



Federation of African Professional Staffing Organisations (APSO)

# Labour Amendments: LRA & BCEA

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## Introduction

The Federation of African Professional Staffing Organisations (APSO), was previously known as the Association of Personnel Services Organisations, and has been in existence since 1977. APSO is the largest and most well-established organisation within the private employment agency (PrEA) sector, and has always held, as its primary goal, the professionalisation of the PrEA industry in South Africa. For the past nearly four decades, APSO has set and managed compliance and best practice standards for its members, for the benefit of clients, candidates and employees alike.

APSO's primary service offerings include:

- Lobbying & Advocacy
- Ethics & Best Practice
- Education & Training
- Information & Networking

## *Affiliations*

APSO is a founding member of the Confederation of Associations in the Private Employment Sector (CAPES) and has thus been actively involved in lobbying and advocacy initiatives to regulate the industry. APSO representatives participate in a range of forums including Business Unity South Africa (BUSA), NEDLAC, Services SETA, National Skills Authority (NSA) and others.

Internationally, APSO is well respected and holds the seat for Africa and the Near East on the Board of the International Confederation of Private Employment Agencies (CIETT). We have been members of this body for more than twenty years and are actively involved in global initiatives to drive compliance, professionalisation and effective regulation for the sector. [www.ciett.org](http://www.ciett.org)

## **Global PrEA pledge “The Way to Work”**

In 2012 CIETT launched its global campaign “The Way to Work: A job for every person, a person for every job”. This campaign is underpinned by some ambitious goals relating to job creation, skills development and empowerment that the industry as a whole, including APSO, is committed to achieving over the next five years. This global pledge seeks to:

1. Support 280 million people in their job lives;
2. Help 75 million young people enter the labour market;
3. Up-skill 65 million people, giving them more job choices;
4. Create 18 million more jobs;
5. Serve 13 million companies with the right talent to succeed

The Way to Work vision is underpinned by the values:

- Quality
- Inclusiveness (social dialogue)
- Serving
- Freedom

APSO has bought into this inspirational and aspirational vision and will set national targets that the South African PrEA sector can work towards.

### ***Quick Facts:***

#### APSO represents:

- More than 800 individual PrEA businesses with over 1200 offices across South Africa;
- In excess of 6000 individual PrEA practitioners;
- All forms of PrEA businesses : members offer a variety of staffing services from permanent recruitment, to advertising response and temporary employment services (TES);
- Different sectors of PrEA : members operate in all sectors of the economy;
- SME businesses : nearly 80% of our membership is made up of SME businesses, many of whom are black-owned;

The Private Employment Agency Sector, including Temporary Employment Services (TES), is a significant contributor to the South African economy. In addition to facilitating smooth transitions for workers between jobs, and assisting employer companies to remain competitive in tough economic times, it is also one of the largest contributors to skills development in the country.

#### A snapshot of the South African PrEA sector:

- Introduced 5.4 million people to the world of work since 2000;
- Agency workers spend less time looking for work, 90 days, compared to a staggering 806 days (2 years 3 months) for the average South African job-seeker;
- Gateway to the world of work: Profile of work seekers/candidates:
  - Never previously employed: 50%
  - Youth aged 18-35: 75%
  - Previously disadvantaged: 82%
- Average of 994 000 people deployed (via TES) on a daily basis
- Of those initially employed as a temp, each year significant numbers are permanently deployed:
  - 30% within 1 year
  - 42% within 3 years
- One of the largest contributors to skills development – R450 million paid over in skills levies
- Conducted 34% of all learnerships in the country

## Executive Overview

**Extraordinary solutions are required to achieve the desired results (reduction of unemployment through job creation and economic stimulation) and we wish to highlight that the traditional methods, including social dialogue, have failed to achieve, to-date, workable solutions.**

### **Mission Critical: Reduce Unemployment**

At the heart of South Africa's many problems lies the ever-increasing scourge of unemployment. All of Government's plans, most especially the National Development Plan, released in mid 2010, focus on the need to create millions of jobs in the next decade. This will not be possible if the proposed labour legislation amendments were to be passed. South Africa already struggles to compete favourably with our African neighbours and BRIC counterparts in respect to education standards, labour relations and productivity, and unless we create an environment that businesses – both local and International – believe is conducive to economic success, we will not stimulate the economy and attract the much-needed foreign direct investment required to have a real impact on job creation.

