



# Response to Queensland Government Consultation Paper

A new proposed standing offer arrangement for the supply of  
contingent workers to Queensland Government.

26 April 2019



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## Background

APSCo Australia is the recognised authority for professional staffing and recruitment companies, supporting Members and engaging with regulators and policy makers to unlock the potential of the modern workforce.

APSCo Australia Members have guaranteed access to expert advisers, current compliance resources and key market analytics to be quality professional staffing and recruitment organisations.

APSCo Australia represents more than 200 companies in the professional staffing and recruitment sector and 46% of these are represented in Queensland as Queensland based companies, offices of Australian owned companies or offices of multinational organisations.

All Queensland Member companies have made a signed commitment to the Association's Code of Conduct; have access to the modules in the accredited Talent Engagement Standard and to the benchmarks of the iSafe WHS Risk Management Program.

Queensland Members also have a commitment to the education and professional development of consultants through the Certified Recruitment Professional examination.

To develop this consultation, APSCo Australia held an Open Forum with representatives of Member companies in Queensland, asked for feedback from Member companies via written submissions and held telephone hearings with a number of regional Members.

As a result, this response represents the views of 82% of the APSCo Membership and has been reviewed by the Membership and the Directors prior to submitting.

APSCo Australia Members are represented across the categories outlined in the consultation document:

- office-based staff
- ICT contingent labour
- integrated contact centre staff
- sport and outdoor recreation labour
- light industrial labour.

with the majority of Members being in office based staff and ICT contingent labour.

## Introduction

APSCo Australia appreciates the opportunity to contribute to this consultation process and acknowledges the Queensland Government's transparency and strategic thinking in their procurement processes.

APSCo believes it is important to note, in response to these questions, that the proposed new open panel represents, in our view, an increase in competition. When this is combined with the suggested increase in reporting demands for suppliers and a requested consideration of fixing supplier charges to fixed margins we firmly believe this leads to a transactional service model, rather than a partnership, to deliver best outcomes for the Queensland Government.

In consultation with our Members, the open panel recommendation from the Queensland Government was the most challenging concept to see as a benefit to any party in the supply chain. We appreciate the intent but do not believe there is sufficient volume of activity, in any category, to create a financially viable outcome for all suppliers to be involved.

This response assumes that if a single SOA is in place, separate panels will remain for each of the categories.

The responses below have been compiled with the views of 82% of the APSCo Member companies currently supplying to Queensland Government and are representative of all of the categories in the consultation, with almost 53% in ICT, which is still our largest cohort of Members.

# Proposal 1

## 1.1 How should the different types of roles be categorised? (to reflect the industry and supplier specialisations)

Of the options provided the two that were highlighted as acceptable for the APSCo Members were:

- Skills for the Information Age (SFIA)
- Australian Public Service Job Family Model

For ICT **SFIA** is considered well defined and accepted as a standard and promotes commonality both nationally and internationally. It is considered good for groupings and if more widely used it would deliver a national framework for roles in this space, which would assist all parties as talent is now so mobile. SFIA does support fringe roles for admin and office support and some finance and budgeting roles but not other categories.

**The Australian Public Service Job Family Model** would be the best framework to use across the SOA. These classifications cover: *Business Support, Professionals, IT, Engineering and Light Industrial* – this would then accommodate a Whole of Government approach across most of the nominated panels in this consultation and also provide Queensland Government with an opportunity to benchmark against other Whole of Government panels at a state and Federal level.

There were some important notes added by Members that should be considered:

1. SFIA is probably the most up to date out of all the options but it still only updated every few years – technology changes quickly - how will this affect the categories and will the administration of the panel be agile enough to update and amend?
2. SFIA should not be used to link pay rates or to compare roles between different organisations. The current Role and Rates displayed in Fieldglass are not realistic and regardless of SFIA, market rates should be determined by supply and demand of skillsets in the market.

The question of categories and sub categories elicited a consistent response across all market segments and that was that too many sub categories create onerous panel management and increased administration time and costs for all parties. There was agreement that how roles are qualified needs to be standardised against an accepted framework (that is relevant to the sector) to ensure consistency for suppliers and for hiring managers.

This should then also establish the framework for performance KPI's and other metrics that require measurement of success. It is important to re-iterate that success is incumbent on all parties:

- The hiring manager understanding the role requirements and the correct expectations of talent
- The supplier ensuring they understand the hiring manager's needs correctly, the time frames and the skill sets required

- Both parties being aware of the current market conditions for such talent in terms of availability and remuneration expectations
- The candidate's preparedness for the role, their availability and their demonstrated skill sets and employability.

