



Ms Elizabeth Alexander AM and Mr David Thodey AO
Independent Reviewers of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act)

By email: PGPAActReview@finance.gov.au

Dear Ms Alexander and Mr Thodey

Independent review of the PGPA Act

Thank you for your letter to me on 9 October 2017, in which you invite written submissions to the independent review of the PGPA Act. This submission is made on behalf of the Tertiary Education Quality and Standards Agency (TEQSA) and reflects the views of the Commissioners of TEQSA, who are collectively the accountable authority of TEQSA.

TEQSA considers that the PGPA Act generally provides an improved framework for the governance, performance and accountability of Commonwealth entities. In particular, consistent guidance provided in the PGPA Act and supporting material from the Department of Finance has assisted in promoting a more consistent and robust approach to the development of corporate plans and annual reports.

TEQSA's principal concern with the PGPA Act and supporting framework is that it continues to involve duplication of effort between agency corporate plans, portfolio budget statements and annual reports, as well as the Regulator Performance Framework separately administered by the Department of Prime Minister and Cabinet. While each of these processes involves valuable work, TEQSA considers that more steps can (and should) be taken to simplify these processes and reduce duplication between the processes.

Such duplication has a particular impact on small entities such as TEQSA. The review's terms of reference require consideration of the impact of the PGPA Act on small entities, including whether adjustments should be made for small entities. TEQSA encourages the review to consider possible mechanisms to assist small entities to reduce the workload associated with compliance requirements under the PGPA Act, thereby allowing those entities to focus on performing the functions in their enabling legislation.

I look forward to your important work on this review.

Yours sincerely



Professor Nicholas Saunders
Chief Commissioner

6 November 2017