



# Police Federation of Australia

The National Voice of Policing

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## Geographic Labour Mobility

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The Police Federation of Australia (PFA) represents the professional and industrial interests of Australia's 57,000 police officers. As such we have a keen interest on the above inquiry.

We have examined the Productivity Commission's Issues Paper and believe your Report will have significance for police. In this submission, we cover issues concerning FIFO/DIDO workforces and related policing matters and, secondly, a national approach to mobility of Australia's police officers.

### **FIFO/DIDO WORKFORCE ISSUES**

The Commission may be aware that the PFA made a submission and appeared before the Standing Committee on Regional Australia's Inquiry into FIFO workforce practices. As a result, we were subsequently invited to make a presentation at the "Making FIFO Work in Regional Communities" conference in Rockhampton in March this year.

In our submission to the Parliamentary Inquiry, we pointed out the following issues –

- Police officers do not have the luxury of being part of a FIFO/DIDO workforce.
- Current policing strategies are predicated on 'community policing initiatives' and as such, Police officers are expected to be domiciled in, and become part

of, the community in which they serve.

- The role of the local police officer in a rural, regional or remote community is far more than simply a 'law enforcer'. There are numerous examples of where police officers use their expertise to work on establishing strong community interaction through local community policing initiatives. This includes assisting to resolve local conflicts and engaging in crime prevention activities with local youth.
- In many FIFO/DIDO locations, the cost of housing, family essentials (groceries and other services) and other infrastructure is extremely expensive. This places a great financial burden on police officers and their families, as well as their respective state/territory police departments/governments. For example, the extra competition for housing, owned or rented, pushes up the price of housing for police officers and other service providers in the community.
- Where large sections of the community are FIFO/DIDO workforces, it becomes far more difficult to create a sense of community for those who are domiciled in such locations.
- By and large police officers cannot earn any-where near the amount of income that mine employees receive. It therefore becomes difficult at times for police departments/governments to retain these members as many seek higher incomes by resigning from the police service and taking up mine employment. We understand that some research has already been undertaken by some jurisdictions indicating that this will be a big issue over coming years as mining production continues.
- If there was a major change in the current FIFO/DIDO practices in remote mining towns to a more permanent population, it would require additional infrastructure and community services in those towns as the "permanent" population expands – this would mean bigger police presence in those towns over time as the towns become a larger meeting point for social purposes – entertainment, medical services, domestic interaction, etc.
- If that was the case, then governments would need to be mindful that if incentives are going to be introduced to encourage population migration to regional centres over the medium to long term, the expansion of local communities over time must also include a built-in capacity, based on "scientific" or evidenced-based methodology, to increase community support infrastructure – including an appropriate increase in the police presence in those towns – over time.

When we made our submission and appeared before the Committee in late 2011, the only real evidence we had about a lot of the issues we raised were from direct contact with members who either worked in the regional or remote locations affected by FIFO or in the communities where many of the families of FIFO workers

resided. Since that time we have identified two key pieces of research on the issue in respect to policing.

The first piece of work was undertaken by Courtney Rowick, Jarunee Khan and Tim Burns from the University of Western Australia and the second, a report by Senior Sergeant Graeme Reeves, currently Officer in Charge of Gympie Police Station who won the 2011 Courier-Mail Scholarship to research FIFO policing models being utilized by the Royal Canadian Mounted Police.

Both pieces of research were to investigate the feasibility of implementing FIFO arrangements for police into rural and remote areas of both states. The research was primarily driven by the issue of lack of police numbers in rural and remote locations.

FIFO in policing is not a new phenomenon. It has been carried out in both South Australia and the Northern Territory to varying degrees over the years.

At the time of the WA research, the demand for police officers in regional WA was increasing primarily due to population fluctuations generated by the mining industry. This was exacerbated by a general decline in regional police numbers largely due to insufficient relocation benefits and poor retention. The WA Police Annual Report of 2011-12 indicated that there were 1,337 police officers and 122 staff in regional WA. These officers and staff are responsible for policing the world's largest single police jurisdiction covering 2.5 million square kilometers.