**In fact, the National Development Plan and Finance Minister Pravin Gordhan both indicate the need to relax labour legislation in order to stimulate the economy and create real jobs.** This is now more critical than ever as the world hobbles through the largest economic downturn since the 1929 Great Depression and companies operate in highly unstable and uncertain times.

According to the Labour Market Performance Report for First Quarter 2012 released by the University of Cape Town's Development Policy Research Unit, the initial labour market recovery observed in 2011 is faltering. The unemployment rate, calculated on the expanded definition to include those who are disillusioned as well as those actively seeking work, stands at 33.8%, more than seven percentage points higher than the pre-recession low of 26.6% measured in the fourth quarter of 2008.

### **Youth: A ticking time bomb**

Throughout the world youth unemployment is a critical factor and none more so than in South Africa where high levels of unemployment are being experienced amongst the youth. The report sets unemployment rates amongst 15 – 24 year olds at 62.4%, nearly double the national average and 25% higher than the rate for 25 – 34 year olds.

The education system is failing desperately and many young people are exiting the secondary education system with Matric certificates yet still functionally illiterate. Skills development in the workplace therefore becomes essential and adds a significant burden, both cost-wise and administratively to employers, who would rather engage with a more mature worker.

The PrEA sector has proven, since the inception of the National Skills Development Strategy (NSDS) I, to be a significant contributor to skills development with more than 30% of all learnerships conducted in the country being facilitated by the sector. For many companies, the advantage of engaging with a PrEA who is able to supply workers (learners), facilitate the administration and operational processes of skills development for these workers, and to manage work schedules to ensure continued productivity is essential; for without it businesses would rather not get involved in skills initiatives seen as too costly & cumbersome to manage internally.

The economic slowdown and existing draconian labour legislation has also resulted in the inability of the South African labour market to generate sufficient numbers of jobs, especially for younger, less experienced workers. Employers are simply too afraid to “take a chance” on a younger worker, for fear that it does not work out.

### **Enforcement is the real issue**

South Africa is recognised to have some of the most rigid labour legislation in the world. The 2011 World Employment Forum ranks South Africa 138<sup>th</sup> (out of 139 countries) in both Flexibility of Wage Determination and Cooperation in labour-employer relations. We also rank worst, 139<sup>th</sup>, in respect to Hiring and Firing Practices. This clearly outlines the fact that our existing regulations are already too stringent in this economic climate.

The real issue however is in relation to compliance and enforcement. Currently, those companies who operate outside of the legislation, are not being investigated and punished and there is no real effective deterrent for non-compliance. [The RIA report clearly indicates that lack of enforcement is a key problem in the current labour market.](#) It further explains that increasing legislative compliance will only serve to exacerbate the problem unless significant resources are employed within the Government departments responsible for implementation and enforcement.

Extensive research, conducted globally by the Boston Consulting Group, proves that over-regulation of any labour market – established or emerging - leads to a direct increase in the number of non-compliant “underground” operators and a decrease in employment in the formal sector where the highest levels of compliance exist.

[Business is highly concerned that attempts to further regulate the South African labour market, resulting in over-regulation, will only serve to increase the cost burden on the already compliant and drive more businesses underground, thereby increasing the non-compliant element.](#)

This will have a severe impact on the number and quality of the jobs in South Africa. As costs increase, compliant businesses will seek opportunities to reduce the number of people employed through automation and mechanisation, thereby resulting in the loss of more decent jobs.

### **ILO concurs that job creation, not legislation amendment, is more critical for SA**

In an article *“The International Labour Organisation has lauded South Africa’s decision to set job creation targets but is concerned that the country remains internationally uncompetitive, particularly against the Asian countries against which it competes with in terms of labour”* written by Alistair Anderson and published on 24 January 2011, Vic Van Vuuren, the ILO’s South African director, said the organisation wanted companies to make a social pact with the government and labour to implement methods with measurable job targets and not to focus on energy-sapping legislation.

[The organisation said amendments to our labour legislation were taking too long to be finalised. SA’s labour laws did not require overhauls but rather that business and government focus more directly on job creation, Mr. Van Vuuren said.](#)

“The debate around the amendments to our labour legislation is heated. They need to be made more carefully. But I will say that the labour legislation we have will not be made much more or less

onerous by the amendments. It complies with the requirements the ILO sets for SA and some other countries,” he said.