If there is a strong framework that all parties reference then KPI's and metrics for the hiring manager and the supplier should be measurable and reportable.

For ICT in particular there was not support for having three tiers/levels as ICT is an easily distinguishable specialisation so, it seems that it would be more appropriate and easier for internal hiring managers to follow a process that has two tiers such as Category (IT) and Specialisation (role title, e.g. Business Analysts).

If there was to be an additional tier the following four verticals most favoured in the feedback were:

- ICT Operations (incl. EUC support, infrastructure, cloud)
- Applications (Software Dev, ERP, BI etc.)
- Project Services (PM's, BA's, Change etc.)
- Strategy, Architecture & Leadership.

### **How will this categorisation help hiring managers make efficient and informed decisions?**

Clear categorisation provides a structure and guideline of who (which Supplier) is best fit to provide the service. Table 1 in the proposal, (as an example), would need to be created by QGP and included in the SOA so all parties have a reference point.

Categories would need to be reviewed periodically to ensure they are relevant to the changing market and this would also ensure roles are not lost to undefined categories and become Statement of Work engagements by default.

Category Managers should have the opportunity to participate in industry led regular reviews of job titles. APSCo Australia conducts such discussions on a quarterly basis through the Index program with SkillsMatch, Burning Glass and DaXtra across professional roles in multiple verticals.

Training in understanding the standard (be it SFIA, the APS Job Family or another option) should be a requirement for suppliers and hiring managers

If all of the above occurs each hiring manager will know, more precisely, what they need and better understand their suppliers' areas of expertise. Suppliers will feel confident to nominate where they have strengths and thus become stronger partners in the supply process.

### **What is the maximum number of sub-categories a supplier should nominate for? (so customers can easily find the right suppliers at the right time and a fair opportunity exists for suppliers of that specialisation)**

Suppliers should not be restricted to the number of sub-categories they can be approved for supply. The decision of appointing suppliers to sub categories should be done on a **capacity** basis, not a **number** limit basis. For example, a specialist supplier may not service any other categories except for their specialism and as such, being restricted to a limited number of sub-categories within the new arrangement across all of QLD Government, would severely affect that company's ability to support QLD Government projects.

For QLD Government, having suppliers that have a solid track record of being able to provide quality resources in any of the established sub categories, however being unable to use them due to a cap on sub category eligibility, would have negative results for obtaining the resources they require and would cause Government agencies to look beyond the panel which could be disruptive.

If there was to be a cap on sub categories then this should be different between specialists and generalists with a caution that generalists must be reviewed and approved as generalists, not just self-nominate as a generalist.

When applying for the SOA, suppliers should have proven history through current Queensland Government Supplier reports or references for other non-Government performance in their nominated categories, unless they are a start-up. As a startup, the Association accreditation should apply, with an 18 month to two year period to then be measured against the same entry points as long term suppliers.

### **Which approach to market is preferred?**

- **a single release ITO?**
- **released in tranches based on category.**

The response to this was divided – almost 50/50 so a summary of both arguments is here to consider:

### **Single release ITO:**

- Release in tranches creates more work for suppliers with little reward. 60-80% of the content responding to multiple tranches via separate RFQs will be duplicated work. Organisations could respond to one ITO, across self-nominated categories but then be accountable with realistic KPI's. This would need to consider the earlier question of number of categories available to each supplier to nominate.
- A single release gives a holistic view to all suppliers of opportunities available, and to the Government of suppliers interested in applying to deliver against the requirements but this must take into account the clear distinction between specialist and generalist mentioned earlier.
- Another alternative is to release an overview of the complete ITO available, then release in tranches as the categories are due to renew. This allows for the whole of market to consider their approach but also allows current arrangements to run their course without suppliers having to consider a new process against current arrangements.
- If it is going to be an open panel then a single release is the only option as unnecessary advantage will be gained by suppliers who are successful in earlier tranches. It could become an anti-competitive process.
- There are also significant differences in requirements for safety/risk management in light industrial and sports and recreation versus professional roles in ICT, office etc. All require due diligence but some require more comprehensive induction, site supervision and PPE supply. Can this all be efficiently covered in a single ITO, to an open panel, and evaluated effectively?

