

From: [de Brouwer, Gordon](#)
To: s 22
Cc: s 22
Subject: RE: Questions re Qantas Chairman's lounge membership FOI [SEC=OFFICIAL]
Date: Thursday, 10 July 2025 10:56:00 AM

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Thank you for your email.

The questions you ask are important.

While my travel level is set by the Remuneration Tribunal, I choose to abide by the APSC's travel policy of selecting the lowest practical fare at the time of booking. That means selecting a flight that meets the traveller's needs and is a regular scheduled flight. My personal preferences are not part of the decision.

In terms of the 45 flights in the FoI, this constitutes 45 individual legs of 14 return and multi-destination trips. Selecting the lowest practical fare for these trips (rather than individual legs) included considerations such as the time of the flight compared to total travel time, booking multiple legs of trips with one airline for ease of travel, airline availability, and cost.

In terms of the flights shown in Document 5, for example:

1. Virgin doesn't fly to three of the locations (9 flights).
2. Virgin flights didn't align with either the time of the meeting ending, or didn't allow me enough time to get to or from the airport before my next appointment on at least 3 trips (12 flights).
3. On other occasions flights were booked with Virgin, but the flight was cancelled and I was rebooked with QANTAS through the APSC's travel provider.

I have no policy or other responsibilities with respect to airlines and have no relevant conflict of interest in my work.

When I am next in Adelaide for work, I'll ask the APSC to set up another Commissioner Drop-In session with public servants and you're welcome to attend and ask further questions.

Best

Gordon

Dr Gordon de Brouwer

Commissioner

Australian Public Service Commission

Level 5 B Block, Treasury Building, Parkes Place West, PARKES ACT 2600
GPO Box 3176 CANBERRA ACT 2601

E: gordon.debrouwer@apsc.gov.au w: www.apsc.gov.au



I acknowledge the traditional owners of the First Nations throughout Australia, and their continuing connection to land, sea and community.

I pay my respects to their elders past and present.

From: s 22 >

Sent: Tuesday, 17 June 2025 1:40 PM

To: de Brouwer, Gordon <Gordon.deBrouwer@apsc.gov.au>

Subject: Questions re Qantas Chairman's lounge membership FOI [SEC=OFFICIAL]

Good afternoon Commissioner de Brouwer,

I am writing to you about an FOI request concerning your Qantas Chairman's lounge membership on the Right To Know website at the following URL:

https://www.righttoknow.org.au/request/apsc_commissioners_qantas_chairm

I note your reply dated 12 March 2025 in which you say an email from a 'Mr Squiggle' was "an interesting follow up from the foi".

I too consider that email and the questions raised as "interesting" and am particularly keen to hear your answers, which are below for your reference.

1. As Commissioner, are you subject to the same travel rules as others in your department? Specifically, the 'key point' that notes 'when booking air travel officials are required to select the Lowest Practical Fare (LPF) which is the lowest fare available at the time of booking on a regular service (not a charter flight), that suits the practical business needs of the traveller?'

2. If the answer to the above is 'Yes', can you please explain the reason(s) why 44 of the 45 domestic and international flights you took during financial years 2024 and 2025 were with Qantas, as shown in 'Document 5: Breakdown of APS Commissioner flights'? How can Qantas be THAT much more suitable to your business needs, THAT much more of the time?

3. Is it your personal preference to travel with Qantas?

4. I refer to Document 3: Senate Finance and Public Administration Legislation Committee - Answer to Questions on Notice, Supplementary Budget Estimates 2024-25 (Question ref no. 0075). According to the information contained therein, on 13 December 2024 you did not hold membership to Virgin's Beyond Lounge. Is this correct?

5. A reasonable person might see a connection between your apparent preference for Qantas patronage and their 'gift' of Chairman's Lounge membership. Some in the community may see this connection as something like a bribe, the result being that Qantas receives more taxpayer funds from the choices you make when booking official travel. Can you see this connection?

My agency, the ATO provides the following advice to staff:

Questions you should ask yourself include:

Would an independent observer reasonably question whether accepting the offer would inappropriately influence the way I carry out my work?

Is the offer an attempt by a person or organisation to compromise my impartiality as an employee of the ATO, TPB or ACNC to seek a commercial gain or facilitate a criminal activity?

Does the offer extend to my immediate family where there is a link with my APS duties?

Is a benefit or advantage in private dealings attributable to my employment with the ATO, TPB, ACNC or the

APS?

Could the offer be perceived as a bribe?

In my view, gifted lounge memberships cannot be anything but an attempt by Qantas/Virgin to 'seek commercial gain'. Do you agree with this view? Otherwise, I am interested to hear your thoughts as to why they might offer the exclusive memberships to select individuals across the APS. What might their motivations be? What criteria do you think they use when determining who to invite to join their exclusive lounges? Do you think that perhaps the airlines are hoping the 'investment' will pay dividends, in aggregate, across all those senior APS executives who are gifted memberships? Are these memberships across the APS in the public interest? If so, what is that public interest?

As a general APS employee, I also put to you that there is an apparent double standard that applies in relation to how policy relating to gifts and conflicts of interest is applied in practice. As an example, the ATO has refused to explain specifically how accepting a Samsung offer (20% off for all government employees available at <https://www.samsung.com/au/offer/samsung-government-store/>) would conflict with the applicable Gifts CEI. Noting the offer requires an individual to register with their government email address, I asked the ATO if the offer would be acceptable if Samsung could allow an alternative method of verification, and the ATO did not respond.

I look forward to hearing from you. Your responses will provide interesting points for discussion with my APS colleagues.

Sincerely

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Data Analyst

Australian Taxation Office

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