includes costs ordered against the Commission

7.5 Legal Practice Committee

The LPC hears and decides discipline applications filed by the Commissioner that involve the less serious charge of unsatisfactory professional conduct and will not result in the removal of the legal practitioner's name from the local roll or suspension from practice. The Committee also hears matters involving alleged misconduct of law practice employees.

The Act requires that the Commission provides administrative and secretariat support to the Committee.

There were no matters filed with or heard by the Committee in the reporting year.

Legal Practice Committee	
Act or instrument	*Legal Profession Act 2007*
Functions	The Committee hears and decides discipline applications lodged by the Commissioner that involve the less serious charge of unsatisfactory professional conduct of a legal practitioner and matters involving misconduct of law practice employees. The Committee also has an advisory function to monitor the effectiveness of legal profession rules and make recommendations to the Attorney-General.
Achievements	Did not sit in 2025-26 financial year.
Financial reporting	Transactions of the entity are accounted for in the financial statements for the Commission.

Remuneration

Position	Name	Meetings / sessions attendance	Approved annual, sessional or daily fee	Approved sub-committee fees if applicable	Actual fees received
Chair	Patricia Schmidt	N/A	N/A	N/A	N/A
Chair	Richard Douglas KC	N/A	N/A	N/A	N/A
Practitioner Member	John McKenna KC	N/A	N/A	N/A	N/A
Practitioner Member	Martin Conroy	N/A	N/A	N/A	N/A
Practitioner Member	Barbara Houlihan	N/A	N/A	N/A	N/A
Practitioner Member	Michael Stewart KC	N/A	N/A	N/A	N/A
Lay Member	Loretta Lynch	N/A	$250.00 Sessional fee	N/A	$0.00
Lay Member	Alice Ruhe	N/A	$250.00 Sessional fee	N/A	$0.00
Practitioner Member	Michael Stewart KC	N/A	N/A	N/A	$0.00
Practitioner Member	James (Brett) Heading	N/A	N/A	N/A	$0.00

Position	Name	Meetings / sessions attendance	Approved annual, sessional or daily fee	Approved sub-committee fees if applicable	Actual fees received
Practitioner Member	Lidia Vicca	N/A	N/A	N/A	$0.00
Lay Member	Patrice McKay	N/A	$250.00 Sessional fee	N/A	$0.00
Lay Member	Peter Ranson	N/A	$250.00 Sessional fee	N/A	$0.00
No. scheduled meetings	0				
Total out of pocket expenses	*Nil expenses*				

7.6 Risk management and accountability

In addition to regular risk management and statutory reporting obligations, the Commission continues to review, update where necessary and report on the following matters:

- workplace health and safety and psychosocial wellbeing matters
- building evacuation procedures
- business continuity planning
- people initiatives including career progression, positive performance management frameworks and engagement strategies
- security standard operating procedures and staff training
- governance and risk management frameworks and procedures.

7.7 External scrutiny

The Commission responded to eight complaints received by the Queensland Ombudsman, which resulted in no further action. There were no significant findings or reports handed down by the Queensland Ombudsman specifically related to the Commission.

During the reporting year the Commission responded to five requests for external review of a decision made to the Office of the Information Commissioner (OIC), all of which were ongoing at 30 June 2026. One external review by the OIC from the previous reporting year was finalised in this reporting year with the decision of the Commission affirmed.

7.8 Service delivery complaints

Feedback is an important tool to assist the Commission to continue to improve the quality of service provided. Constructive feedback, including complaints, helps us to identify areas for organisational improvement, staff development and training, and what we are doing right.

The Commission undertook further review of its draft service delivery complaints handling policy following feedback and suggested improvements from the Queensland Ombudsman and to reflect operational changes within the Commission. The policy will be published to the Commission's website shortly.

The Commission received 26 service complaints and finalised 25 during the year, including those from previous reporting years. There were 20 matters that required no further action. This reporting year saw a slight decrease in service delivery complaints received than the previous period, however the number of these complaints received still remains higher than past years. Most of the complaints received relate to issues of delay and communication on aging complaint and investigation files. Part of the reduction is attributable to the changes made to the Commission process for dealing with such matters and the implementation of greater levels of frontline engagement by officers handling complaints and investigations to prevent issues from escalating to formalised service delivery complaints. The Commission will continue to monitor these complaints and any trends identified to inform any organisational improvement activities or training required.

Responsibility for the handling of these complaints moved to the Commission's Operations Team during the reporting year, with a view to improving response times for these complaints.

7.9 Information and record keeping

The Commission's regulatory functions rely on robust information and record-keeping practices. Those practices are not only mandated by legislative and state government requirements but are also essential for ensuring the Commission remains informed and equipped to effectively discharge its responsibilities. All records and information are stored, maintained and disposed of in accordance with relevant legislation, state government protocols, and the Commission's Retention and Disposal Schedule.

