

Marie Dalins
Director
Adjudication
Australian Competition & Consumer Commission
GPO Box 3131
Canberra ACT 2601
By Email: adjudication@accc.gov.au

Subject: "AA1000435 – RCSA – submission"
18th March, 2019

Dear Ms Dalins,

RE: AA1000435 – RCSA – submission: Application for reauthorisation of the RCSA Code of Conduct.

Thank you for the opportunity to respond to the request for re-authorisation of this Code.

As an interested party, APSCo Australia represents the Association of Professional Staffing Companies in Australia and is part of a larger global organisation (APSCo Global) representing companies across Australia, New Zealand, United Kingdom, Germany and Singapore.

The Australian and Global Association both have Codes of Conduct which have been established using a professional conduct framework that is the platform to educate and, where necessary impose behavior improvement methodologies or sanctions for inappropriate commercial activity or mistreatment of individuals.in the management and support of professional talent.

A number of our Members are also Members of RCSA and, as such they also have a separate but joint interest in this Code.

APSCo Australia commends RCSA for the process and for the re-calibration presented for the re-authorisation of the Code using the professional conduct framework and supports the notion that increased regulation through state and federal jurisdictions requires this change.

The evidence presented, the supplementary materials and the vision to provide additional Guidelines is to be commended and APSCo Australia does support the view that it provides a framework to promote high standards of professional behavior and conduct for Association Members.

The size of the recruitment sector is such that, in our view, the provisions of the Code are not anti-competitive as the RCSA's Membership does not, by their own statements in the submission, have coverage of a level that could be deemed anti-competitive.

APSCo Australia believes the Code delivers information to assist RCSA Members and the market understand best practice dealings in the marketplace between corporations but APSCo Australia considers the opportunities for individuals to raise concerns and understand the process may be somewhat more difficult.

Having said that, we appreciate the proof will be in the outcomes going forward and the indications that reporting on outcomes and surveys to measure success rates is a positive step.

APSCo Australia is concerned with the short time frame for this process of submission and review as it has not allowed enough time for interested parties to consult and discuss in an appropriate and measured manner.

The aspirations of Code 5, the content of Code Standard of Professional Conduct are all acceptable to any level of the market – it is the PCGIG enforcement element that requires some considerable deliberation and understanding.

Regards,

A handwritten signature in black ink that reads "Julie Mills".

Julie Mills
Managing Director
APSCo Australia

Director
APSCo Global