

Department of State Growth

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Our Ref: MPR26/54/4

Hon Ruth Forrest MLC
Chair
Public Accounts Committee
E-mail: ruth.forrest@parliament.tas.gov.au

Dear Chair *Ruth.*

I am writing in relation to the Probity Plan committed to by the Tasmanian Government as part of the *Macquarie Point Multipurpose Stadium – Governance, Oversight and Assurance Framework*.

As I outlined to you in my correspondence of 3 February 2026, I appointed MODA Consulting as the Independent Probity Adviser for the Macquarie Point Precinct Project. In line with the Government's commitment, one of their first tasks was to complete a Probity Plan within 60 days of the *State Policies and Projects (Macquarie Point Precinct) Order 2025* passing the Tasmanian Parliament, or before the first plan is approved.

The Probity Plan has now been approved and will be made publicly available in line with the Government's commitment. I have enclosed a copy of the Probity Plan for the Committee's reference.

If you have any questions, please contact Andrew Johnson, Director – Office of the Secretary by email at andrew.johnson@stategrowth.tas.gov.au

Yours sincerely

A handwritten signature in blue ink, appearing to read "Craig Limkin". The signature is fluid and cursive, written over a light blue horizontal line.

Craig Limkin
Secretary

4 March 2026

Enc: Probity Plan



State Policies and Projects (Macquarie Point Precinct) Order 2025

Probity Plan

version 3.0 24 February 2026

Document Control Table

Version	Date	Status	Approver
1.0	9 Feb 2026	IPA-prepared working draft for DSG Review	Andrew Harris
2.0	18 Feb 2026	Incorporation of DSG Review comments	Andrew Harris
3.0	24 Feb 2026	Incorporation of OC review comments	Andrew Harris

Acronyms & Abbreviations

Acronym	Meaning
AHC	Aboriginal Heritage Council
AHT	Aboriginal Heritage Tasmania
CC	Macquarie Point Urban Renewal Cabinet Committee
COI	Conflict of Interest
DPAC	Department of Premier and Cabinet
DPFEM & SES	Department of Police, Fire and Emergency Management and the State Emergency Service
DSG	Department of State Growth
EPA	Environment Protection Authority
GOA Framework	Macquarie Point Multipurpose Stadium - Governance, Oversight and Assurance Framework
HCC	Hobart City Council
IPA	Independent Probity Advisor
MAST	Marine and Safety Tasmania
MPDC	Macquarie Point Development Corporation
NRE Tas	Department of Natural Resources and Environmental Tas
OC	Macquarie Point Urban Renewal Oversight Committee
PAC	Parliamentary Public Accounts Committee
RSL	Returned & Services League of Australia (Tas)
The Order	State Policies and Projects (Macquarie Point Precinct) Order 2025
TSO	Tasmanian Symphony Orchestra
UTAS	University of Tasmania

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Background

The Order

The *State Policies and Projects (Macquarie Point Precinct) Order 2025* (the Order) allows the Macquarie Point Multipurpose Stadium (the Stadium) to proceed as a project of state significance, subject to conditions. The Order took effect on 4 December 2025.

These conditions cover a wide range of requirements including detailed plans for matters such as design, construction, heritage and environmental management and operational arrangements. Compliance with the Order will be underpinned by a structured system of plans, consultation, approvals, and enforcement mechanisms.

The Order allows the Project¹ to proceed as if relevant permit and approvals were issued under the:

- *Land Use Planning and Approvals Act 1993*
- *Historical Cultural Heritage Act 1995*
- *Aboriginal Heritage Act 1975*
- *Environmental Management and Pollution Control Act 1994*.

A separate building permit will be required under the *Building Act 2016* for the construction of the Stadium.

The GOA Framework

The Macquarie Point Multipurpose Stadium Governance, Oversight and Assurance Framework (the GOA Framework) provides a structured approach to managing the Stadium Project. It clarifies the relationship between:

- *Governance*, which sets the rules and decision-making authority
- *Oversight*, which monitors compliance and performance
- *Assurance*, which delivers independent validation of project health and readiness.

Section 5.1 of the GOA Framework requires a Probity Plan to be developed outlining compliance and administrative requirements set out in the Order. An Independent Probity Advisor (IPA) has been appointed to monitor and assess compliance with the administrative decision-making processes set out in the Order and offer proactive guidance on probity issues throughout the project lifecycle.

Reports from the IPA will be provided to the:

- Macquarie Point Urban Renewal Oversight Committee (OC)
- Public Accounts Committee of the Tasmanian Parliament (PAC).

¹ Project is defined in Clause 3 of the Order

Purpose and Structure of this Plan

This Probity Plan sets the standards, assurance controls and processes to ensure that all compliance administrative decisions and processes related to the Stadium Project pursuant to the Order are conducted with integrity, fairness and transparency thereby maintaining public confidence.

