

Privacy Policy

Date this Policy was last updated	20/09/2017
Date of next review	20/09/2019
Who is responsible for this Policy	Managing Director
Outcomes and success measures	<p>The desired outcome of this Policy is that we handle information in a way that protects the privacy of Candidates, Clients and others, and that we comply with our obligations under the <i>Privacy Act 1988</i> and other relevant legislation.</p> <p>The effectiveness of this Policy will be assessed by whether we achieve our objective of zero privacy breaches.</p> <p>The efficiency of this Policy will be assessed by whether we are able to implement the Policy effectively within existing resources.</p>

Scope

This policy applies to information collected by Wood Recruitment.

Summary

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

If you only browse our website, we do not collect private information, though we may collect information related to your visit to our website.

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

This document describes how we manage your personal information as an APP Entity under the Australian Privacy Principles (APPs). Further information about the APPs is available from the Office of the Australian Information Commissioner website at <http://www.oaic.gov.au/images/documents/privacy/privacy-resources/privacy-fact-sheets/privacy-fact-sheet-17-australian-privacy-principles.pdf>

If you have any questions please contact our Privacy Officer on (08) 9221 8122 during normal office hours or by email to reception@woodrecruitment.com.au



APP Entity

Wood Recruitment 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.

Information Flow

When we collect your personal information:

- We check that it is reasonably necessary for our functions or activities as a recruitment firm and provider of on-hire employment services.
- 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 (see 'How your personal information is held').
- We retrieve your information when we need to use or disclose it for our functions and activities (see 'Purposes'). 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 the APPs (see 'Access & Correction').
- We correct or attach associated statements to your personal information in accordance with the APPs (see 'Access & Correction').
- 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. In accordance with the *Privacy Act 1988*, we do not destroy or de-identify information that is contained in a Commonwealth Record.

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 firm and provider of on-hire employment services and is likely to differ depending on whether you are:

- a Candidate;
- a Client; or
- a Referee



For Candidates

The type of information that we typically collect and hold about Candidates 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 information
- Work history and relevant personal details
- Employment preferences

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 information
- Invoicing details
- Skills requirements

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 Candidates for particular jobs or particular types of work and includes:

- Contact information
- Record of comments provided

Purposes

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

- a Candidate;
- a Client; or
- a Referee.

For Candidates

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

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

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.

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;
- Candidates suitability assessment;
- recruitment functions.

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

- Our Policy on Direct Marketing
- Overseas Disclosures

Our Policy on Direct Marketing

We may use information you provide us to contact you with information about our services that we believe may be of benefit to you.

We will never share your information with any third parties for marketing purposes.

We comply with the requirements of the anti-spam legislation and will not send you marketing emails without your consent.

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 Candidate;
- a Client; or
- 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 'Electronic Transactions' and 'Photos & Images'.

For Candidates

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 you attend an interview with our staff.



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.

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.

For Referees

Personal information about you may be collected when you provide it to us in the course of our checking Candidates references with you and when we are checking information that we obtain from you about 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.

Photos & Images

We may ask to see photographic ID, including a licence or passport where we need to verify your identity, work rights or qualifications. 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 documents would be sufficient in the circumstances.

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; or
- submit a resume by email or through our website.

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 Office of the Australian Information Commissioner's online resource on Internet Communications and other Technologies (<http://www.oaic.gov.au/privacy/privacy-topics/internet-communications-and-other-technologies/>)



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

How your personal information is held

Personal information is held in our Information Record System (see '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.

See the section, 'Information Security', for further details.

Our Information Record System

Information Security

We adopt a number of procedures to protect the information that we hold from unauthorised access, including:

- Staff training
- "Clean desk" procedures
- Password protection
- Restricting access to information on a "need to know" basis
- Measures to secure information on laptops, mobile phones and portable storage devices
- Culling procedures including shredding and secure disposal etc.

Disclosures

We may disclose your personal information for any of the purposes for which it is primarily held or for a lawful related purpose (see 'Purposes' and 'Related Purpose Disclosures').

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

Disclosure will usually be:

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

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;
- Auditors.

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.

Cross-Border Disclosures

Your personal information is not likely to be disclosed to overseas recipients. If you have expressed interest in an overseas placement you will be asked if you want to proceed to disclose your information overseas.

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 'Access Policy'.

For more information about applying to correct your information, see 'Correction Policy'.

We will endeavour to respond to requests for Access or Corrections within 30 days. If we do not agree to grant all or part of your request, we will tell you the reasons for our decision. If you are unhappy with the way we deal with your request, you may make wish to use our complaints process (see 'Complaints').

Access Policy

If you wish to obtain access to your personal information you should contact our Privacy Officer on (08) 9221 8122 during normal office hours or by email to reception@woodrecruitment.com.au

You will need to be in a position to verify your identity.

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.

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 Officer by email to reception@woodrecruitment.com.au or by post to Wood Recruitment, Level 3, 679 Murray Street, West Perth WA 6005. You can also make complaints to the Office of the Australian Information Commissioner (see <http://www.oaic.gov.au/privacy/privacy-complaints>).

Complaints may also be made to RCSA, the industry association of which we are a member (see http://www.rcsa.com.au/imis15/RCSAweb/RCSA_Code/How_to_Lodge_a_Complaint/RCSAweb/wc-RCSACode/How_to_Lodge_a_Complaint.aspx?hkey=251c3b7f-5df2-4d10-b106-482947e4c04e).

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.

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.