### **Proposed legislation threatens job creation goals**

The proposed changes to the legislation, in particular the curtailment of the use of a-typical employees (temporary, fixed term and part-time) by limiting the time of employment to 6 months, before being considered to have all the rights associated with permanent employment, including access to benefits, will have dire consequences for the labour market. It is estimated that almost 4 million people are employed in a-typical arrangements in South Africa, the majority of which are employed directly with companies, and the local labour market is simply not able to absorb all of these.

Further, the poor drafting of the proposed legislation has already led to confusion in the marketplace with different lawyers interpreting the drafts differently. This uncertainty, rather than specific legislative amendments, is more likely to cause a loss of jobs as businesses battle to come to terms with administering it internally.

Sandile Zungu, of the Black Business Council, expressed his concerns about the impact of the proposed legislation in the Financial Mail (June 22 – 27 edition), saying:

*“Small and medium enterprises (SMEs) are the gold mines from where economic growth and employment are going to come ... the problem with the current debates, especially on the emotive issues like labour broking and labour regulation, is that there’s too little realism and too much inflexibility.”*

In their submission, the South African Chamber of Commerce and Industry (SACCI) also highlights their concerns about the impact on SME business. Employment trends are clear, larger businesses are streamlining (and downsizing) wherever possible to remain competitive so the likely space for growth and job creation is amongst SME businesses. Unless Government ensures that a conducive economic environment is created to encourage entrepreneurs to expand and grow, the ambitious targets of job creation will never be achieved.

### **The “f-word” - Flexibility**

Government and unions in South Africa, and elsewhere in the world, are struggling to come to terms with the changing world of work and the increasing use of flexibility within the labour market. Gone are the days that an individual was employed ‘for life’ at a single employer with full benefits and a gold watch on retirement. Chronic skills shortages, increasing global competition and improving technology have created a labour market that favours flexible, project-based employment. This more flexible labour model need not mean precarious work. [“Flexicurity”, a concept coined in Europe, promotes the balance between flexibility and security for the employee through effective regulation and the availability of suitable social protection schemes.](#)

Companies, in order to remain competitive, are choosing to outsource their non-core functions and to bring specific skills, for specific projects, in “just-in-time”. The nature of these employment relationships varies but is most often defined as “a-typical”.

To effectively manage the sourcing, recruiting, assessing and administering of flexible labour, businesses have turned to specialists, in the form of Temporary Employment Services (TES) companies. And South Africa is no different.

### **Adapting to Change – International research**

In 2011, the International Confederation of Private Employment Agencies (CIETT), commissioned the international research experts, Boston Consulting Group, to undertake global research on the impact of the Private Employment Agency (PrEA) sector and their role in facilitating adaption to change, better labour markets and decent work. The research brought together all pieces of research conducted on the PrEA sector – both independent and sector-commissioned – over the past decade and is therefore truly expansive and inclusive in its data source. The results were overwhelmingly clear. PrEA enable adaption – for both businesses and workers – in increasingly volatile and complex labour markets. [The research clearly indicated the need for appropriate regulatory frameworks to govern the PrEA sector, so as to ensure that they continue to provide services that enable an efficient labour market, drive skills development and the Decent Work Agenda.](#) A full report is made available as an Annexure to this submission.

### **The Labour Law Review Process**

In 2009 the Government first mentioned their intention to alter the labour laws and in June 2010 they presented to Cabinet their first drafts of the Labour Relations Amendment Bill, the Basic Conditions of Employment Amendment Bill, the Employment Equity Bill and the newly created Employment Services Bill. These were rejected by Cabinet who called for a Regulatory Impact Assessment (RIA) to determine the impact on the economy, and in particular the Government's plans for rapid job creation.

[The RIA](#), commissioned by the Department of Labour, was undertaken by University of Cape Town and amongst others, law professor Paul Benjamin. This document was originally released in September 2010 and [predicted that the new laws would have a profoundly negative effect on flexibility in the labour market and hamper the ability of South African companies to compete in the global market.](#) Throughout the nearly 200-page document, the RIA highlights the fundamental flaws in the proposed bills including the unconstitutionality of some provisions, including the suggested ban on labour brokers, inconsistencies between the bills themselves, and practical issues relating to Government's lack of resources to effectively implement and enforce the proposed legislation, amongst others. Business endorsed much of the RIA comment, yet throughout the negotiation process, Government has ignored its own research findings.