It also gives effect to the GOA Framework requirement that a probity plan be developed and made publicly available and formalises the appointment, independence and reporting line of the IPA.

This Probity Plan applies to all Tasmanian Government agencies engaged in the Macquarie Point Urban Renewal Program including the Macquarie Point Development Corporation (MPDC), Stadiums Tasmania, and advisors and contractors involved in the planning, delivery and operational stages of the Stadium Project.

This Plan comprises two parts:

- Part A – Roles and Responsibilities under the Order
- Part B – Probity Management.

Related Documents

This Probity Plan is to be read in conjunction with:

- *State Policies and Projects (Macquarie Point Precinct) Order 2025*
- Macquarie Point Multipurpose Stadium Governance, Oversight and Assurance Framework
- Conflict of Interest Management Plan
- State Service Principles and State Service Code of Conduct
- Purchasing Framework Better Practice Guidelines
- Treasurer's Instructions issued under the *Financial Management Act 2016*
- Infrastructure Tasmania Project Assurance Framework
- Independent project, design and technical quality and assurance reviews initiated by MPDC.

Scope

This Probity Plan applies to:

- Development, approval and administration of all plans, permits and conditions required under the Order (e.g., Staging Plans, Design Plans, Operational Management Plans, Construction Environmental Management Plans, noise, transport and heritage plans).
- Engagements, negotiations and communications with stakeholders identified in the Order and GOA Framework (for example, but not limited to, TasPorts, Hobart City Council, Environment Protection Authority (EPA), Heritage Tasmania, Australian Football League/Cricket bodies), including the Design Quality and Integrity Review Panel processes.

Note that references to the relevant sections in the Order are included in this Probity Plan.

Risk Appetite Statement - Probity

The GOA Framework states that the Project parameters support stringent risk management, underpinned by regular monitoring and reporting (page 5). This proactive reporting supports early issues identification and risk mitigation (page 15).

With the above governing framework in mind, the risk appetite on the Stadium project for the management of matters of probity is considered Low. This means a conservative and risk-averse operating and governance environment has been set regarding administrative decision-making arrangements under the Order.

The IPA will develop and maintain a suite of probity and assurance controls to reflect this risk appetite statement, as outlined in Part B of this Probity Plan.

IPA Relationship to the Project-Level Probity & Assurance Advisors

The IPA's role is to monitor and assess compliance with the administrative decision-making processes set out in the Order and offer proactive guidance on probity issues throughout the project lifecycle. The IPA operates independently of the Project team and reports directly to the OC.

In contrast, Project team management arrangements are the responsibility of the Proponent with RSM Australia providing project-level probity advice and Scyne performing ad hoc reviews on procurement documentation and key management plans. Where relevant, this Probity Plan makes specific reference to this contrast in probity and assurance roles.

Governance, Independence and Roles

The GOA Framework and Order requirements set out the following clear "Line of Sight" for Project delivery governance:

- *MPDC*: The MPDC is the delivery agency responsible for procurement and delivery within Cabinet endorsed parameters. The MPDC will provide monthly reporting to the MPDC Board, and then to the OC within endorsed parameters.
- *Macquarie Point Urban Renewal Oversight Committee*: The OC has whole of government strategic oversight of the Macquarie Point Urban Renewal Program and can request deep dives into aspects of the Project and make recommendations on escalation of matters to the Cabinet Committee.
- *Macquarie Point Urban Renewal Cabinet Committee (CC)*: The CC provides Ministerial oversight of the Macquarie Point Urban Renewal Program and coordinates advice to Cabinet.
- *Parliamentary Public Accounts Committee*: The PAC will receive quarterly reports from the OC and may receive confidential assurance material.
- *Regulators under the Order (e.g., EPA Director, Heritage Council, TasWater, Planning Authority)*: Regulatory agencies enforce specified schedules or conditions under the Order.

Part A – Defining Roles & Responsibilities Under the Order

Introduction

Plans sit at the centre of the Order’s structure because they convert the high-level statutory conditions into detailed and actionable requirements that govern the design, construction and operation of the Stadium. Through these Plans, the Order specifies what must be addressed, who is responsible for preparing each component, and which agencies hold approval and oversight functions.

As a result, the Plans serve as the principal instruments through which roles and responsibilities are assigned, coordinated and monitored across the Project. The Order further establishes a clear governance framework in which the preparation, approval and enforcement of these Plans define the respective obligations of parties involved in the delivery of the Project.

This clarity of roles and responsibilities - structured around the lifecycle of each Plan - directly informs the Probity Plan by ensuring that oversight, decision rights and regulatory interactions are predictable, auditable and conducted with due process throughout the delivery of the Project.

