

Ground Recruitment Pty Ltd is committed to protecting the privacy of the personal information it collects and receives. We are required to comply with Australian Privacy Principles (APPs) and the *Privacy Act 1988* (Cth) Privacy Act.

This policy explains how Ground Recruitment collects, uses, discloses and otherwise handles personal information relating to individuals who apply for employment opportunities with Ground Recruitment . It also explains how you can ask to access and correct the personal information we hold about you or complain about any suspected privacy breach. Nothing in this policy limits any of our other obligations at law.

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

## **1. Personal and sensitive information**

Personal information is any information about you. It may range from the sensitive (eg relevant medical history or criminal history) to the everyday (eg address and phone number). We may collect the opinions of others about your work experience and qualifications, aptitude test results, behavioural test results and other information in connection with your possible work placements.

Sensitive information is a special category of personal information. It is information or an opinion about your:

- Racial or ethnic origin;
- Political opinion;
- Membership of a political association or religious beliefs, affiliations or philosophical beliefs;
- Membership of a professional or trade association or membership of a trade union;
- Sexual preferences or practices;
- Criminal record;
- Health or disability (at any time);
- Expressed wishes about the future provision of health services.

Sensitive information can, in most cases, only be disclosed with your consent. We do not actively seek to collect sensitive information unless it is necessary to perform our services.

## 2. Information flow

When we collect your personal information:

- We check that it is reasonably necessary for our functions and activities as a recruitment agency;
- If you register with Ground Recruitment , we check that your information 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 database and computer systems;
- 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 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.

## 3. Kinds of information that we collect and hold

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

- Candidate
- Client
- Referee

### Candidates

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

- CVs or resumes submitted when applying for advertised positions with Ground Recruitment ;
- Notes from interviews;
- Registration forms or other documents supplied when registering with Ground Recruitment ;

- Reference checks completed or received about candidates;
- Results from enquiries that we have made to former employers, work colleagues, professional associations or registration bodies;
- Results from any competency or medial test;
- Performance feedback received (whether positive or negative);
- Complaints from or about candidates in the workplace;
- Information about workplace accidents in which candidates were involved;
- Information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved;
- Candidates' work status from the Department of Immigration;
- Identification, police checks and licence information;
- Any additional information provided by candidates.

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.

## **Clients**

The type of information that we typically collect and hold about clients is necessary to help us manage the presentation and delivery of our services and includes contact details of clients, including names, business addresses, email addresses and credit history. Additionally, we hold the history of transactions between Ground Recruitment and its clients including emails, correspondence and notes contained on Ground Recruitment's ' database systems.

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

## **Referees**

The type of information that we typically collect and hold about referees is information that is necessary to help determine the suitability of candidates for particular jobs or assignments. This is limited to references conducted on candidates which are contained on Ground Recruitment's database systems.

## **4. Use and disclosure of personal information**

### **Candidates**

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

- Our assessment of your suitability for registration with Ground Recruitment;
- The necessary validation (including from appropriate third party sources) of your resume, CV, nominated references or stated qualifications, experience, training or abilities. Where we require third party validation we will tell you how we propose to obtain it;
- Your actual or possible work placement;
- Your performance appraisals;
- Our assessment of your ongoing performance and prospects;
- Any test or assessment (including medical tests and assessments) that you might be required to undergo;
- Our identification of your training needs;
- Suggestions we may make to you, whilst you remain registered with us, for further training in connection with work of the type that you are seeking through us;
- Any workplace rehabilitation in which you and we are involved;
- Our management and resolution of any complaint, investigation or inquiry in which you are involved;
- Any insurance claim or proposal that requires disclosure of your personal or sensitive information;
- Undertaking criminal reference checks and other background checks;
- Any reference that we may give concerning your work;
- Our statutory compliance obligations;
- Qualifying your visa status and checking your right to work in Australia;
- Our direct marketing to you.

We may disclose your personal information for any of the purposes for which it is primarily held or for lawful related purposes. Your personal information may be disclosed to:

- Potential and actual employers and clients of Ground Recruitment ;
- Referees;
- A person who seeks a reference about you;
- Our insurers;
- A professional association or registration body that has a proper interest in the disclosure of your personal and sensitive information;
- A workers' compensation body;
- Companies engaged by Ground Recruitment which provide testing, compliance or induction services eg Workpro, Revellian or criminal checking agencies;
- A parent, guardian, holder of an enduring power of attorney (or like authority) or next of kin whom we may contact in any case in which consent is required or notification is to be given and where it is not practicable to obtain it from or give it directly to you;
- Third party contractors/service providers for the purposes of assisting us to provide you with our services, and/or improve the services we offer you including (a) providing us with specialized database management, development, storage and surveys (eg Manatal & Survey Monkey) and, (b) assisting with the provision of marketing communications to you (eg MailChimp). Some service providers may be located off shore;
- Any person with a lawful entitlement to obtain the information;
- The Department of Immigration.