During the reporting period, the Commission completed the first phase of its CMS Project with the implementation of *Regis*, replacing the Commission's legacy case management system which had supported its operations since inception and was developed some 30 years ago. The new system provides a contemporary platform for managing the Commission's regulatory functions and significantly enhances its information management and record-keeping capabilities. The implementation of *Regis* also established a more structured approach to the management of records, including the expanded use of SharePoint for document storage and information governance.

The transition to *Regis* will improve the Commission's ability to capture, manage and report on information across its core business areas. The project also provided an opportunity to review and modernise a range of business processes that had developed over time to accommodate limitations in the previous system. While further refinement and optimisation will continue as the system matures, the Commission has established a stronger technological and record-keeping foundation to support its ongoing regulatory and statutory responsibilities.

During the reporting period, the Commission continued to work collaboratively with the Queensland Law Society to manage information sharing requirements arising from changes to external systems. Interim solutions, including

manual processes and the establishment of a secure information-sharing portal, have assisted in maintaining the flow of information required by the Commission to perform its functions. The second and final phase of the CMS Project is intended to further enhance information sharing and reduce reliance on manual processes through system integration and automation initiatives, delivering additional efficiencies for both organisations. Integration of the data sharing with both the QLS and the BAQ are critical to the ongoing efficient sharing of data in the co-regulatory model

7.10 Human rights

The Commission treats all people with dignity and respect. The Commission is committed to protecting and promoting the human rights of all people as we maintain a culture that encourages and respects human dignity. As a statutory authority, we have an obligation to act and make decisions in a way that is compatible with human rights, and when making a decision, to give proper consideration to human rights.

While the very nature of the regulatory work that we do results in making decisions that may impact individual human rights, all decisions appropriately consider and are compatible with human rights. Where there is any limitation imposed on an individual's human rights, it is done so lawfully and where such limitation is considered reasonable and justifiable. These decisions are consistent with the greater public interest, in seeking to protect consumers of legal services, maintain the standards expected of lawyers, helps to maintain confidence in the legal profession and the administration of justice, and ensures ethical conduct, consistent with the purposes of the regulatory regime set out in the Act (sections 3, 22 and 416).

The Commission has reviewed, and continuously reviews, all decision-making processes, policies and guidelines to ensure their continued compatibility with human rights and/or compliance with the *Human Rights Act 2019*.

7.11 Open data

Without limiting our powers and obligations under the Act, the Commission aligns with the Department's Open Data Strategy. For more information on the Open Data Strategy, visit the Queensland Government Open Data Portal at https://www.data.qld.gov.au.

7.12 Queensland language services policy

The Commission continued to provide access to translator services for people from non-English speaking backgrounds, and relay services for people with hearing and vision impairments.

7.13 Interpreter services

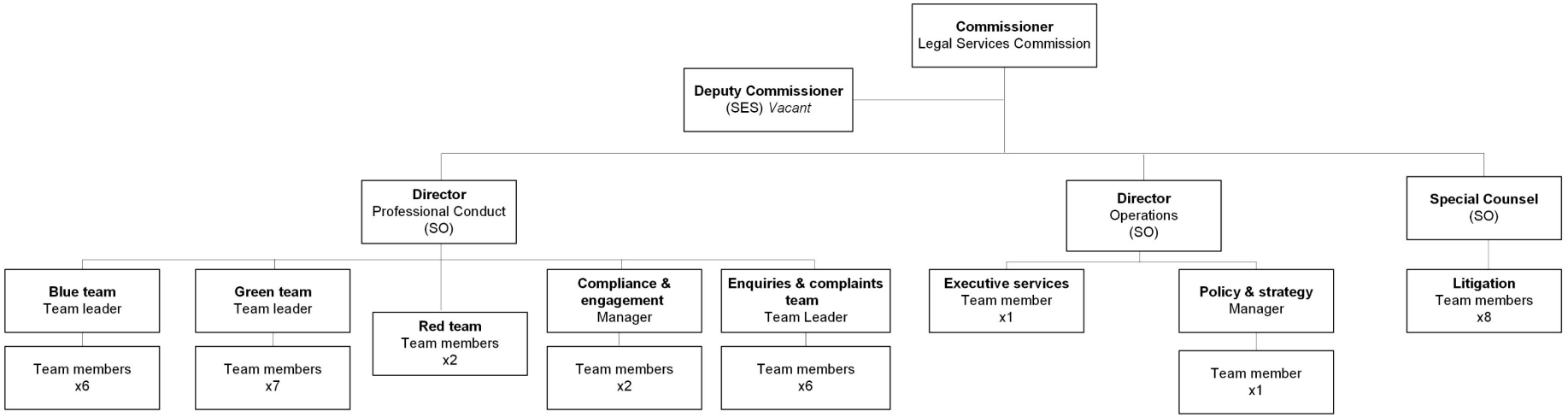
Interpreter services are available for all Commission's publications and online information, and on request for Commission events and for activities undertaken by third parties on the Commission's behalf.