Scope of Parties

The Order identifies a number of agencies or entities involved in the delivery and operation of the Project, including:

- The Proponent
- The Operator
- Department of State Growth (DSG)
- Other State Government Agencies
- Planning Authority
- Third Party Organisations to be consulted
- The Design Quality and Integrity Review Panel.

The following sections provide a summary of the roles for each of these parties.

The Proponent

The MPDC is established under the *Macquarie Point Development Corporation Act 2012* to deliver the Stadium as part of its statutory function to redevelop the Macquarie Point site. The MPDC is to ensure it maintains robust internal governance arrangements in place with independent quality reviews and a Probity Advisor to oversight procurement processes.

As defined in the Order, the Proponent is the MPDC and only the Proponent may prepare and submit plans or documents under the Order. Any document lodged by a third party has no effect, confers no approvals, and does not satisfy any condition of the Order.

Ultimately, it is the Proponent that is legally responsible for meeting the conditions imposed by the Order.

If a plan linked to a decision made under the Order is submitted by entities other than the Proponent (e.g., contractors or Stadiums Tasmania as the operator) then the MPDC must first authorise this as a Proponent-approved plan and clearly communicate that authority to the Secretary of DSG.

The Operator

The Operator, as defined in the Order, is Stadiums Tasmania. The direct obligations of Stadiums Tasmania under the Order cover access to all project documents (Condition A10), social impact assessment and post-occupation monitoring (Condition D13), and compliance with TasWater trade wastewater conditions (Condition T6).

Department of State Growth

Overall responsibility for the administration of the Order sits with DSG as it holds administrative responsibility for the *State Policies and Projects Act 1993*².

The Minister for Housing and Planning is the responsible Minister for initiating the Order by formally recommending its making to the Governor, which resulted in the Macquarie Point Stadium being declared a project of State significance under the *State Policies and Projects Act 1993*. Through this act of recommendation and initiation, the Minister set in motion the framework under which the Project is governed, regulated and enforced.

The Secretary of DSG is responsible for taking a range of administrative actions under the Order. These are further detailed in this Plan but include:

- The approval of plans (often in consultation with others)
- The establishment of a Design Quality and Integrity Review Panel
- Maintaining a register of approved plans and documents.

Other State Government Agencies

Several other Tasmanian Government agencies have roles and responsibilities under the Order. These are:

- The Environmental Protection Authority (EPA) – the Director of the EPA has a role in approving plans (usually in consultation with the Secretary, DSG) and the Proponent must issue the EPA with various notifications as specified in the Order. The EPA is also responsible for enforcement of the Construction Environmental Management Plan and the environmental conditions contained in Schedule 5 of the Order.
- Heritage Tasmania - within the Department of Natural Resources and Environmental Tas (NRE Tas) - is responsible for approving plans required under Schedule 4 of the Order.
- Tasmanian Heritage Council - as established under the *Historic and Cultural Heritage Act 1995* - is responsible for the enforcement the historic cultural heritage conditions in Schedule 4 of the Order.

² See Administrative Arrangement Orders 2025.

- The Minister for Aboriginal Affairs is responsible for the approval of the Unanticipated Discovery Plan required by Condition AH5 (Schedule 3).
- The Director, National Parks and Wildlife (currently this is the Secretary of NRE Tas) is responsible for the enforcement of the Aboriginal heritage conditions included in Schedule 3 of the Order.
- TasWater is responsible for providing consents as necessary under Schedule 6 and for the enforcement of Schedule 6. The Secretary, DSG is to consult with TasWater in approving a final survey of plans under Condition D14.
- TasNetworks is responsible for approval of certain elements of the Electrical Network Services Plan as listed in B15. The Secretary, DSG must consult with TasNetworks before approving the Electrical Network Services Plan and the final survey of plans (Condition D14).
- TasPorts must be consulted with during the preparation and approval of various plans, for example, the Construction Environmental Management Plan, the Operational Noise Management Plan under Condition D12, the Events Management Plan under condition D7 and a Special Event Management Plan under Condition A5.
- Marine and Safety Tasmania (MAST) must be consulted during the preparation and approval of various plans, for example, the Public Domain and Landscaping Plan prepared under condition B3 and the integrated lighting strategy under Condition D3.

While not explicitly required by the Order itself, the Government has committed to ensuring that:

- The Head of the State Service (currently the Secretary, Department of Premier and Cabinet) is consulted before the Secretary, DSG makes a decision on any condition in the Order
- The Department of Police, Fire and Emergency Management and the State Emergency Service (DPFEM & SES) will be consulted as part of the development and approval of the Flood and Emergency Evacuation Management Plan.

