

4 Recruitment Group PTY LTD Privacy Policy

1. Introduction

We manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles*.

You can request a copy of our full policy, or just read the parts that interest you by following the links in this document. Some links will take you to external sites. 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.

We manage personal information according to our usual information flow. There may sometimes be departures from our usual information flow.

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).

You will also be able to find out about the information flows associated with that information.

1.1. APP Entity

4 Recruitment Group manages personal information, as an APP Entity, under the Australian Privacy Principles (APPs).

Because we may sometimes work as a contracted service provider to a range of Commonwealth, State and Territory government agencies, it might become 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](#)

1.2. Information Flow

When we collect your personal information:

- we check that it is reasonably necessary for our functions or activities as a *employment agency and On-hire Firm*

- 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 and conditions, we permit you to [access](#) your personal information in accordance with APP:12 .
- we [correct or attach associated statements](#) to your personal information in accordance with APP:13.
- we destroy or de-identify your personal information when it is no longer needed for any [purpose](#) 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 a recruitment and on-hire agency is likely to differ depending on whether you are:

- a [Workseeker](#)
- a [Client](#)
- a [Referee](#)

2.1. 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:

- Contact details including: name, address, telephone numbers and email address
- Proof of identity Documentation
- Payroll information including: banking details, superannuation fund, tax file number and date of birth
- Confirmation of right to work in Australia

- Placement or work history
- References and employment feedback
- Qualifications
- Professional Memberships
- Drivers licence, car insurance and registration
- Medical and criminal history
- An assessment of skills and abilities

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:

- Contact details
- Roles, reporting lines, inter-personal communication, and cultural fit requirements within your organisation;
- Business, social, or personal interests about which we may be able to provide news and information;
- Celebration milestones and dates, preferred social media contact channels, etc that you choose to share with us.

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:

- Your name and contact details
- your relationship with and knowledge and opinions of our Candidate as relevant to the reference we are seeking;
- other background and contextual information as relevant to the reference we are seeking.
- confirmation of your identity and authority to provide a reference (if necessary).

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:

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

3.4. Our Policy on Direct Marketing

We may use your personal information to directly market our services, or the services of other businesses with whom we work cooperatively.

We do not obtain customer lists from third parties for marketing purposes.

You may choose not to consent to direct marketing from us simply by letting us know by text message, phone call, or email.

We aim to observe the requirements of anti-spam legislation and would provide an effective means for unsubscribing from any marketing that would be considered to be spam.

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](#)

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.

Personal information is also collected when:

- We speak to you
- We receive a reference
- We receive feedback from one of our client partners
- We complete background checks or assessments

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.

Photos & Images

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

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. 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;
- use web-based application and placement management apps to submit identification documents, receive job offers, undertake inductions, or upload time sheets etc.

Web-based applications that we frequently use include:

- JobAdder
- Web browsers and search engines
- LinkedIn
- Facebook and other social media platforms
- Microsoft 365
- 3rd party client recruitment software

Some apps might invite you to use your social media log-in details (e.g.; Facebook or Google log-in user names and passwords).

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 [Social Media & Online Privacy](#).

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

5. How your personal information is held

Personal information is held in our [Information Record System](#) 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

All information you provide to us is stored on secured servers with appropriate protection against unauthorised access. This may include cloud servers used by the providers or the 3rd party software we use as described [here](#)

5.2. Information Security

Security of personal information is important to us and we implement a variety of measures to make sure this information is protected. This includes but is not limited to:

- Firewalls and secured servers
- Secure work environments and password protection systems that prevent unauthorised access and copy of your personal information
- Regularly changing passwords
- 3rd party verification software
- Ongoing staff training
- Secure processes for disposal of personal information

5.3. Data Breach Notifications & Response

In the event of a data breach, we would respond by measures appropriate to the nature and seriousness of the breach and the size and resources of our organisation taken in accordance with the [four steps](#) set out in the OAIC's data breach notification guidance and advice.

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.
- to our contracted service providers, insurers, professional advisors and others with a proper interest in receiving your personal information for a lawful related purpose.

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, 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. Overseas Recipients

We partner with various organisations who employ overseas staff. As a result some of your personal information is likely to be disclosed to overseas recipients in order for them to perform their duties effectively.

Examples of the types of recipients and information disclosed are:

- IT software providers and third party employees/contractors
- Telecommunications companies and their third party employees/contractors
- Referees based overseas or companies completed references who are based overseas
- Outsourced back-end administration tasks such as data entry, resume compilation etc.

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.

For more information about access to your information see our [Access Policy](#).

For more information about applying to correct your information see our [Correction Policy](#).

7.1. Access Policy

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

Consistently with [guidance and advice](#) provided by the OAIC, we may impose a charge (provided it is not excessive) for retrieving and providing access to your personal information. Any such charge would be calculated having regard to:

- our staff costs in searching for, locating and retrieving the requested personal information, and deciding which personal information to provide to you;
- our staff costs in reproducing and sending the personal information;
- the costs of postage or materials involved in giving access
- the costs associated with using an intermediary – e.g., where access might be granted indirectly or to paraphrased information.

In determining the amount to charge, we would consider:

- our relationship with you;
- any known financial hardship factors;
- any known adverse consequences for you if you do not get access to the personal information.

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.

You can also find out information about our [Data Breach Response and Notification Procedures](#).

8. 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](#).

8.1. 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:

Richard Duncan
03 9013 5900
enquiries@4hc.com.au

You can also make complaints to the [Office of the Australian Information Commissioner](#) through the Commission's website and the means set out there.

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 RCSA Code and grievance intervention rules do NOT constitute a recognised external dispute resolution scheme for the purposes of the APPs; but are primarily designed to ensure the good professional conduct of the Association's 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 establish 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](#).