

Privacy Policy

1. Introduction

We manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles*. This Policy applies to information collected by Cox Purtell Staffing Services Pty Ltd.

We only collect information that is reasonably necessary for the proper performance of our activities or functions.

We do not collect personal information just because we think it could be useful at some future stage if we have no present need for it.

We may decline to collect unsolicited personal information from or about you and take steps to purge it from our systems.

By following the links in this document, you will be able to find out how we manage your personal information as an APP Entity under the Australian Privacy Principles (APPs).

If you have any questions please contact us on (02) 9220 3400.

1.1 APP Entity

Cox Purtell Staffing Services manages personal information, as an APP Entity, under the Australian Privacy Principles (APPs).

Because we are a contracted service provider to a range of Commonwealth, State and Territory government agencies, it sometimes becomes necessary for us to collect and manage personal information as an Agency under different privacy arrangements.

If you wish to know whether this applies to you, please contact us on (02) 9220 3400.

1.2 Information Flow

When we collect your personal information:

- we check that it is reasonably necessary for our functions or activities as an employment agency.
- we check that it is current, complete and accurate. This will sometimes mean that we have to cross check the information that we collect from you with third parties.
- we record and hold your information in our Information Record System. Some information may be disclosed to overseas recipients.
- we retrieve your information when we need to use or disclose it for our functions and activities. At that time, we check that it is current, complete, accurate and relevant. This will sometimes mean that we have to cross check the information that we collect from you with third parties once again - especially if some time has passed since we last checked.
- subject to some exceptions, we permit you to access your personal information in accordance with APP:12 of the (APPs).
- we correct or attach associated statements to your personal information in accordance with APP:13 of the (APPs).

- we destroy or de-identify your personal information when it is no longer needed for any purpose [*Links to Level 1: Purposes*] for which it may be used or disclosed provided that it is lawful for us to do so. We do not destroy or de-identify information that is contained in a Commonwealth Record.

2. Kinds of information that we collect and hold

Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our functions and activities as an Employment Agency and is likely to differ depending on whether you are:

- a Workseeker;
- a Client;
- a Referee.

2.1 For Workseekers

The type of information that we typically collect and hold about Workseekers is information that is necessary to assess amenability to work offers and work availability; suitability for placements; or to manage the performance in work obtained through us and includes:

- Past and current work experience
- Your actual or possible work placement
- Any test or assessment (including medical tests and assessments) that you might be required to undergo

2.2 For Clients

The type of information that we typically collect and hold about Clients is information that is necessary to help us manage the presentation and delivery of our services and includes:

- Relevant contact details
- Agreed rates and terms
- Past and present placements

2.3 For Referees

The type of information that we typically collect and hold about Referees is information that is necessary to help to make determinations about the suitability of one of our Workseekers for particular jobs or particular types of work and includes:

- Company and title of relevant employment
- Contact information

3. Purposes

The purposes for which we collect, hold, use and disclose your personal information are likely to differ depending on whether you are:

- a Workseeker
- a Client;
- a Referee.

The following sections are also relevant to our use and disclosure of your personal information:

- Our Policy on Direct Marketing
- Overseas Disclosures

3.1 *For Workseekers*

Information that we collect, hold, use and disclose about Workseekers is typically used for:

- work placement operations;
- recruitment functions;
- statistical purposes and statutory compliance requirements.

3.2 *For Clients*

Personal information that we collect, hold, use and disclose about Clients is typically used for:

- client and business relationship management;
- recruitment functions;
- marketing services to you;
- statistical purposes and statutory compliance requirements.

3.3 *For Referees*

Personal information that we collect, hold, use and disclose about Referees is typically used for:

- to confirm identity and authority to provide references;
- Workseeker suitability assessment;
- recruitment functions.

3.4 *Our Policy on Direct Marketing*

Cox Purtell may sometimes use personal information for marketing purposes but only subject to the following:

- Personal Information is only used for marketing purposes to allow Cox Purtell to provide:
 - Workseekers, whilst they are registered with us, with updates in relation to employment opportunities, market information and promotions from time to time;
 - Clients, with whom we have a relationship, with market information and promotions from time to time;
 - Subscribers to Cox Purtell's website with news and job alerts they have subscribed for.
- Personal Information is not used by or disclosed to any third party for marketing purposes;
- Client lists are not generally obtained from third parties for marketing purposes;
- In accordance with the anti-spam legislation, individuals to whom marketing communications are sent are:
 - chosen on the basis of having given their express and/or implied consent for such communications to be sent to them since they registered with Cox Purtell for the purpose of engaging Cox Purtell as their employment agent; and
 - always given on opt out or unsubscribe option in relation to such communications.