Planning Authority

Under the Order, Hobart City Council (HCC or Council) is formally recognised as the planning authority. The Order assigns the Council several responsibilities that align closely with its stewardship of local infrastructure and public realm assets. Council plays an essential role in reviewing and approving detailed plans that affect its networks - such as stormwater systems, footpaths, road interfaces and subdivision services - and it is a required consultation partner for several operational and environmental management plans.

At the same time, the Order establishes a State-led approvals and regulatory framework, reflecting the Project's designation as one of State significance. Council's role therefore shifts to a more targeted and collaborative function, centred on ensuring that State led plans integrate appropriately with municipal infrastructure and long-term local service needs.

In terms of statutory enforcement, Council continues to exercise important compliance responsibilities for areas expressly assigned to it under the Order (i.e. Schedules 7 and 8).

The Probity Plan acknowledges the different roles of Council under the Order in the delivery of the Project.

Third party organisations

The Order mandates that consultation with the following organisations must occur during the development of the Construction Environmental Management Plan (Condition C1), the Operational Noise Management Plan (Condition D12), the Events Management Plan (Condition D7) and a Special Event Management Plan (Condition A5):

- Baha'i Centre of Learning
- Federal Group
- Returned and Services League (RSL) of Australia (Tasmania Branch)
- Tasmanian Symphony Orchestra
- University of Tasmania.

Note, there are also consultation requirements in the Order for specific circumstances - for example, Schedule 3, AH3 which provides that relocation of relics must be consistent with advice provided by the Aboriginal Heritage Council as a result of consultation with the Tasmanian Aboriginal community.

Design Quality and Integrity Review Panel

The Design Quality and Integrity Review Panel, established by the Secretary of DSG under Condition A9, is a central mechanism in the Order for ensuring the Stadium's architectural, landscape and urban design outcomes meet the standards expected of a project of State significance.

Condition A9 requires the Secretary to appoint a panel of three to five members with expertise spanning architecture, landscape architecture, urban design and heritage, ensuring that design decisions are informed by independent and multidisciplinary professional judgement.

Under Condition A9, the Panel must review key design solutions at the earliest stages of development and provide formal feedback to the Proponent before core Plans are submitted for approval. This structured review process strengthens design integrity, improves coordination across agencies, and helps ensure the Stadium integrates appropriately with its urban and heritage context.

Decision Making Controls Required by the Order

This Plan embeds controls around the Order's approval pathways, consultation requirements, and publication and notification duties as follows:

Document Approvals & Registers (Conditions A1–A4):

The conditions ensure that every "relevant document" (plans, strategies, reports) is prepared by a suitably qualified person and is approved by the Secretary of DSG after regulator consultation, provided to relevant regulators within 14 days and published unless security/commercial exemptions apply. Relevant documents are recorded on the Secretary's quarterly register which is tabled in Parliament.

Consultation Protocols (Conditions AA1–AA3):

The conditions prescribe a minimum 28-day consultation period, unless agreed otherwise; There are steps to reach consensus with relevant regulators, to take into account Design

Quality and Integrity Review Panel feedback, where applicable, and governing scheduling and evidence consultation as a probity requirement.

Design & Staging Approvals (Conditions B1–B15) and Operational Readiness (Conditions D1–D14):

There are probity checkpoints at each holding point where Secretary and/or Regulator approval is required (e.g., Public Domain & Landscaping Plan, Signage & Wayfinding Plan, Design Plans, Transport/Noise/Waste/Security/Evacuation Plans; final plan of survey). Conflict of interest registers are to be maintained for all contributors to these approvals.

Special Events (Condition A5) and Noise/Hours (Conditions D2, D12):

The conditions seek to ensure the consistent application of thresholds, Secretary approvals for exceptions, and evidence of the conduct of the required stakeholder consultation (A6; with TSO, RSL, HCC, TasPorts, UTAS).

Regulatory & Enforcement Schedules (3–8):

The schedules cover Heritage, Aboriginal heritage, environmental, TasWater and HCC and the conditions have distinct enforcement leads. Probity will require transparent traceability from condition to evidence of compliance in these categories.

Summary of Roles & Responsibilities: Order Conditions

Table 1 (overpage) provides a summary of the roles and responsibilities of the entities contained in the Order in the development, consultation, approval, and enforcement of required Plans.

