



Australian Government
Australian Public Service Commission

Australian Public Service Commissioner

PGPA Act Review
Attention: Review Secretary
Department of Finance
1 Canberra Avenue
Forrest ACT 2609

email: PGPAActReview@finance.gov.au

Dear Ms Alexander and Mr Thodey

Comments on the PGPA Legislation and Rule Independent Review Consultation Draft

Thank you for the opportunity to comment on the Consultation Draft of the review of the PGPA Legislation and Rule.

Our comments are in relation to the Reporting of Executive Remuneration. Recommendations 34 and 35 seek to improve the transparency and accountability of these arrangements.

The APSC produces an annual report on remuneration paid to APS employees as at 31 December. This is based on a comprehensive data collection exercise of approximately 140,000 employment records. The data is aggregated to be able to identify movements and trends in salary, allowances, superannuation and bonuses paid to APS employees.

While this report provides a broad level of transparency, it is primarily intended to provide benchmarking information to inform remuneration policy setting across the APS.

The recommendations of the report to include executive remuneration details in agency annual reports are supported.

Some guidance around who would be captured by these proposals would be useful, most notably in the categories of *key management personnel* and *highly paid staff*.

Yours sincerely

[Redacted Signature]
John Lloyd PSM
June 2018
[Redacted Name]