It is an indictment on the process that this RIA document was published simultaneously with the four original draft bills on 17 December 2010. In addition to the documentation being contradictory, the timing could not have been worse for Business, many of which had closed for the festive period, leading to a highly shortened commentary period.

It soon became apparent that the bills were so poorly drafted – they were riddled with errors and inconsistencies - and in numerous areas were unconstitutional and contrary to Government's own RIA. The process suggested by the Minister at the time was halted and the Bills were referred to NEDLAC for negotiations before the bills could be presented to Parliament.

At the outset of the NEDLAC process, Business made it clear that they were unwilling to engage on the bills given that they were so poor. Instead, the social partners agreed to set aside the Bills and rather focus on the principle issues, clustered under six themes, being those that cut across all four bills.

These six themes were:

- A-typical Employment Relationships;
- Dispute Resolution;
- Compliance & Enforcement;
- Collective Bargaining;
- Access to Employment; and
- Employment Equity

Despite the extensive evidence provided by the RIA report, the recommendations made by the Business delegation, have been largely ignored throughout the process.

### **To agree, or not to agree, that is the question**

The NEDLAC negotiations have been highly frustrating, particularly for Business, who believes that the social partners have not been committed to true social dialogue and seeking compromise. Throughout the nearly two-year-long negotiations, COSATU has been consistent in its organised call for an outright ban on temporary work, and for labour brokers to be banned, despite the representatives of labour agreeing in the discussions that regulation, rather than prohibition, was the way to go. Department of Labour too has not been constructive in the process and forced Business to make a lot of concessions whilst allowing the other social partners to stick to their original position. The process of negotiation during 2011/12 at NEDLAC is a bad reflection on the state of social dialogue in the country.

Since the outset of the NEDLAC negotiations, several new proposals have been tabled and Business believes that as a minimum, a new Regulatory Impact Assessment (RIA) study should be commissioned on any Bill to be released. The new RIA should seek to understand the impact of the proposed changes in light of the global economic downturn and Government's ambitious job creation goals set out in the various transformation plans, such as the National Development Plan.

### **Commitment to effective regulation**

The industry has long advocated the need for specific regulation to govern the PrEA sector. We are committed to regulation that is fair, effectively enforced and that recognises the dynamic nature of labour markets today. We regularly engage with a broad range of stakeholders to identify opportunities and innovative ways to create such a regulatory framework.

APSO is dedicated to driving the CIETT Way to Work vision in South Africa for the benefit of the industry and the country as a whole by:

- Calling and acting on appropriate regulations;
- Partnering with relevant stakeholders;
- Raising the professionalism and quality standards of the whole industry;
- Educating policy makers; and
- Expanding the membership base

## **APSO initiatives to drive professionalisation of the PrEA sector**

APSO has a long history of working on specific initiatives, both internally and with key stakeholders, such as Department of Labour, to address issues of non-compliance and to attempt to raise the standards of the industry for the benefit of the clients, candidates and workers who engage with our members.

Some of the highlights include:

### **1. *Development of a Code of Ethical & Professional Practice***

Since its inception, APSO has always had a strict Code of Ethics that has governed the behaviour of its members. Although not prescriptive in terms of business models or fees, it sets the minimum standards of service expected to be given, by a member, to their clients, their candidates, work seekers and other members.

Over the years the Code has regularly been reviewed to ensure “fit for purpose” and alignment with current legislation and prevailing market conditions. It is regularly referenced by various stakeholders and is considered to be the epitome of ethics and best practice within the PrEA sector in South Africa.

The Code is currently being reviewed again, to ensure that it meets local conditions but is also aligned globally to best practice standards set by the International Labour Organisation (ILO) in convention 181 on Private Employment Agencies, as well as those in other countries.

### **2. *Establishment of an effective Complaints mechanism***

APSO has always offered a complaints mechanism for clients, candidates, work seekers or members who believe that an APSO member has not lived up to either their Terms of Business, or the APSO Code. This service is offered for free and seeks to find suitable recourse or resolution to the problem.

