

As stated in RCSA's application to ACCC, *the RCSA Service Delivery Standard (SDS) is a commercially sensitive document in that it represents valuable intellectual property owned by RCSA. A copy has been provided to the Commission on a Commercial in Confidence basis. The SDS is an industry specific standard.*

I can confirm:

- The SDS is not new, it has been around since 2010 and has only been administered by one organisation, Fathom Consulting (aka Certex).
- The purpose of the RCSA taking control was to increase availability and to market the SDS to a wider number of RCSA members, as it appeared the program had lost momentum and there was little take up of the SDS.
- The intent was to open up auditing to a range of auditors and reduce the audit costs to members by sourcing auditors in each capital city and large regional centres.
- The reason the RCSA wants all auditors to participate in a training/induction before it will approve them as an SDS auditor is to ensure they understand the industry, the basis of the SDS (predominantly ISO 9001 with some AS 4801 included) and to familiarise auditors with the RCSA Code of Conduct which integrates into the SDS.
- It is not intended to register the SDS with JAS-ANZ; at least not in the near future.
- The purpose of the standard is to drive toward a consistent standard of recruitment and labour hire practices across the industry.
- Implementation and conformance with the SDS in no way prevents or inhibits an organisation from pursuing certification to ISO 9001. In fact the RCSA promotes reducing costs of certification to members by accepting the ISO 9001 certification in place of the SDS where it has been confirmed that the 9001 management system has incorporated all the requirements of the SDS.
- The RCSA expects that auditors will have completed an industry recognised auditor training program; e.g. Exemplar Global or IRCA AU-TL QM qualification, have suitable experience in HR, recruitment or the labour hire industry, before it will appoint auditors as being approved by the RCSA to audit the SDS.
- At the current time, application of the SDS is voluntary and is the decision of the member, as is membership of the RCSA, therefore there is no restraint of trade as a result of not participating in the program.

With regard to the other points that you raised "*...whether any suitable auditor can request to do the RCSA training/induction and become an SDS approved auditor?*" and "*Is there a limit on the number of approved auditors?*", I can confirm, as provided at point 2(b)(D) on page 2 of Form G (highlighted below) that "*RCSA will approve persons, who have demonstrated their competence and who are and remain otherwise suitable to provide SDS Audit Services to Members, for appointment to a Panel of SDS Approved Auditors from which Members may select appointees to conduct audits against the SDS.*"

RCSA has not set any limit as to the number of approved auditors. As previously stated, RCSA's intent is to open up auditing to a range of auditors in each capital city and large regional centres.

2. Notified arrangement

(a) ...

(b) Description of the conduct or proposed conduct:

- A. RCSA administers a Service Delivery Standard to provide its Members with a framework for consistent delivery of high quality recruitment and/or labour hire services;

- B. The Service Delivery Standard draws on relevant standards for conformity programs as reference points for the implementation in ongoing operation of the program;
- C. The RCSA Members will seek Certification against the SDS;
- D. RCSA will approve persons, who have demonstrated their competence and who are and remain otherwise suitable to provide SDS Audit Services to Members, for appointment to a Panel of SDS Approved Auditors from which Members may select appointees to conduct audits against the SDS;
- E. RCSA Members will acquire SDS Audit Services only from the Panel of SDS Approved Auditors;
- F. SDS Certified Members wishing to integrate their SDS program into a certified ISO 9001 program or similar must:
 - have submitted their SDS program to an initial assessment completed by an RCSA Approved Auditor to verify compliance with the requirements of the SDS standard; and
 - be certified by a JASANZ approved certification body, and certification must remain current.
- G. Suspension, cancellation or termination of the ISO 9001 or similar certification will result in cancellation of the RCSA SDS Certification.

Should Dr Galloway or another representative at JAS-ANZ wish to discuss this matter in person or by teleconference call, RCSA will be happy to do so.

Please do not hesitate to contact me should you have any further queries or wish to discuss the matter.

Kind regards,

Martin

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