



**Australian Government**  
**Australian Public Service Commission**

Australian Public Service Commissioner

Senator the Hon. Cory Bernardi  
Chair, Standing Committee on Finance and Public Administration  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

Dear Senator Bernardi

*Submission: Inquiry into Governance of Australian Government Superannuation Schemes  
Legislation Amendment Bill 2015*

Thank you for the opportunity to provide a submission to this inquiry.

I do not support the amendment to the *Governance of Australian Government Superannuation Schemes Legislation Amendment Bill 2015*, which proposes special mobility arrangements for former Australian Public Service (APS) employees who become employed by the Commonwealth Superannuation Corporation.

Mobility rights between APS and non-APS Commonwealth authorities were removed in 1999 when the Public Service Act came into effect. The provisions were found to impose obligations on employers that involved legacy rights of return for employees that could be held for several years. This adversely affected the capacity of employers to manage their workforces in a flexible manner.

In normal circumstances, employees of non-APS Commonwealth authorities are able to compete on merit for all advertised employment opportunities in the APS.

The proposed amendment has been raised in the context of the current arrangements for APS recruitment, which restrict the eligibility of non-APS employees to apply for most APS jobs. These restrictions are temporary and are under review by the Government, following the achievement of a significant reduction to the size of the APS workforce.

Given the temporary nature of the recruitment restrictions, I see no compelling reason to introduce special mobility arrangements for former ComSuper employees to return to the APS.

I am also most concerned that the proposed amendment would set an unwelcome precedent for any future transfer of employees out of the APS.

Yours sincerely

John Lloyd PSM

17 April 2015