4. How your personal information is collected

The means by which we will generally collect your personal information are likely to differ depending on whether you are:

- a Workseeker
- a Client
- a Referee

We sometimes collect information from third parties and publicly available sources when it is necessary for a specific purpose such as checking information that you have given us or where you have consented or would reasonably expect us to collect your personal information in this way.

Sometimes the technology that is used to support communications between us will provide personal information to us - see the section in this policy on Electronic Transactions.

See also the section on Photos & Images.

4.1 For Workseekers

Personal information will be collected from you directly when you fill out and submit one of our application forms or any other information in connection with your application to us for work.

We may also collect personal information about you from a range of publicly available sources including newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records we will manage the information in accordance with the APPs and our Privacy Policy.

4.2 For Clients

Personal information about you may be collected:

- when you provide it to us for business or business related social purposes.

We may also collect personal information about you from a range of publicly available sources including newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records we will manage the information in accordance with the APPs and our Privacy Policy.

4.3 For Referees

Personal information about you may be collected when you provide it to us:

- in the course of our checking Workseeker references with you and when we are checking information that we obtain from you about Workseekers.

We may also collect personal information about you from a range of publicly available sources including newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records we will manage the information in accordance with the APPs and our Privacy Policy.

4.4 Photos & Images

We will not request that you supply photographs, scan photo ID, or capture and retain video image data of you in cases where simply sighting photographs or proof of identity documents would be sufficient in the circumstances.

4.5 Electronic Transactions

Sometimes, we collect personal information that individuals choose to give us via online forms or by email, for example when individuals:

- ask to be on an email list such as a job notification list;
- register as a site user to access facilities on our site such as a job notification board;
- make a written online enquiry or email us through our website;
- submit a resume by email or through our website or other job board.

It is important that you understand that there are risks associated with use of the Internet and you should take all appropriate steps to protect your personal information. It might help you to look at the OAIC's resource on Internet Communications and other Technologies.

You can contact us by land line telephone or post if you have concerns about making contact via the Internet.

- Sometimes, Cox Purtell collects personal information that individuals choose to give us via online forms or by email, for example when individuals:
- ask to be on an email list such as a job notification list;
- register as a site user to access facilities on our site such as a job notification board or news and market updates;
- make a written online enquiry or email us through our website; or
- submit a resume by email or through our website.

Social Media & Web

In order to assess your suitability for positions and to assist you to find work, Cox Purtell will need to collect, use and disclose personal information about you.

In addition to conducting Internet searches using search engines and entering your name and relevant identifying details, Cox Purtell may look at your social media footprint on sites such as LinkedIn and Twitter to conduct background checking.

Emails

Cox Purtell's telephone technology (telephone systems and mobile phones) logs telephone calls and messages received and sent and enables call number display in most offices.

When your call number is received by Cox Purtell because you phone or send Cox Purtell a message, the number will only be used or disclosed for the purpose for which you have provided it and it will not be added to a phone list or used or disclosed for any other purpose without your consent other than as may be permitted or required by law.

Teleconferences and Video Conferences

Teleconferences and video conferences may be recorded with your consent. In cases where it is proposed that they be recorded, we will tell you first the purpose for which they are to be used and retained.

Database

Cox Purtell use recruiting software and databases to log and record recruitment operations.

Cox Purtell uses TRIS as an application tracking system for applications received via Cox Purtell's website or job boards (such as Seek and Mycareer). Using the Broadbean software, Cox Purtell can automatically transfer suitable applicant's resumes and contract information to the respective fields in Cox Purtell's internal secure candidate database. Our internal candidate and client database provides searching and job matching facilities.

Mobile Access

Some Cox Purtell staff may use laptops, tablets, mobile phones and other portable electronic devices that allow them to access, retrieve and store your personal information. Where Cox Purtell staff utilise portable devices, they are subject to Cox Purtell's Internet & Email Policy.

Paperless Office

Recognising the environmental advantages and efficiencies it provides, Cox Purtell operate a partially paperless office as a result of which your paper based communications with us may be digitised and retained in digital format. The paper based communications may be destroyed.

It is therefore important that, except where specifically requested, you do not send us originals of any paper based document and that you retain copies for your own records.

Where we do request original paper based documents we will return them to you once they are no longer required by us for the purpose for which they may be used or disclosed.

5. How your personal information is held

Personal information is held in our Information Record System [*links to level 2: Information Record System*] until it is no longer needed for any purpose for which it may be used or disclosed at which time it will be de-identified or destroyed provided that it is lawful for us to do so.