Table 1 – Roles & Responsibilities: Order Conditions

Party	Must be consulted during preparation of Plans	Submits Plans	Must be consulted during approval of Plans	Approves Plans	Enforces Plans
Aboriginal Heritage Council	AH3				
Aboriginal Heritage Tasmania	AH2; AH5				
Design Quality and Integrity Review Panel	A9				
MPDC (Proponent)		B2; B3–B8; B9–B11; B13–B15; C1–C4; D5–D12			
Stadiums Tasmania (Operator)		D13 (reports)			
Secretary (DSG)			AA3	B3; B5; B7; B9–B15; C1; C3; D1; D5; D7–D12	
Minister for Aboriginal Affairs			AH5	AH5	
Director of EPA			B2; B7; C1; C3	C1 (confirmation)	Schedule 5; C1; CN2
NRE Tas (Heritage Tas)	AH5		H1–H7	H1; H6	Sched. 3: Director NPW; Sched. 4: Heritage Council
Heritage Council					Schedule 4
TasWater				T11–T12; T16; T21–T23	Schedule 6
TasNetworks			B15; D14	B15, T4	
TasPorts	A5; A6; B3–B4; D12		C5; B3; D11		

Party	Must be consulted during preparation of Plans	Submits Plans	Must be consulted during approval of Plans	Approves Plans	Enforces Plans
Marine & Safety Tasmania			D3; D11		
Hobart City Council (Planning Authority)	A6; D7; D12; B11; B14		B11; B14	Schedule 7 (ENG, SW, R, Rs)	Schedule 8 – A1; A5; B2; B3; B5; B7; B10; B13–B15; C3–C5; D1–D14; Schedule 7
Baha’i Centre of Learning	A5; A6; A7; D12				
Federal Group	A5; A6; A7; D12				
RSL (Tas Branch)	A5; A6; A7; D12				
Tasmanian Aboriginal Community	AH3				
Tasmanian Symphony Orchestra	A5; A6; D7; D12(h)(i)–(m)				
University of Tasmania	A5; A6; A7; D12				

The Government has committed to ensuring that:

- The Head of the State Service (currently the Secretary, Department of Premier and Cabinet) is consulted before the Secretary, DSG makes a decision on any condition in the Order
- The Department of Police, Fire and Emergency Management and the State Emergency Service (DPFEM & SES) will be consulted as part of the development and approval of the Flood and Emergency Evacuation Management Plan. The Flood and Emergency Evacuation Management Plan

These commitments are not included in the Order.

Part B – Probity Management

Probity Objectives

The IPA's role is to provide guidance and advice, where required, to ensure that the following probity principles are upheld at all times.

1. *Integrity & Impartiality*: Decisions are based on merit, free from bias, favouritism and improper influence
2. *Transparency & Accountability*: Processes are documented; required plans and approvals are recorded, notified to relevant regulators and, where required, made public per the Order (A1–A4)
3. *Fairness & Consistency*: Comparable participants are treated consistently; information is provided on an equal basis, with clear audit trails
4. *Confidentiality & Information Security*: Information that is commercially sensitive, security sensitive or otherwise protected by law is safeguarded (including “in camera” handling where appropriate)
5. *Value for Money & Fitness for Purpose*: Achieved through structured and evidence-based processes, consistent with project parameters and cost controls
6. *Compliance*: All activities comply with the Order, applicable legislation and conditions set by relevant regulators.

Roles & Reporting Responsibilities of the IPA

The primary role of the IPA is to monitor and assess compliance with the administrative decision-making processes set out in the Order. In conducting this primary role, the IPA will offer proactive guidance on probity issues throughout the project lifecycle.

The IPA will observe and provide independent probity and assurance advice to the OC and the Secretary of DSG in relation to the identification, assessment, and management of risks arising during the administrative decision-making processes set out in the Order, to ensure they are conducted with integrity, fairness and transparency.

The IPA reports formally to the OC and administratively to the Secretary of DSG (not to the delivery team), reinforcing independence from operational and commercial decisions.

When providing probity advice under this Plan, the IPA's advice is to be consistent with:

- The administrative decision-making requirements of the Order
- The GOA Framework
- Probity guidance prepared by the Department of Premier and Cabinet (DPAC)
- Applicable Treasurer's Instructions under the *Financial Management Act 2016*
- Department of Treasury and Finance's Procurement Better Practice Guidelines (Principles and Policies), particularly Annex A Probity Guidelines for Procurement
- Any other applicable guidelines or instructions issued by the Tasmanian Department of Treasury and Finance relating to Probity Requirements.

Also, the IPA has a broad brief to attend meetings with the Proponent, operator and regulators, including officials of Tasmanian State Government agencies in providing oversight and assurance. This will involve:

- Real time probity advice and probity reports for the OC and Secretary of DSG that assess compliance of the administrative decision-making process outlined in the Order, including identified risks, observations and recommendations
- Providing proactive, expert advice during, and in connection with, the decision-making processes under the Order
- Providing probity advice to the Secretary of DSG as required
- Through the Secretary of DSG, providing advice to support other Government committees in providing whole-of-government strategic oversight and policy advice
- Provide real time probity advice across planning approvals, stakeholder consultations mandated by the Order (e.g. Condition A6)
- Reviewing key documents prior to decision or issue
- Maintaining a Probity Issues Register and Probity Advice Log
- Preparing Probity Reports for the OC
- Providing materials to the PAC “in camera” as required.