## Tranches:

The ITO should be released in tranches that are clearly defined across industry specialisation and across the agreed, relevant categories. The reasons for this include:

- Each category has different requirements, both operationally, and from a financial/ rates/oncost perspective. Grouping them together in a single ITO would be cumbersome to submit for and to evaluate.
- Each tranche should incorporate questions/explore solutions relevant to the skill set of those contingent workers per category and their industry specific requirements.

NOTE: One of the challenges for generalists who supply across multiple categories and have multiple brands is the restrictive manner in which a business is viewed under the current arrangement. A strong recommendation (based on the Labour Hire Licence protocol) was to allow companies to apply using their multiple ABN's and brands across the various categories under a single ITO.

For example:

Company A Work – supply to sport and light industrial

Company A Talent – supply business support, engineering and ICT

If multiple ABN's/brands could be listed on a single ITO then opportunities to maximise the value multi-category companies bring to the SOA would be increased.

## Proposal 2

### Candidate care

This is an area that is essential in any workforce and is extremely difficult to measure as each supplier will have their own strategy, message to market and unique value proposition to their candidates, as it is part of every company's talent attraction and retention program.

The question should be what evidence is required to ensure suppliers have a candidate care strategy in place and, equally as important, what is the policy of the various Government agencies in allowing a care plan to be activated and/or managed if required?

Some essentials which could be considered in the SOA include:

Evidence of:

- Current and adequate insurance including WorkCover.
- appropriate induction, on boarding and training appropriate to the role, including WHS
- Payment terms for contractors and statutory payments for superannuation and other benefits. This has all been vetted for APSCo Members via our Business Verification process and is also vetted in the Labour Hire Licensing assessment but it is important to review.
- Policies related to onsite visits, contractor grievance procedures and dispute resolution procedures.
- Worker satisfaction checks. These are conducted as part of the safe process for APSCo participating companies by a third party auditor.

- Reporting on number of candidate visits or contacts made.
- Regular surveys by QLD Government Departments direct to contractors to get feedback on their suppliers.
- Provision of an EAP program and an identified contact person for contractor support onsite.
- Contractor Support Pack with all the necessary contact details for support if needed.
- Return to Work policy.
- Procedures to address personal issues e.g. bullying & harassment, payroll questions etc.
- Consistently high NPS score.

**Membership of a relevant Australia industry or professional Association with a Code of Conduct or Practice should be an expectation on any SOA going forward for the following reasons:**

- Labour Hire Licensing has created the minimum benchmark, but is a legislation driven program. Non-compliance means costs to business not business improvement.
- The Associations, over the past ten years in Queensland, have demonstrated their commitment to market education, best practice modelling, setting of standards, mediation and intervention when issues have occurred to support both the companies involved and the Queensland Government agencies as required.
- This process has resulted in improved education for hiring managers, for recruitment companies and for contractors and we have seen diminished issues between parties as a result of this.
- Association Membership, as a pre-requisite, should not be a barrier as Association fees are set against business size and are, for the most part, inexpensive.
- What needs to be considered is whether the Membership is for an individual or a company. In APSCo's view it must be a company as an individual cannot be held accountable for actions of others in the company whereas a company membership binds all in the company to the Code of Conduct and other Rules and Standards.
- APSCo Members have access to quality measures available in their Membership, which support some of the KPI and business assessment questions including: the pre-Membership approval compulsory Business Verification Review, the iSafe WHS Risk Management program and the JAS-ANZ accredited Talent Engagement Standard.
- APSCo Australia also recommends relevant Association Membership should be required for independent contractors operating under their own ABN.

**What minimum requirements should suppliers have to meet to support Government's commitment to Backing Queensland Jobs and Buy Queensland?**

With many companies in our Membership supplying talent into Queensland because they have been asked to do so by national Government agencies such as Defence - this question has a number of important considerations apart from the Government's commitment.

General feedback was that there should be a physical and proven presence with an account manager available in Queensland office and that Qld based suppliers should be identified to encourage Qld Government agencies to consider them first, as part of Government policy.

It is also essential that "Backing Queensland Jobs", as a policy, does not preclude sourcing of talent across borders when Queensland talent cannot be sourced. The demand for skilled workers in many professional sectors is increasingly hard to meet, with local talent, it is

important that suppliers and Government are not limited in sourcing and engaging talent for highly challenging roles.