We take a range of measures to protect your personal information from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

5.1 Our Information Record System

Information is stored securely on our electronic database.

5.2 Information Security

We are proudly ISO 9001:2008 Accredited. Our Quality Management System requires us to uphold stringent policies, procedures and processes surrounding the collection, storage and security of information that we hold.

Our other staff policies that assist in protecting information include:

- Protection of Electronic Data Procedure
- Internet & Email Policy
- Password protection
- Policies on laptop, mobile phone and portable storage device security;

- Culling procedures including shredding and secure disposal etc.

6. Disclosures

We may disclose your personal information for any of the purposes for which it is primarily held or for a lawful related purpose.

We may disclose your personal information where we are under a legal duty to do so.

Disclosure will usually be:

- internally and to our related entities
- to our Clients
- to Referees for suitability and screening purposes.

6.1 Related Purpose Disclosures

We outsource a number of services to contracted service suppliers (CSPs) from time to time. Our CSPs may see some of your personal information. Typically our CSPs would include:

- Software solutions providers;
- I.T. contractors and database designers and Internet service suppliers;
- Legal and other professional advisors;
- Insurance brokers, loss assessors and underwriters;
- Superannuation fund managers;
- Background checking and screening agents.

We take reasonable steps to ensure that terms of service with our CSPs recognise that we are bound by obligations to protect the privacy of your personal information and that they will not do anything that would cause us to breach those obligations.

6.2 Cross-Border Disclosures

Some of your personal information is likely to be disclosed to overseas recipients. We cannot guarantee that any recipient of your personal information will protect it to the standard to which it ought to be protected. The costs and difficulties of enforcement of privacy rights in foreign jurisdictions and the impracticability of attempting to enforce such rights in some jurisdictions will mean that in some instances, we will need to seek your consent to disclosure.

7. Access & Correction

Subject to some exceptions set out in privacy law, you can gain access to your personal information that we hold.

Important exceptions include:

- evaluative opinion material obtained confidentially in the course of our performing reference checks; and access that would impact on the privacy rights of other people. In many cases evaluative material contained in references that we obtain will be collected under obligations of confidentiality that the person who gave us that information is entitled to expect will be observed. We do refuse access if it would breach confidentiality.

7.1 Access Policy

If you wish to obtain access to your personal information you should contact our Privacy Co-ordinator. You will need to be in a position to verify your identity.

[Include any other information about your access policy – e.g. information about:

- *Any lawful costs or charges that you impose*
- *Timeframes for your response to access requests*
- *What happens in the event that you refuse access*
- *Complaints].*

7.2 Correction Policy

If you find that personal information that we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to correct it by contacting us.

We will take such steps as are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

If we have disclosed personal information about you that is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to notify the third parties to whom we made the disclosure and we will take such steps (if any) as are reasonable in the circumstances to give that notification unless it is impracticable or unlawful to do so.

Complaints

You have a right to complain about our handling of your personal information if you believe that we have interfered with your privacy.

For more information see our Complaints Procedure.

7.3 Complaints procedure

If you are making a complaint about our handling of your personal information, it should first be made to us in writing.

You can make complaints about our handling of your personal information to our Privacy Co-ordinator, whose contact details are:

James Purtell (02) 9220 3400.

You can also make complaints to the Office of the Australian Information Commissioner.

Complaints may also be made to RCSA, the industry association of which we are a member.

RCSA administers a Code of Conduct for the professional and ethical conduct of its members.

The RCSA Code is supported by rules for the resolution of disputes involving members.

NOTE: The Association Code and Dispute Resolution Rules do NOT constitute a recognised external dispute resolution scheme for the purposes of the APPs; but are primarily designed to regulate the good conduct of the Associations members.

When we receive your complaint:

- We will take steps to confirm the authenticity of the complaint and the contact details provided to us to ensure that we are responding to you or to a person whom you have authorised to receive information about your complaint;
- Upon confirmation we will write to you to acknowledge receipt and to confirm that we are handling your complaint in accordance with our policy.
- We may ask for clarification of certain aspects of the complaint and for further detail;
- We will consider the complaint and may make inquiries of people who can assist us to established what has happened and why;

- We will require a reasonable time (usually 30 days) to respond;
- If the complaint can be resolved by procedures for access and correction we will suggest these to you as possible solutions;
- If we believe that your complaint may be capable of some other solution we will suggest that solution to you, on a confidential and without prejudice basis in our response.

If the complaint cannot be resolved by means that we propose in our response, we will suggest that you take your complaint to any recognised external dispute resolution scheme to which we belong or to the Office of the Australian Information Commissioner.