## 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;
- Credit history checks;
- Statistical purposes and statutory compliance requirements.

## Referees

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

- To confirm identity and authority to provide references;
- To assist clients assess the suitability of candidates;
- Recruitment functions.

Ground Recruitment will make available references completed on candidates to clients who are considering Ground Recruitment ' candidates.

## 5. Reference check notification

The information collected by Ground Recruitment when conducting reference checks is used for the purpose of assessing candidates' suitability for work for which they have applied through Ground Recruitment. Reference checks provided by referees will be disclosed to prospective employers. It is not likely that reference checks will be disclosed to overseas recipients.

If information provided by referees is considered private information, Ground Recruitment will need to ensure the accuracy and completeness before using or disclosing it. In some cases, this will mean that the information will be checked directly with Ground Recruitment's candidates or other third parties.

If information is considered confidential information to either, the referee, the organisation or any other person, referees should advise Ground Recruitment . Ground Recruitment can then take steps to protect the confidentiality of the information.

## 6. Our policy on direct marketing

From time to time, Ground Recruitment will use personal information for marketing purposes. This may include contacting clients with information on currently registered candidates or candidates with current recruitment opportunities, information on Ground Recruitment business development promotions or acknowledgement gifts. Ground

Recruitment will not sell or provide Ground Recruitment personal information to independent third parties for marketing purposes.

Should you not wish to receive marketing information, you may opt out receiving communications from Ground Recruitment by emailing [admin@groundrecruitment.com.au](mailto:admin@groundrecruitment.com.au) or advising our consultants when you receive a marketing call.

## **7. Electronic transactions**

Sometimes we collect personal information that individuals choose to give us via on-line 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 on-line enquiry or email us through our website or other websites used by Ground Recruitment ;
- Update their details on our database through Manatal;
- Submit a resume by email through our website or other websites used by Ground Recruitment .

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.

## **8. Security and storage of personal information**

Ground Recruitment will take reasonable steps to protect your personal information we hold from misuse, loss, unauthorised access, modification or disclosure. If your information is no longer required, Ground Recruitment will permanently destroy physical copies of your personal information. Electronic information may be maintained on our computer systems and databases.

In accordance with the Australian Privacy Principles any data breaches will be reported to the appropriate body.

## **9. Disclosure to overseas recipients**

Ground Recruitment will not disclose your personal information to overseas parties, unless it is with your consent for the purposes submitting your information for consideration for an overseas employment opportunity which Ground Recruitment has been engaged to fill.

## **10. Unsolicited information**

Unsolicited personal information is information Ground Recruitment has received which it has taken no steps to collect. If the information received is not required for Ground

Recruitment to perform its services, Ground Recruitment will destroy the information via secure means as soon as practicable.

## **11. Access and correction of personal information**

Subject to some exceptions which are set out in the National Privacy Principles (Principle 12 – access to personal information) you have a right to see and have a copy of personal and sensitive information about you that we hold.

Important exceptions apply including evaluative opinion material obtained confidentially in the course of performing reference checks and access 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 will refuse access to references if it would breach confidentiality.

If you are able to establish that personal or sensitive information that we hold about you is inaccurate, incomplete, irrelevant, misleading or out of date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date.

If we are unable to agree that personal or sensitive information that we hold about you is inaccurate, incomplete, irrelevant, misleading or out of date, you may ask us to place with the information a statement by you that claims that particular information is not accurate, complete and up-to-date.

If you wish to exercise your rights of access and correction, you should contact our Privacy Officer whose details are shown below. In some cases, we may impose a moderate charge for providing access to personal or sensitive information. We will not charge you simply because you lodge a request for access.

## **12. Complaints**

If you have a complaint about how Ground Recruitment has collected, stored or used your personal information, please contact Ground Recruitment's office. All complaints should be in writing. We will endeavor to deal with your complaint and take any reasonable steps to resolve your complaint within thirty days.

If your complaint is unable to be resolved within thirty days, Ground Recruitment will advise you in writing when your complaint may be resolved. If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commission.

Please contact Ground Recruitment if you have any queries about the way Ground Recruitment collects or discloses your personal information.

### **13. Contact Us**

Ground Recruitment:

The Privacy Officer

Phone 0499 988 011

Email [patrick@groundrecruitment.com.au](mailto:patrick@groundrecruitment.com.au)

Contact can be made during normal office hours which are 8am to 5pm Monday to Friday.