Companies who have national contracts and are required by Queensland Departments to supply, submitted the following commentary to be considered in the sense of fairness to all with respect to having a business based in Queensland:

1. A business who is required, through a national contract, to supply to a Queensland Government agency but is a niche enterprise (not a national or international organization) should not be excluded from submitting to an ITO for the following reasons:
  - They will have proved their ability and have evidence on record of their supply management.
  - In most cases they have access to talent that is needed and has special requirements.
  - Queensland Labour Hire Licenses and other statutory requirements have all been undertaken and approved and all local taxes are being paid.
2. Additional evidence should be required when they submit for an ITO including:
  - a commitment to attend any briefings and meetings in Queensland as required
  - their remote candidate care and issues resolution strategy
  - evidence of a national contract that they are required to supply for in Queensland.

### **Measuring a supplier's ability to meet the Quality, Safe Workplace requirement in line with Buy Queensland best practice principles?**

Suppliers must provide proof of:

- Current and adequate insurance – in particular WorkCover.
- Proof of WHS system and site management aligned the categories of workers they apply to supply for (e.g. iSafe).
- Evidence of correct pre-placement induction and work health and safety training aligned to the categories of workers they supply.
- Evidence of a system of regular site and system reviews where workers are placed (iSafe).
- Evidence of annual audits and updates of their internal WHS systems, policies and practices (e.g. Talent Engagement Standard module – Safety Management or ISO accreditation).

### **Other quality measures suppliers should be required to meet to be a panel supplier**

- Suppliers to nominate and provide profiles of account managers who will be managing accounts and include any history of delivery of outcomes to Qld Government.
- Evidence of commitment to professional development and training of consultants in the suppliers business (e.g. Certified Recruitment Professional).
- Evidence of financials.
-

## Proposal 3

### Key Performance Indicators (KPI's)

APSCo Australia believes:

- Established KPI's will identify non-performers and allow Government agencies to choose suppliers that can meet their capabilities.
- KPI's need to take into account the number of suppliers on an open panel and the categories that are being recruited for as well as the level of reporting required by suppliers.
- An ideal number of KPI's is 5 to 6 so it is important to determine which are the most important both for the supplier's development on the panel and the Government's goals.
- The nominated KPI's may be inappropriate for an open panel given the nature of the sub categories suggested.
- The KPI's are more suited to exclusive arrangements or a rationalised panel.
- If an open panel is implemented then KPI's need to be implemented that measure quality and are based on candidate and client satisfaction levels measured through pro-active surveys and review discussions.
- If a more rationalised panel was implemented then the KPI's suggested would be acceptable.
- Setting arbitrary targets is difficult when you have new supplier arrangements and across multiple categories.

APSCo recommends working with suppliers in the first 6 months, to establish baselines as there are often client-driven mitigating factors as well as shifting market pressures that impact deliverables and the benchmarks may need to be varied.

**NOTE:** Fill rate is an inappropriate measure if this will be an open panel, as the opportunities to fill will be spread across a large number of suppliers.

Other KPI's could include:

- Invoicing process accuracy (supplier)
- Payment terms met by client (invoices paid within 30 days or period specified in deed)
- Submission to hire – quality of candidates
- Attrition and termination (contractor duration)

### Supplier able to provide candidates in their nominated category/specialisation

Established suppliers should be expected to deliver from the time they are activated on the panel.

A 12-month capability timeframe should be offered to “new start-ups”.

Monitoring supplier capability must also take into consideration:

- The number of roles released to the supplier
- Geographical locations
- Sourcing for hard to find skill sets

- Operational differences across Government Departments which are beyond the control of the suppliers.

### **Circumstances to be considered to exclude a supplier from the panel?**

- Evidence of poor Candidate Care
- Consistent failure to supply quality candidates
- Non-payment of superannuation and worker entitlements.
- Underpayment of contractors - less than agreed rate to them or stated by Government.
- Non-registration for Queensland Payroll Tax.
- Not meeting minimum Pi & PL requirements.

## **Proposal 4**

### **Supplier margin proposed model**

#### **What is a fair and sustainable maximum margin?**

APSCo acknowledges that this is a pathway the Queensland Government is committed to pursue so it is re-iterated that the proposed addition of a significant number of new suppliers to the panels will mean the margins will be of greater significance, as the opportunity to supply may be reduced and this will make QLD Government a less attractive client.