The report suggested that the resources boom had significantly increased the population in the Kimberley, Pilbara and Gascoyne regions of WA. The existing infrastructure and systems in these areas had not been able to cope with the influx of people. Police systems, in particular, had been placed under stress due to the changes, and each of the five major police stations in the north-west of WA were, at the time, estimated to be under-staffed by approximately 15-20%. It was suggested that some 50 additional police officers were required to effectively police the region, and more would be required in the future due to the anticipated rapid expansion of the resources sector. Following a concerted push by the Western Australia Police Union (WAPU) a lot of those vacancies were subsequently filled, taking away some of the pressure to look at alternative methods of filling such vacancies, however numbers continue to fluctuate considerably in this area.

The previously enforced strategy of transferring officers into these locations had not been able to keep pace with the demand for numbers. Facilities including housing and police facilities had likewise struggled to keep pace. The ability to recruit locals to come back to their communities as police officers was also significantly diminished by the resources sector offering them employment. And who could blame them for taking up such well-paying offers in their local community.

The cost of living in regional areas which support the resources industry is elevated. The district allowances provided to police officers are designed to balance the cost of living in these regional areas. However the salaries and allowances on offer to police, pale in comparison to some of the salaries on offer in the resources sector.

The WA research identified a number of reasons why there have historically been difficulties in attracting and retaining police officers to these regional areas. It's acknowledged that a number of the reasons are shared by other professional groups (such as teachers and health professionals), whilst others are more specific to the police themselves. They include:

- Geographical Isolation: remote communities are isolated, and far removed from the attractions of the cities
- Limited services and infrastructure, such as housing, medical, schooling and social activities This can deter people from relocating to remote communities, especially if they have families
- The perception of limited career opportunities and future prospects
- The lack of in-built relief and support mechanisms in the case of absence, injury or illness
- Excessive time on duty and call outs which limits time off and time with family and friends
- Poor housing and police facilities
- Lack of employment opportunities for partners
- An unwillingness to uproot and move to a regional community after completing training and probation in urban areas.

In response to those issues, the WA police service considered the implementation of several strategies to attract and retain police officers to WA regional areas, some of which include:

- Enhancing relocation packages and facilities
- Improving the number of local regional recruits
- Requesting funds from relevant large organisations to invest in community initiatives and facilities
- Implementing Fly in Fly out (FIFO) police officers to augment existing facilities (During the period the Multi-Function Police Facilities were being established, police policed the areas from ad hoc shared facilities (eg Kalumburru). Staff however worked there on a permanent basis. FIFO was not ultimately used).

In our evidence to the Parliamentary Committee back in November 2011 we pointed out the possibility of trialing FIFO policing at the Chevron Gorgon project on Barrow Island just off the northwest coast of Western Australia.

Initially this project was planned as a FIFO project for all workers except police. Of more recent times there have been a number of discussions about also having police as part of FIFO arrangement, not necessarily out of Perth but more likely out of Karratha. As we understand it, at present those discussions are ongoing.

In Queensland, as part of his research into the possibility of FIFO for police in that state, Senior Sergeant Reeves concentrated his research into police numbers in the Central Region of QLD. That Region comprises some 20% of the State and covers a total area of approximately 467,000 square kilometers. It encompasses four police districts—Rockhampton, Mackay, Gladstone and Longreach. The major population

base is located on the eastern fringe of the region along the coast line. We were advised that the Central Region rarely achieved 100% staff numbers and generally carried between 40 and 100 vacancies at any one time. This is in a region with an authorized capacity of some 840 officers.

The Queensland research indicated that the Queensland Police Service Housing Policy lists a total of 63 isolated locations contained within the Charleville, Mt Isa, Gympie, Mareeba, Cairns, Longreach, Townsville & Rockhampton areas. The policy also lists a further 176 rural stations throughout Queensland where the provision of housing is designed to be a significant factor in attracting officers to serve at locations outside the south east region.

Like WA, in QLD the problem of attracting sufficient police for vacancies at isolated and rural stations is an ongoing issue. We understand that even when these positions were filled, the successful police applicants generally only remained there a minimum two or three year tenure periods before transferring away to coastal or metropolitan centres.

The difficulty attracting and retaining staff in western divisions is not limited to the Central Region, but is a major issue of the Queensland Police Service. In recent years, police officers, particularly the ranks of constable and senior constable, have been reluctant to apply for western/rural stations within the QPS. Even with inducements such as shift, station and isolation allowances and the provision, in some instances, of free or subsidised accommodation, the ability to attract and retain police at western/rural stations has not improved. At present though, there are no plans to implement FIFO policing arrangements in QLD.