APSO is a proud member of the Institute of Ethics South Africa who has reviewed both our Code and our complaints process. The process has been refined over time to ensure that it meets the highest standards possible and achieves the desired effect of providing timeous resolution to aggrieved parties.

APSO employs a full time Ethics & Legal Officer, Advocate Janet Early who manages this function. She has extensive legal and ethics training and is well positioned to ensure that anyone who engages with APSO receives the highest level of professional service.

### **3. *Assurance of compliance amongst members***

Membership of APSO is not automatic and is dependent on the applicant PrEA business meeting our stringent membership criteria. The criteria encompass general business compliance, i.e. registrations with SARS etc, as well as industry-specific requirements such as being in possession of the Private Employment Agency certificate issued by the Department of Labour. Businesses operating TES are also required to show evidence of registrations with

appropriate bargaining councils etc. Applicants undergo both a paper-based compliance check and an on-site inspection before being accepted as members.

APSO has also developed a more structured inspectorate system that seeks to ensure the continued compliance of existing members via an annual self-assessment process. We have based this model on best practice examples locally and internationally and make use of external independent inspectors to ensure quality and consistency.

Many of South Africa's leading employers have chosen to make APSO membership a pre-requisite for doing business with them, because they see it as an added stamp of credibility and assurance of compliance and best practice standards.

#### **4. *Development of an Entrance Exam for individual practitioners***

Since 1981 APSO has had an entrance exam that is compulsory for all PrEA practitioners working for an APSO member company. This exam covers the embedded knowledge we believe is a requirement for compliant and professional service delivery within the sector, primarily labour legislation, ethics and best practice. The material was regularly updated to ensure relevance with applicable legislation.

In 2010, APSO revamped the Entrance Exam and it is now offered as a 3-month learning programme covering 10 modules including labour legislation, corporate governance & ethics, recruitment best practice, sales and marketing and project management. It continues to be seen by many corporate clients as the minimum requirement for engagement.

#### **5. *Development of Career Pathways for real professionalism***

APSO has actively engaged within the Services SETA structures and has been working, together with our fellow labour recruitment chamber members, to develop a career pathway for individual PrEA practitioners. This includes the development of qualifications, including the NQF4 Labour Recruitment qualification and the proposed NQF5 and NQF7 industry qualifications.

In addition three (3) professional designations have been scoped and registered with the South African Qualifications Authority (SAQA) and include expectations of ongoing Continuous Professional Development of individuals.

We believe strongly that effective professionalism must be driven on two levels – first, compliance on the company and secondly, the knowledge & behaviours of the individuals operating within it.

#### **6. *Formation of an industry lobbying body (CAPES) to engage tripartite stakeholders***

APSO is a founding member of the Confederation of Associations in the Private Employment Sector (CAPES). CAPES was formed to act as a lobbying body to represent the PrEA industry as a whole and brings together various associations including, APSO, the Allied Nursing Agencies of South Africa (ANASA), the Information Technology Association (ITA) and the Constructional Engineering Association (CEA).

APSO actively supports the efforts of CAPES and several APSO members serve on CAPES structures. CAPES has been at the forefront of negotiations in respect to the labour law review and continues to represent the industry in these matters.

**7. *Ongoing engagement with International bodies to ensure local alignment to global best practice standards***

As a proud member of the International Confederation of Private Employment Agencies (CIETT), APSO is actively engaged with our fellow PrEA organisations across the world in setting standards, promoting fair and effective regulation and the elimination of any form of non-compliant sector.

In addition, APSO continues to support the efforts of the International Labour Organisation (ILO) and has participated at the last two Global Dialogue forums (2009 & 2011) on the industry in Geneva. APSO has also sent representatives to other regional ILO sessions including to the recent one hosted in Harare on Occupational Health & Safety.

APSO supports the ratification of ILO convention 181 on Private Employment Agencies and its premise, to recognise, promote and effectively regulate the sector.

**8. *Engagement with Trade Union stakeholders***

APSO is open to social dialogue and has always promoted the concept of freedom of association for our members and their employees. We have, as part of the CAPES memorandum of agreement with trade union federation FEDUSA, actively been involved in a world-first pilot project to explore how trade unions can more effectively engage with temporary employees. This has involved two of APSO's largest TES members providing up to 800 individual temp workers with access (at no cost to the worker) to trade union membership and the affiliated benefits. This ongoing project, run over the past 12 months, has provided the opportunity to share ideas on how to meet the needs and expectations of the TES workforce. In addition, this pilot involved the set up of a dedicated Temp Call Centre, a world first, that allows temps working for any employer to call in and access advice and assistance.