8. Appendices

Appendix A – Glossary

Abbreviations and acronyms	
Act	*Legal Profession Act 2007*
Attorney-General	Attorney-General and Minister for Justice and Minister for Integrity
BAQ	Bar Association of Queensland
CMS	Case Management System
Commission	Legal Services Commission
Commissioner	Legal Services Commissioner
Department	Department of Justice (Queensland)
Investigation matter (IM)	Pursuant to the Act the Commissioner has power to commence an investigation without a formal complaint being made
ILP	Incorporated legal practice
MAIC	Motor Accident Insurance Commission
LPAB	Legal Practitioners Admissions Board
LPC	Legal Practice Committee
LPD	Legal practitioner director (of an ILP)
PIPA	*Personal Injuries Proceedings Act 2002*
QCAT	Queensland Civil and Administrative Tribunal
QLS	Queensland Law Society
UPC	Unsatisfactory professional conduct
WCR	Workers' Compensation Regulator

Appendix B – Legal Services Commission organisational chart



Appendix C – Compliance checklist

Summary of requirement		Basis for requirement	Annual report reference
Letter of compliance	• **A letter of compliance from the accountable officer or statutory body to the relevant Minister/s**	ARRs – section 7	3
Accessibility	• **Table of contents** • **Glossary**	ARRs – section 9.1	4-5 60
	• **Public availability**	ARRs – section 9.2	2
	• **Interpreter service statement**	*Queensland Government Language Services Policy* ARRs – section 9.3	2, 59
	• **Copyright notice**	*Copyright Act 1968* ARRs – section 9.4	2
	• **Information Licensing**	*QGEA – Information Licensing* ARRs – section 9.5	2
General information	• **Introductory Information**	ARRs – section 10	13-17
Non-financial performance	• **Government's objectives for the community and whole-of-government plans/specific initiatives**	ARRs – section 11.1	-
	• **Agency objectives and performance indicators**	ARRs – section 11.2	52-54
	• **Agency service areas and service standards**	ARRs – section 11.3	52-54
Financial performance	• **Summary of financial performance**	ARRs – section 12.1	54-55
Governance – management and structure	• **Organisational structure**	ARRs – section 13.1	50-51, 61
	• **Executive management**	ARRs – section 13.2	50-51
	• **Government bodies (statutory bodies and other entities)**	ARRs – section 13.3	53-55
	• **Public Sector Ethics**	*Public Sector Ethics Act 1994* ARRs – section 13.4	52
	• **Human Rights**	*Human Rights Act 2019* ARRs – section 13.5	59
	• **Queensland public service values**	ARRs – section 13.6	-
Governance – risk management and accountability	• **Risk management**	ARRs – section 14.1	57
	• **Audit committee**	ARRs – section 14.2	-

	• **Internal audit**	ARRs – section 14.3	-
	• **External scrutiny**	ARRs – section 14.4	57
	• **Information systems and recordkeeping**	ARRs – section 14.5	58
	• **Information Security attestation**	ARRs – section 14.6	-
Governance – human resources	• **Strategic workforce planning and performance**	ARRs – section 15.1	51-52
	• **Early retirement, redundancy and retrenchment**	Directive No.04/18 *Early Retirement, Redundancy and Retrenchment* ARRs – section 15.2	-
Open Data	• **Statement advising publication of information**	ARRs – section 16	59
	• **Consultancies**	ARRs – section 31.1	https://data.qld.gov.au
	• **Overseas travel**	ARRs – section 31.2	https://data.qld.gov.au
	• **Queensland Language Services Policy**	ARRs – section 31.3	https://data.qld.gov.au
	• **Charter of Victims' Rights**	*VCSVRB Act 2024* ARRs – section 31.4	https://data.qld.gov.au
Financial statements	• **Certification of financial statements**	FAA – section 62 FPMS – sections 38, 39 and 46 ARRs – section 17.1	3
	• **Independent Auditor's Report**	FAA – section 62 FPMS – section 46 ARRs – section 17.2	-

FAA	Financial Accountability Act 2009
FPMS	Financial and Performance Management Standard 2019
ARRs	Annual report requirements for Queensland Government agencies
QGEA	*Queensland Government Enterprise Architecture*
VCSVRB	*Victims' Commissioner and Sexual* Violence *Review Board Act 2024*