In the 2<sup>nd</sup> dot point of our written submission to the Federal Committee's Inquiry we said

*Current policing strategies are predicated on 'community policing initiatives' and as such, Police officers are expected to be domiciled in, and become part of, the community in which they serve.*

However, many of our police, not only in QLD but many other parts of the country, live long distances from their workplace. That scenario exists in most capital cities across Australia, much of it to do with lifestyle choices and the high cost of living in some capital cities. Perhaps the same can be said for decisions made by FIFO workers.

Rural, regional and remote policing has always been known for its strong links between the local community and its police officers. The question is: Why should the links between police and the community in Rockhampton be any different to Robina or Cobar to Collaroy or Shark Bay to South Perth?

Police Departments haven't seen the necessity to force officers to live in their local communities in Metropolitan Australia, so why should they have to live in a regional, rural or remote community in which they work? Of interest though, to be a police

officer in the NYPD an officer must reside in New York City or Suffolk, Westchester, Orange, Rockland, Nassau or Putnam Counties, all in the state of New York.

FIFO policing has been working successfully in Canada for some time.

The research of Graeme Reeves demonstrated the use of Air Services Canada to transport police to and from remote isolated areas as an effective model, accepted by both police and the community in areas crying out for more police on the beat. Reeves report argues its wholehearted support that permanent police in any location is a preferred option, but FIFO options are an effective measure to counteract the inability to attract, retain and accommodate officers in some remote and isolated areas.

Reeves tour of police FIFO operations in Canada combined with previous research established that:

- FIFO operations in Canada increased police presence in communities in hard to fill areas
- FIFO increased the quality of life for members/families that would previously be disadvantaged by forced transfers into hard to fill areas
- FIFO in Canada has reduced member turnover
- FIFO will reduce transfer costs but in turn will increase travel expense
- FIFO has been proved to increase interest in officers wishing to work in the northern areas of Canada
- The RCMP relief unit has provided the RCMP with a central pool of resources for major / unexpected events
- The Thompson/Winnipeg model gives support that any successful FIFO operation must be based in a desirable living area for employees.

Thompson is located 750km north of Winnipeg and is the major town servicing the Northern area of Manitoba. With a population of approximately 15,000 the Thompson detachment has a compliment of 47 officers including an inspector, one staff sergeant, one sergeant, six corporals and 38 constables.

For the past several years Thompson has ranked as Canada's most violent city as determined by Statistics Canada. Thompson had the worst crime rate in all of Canada in 2008, 2010, 2011, and 2012. The only year in which Thompson did not rank first was in 2009, when it ranked second overall and was classified as the second most violent city in Canada.

Thompson was responsible for policing five outlying communities including Split Lake (2000 people, 150 km northeast of Thompson), York Factory (250 people, 105 km northeast of Thompson), Tadoule Lake (325 people, 350 km north of Thompson) Pikwitonei (200 people, 50 km southeast of Thompson) and Thicket Portage (250 people, south of Thompson).

What happens in these remote detachments is that the OIC is allocated on a permanent basis, but junior staff work effectively on a rotational basis using FIFO.

Investigative officers are already being flown in on a needs basis to remote detachments and strike teams have been introduced to fly into areas for three to five day deployments to assist local police and to execute search warrants which has proven to be very effective.

These remote locations are termed limited duration posts (LDP's) and staffing is an on-going challenge given the yearly turn-over of members. Attracting members to these remote communities is particularly challenging given infrastructure, resourcing, workload and of course quality-of-life issues. There are significant difficulties in attracting families to such locations.

The Relief Units, (FIFO's) were established almost five years ago in response to detachments that were unable to effectively respond to increased calls for service due to a lack of local infrastructure; including housing, office space and detention facilities. It was also established that insufficient officers, equipment, transportation risks, geography and isolation were on-going challenges with policing in these remote northern areas.

The emergent nature of this service gap necessitated a response that promptly addressed infrastructure and member mobilisation issues. An independent FIFO unit dedicated to servicing several remote locations was established in April 2008 which consisted of six members (Sgt-1, Cpl- 1, Con 4) and one public service employee.

The purpose of the Relief Teams was to:

- Assist North District in their resource issues
- Expose members to North District Policing in the hope of interesting them in a North location
- Increase their police skill set.