Within the healthcare sector, APSO has engaged with a variety of trade unions including Solidarity, DENOSA, NEHAWU and HOSPERSA, to educate them about the nursing staffing sector and to seek agreement on the continued extension of the Ministerial Determination for BCEA Sick & Annual leave benefits to agency nurses.

**9. *Continued education of Clients, Candidates and Workers to avoid potential exploitation***

APSO continually runs articles, seminars and information sessions to educate and inform clients, candidates and workers about their rights and how to effectively engage with legitimate PrEA. We believe this work is especially important to ensure that individuals are not at risk of potential exploitation from non-compliant or scam operators.

## **APSO support for Government's socio-economic priorities**

### **1. Promotion of Decent Work**

In 2010/11 APSO secured funding from the National Skills Authority (NSA) and embarked on an education programme for our members. One of these programmes focused on educating members about Decent Work, the initiatives that the industry has in place and how our members can assist in driving the programme forward. This national road show engaged with several hundred employers and provided a solid knowledge base and tools for our members, especially those SME operators, to begin to implement Decent Work initiatives within their businesses for the benefit of their permanent and temporary workforces.

### **2. Youth Empowerment**

APSO recognises the important of empowering young people to access the world of work. We provide advice through a regular column in the quarterly Skills Focus magazine that is distributed to young people, via Department of Labour Centres, in both urban and rural areas. Articles focus on educating young people about how to access learning and work opportunities and how to position themselves better during their job search.

APSO has also worked extensively with the Central Johannesburg Colleges (CJC) to develop a programme for their interns to educate their students about their rights as work seekers, how to interview effectively and secure employment. APSO members also participated in the inaugural CJC job fair in 2011 and provided access to work opportunities for many of the students who attended.

### **3. Capacitation of Public Employment Services**

APSO has continued to build relationships with the Department of Labour, in pursuit of public-private partnership. This has taken many forms over the years including information sharing, cooperation to eliminate non-compliant operators and most recently the capacitation of the newly formed Public Employment Services (PES).

In 2011 and 2012, APSO has hosted a specially developed 3-day training programme for the PES in Gauteng, Free State, Eastern Cape, Mpumalanga and Limpopo. Across these programmes more than 300 individual PES practitioners have been capacitated to provide employment services as mandated to them. In addition to classroom based training, a pilot project within Gauteng saw PES practitioners hosted by APSO members to get hands-on experience of a working PrEA office.

### **Way Forward**

APSO is committed to meaningful social dialogue and to achieving an appropriate regulatory framework for the private employment services sector in South Africa. However, we are concerned that the current proposals will not achieve the goal of reducing non-compliance and driving job creation, but rather the opposite.

We support the CAPES Position Paper (submitted as an Annexure) that highlights our primary concerns and addresses the real issues at hand. It further provides clarity on the required actions to be taken by the social partners to achieve the universal goal of all South Africans, namely the reduction of unemployment.

## ***Annexures***

As a means to keeping this submission short, we have provided an Executive Overview herein and attached a variety of Annexures we believe important to provide context and detailed information.

These annexures include:

1. Adapting to Change Report (International research by Boston Consulting Group);
2. CAPES Position Paper;
3. APSO Code of Ethical & Professional Practice

We would equally provide any additional information you require, we simply ask that you forward these requests to our Chief Operating Officer, Natalie Singer, whose details are listed below.

## ***Additional Information***

These websites will provide you with additional information on the information contained herein:

Federation of African Professional Staffing Organisations (APSO)	<a href="http://www.apso.co.za">www.apso.co.za</a>
Confederation of Associations in the Private Employment Sector (CAPES)	<a href="http://www.capes.org.za">www.capes.org.za</a>
International Confederation of Private Employment Agencies (CIETT)	<a href="http://www.ciett.org">www.ciett.org</a>
International Labour Organisation (ILO)	<a href="http://www.ilo.org">www.ilo.org</a>
National Planning Commission (National Development Plan)	<a href="http://www.npconline.co.za">www.npconline.co.za</a>

## ***Contact Information***

If you have any questions in regard to this submission, please do not hesitate to contact us:

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