Unlocking the potential of the modern workforce and managing that potential for clients, from sourcing to placement and ongoing candidate care, requires significant investment by the suppliers in employee skilling, internal systems, sourcing and selection, statutory costs and general business costs.

APSCo will not accept that a maximum margin be set universally across the categories and so responses in this section reflect what APSCo considers are the challenges faced in trying to fix or set the margin and the key points to be considered.

APSCo suggests that if margins are to be set then the following needs to be considered:

- If there is to be a maximum rate it should be driven by the industry sector of that role category with a flat percentage rate per industry category, not per role, the margin return to the supplier will adjust according to the daily/hourly rate of remuneration to the worker.
- If margin is to be set then it should be set as a percentage of the rate charged for the worker's services, in any category, and would then provide a return to the supplier that reflects the various additional costs that come into play in the sourcing process
- With the proposed open panel there will be a reduction in the ability of suppliers to negotiate margin and it will become commercially unviable to service the client. The margins need to be considered against the current maximums of the top 5-10 suppliers on current panels, as these have been sustainable to date BUT with increased competition may also need adjusting.
- With this as a starting point and a rate card established, regular reviews of the rate card, based on market conditions and skills availability, would need to be established.

- Statutory on-costs including insurances should be outside this percentage calculation and this is reflected as the possible way forward by the Queensland Government in the questions posed.
- Long tenure rates need to be re-visited if there are to be capped margins - standardisation at 12 months seems to be an acceptable level.

***Are there any categories that should attract a higher margin? What margin would be appropriate?***

Yes, harder to fill categories such as ICT or Engineering should attract a higher margin but again it is recommended that the same margin be applied across a category and not on a role by role basis.

Independent labour market analytics should be used bi-annually to validate roles that are considered in demand or hard to fill to ensure the proposed margin is appropriate.

This further supports a rate card approach.

***Should the same maximum margin be applied across all regions?***

Yes, the margin can stay constant as the pay rate will go up to reflect if that region has harder to fill categories, skill shortages or harder to fill roles and, if the margin is paid as a percentage of the pay rate then it will adjust accordingly.

***Should a separate maximum margin apply to roles in skills shortage areas to ensure we attract quality candidates?***

No, the margin can stay constant as the pay rate will go up to reflect if that region has harder to fill categories, skill shortages or harder to fill roles and, if the margin is paid as a percentage of the pay rate then it will adjust accordingly.

***Would a standardised approach to insurances suit all suppliers?***

No, as different suppliers have different insurance requirements. A supplier providing light industrial labour has very different insurance requirements than an office administration supplier or a generalist provider.

In addition to this, small to medium enterprises and start-ups need some consideration in insurance expectations – many cannot access the current required levels because of their business size and this becomes anti-competitive.

***Would a standardised approach to WorkCover suit all suppliers?***

No, WorkCover requirements should differ depending on the role requirements and the work being performed. Cost of protective clothing, if the supplier is to provide, needs to be considered.

## Proposal 5

### *What would a reasonable pricing model be for 'recruitment as a service'?*

APSCo did not have enough information to prepare a comprehensive response to this question but we do believe that any suppliers in this space would need to have some specific qualifying criteria to be appointed to such a panel, such as:

- a proven track record of supporting these requirements as a sole supplier, master vendor or part of a very restricted panel.
- panel numbers would be restricted with a guarantee that suppliers get a certain volume of work.

The general view was that the volume, in the professional staffing and recruitment sector, isn't there to make this an attractive option for suppliers in Queensland.

## Final Comments

### *Any other comments*

APSCo Members have responded to this consultation with consideration for their own business as well as for consideration of moving Qld Government forward in their acquisition of talent for all projects.

The responses are a summary of a comprehensive consultation and the following comments are snapshots of the final views from companies who have a long history with QLD Government.

*It appears that the new panel is an attempt to broaden the supplier base whilst diminishing the financial incentives, which ultimately demonstrates a lack of understanding by the Qld Government in terms of what is required of business in order to provide quality candidates. The suggestions appear to be designed in order to develop a transaction process for what recruitment agencies do as a service. We are providers of people, not products.*

*The purpose of the existing ICT Contingent Labour panel, as an example, when put in place was to create a rationalised panel. This meant increasing the successful recruitment agencies market share of business within Qld Government, ensuring Qld Government had access to the best talent and encouraging relationship-based services.*

*If the suggestions put forward for the new arrangements are implemented this will ultimately result in reduced service levels by suppliers across Qld Government and cause damage to the Government's ability to have suppliers that value (and prioritise) Queensland Government requirements.*

