

Australian Government The Repatriation Commission

PRESIDENT DEPUTY PRESIDENT COMMISSIONER

PGPA Act Review Attention: Review Secretary Department of Finance One Canberra Avenue FORREST ACT 2603

Dear Ms Alexander and Mr Thodey,

Thank you for the opportunity to provide a written submission to the independent review of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act.) DVA has been able to work more autonomously under the PGPA Act due to the fact that it is more principles based. There are some observations which can help enhance the alignment of the PGPA Act with operational requirements.

## Performance Reporting

Departments are facing concerns raised from audit committees in relation to their level of responsibility and provision of assurance around the performance information in the annual performance statements. These concerns relate to their roles in ensuring that the performance criteria meet the requirements of being relevant, reliable and complete. Audit committees are to provide a reasonable level of assurance on the appropriateness of an entity's performance reporting, as required in s17(2) of the PGPA Rule.

The PGPA Act and associated guidance could be better aligned in terms of roles and responsibilities of the audit committee, as distinct from management, in providing the appropriate level of assurance for performance reporting to the accountable authority, where this is still providing cause for concern to committees and operational delays to departments in having the performance statements signed-off.

## Other

Departments also remain interested in how 'earned autonomy,' now 'differential regulation,' is going to be applied. The Public Management Reform Agenda indicates that consultation has now been undertaken with Commonwealth entities around differential regulation. DVA remains uncertain as to what this entails, how it is intended to be applied and what this means to its operations. Further guidance in terms of the differential regulation approach and its overall application to Departments would also be welcomed.

Thank you again for the opportunity to comment on whether the PGPA Act is achieving its objectives.

Your sincerely



S. Lewis PSMPresidentNovember 2017