The Relief Unit provides two x three-person rotations to enhance police presence in several remote communities. Feedback from unit members and clients indicated this service delivery model was a success because it increased police presence in the community and enhanced proactive policing activities. Feedback also confirmed that the response to job postings for the FIFO unit was markedly higher than regular northern LDP's. And the staffing of the FIFO unit detachment took significantly less time to action than regular LDP's.

The Relief Unit's location was a major factor in attracting personnel to apply for a position. Advertised vacancies in the relief unit based in Thompson only received three applications. When re-advertised with the detachment based in Winnipeg, there were ninety applications. This indicates the location of the permanent base is a big factor in setting up a relief or FIFO unit. Both locations were to service the same LDP's but obviously Winnipeg was the preferred location, as it is a major city with good facilities, and a significantly lower crime rate.

The RCMP keeps a data base of officers who volunteer to serve in the relief units for limited periods. Officers nominate times of availability and must have permission from their normal supervising officer to perform relief duties.

In the first year of operation, officers were selected by the service and given no choice but to be in the relief unit. It was quickly established that officers who volunteered provided more value to the LDP as these officers were keen and more productive.

The RCMP is currently working on a business case proposal to add a further six LDP's to be serviced by a centralized FIFO unit on a permanent basis.

The RCMP model demonstrates that FIFO can work in policing.

In the Northern Territory similar problems of attracting and retaining members in remote locations is an issue. One such location is Maningrida, an indigenous community in the heart of the Arnhem Land region. It is located 500 km east of Darwin and 300 km north east of Jabiru. Maningrida has a population of approximately 2,000.

Maningrida has managed to maintain its permanent establishment of 3 Officers, but has constantly struggled to maintain the additional three temporary positions identified for the station as part of the NT Emergency Response.

In 2012 the NT Police Department commenced a project involving 6 police based in Darwin working a rotational roster which had them working their rostered shifts on the ground in Maningrida and taking their rostered days off back in Darwin. It is acknowledged that the diverse nature of remote policing across the NT predicates that there is no one model that will meet the needs of all communities. The NT's overarching policing philosophy is to achieve a model that delivers an outcome of sustainable 'safer Indigenous communities'. Hence the need to implement a Remote Policing Model that is innovative, flexible, effective and attractive to members, while providing financial sustainability.

Police working in the trial worked 10 hour shifts for 8 days straight before returning to Darwin for their rest days. That trial is still on-going but there is some speculation that it is proving to be cost prohibitive and we expect that NT Police may begin exploring other options to ensure numbers are maintained in Manangrida.

South Australia Police did have a FIFO arrangement at Anangu Pitjantjatjara Yankunytjatjara (APY Lands) The APY Lands are a large Aboriginal local government area located in the remote north west of South Australia and has a population of around 2,500 people.

For some time this area was policed using some sworn officers from SAPOL together with Community Constables from the local indigenous communities. After it became difficult to recruit the Community Constables, SAPOL established a FIFO arrangement for more sworn officers to be flown in on temporary basis only, due to the lack of infrastructure including police housing. This ensured that they maintained an appropriate police presence in the area.



Subsequently the SA and Federal Governments, together with SAPOL, constructed the appropriate infrastructure, particularly housing for officers and their families and developed incentives to entice SAPOL members to live and work in the location. At present they have 24 staff located on the Lands and they have now been able to do away with the FIFO arrangements.

The APY Lands is a good example of how cooperation between the many levels of government, SAPOL and the Police Association of South Australia (PASA) have been able to overcome the difficulties of ensuring sufficient trained police in what had been traditionally considered a hard to fill location and where they'd been forced to use FIFO arrangements to overcome the problems.

In respect to FIFO policing arrangements in Australia, the only one that still currently exists is Maningrida in the NT and we understand that due to cost constraints, that model is under review.

The Canadian experience however is an example of how such an arrangement could work. Namely, a mixture of full time staff permanently on the ground, supplemented by a FIFO contingent from a major centre. (This is how the original APY lands policing arrangement worked, as does the current Maningrida project). It has worked successfully in Canada for almost five years now and all indications are that it will be expanded.

The PFA has not advocated FIFO in any particular location across Australia, however we are always open to ideas about how we can best provide policing services to the whole country.