***There are many areas of concern in grouping such conflicting industry areas under one SOA. The Queensland market is not as large as others in Australia and this needs to be considered with uncapping the suppliers and opening categories. The administrative burden on Government who are struggling to deliver reports and follow-ups on the current arrangements will need to be taken into account.***

***The current processes for submitting candidates are administratively onerous for current suppliers and often result in the Government missing out on candidates due to the submission requirements.***

***Setting margins is becoming the norm in procurement but they must be realistic and viable for all parties or the model won't deliver to the client or be sustainable for the suppliers. There is enough history in Queensland Government panels to have a meaningful dialogue on true value measures that are realistic and of value to the Queensland Government. This is not being utilised effectively, in the current arrangements, and seems such a waste of valuable information that could assist this process if it was available as part of the consultation.***

*The SOA should be mindful of appointing 'Suppliers' who are working in a role within Queensland Government while also working for themselves as a 'Supplier' (e.g. a program manager who is also a 'recruitment company'). There are many such sole traders now with Labour Hire Licenses and it is important that the criteria for being on any panel is strictly adhered to.*

*The Government needs to consider the administrative and competitive impact of having an open SOA or offering Supplier 'application windows'. In all circumstances, Suppliers should be held to adhere to the same processes, guidelines and qualifications as 'initial Suppliers' (e.g. the RFI process).*

*The SOA should specify the circumstances for Supplier removal, e.g. 12 months on the panel and not meeting KPI's or non-performance in candidate supply/retention. This is especially relevant to Suppliers who have received roles but lack placement conversion. This may not be as relevant to specialist niche suppliers who may have limited roles released to them.*

***Hiring manager communications, with an open panel, will increase exponentially and it will be essential to create a better process for achieving clear briefs so that recruiters can act efficiently.***

***Long term, the panels need to be monitored to only include suppliers who actively engage and invest the time to become a Queensland Government supplier. For some specialist and niche recruiters this is not about the number of roles but rather is about quality of candidate and responsiveness.***

***The data is available to assess suppliers' performance with their responses, services they provide and the quality of contractors placed and retained on site. If this information was more readily available (like a league table for performances in certain categories) it would create more value for hiring managers in determining where they can source their recruitment supply.***

***If the panel is expanded, we will experience greater competition and APSCo Members should expect a strengthening of the SOA's mandate for all contingent labour in Qld Government. This will hopefully generate a better outcome for suppliers, deliver stronger service levels, quality talent, greater controls, transparent reporting and evidence for the quality spend of the Government purse.***

*An alternative to an open panel is to have a targeted approach to bring in new suppliers who meet the needs of Government for hard to fill specialist roles where current suppliers are unable to attract and supply the talent.*

*Qld Government and APSCo have this information so an expansion of the panel to meet current shortcomings in the current providers, not as a blanket approach to an open panel would be far more intuitive.*

The general consensus is that open panels are counterproductive for the Queensland market and will lead to changes in service levels and undermine Queensland Government's strategic objective - to access the best talent. It is recognised that this has to be counterbalanced with the fairness to all policy and, in particular the "Back Queensland" initiatives, but the costs to apply to ITO's and then to see little return because of the number of suppliers is also counterproductive to these policies, which are to support business in Queensland.

### **And finally – questions for the Contingent Labour Consultation that we would want addressed in the ITO**

#### **Categories and sub categories**

- How many categories/sub-categories can be selected – is there a cap?
- What will the criteria for being able to select a category?
- How will this be checked re: your suitability?

#### **Candidate care**

- How does QLD Government plan to collate and measure this as it is subjective – and against what benchmarks?

#### **Ongoing performance measures and standards**

- Will the KPI's be the same across all categories?
- Will they be varied for hard to fill roles?
- With increased agencies on panel, can performance be qualitatively measured?
- Candidate surveys are voluntary, response rates are not high - how can it be a KPI?
- What will be the SLA's on "fail to fill" roles in a sub category – i.e. fill time is not appropriate for many categories. This cannot be standardised across the categories featured in this SOA.

#### **Margins:**

- Will heritage rates be abolished as part of these changes?

Again thank you for the opportunity to respond and if there are any questions on the topics raised please feel free to contact Julie Mills , APSCo Managing Director on 0427 771 616 or [julie@apscoau.org](mailto:julie@apscoau.org)

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