A detailed list of IPA roles and responsibilities is provided in the following summary table.

IPA Roles	Description	Reporting Responsibilities / To Whom	Reporting Frequency
Real-time Probity Advice	Provide ongoing advice across planning approvals and stakeholder consultations required under the Order.	Secretary, Department of State Growth; Oversight Committee (OC)	Continuous; monthly log
Monitor Decision-Making Compliance	Review compliance with administrative decision-making processes required under the Order.	Oversight Committee (monthly); PAC (quarterly)	Monthly & Quarterly
Probity Issues Register	Maintain Probity Issues Register; record issues, advice, decisions and risks.	Oversight Committee; Cabinet Committee for material breaches	Monthly; immediate for breaches
Probity Advice Log	Maintain formal log of all probity advice.	Oversight Committee; PAC (in camera)	Monthly & Quarterly
Conflicts of Interest Register & Management	Maintain a live COI Register; ensure all participants complete declarations.	Oversight Committee	Monthly
Spot Checks / Assurance Activities	Conduct spot audits on A6 consultation, A1–A4 publication compliance, evaluation records.	Oversight Committee; PAC	Quarterly or as scheduled

IPA Roles	Description	Reporting Responsibilities / To Whom	Reporting Frequency
Review Document Approvals (A1–A4)	Check compliance with approvals, regulator consultations, and publication rules.	Oversight Committee; PAC	Monthly
Review of Plans Under Order Approval/Hold Points	Review design, staging, operational plans including conflict checks.	Oversight Committee	Per approval gate
Probity Breach Management Oversight	Verify all suspected breaches are recorded, contained, notified, and corrected.	Oversight Committee; Cabinet Committee; PAC	Immediate
Probity Induction & Training	Deliver mandatory inductions and annual refreshers.	Oversight Committee	Annual; targeted sessions
Assurance & Gatekeeping Inputs	Integrate probity checks into Gate Reviews, Deep Dives, Health Checks.	MPDC; Oversight Committee	Monthly / per assurance event
Consultation Integrity Checks	Verify mandatory consultees, 28-day timeframes, and record completeness.	Oversight Committee	Ongoing
Escalation & Change Control Management	Verify requests for material changes to either Project to either scope, schedule, quality and/or budget.	Oversight Committee	As need arises
Information Security & Publication Compliance	Ensure application of A3 rules and classification of sensitive information.	Oversight Committee; PAC	Monthly & Quarterly

The above list of IPA roles will be actively reviewed by the OC and the Secretary of DSG as the Project progresses. Summary descriptions of the above-listed IPA roles are provided overpage.

Real-time Probity Advice

The Order sets out a highly structured approach to how plans (such as design documents, environmental plans and operational strategies) must be prepared, reviewed and approved before each stage of the Project can proceed. The IPA's role is to proactively support this framework by helping decision-makers navigate those requirements in real time, so that every step aligns with proper process and the public interest.

By being available as decisions arise, the IPA's involvement will help to ensure that the decision-making approval processes remain consistent, accountable and free from bias. This real-time oversight is designed to give stakeholders and the community confidence that the Project is being delivered with the highest standards of integrity.

In addition to regular meetings with key decision makers and Project delivery parties (e.g. the Proponent), the IPA will establish and maintain a monthly log of probity advice (see also Probity Advice Log, below).

Monitor Decision-Making Compliance

The Probity Plan embeds controls and assurance around the Order's approval pathways, consultation and evidentiary requirements to support decision-making by the Secretary of DSG and the Proponent which is demonstrably compliant with the Order.

Design & Staging Approvals (B1–B15) and Operational Readiness (D1–D14) under the Order provide for probity checkpoints at each holding point where the Secretary or a regulator's approval is required.

There is a public expectation that agency-driven plans and recommendations which are submitted to the Secretary of DSG for determination will have been developed consistently with both the Order and the objectives established by the GOA Framework (page 2) which include:

- Clear visibility of governance arrangements, decision-making processes, and project progress to the Tasmanian community and stakeholders (Transparency and Accountability) and
- Robust oversight and assurance. Decision records must include materials considered, reasoning, risk and probity considerations, and the final determination, including conditions.

The IPA will implement processes to monitor and review compliance with administrative decision-making processes required under the Order. This will include providing the Secretary of DSG with an assurance certification and a Probity Report to be included as part of the documentation which forms the submission for each decision to be made under the Order.