The PFA is clearly of the view that permanent police in any location is a preferred option, but FIFO options appear to be an effective measure to counteract the inability to attract, retain and accommodate officers in some remote and isolated areas. It has proved successful in remote and isolated areas of Canada, there is no evidence to suggest that, if properly established, it couldn't operate successfully in Australia.

The APY Lands outcome in SA appears to be a good model. Co-operation between various levels of government (federal, state and local where applicable), police departments and the police association/union, together with the construction of appropriate infrastructure, particularly housing for officers and their families, and incentives to entice members to live and work in a location has worked in SA and there is no reason why it could not operate well in other parts of the country.

## **A NATIONAL APPROACH TO POLICE OFFICER MOBILITY**

Your Issues Paper looks at impediments to mobility and options to further mobility.

There are certainly serious impediments to mobility across the Australian police services. Currently, a sworn police officer moving to another jurisdiction in Australia loses their status and must begin again at the rank of constable, a problem which works very much against mobility.

In 2009 Roger Beale AO conducted a Federal Audit of Police Capabilities for the Federal Government and provided a report ***New Realities: National Policing in the 21<sup>st</sup> Century***. Beale said:

***“Finding 3.15:***

Policing is a major category of employment across the Federation, but unlike other skilled occupational categories such as health professionals and workers, teachers and tradespeople there is little mutual recognition of skills and qualifications, and little interstate mobility of employment. There are separate police academies in each jurisdiction but no common core curricula or accreditation of competencies. Combined with limited lateral movement between police agencies, this restricts career opportunities and reinforces the insular nature of many police forces which has been the subject of negative comment by a number of Inquiries into police corruption, including the Wood Royal Commission.

**Recommendation 3.8:**

The Productivity Commission should be commissioned, with the support of COAG, to conduct a study on the national policing workforce akin to that which has been conducted in relation to health. This should incorporate likely future demands, examine demographic drivers and alternative mechanisms for assisting police in determining the allocation of policing resources geographically. It should also examine barriers to the development of a national policing labour market, in particular barriers relating to qualifications and the mutual recognition of qualifications.”

The PFA has for a number of years had a policy in support of police professional registration across the country as a means of advancing the professionalism of policing and enabling greater police officer mobility.

The PFA presented its 2009 proposal for a national police registration scheme to the then Ministerial Council on Police and Emergency Management and the feasibility of national registration is about to be examined in late 2013 as agreed by Ministers.

We have also put that policy to both the major political parties at a number of Federal elections, including the 2013 election.

Our 2010 pre-election policy said:

## **Professionalisation of Policing/National Police Registration**

We propose that the Commonwealth, with interested States and Territories and the PFA, develop a national police registration and training accreditation scheme to enhance the profession, coordinate policing education, and facilitate mobility amongst police officers.

In their responses to the PFA at the 2010 election, the parties said as follows:

### **Australian Labor Party**

A re-elected Gillard Government will continue to work in partnership with the PFA, through the Ministerial Council for Police and Emergency Management – Police (MCPEMP) and other relevant bodies, towards national recognition of the experience and qualifications of police, across State and Territory borders.

Federal Labor considers that the goal of the Police Federation in seeking a national police registration, training and accreditation scheme to facilitate the career mobility of Australian police should be pursued. We will ask the States and Territories and their police agencies to work with the Commonwealth towards this goal.

### **Coalition Parties**

A Coalition Government supports the development of a national police workforce planning strategy following the national workforce planning study by the Productivity Commission. The Coalition supports the PFA being part of a steering committee to advise on the Productivity Commission's work.

The PFA has again made police professional registration a priority issue in our 2013 pre-election policy. In that policy we say:

### **“PRIORITY 2: The Police Profession**

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2(a) The PFA seeks your party's commitment to support and provide seed funding for the establishment of a National Police Registration Scheme as a collaborative effort between the Australian Government, the PFA and state and territory jurisdictions.

COAG's reform agenda states, "Governments at all levels share responsibility for issues that could not have been foreseen at the time of Federation in 1901". As a result in February 2011 they agreed to five themes of strategic

importance. Theme 2 focused on “A national economy driven by our competitive advantages”. It is this theme that seeks to create a seamless national economy to improve the environment in which Australian businesses operate and to assist in meeting Australia’s productivity challenges. A key component of that theme relates to professional registration and occupational licensing.

