

## Direct Recruitment Privacy Policy

Direct Recruitment manages personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles (APP)*. This policy applies to information collected by Direct Recruitment.

Direct Recruitment is committed to protecting the privacy and personal information of our clients who generally include job seekers seeking employment or training, employers, on-hire workers, applicants for positions, training providers, suppliers and government agencies.

As this policy is intended to meet the needs of the range of people who come in contact with us, some information may not be seen as relevant by all people

### Kinds of information collected and held

Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our functions and services and may differ for various clients. We do not collect personal information if we have no present need for it. Wherever possible Direct Recruitment will try to collect this personal information directly from you.

Information may include (but not limited to) the following:

- contact details such as name, address, telephone number, email address, date of birth, licence details
- education and qualifications
- resume and application information
- work performance information e.g. reference checks
- bank account details
- tax file number
- police and working with children check clearances
- Australian work rights or visa credentials
- Personal identification credentials – drivers licence, passport
- Payroll details
- Information about incidents in the workplace
- Information about absences from work due to leave, illness or other causes
- Information obtained to assist in managing client and business relationships

Sensitive information has a particular definition under the Act to which higher privacy standards apply. Sensitive information includes racial or ethnic origin, affiliations or beliefs, criminal record, financial status, health or disability. Generally Direct Recruitment does not collect sensitive information; the exception being any information that the job seeker thinks will assist Direct Recruitment in placing a job seeker into employment. We will collect and manage this information in accordance with the APP.

## Collection of personal information

The type of information that we typically collect and hold is information that is necessary to perform our functions and duties which are to:

- Determine eligibility for our employment-related services
- Provide employment-related services
- Recruitment functions
- Manage performance in work obtained through us
- Client and business relationship management
- Marketing services

Information is preferably collected directly from an individual or organisation. This can be done by completing a form, interviews, meetings, phone conversations, business cards, resumes, job applications.

As a provider of services to governments, we may collect personal information from relevant government departments and agencies including:

- Department of Employment
- Department of Human Services - Centrelink

We may also collect personal information through other third parties including:

- Educational institutions and training providers
- Medical practitioners
- Previous or current employers
- Nominated referees
- Criminal records check provider
- Publicly available sources including newspapers, journals, directories, the Internet and social media sites

We will manage the information in accordance with the Act and our Privacy Policy.

Direct Recruitment does not collect personal information via the internet unless you specifically provide it to us.

Where we receive unsolicited personal information we will assess if the information is reasonably necessary for our functions and activities and treat it in the same way as any other personal information. Where we assess the information is not reasonably necessary for our functions and activities we will either destroy or de-identify the information.

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.

Direct Recruitment understands that where lawful and practicable, individuals have a right not to identify themselves. If an individual wishes merely to enquire about Direct Recruitment services, jobs etc. they do not have to identify themselves however, due to the nature of the services being provided to you this will be in very limited cases.

## **Disclosure of personal information**

Your personal information may be disclosed to:

- Potential, current or future employers
- Education and training providers
- Criminal records check provider
- Relevant Australian and State government departments and agencies e.g. Centrelink
- Specialist professionals providing services to Direct Recruitment
- Other parties that provide support services to Direct Recruitment where reasonably required
- Any person with a lawful entitlement to obtain the information

Related purpose disclosure - 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:

- I.T. contractors and database designers and internet service suppliers
- Legal and other professional advisors
- Insurance brokers, loss assessors and underwriters
- Superannuation fund managers

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.

Direct marketing - We will not disclose any held personal information about an individual for the purpose of direct marketing unless:

- The individual has given consent
- The individual has requested not to receive direct marketing material.

We will not disclose personal information held to an overseas recipient.

## **Data Quality and Security**

We are committed to taking reasonable steps to ensure that the personal information we hold is accurate, up-to-date and complete.

Personal information is held in our record systems 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 steps to protect your personal information from:

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

All personal and sensitive information held by Direct Recruitment is stored securely and protected from unauthorised use or access. Information is stored in hard copy formats in locked storage facilities and in electronic formats in computer systems that are firewalled and password protected.

Information is archived for the required timeframe and then securely disposed in accordance with our Records Management procedures.

### **Unique Identifiers**

Direct Recruitment will not use or disclose government related identifiers of an individual unless:

- The use or disclosure is necessary to verify the identity of the individual for the purpose of our activities and functions
- The use or disclosure of the identifier is reasonably necessary for it to fulfil its obligation to an agency
- It is required or authorised under Australian Law.

### **Access & Correction**

Subject to some exceptions set out in privacy law, you can gain access to your personal information that we hold to ensure that it is accurate, complete and up to date.

For security purposes, individuals may be asked to put their request in writing and may need to verify their identity before information is released. We will respond to your request for access within 14 days.

We may refuse to provide you access to records if there is a basis for the refusal under other legislation which could include:

- Records containing information about another person
- Medical/psychiatric records (other than if supplied by you or an employer)
- Psychological records
- Information provided by third parties ie evaluative opinion material obtained confidentially in the course of our performing reference checks
- That giving access would pose a serious threat to the life, health or safety of any individual
- Deemed frivolous or vexatious
- Information relates to legal proceedings
- Giving access would be unlawful.

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.

## **Enquiries and Complaints**

Privacy related enquiries or complaints regarding our compliance with the Privacy Act should be made in writing and directed to:

General Manager  
Suite 508, 685 Burke Road  
Camberwell 3124  
Email: [privacy@directrecruitment.com.au](mailto:privacy@directrecruitment.com.au)

You enquiry or complaint will be responded to within 14 days. We may also refer it to the relevant Australian or State government department.

If you are not satisfied with our response, complaints can be made directly to the relevant government department or the Australian Information Commissioner.