Post-decision, there is a requirement under the Order (A4) that the Secretary of DSG is to maintain a register of decisions made under the Order, including decisions not made by the Secretary.

Probity Issues Register

The IPA will establish and maintain a Probity Issues Register to manage probity issues arising during the delivery of the Project linked to administrative decision-making under the Order.

Regular monthly reporting will be provided to the OC, with material breaches reported immediately to the OC and, as required, Cabinet. Monthly reporting to the OC will take into account any probity management reporting by the Proponent on project-level probity matters.

See further detail also provided below under “Probity Breach Management Oversight”.

Probity Advice Log

All written probity advice provided by the IPA will be recorded in a Probity Advice Log, to be reported monthly to the OC and made available to the PAC.

The format of this Log will include information such as Date, Description of the probity matter, Severity (i.e. Red/Amber/Green), Action taken, and further comments on any additional probity management strategies that could be implemented.

Conflicts of Interest (COI) Register & Management

Requirement to complete a COI declaration

All individuals involved in the project must identify, declare, and appropriately manage any actual, potential, or perceived conflicts of interest. Decisions and actions must be taken in a manner that is impartial, transparent, and consistent with the public interest. A conflict of interest arises when personal, professional, or financial interests could improperly influence - or be seen to influence - the performance of official duties.

All participants (officials, Board members, panel members, evaluators, advisors and contractors) must complete COI declarations on induction and before each critical decision point (including evaluation stages and approval of “relevant documents”).

The IPA will establish, maintain and oversee a live COI Register.

Management of COIs

COIs will be managed or eliminated through recusal, role reassignment, information barriers, or removal from the process. Any residual management action must be recorded in meeting minutes and the Probity Issues Register maintained by the IPA.

The IPA will prepare a Conflict of Interest Management Plan and monitor agency compliance with requirements for controls to minimise risk of conflicts across the development and approval of plans, prescribed consultation and decision-making and the appointment of the Design Quality and Integrity Review Panel.

Gifts, Benefits, Hospitality & Lobbying

Acceptance of gifts, hospitality or benefits from current or prospective tenderers, consultants, or stakeholders where compliance decisions are pending is prohibited. Any offered item must be declined and reported to the IPA.

All unscheduled representations (lobbying or approaches) must be documented with material approaches disclosed to the IPA and OC for approval before proceeding. All approved meetings are to have agendas, a record of attendees and minutes.

Spot Checks / Assurance Activities

The IPA will recommend targeted probity spot audits where these may be warranted or desirable, for example, checks of consultation compliance under Condition A6, document publication and regulator notification requirements under Conditions A1–A4.

Findings and improvements will be tabled to the OC and, where appropriate, shared with PAC.

Review Document Approvals (A1–A4)

Order Conditions A1 to A4 establish general administrative rules about preparing, approving, sharing, and registering documents.

In summary, these administration rules cover the approval standard for all required documents (Condition A1), timing and notification requirements (Condition A2), what documents must be publicly available (Condition A3), creating and maintaining a formal register of approvals (Condition A4).

Review of Plans Under Order Approval/Hold Points

The Order’s structure establishes many approval hold points (e.g., “Before works commence...”, “Before the Stadium is used...”, “must be approved by the Secretary...”) throughout conditions such as B2, B3, B5, B7, C1, D5, D7, etc.

In this context, prior to approval by the Secretary of DSG, each relevant plan will be subject to the completion of an assurance review process undertaken by the IPA. While there are differences between the pathways of plans, the following broad assurance checks will be performed by the IPA in advance of submission to the Secretary of DSG for consideration and determination:

- Overarching requirements of the Order have been met
- Compliance with the Condition dependencies is evident
- Documentation requirements have been met, including content and consistency
- Evidence requirements have been met
- Compliance assurance has been conducted by the drafting agency
- Sequencing and other dependencies have been addressed
- Mandated consultation has been conducted
- Conflicts of interest have been managed
- Timelines, publication and record keeping have been addressed.

Each plan will be subject to assurance compliance certification and reporting prepared by the IPA which will combine with technical, contractual, policy inputs (where warranted) to provide the Secretary of DSG with sufficient information and assurance to make an informed and defensible decision on each plan.

Breach Management Oversight

Any suspected probity breach will trigger immediate notification to the IPA and OC Secretariat and be recorded in the Probity Issues Register.

In the event of a possible probity breach, the following breach management process applies:

- *Immediate actions:* Relevant entity to contain the risk, notify the IPA and the OC Secretariat; record the matter in the Issues Register and preserve evidence

- *Assessment:* The IPA will determine materiality of the occurrence and recommend remedies and controls, including process correction, re-evaluation, market reopening, personnel changes
- *Reporting:* Material breaches will be reported to OC and CC. If breaches relate to regulated conditions, the relevant regulator will be notified. If there is interest at Parliamentary level, an in-camera brief for PAC will be prepared by the IPA.