One of the major outcomes of Theme 2 was the registration of health professionals. COAG concluded that such a national scheme would deliver many benefits to the Australian community.

It was agreed that the new health scheme should support workforce responsiveness, flexibility, sustainability and innovation. National registration, they said, would also mean that doctors, nurses and other health professionals would be able to practise across State and Territory borders without having to re-register. This, it was suggested, would improve workforce mobility, allowing health practitioners to move easily to a new State, to serve elsewhere in times of emergency, or to provide locum services at various locations.

In line with that theme Australia’s police seek a National Police Professional Registration Scheme.

Police are one of the fundamental pillars of a free and safe democracy. Policing is a physically and morally dangerous occupation in which practitioners deal constantly with complex, and often ambiguous, problems. Policing requires high levels of judgment, discretion, dispute resolution, problem solving, and physical and moral courage. Police exercise *original*, not delegated, authority and have considerable autonomous discretion. In other words, policing is an intellectually challenging and quintessentially professional task, yet it is not accorded the public recognition and status of a profession.

For nearly two decades police associations and unions across Australia, through the Police Federation of Australia, have supported a strategy for the professional development of policing which includes national standards, inter-jurisdictional mobility, a professional registration board and a professional certificate to practice.

In the PFA’s view a national registration scheme should be designed to:

- improve the status of the police profession;
- facilitate inter-jurisdictional mobility;
- protect the police professional domain; and
- provide and maintain, on the community’s behalf, proper standards of policing practice, police ethics, a police code of conduct and professional membership.

Police professional registration aims to protect the community by assuring the quality and safety of police services by suitably qualified and trained police officers.

Inter-jurisdictional mobility of police is a reality, both between Australian jurisdictions, and to and from comparable countries. The AFP, and every other jurisdiction, is reliant on mobility to meet at least some of its workforce requirements. It is necessary to meet the needs of the community, the needs of modern policing and the needs of the police workforce. A national registration scheme will allow for mobility, where a jurisdiction decides to facilitate mobility and, at the same time build confidence that professional standards are being upheld and maintained.

The PFA's presented its model framework to the then Ministerial Council on Police and Emergency Management – Police (MCPEMP) in June 2009. As a result of that presentation MCPEMP referred the matter to the MCPEMP Senior Officers' Group (SOG) which considered the issue in September 2009 and resolved to form a Working Party to undertake a project to examine "The Feasibility of a National Police Registration Scheme". That Working Party reported back to SOG and the then to the Standing Council on Police and Emergency Management (SCPEM) in November 2011.

Two of the key recommendations from that report were that:

- APPSC, (Australasian Police Professional Standards Council) or its retitled successor, be requested to review the possibility of a National Police Registration Scheme when the certification element of the Police Practice Standards Model (PPSM) is considered which is estimated to be mid-2013; and
- APPSC, or its retitled successor, be requested to provide a report to SCPEM no later than the end of 2013 on the implications of the certification element of the PPSM for the feasibility of a National Police Registration Scheme taking into account the 2011 feasibility study.

The certification elements of the PPSM are currently being discussed by jurisdictions and, in that context, the issue of Professional Registration will again be on the agenda.

In Victoria, the Police Regulation Amendment Bill 2012 (VIC) amended the Police Regulation Act 1958 and established a Police Registration and Services Board (PRS Board) in that state, the first of its kind for policing in Australia. The PFA supports the establishment of the Victorian PRS Board, however we are concerned that unless Police act nationally on such an issue, we will find ourselves in the same position as the various health professions prior to the formation of the Australian Health Practitioner Regulation Agency in 2010, potentially having a registration authorities in every state and territory in the country and not a national body.

It is important that an Australian Government have a strong supportive position of promoting a national professional registration regime for Australia's police."

The PFA is expecting to receive advice from the ALP and the Coalition about their policies regarding the police profession in the next week or two in the lead up to the September 7 election.

We would be pleased if the Productivity Commission in its inquiry into Geographic Labour Mobility would take up the issue of mobility across the Australian police profession because we believe there are impediments to mobility that can be addressed in a streamlined, and cost-effective way. We would welcome the Productivity Commission making firm recommendations on this initiative.

The PFA would be happy to meet with the Productivity Commission to discuss any aspects of this submission.

Yours sincerely

Mark Burgess  
Chief Executive Officer