Probity Induction & Training

Mandatory probity induction is required for all officials, evaluators, panel members and advisors prior to involvement. Annual refreshers are required for long-running packages with targeted sessions for high-risk stages, such as Condition(s) D1–D12 (operational approvals) or other points determined by the OC or the Secretary of DSG.

The IPA will provide specific probity training to parties involved in reviewing and making decisions under the Order. This will complement project-level probity training provided by the Proponent's probity advisor.

Assurance & Gatekeeping Inputs

IPA-related probity checkpoints will be integrated into the ITas Project Assurance Framework which includes Gate Reviews, Health Checks and Deep Dives. While review recommendations may be confidential, Senior Responsible Owners must ensure action plans and probity implications are tracked by the OC and provide material to PAC in-camera as required.

Also, the Proponent will ensure its project-specific probity and assurance checks are integrated into the ITas Project Assurance Framework.

Consultation Integrity Checks

Condition A6 requires the Proponent and those preparing the required plans (i.e. the organisations and individuals responsible for developing the Construction Environmental Management Plan, the Operational Noise Management Plan, the Events Management Plan and any Special Event Management Plan) to consult a specified group of stakeholders about how those plans address noise and vibration.

For plans requiring specific consultation under Condition A6, a Consultation Evidence Pack (letters, timeframes, submissions, responses) or equivalent project management document must be maintained.

The IPA will conduct spot-checks for completeness and timing (≥ 28 days unless otherwise agreed) and check for completeness and timing (≥ 28 days unless otherwise agreed).

Escalation & Change Control Management

As the Project progress through its lifecycle, there may be a need to consider material Changes to either scope/schedule/quality/budget.

Any such proposed changes will need to follow the escalation pathway: MPDC → OC → Cabinet Committee → Cabinet (as required).

The role of the IPA is to verify the integrity of the process supporting proposed material changes through the provision of complete advice, options analysis, impartiality, and accurate recordkeeping.

Information Security & Publication Compliance

All material connected with the Project and the Order must be classified and stored in accordance with government security standards.

The Order's publication rules (Condition A3) must be applied to ensure confidential information (e.g., commercial-in-confidence, security-sensitive operational plans, gate review recommendations) is handled accordingly, including in-camera transmission to PAC when required.

Condition A3 states that any important plan or document that is officially approved for the Project must be made publicly available, unless publishing it would create safety or security risks or harm someone's commercial interests. If the document is published, it must stay publicly accessible for a set period - at least two years after construction is practically finished, or, for documents related to operating the Stadium, for as long as the document remains in effect.

Also, all information, decisions, and activities related to the administration of the Order must be documented, retained, and managed in accordance with applicable record-keeping legislation, government policies and security standards, and organisational requirements.

Records must be complete, accurate, secure, and accessible to support transparency, accountability, auditability, and informed decision making, against legislation, government policies, and organisational requirements.

Individuals involved in the Project are responsible for creating and maintaining records that adequately capture their actions and contributions.

Any documents provided by a proponent or operator as part of plans, or accompanying plans, must be used solely for the purposes for which they were provided, unless the Proponent or Operator has given express written permission for any other use.

Nothing in this provision is intended to limit or circumvent obligations under Right to Information legislation or established active disclosure principles.

The role of the IPA is to monitor compliance with the information management arrangements set out in the Order. Project-level and other related information management is the responsibility of the Proponent, Operator and other parties involved in development of Plans. Templates & Registers (operational tools)

The following IPA-specific artefacts will be maintained under OC oversight:

1. Probity Risk Register
2. COI Declarations & COI Register
3. Probity Advice Log
4. Probity Issues Register / Breach Log
5. Assurance checklists for decision-making of Plans include conformance check with Order Conditions A6/AA1-AA3 requirements
6. Publication & Notification Tracker (Order Conditions A1-A4 compliance including Secretary's Register entries and timing).

Review and Currency

This Probity Plan is a living document and will be reviewed at least quarterly or upon material change (e.g., new parameters from Cabinet, Order amendments, or significant procurement or assurance findings).

Updates to the Plan will be tracked and, where relevant, made publicly available, consistent with the Order's transparency provisions.

Appendices (to be attached on finalisation)

- **Appendix A:** COI Declaration Form & COI Management Plan (including examples of actual, perceived, potential COI)
- **Appendix B:** Probity Advice Log template
- **Appendix C:** Consultation Evidence Pack checklist (A6/AA1–AA3)
- **Appendix D:** Publication & Notification Tracker (A1–A4)
- **Appendix E:** Breach Response SOP & Escalation chart to OC → CC → Cabinet.