

# Privacy Policy and Procedures

This document sets out the policy and procedures of Command Recruitment Group in relation to the handling and management of personal and sensitive information.

## Policy and statement of commitment

Command Recruitment Group respects the privacy rights of all individuals in the workplace. Command Recruitment Group is committed to ensuring that all directors and staff involved in the management of Command Recruitment Group comply at all times with their obligations under the Privacy Amendment (Private Sector) Act 2000.

## National Privacy Principles (NPP)

Command Recruitment Group is bound by the NPP from December 21, 2001. Under the NPP, an organisation is only entitled to collect personal information where that information is necessary for one or more of its functions or activities; and must only collect that information by lawful and fair means and not in an unreasonably intrusive way.

## Information held

Command Recruitment Group currently holds some information in relation to its employees, temporary staff, contractors and other workplace participants. This information includes, but is not limited to:

- Tax file numbers
- Candidate information submitted and obtained from the Candidate and other sources in connection with applications for work;
- Information documenting the work history of workplace participants (such as their letter of appointment and bank account details as well as records of any salary adjustments, work performance information, salary sacrifice documents and sick leave taken).
- Information obtained to assist in managing client and business relationships;

There are a variety of reasons why Command Recruitment Group is required to hold this information. Some of the reasons include:

- Ensuring that both Command Recruitment Group and any workplace participants are meeting their obligations under relevant legislation as well as their contract of employment
- Placement operations
- Staff management;
- Training
- Client and business relationship management
- Marketing
- Ensuring the health, safety and welfare of all workplace participants at times when they are performing work for Command Recruitment Group; and
- Allowing appropriate insurance cover for these workplace participants

# Procedures for collection, management, use and disclose of information

## 1. Collection

- 1.1 Information will only be collected with the consent of all workplace participants. All candidates registering for employment through Command Recruitment Group will be asked to sign a verification and consent clause.
- 1.2 Information will only be collected that is necessary in order to carry out the function of Command Recruitment Group's work.
- 1.3 Information will only be collected in a fair and lawful manner.

## 2. Management and use

- 2.1 All candidates will be informed why we are collecting information about them and who else we might give it to. A copy of this policy and procedure will be made available to all workplace participants.
- 2.2 Command Recruitment Group will use or disclose personal information for the primary purpose of collection.
- 2.3 All employees are to take reasonable steps to ensure the personal information we collect, use or disclose is accurate, complete and up-to-date. This may require updating the information from time to time.
- 2.4 All current candidates' hard copy files are to be kept in the filing room or in consultants' "work in progress" files. All placed candidates' files will be archived in a security storage area. All candidate files that are no longer needed will be disposed of via the shredder or security bins provided.

## 3. Disclosure

- 3.1 Information relating to candidates will only be disclosed to potential employers if deemed as relevant. Relevant information may include, but is not limited to:
  - Relevant education and training
  - Skills
  - Test results
  - Memberships
  - Interests
  - Career summary (employment history)
  - References
  - Salary/hourly rate expectations
  - Current job options
  - Availability to start
- 3.2 Access to the above information is limited to a "need to know" and/or consent basis.

## For permanent employees

Information	Access restricted to:
Full personnel files, including: employment history, performance appraisals, interview notes, training records and salary	Directors, the employee's direct divisional manager and the human resources manager
Payroll and salary records	The Financial Controller, the Managing Director, the Operations Manager and Payroll Officer
Leave history records	The Financial Controller, the Managing Director, the Operations Manager and Payroll staff
Employee relations records	The Financial Controller, the Managing Director, the Operations Manager and Payroll staff, the Team Leader

## For temporary and casual staff:

Information	Access restricted to:
Candidate files, including employment history, interview notes, reference check and test results	Directors, consultants and divisional managers and database administration staff
Payroll information	The Financial Controller, the Managing Director, the Operations Manager and payroll staff and consultants
Quality control reports	Recruitment consultants

### 3.3 Disclosure of information

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

In some cases we may only disclose information with your consent.

We may disclose your personal information where we are under a legal duty to do so, including circumstances where we are under a lawful duty of care to disclose information.

### 3.4 Compulsory release of information

There may be circumstances where Command Recruitment Group is contacted in relation to the compulsory release of some of the above information. For example, as a result of Command Recruitment Group supplying the Australian Taxation Office (ATO) with an employee's tax declaration, a statutory body such as Centrelink or the Child Support Agency may require us to release relevant information to their authority. In such cases Command Recruitment Group are obliged to comply with the request, without necessarily seeking the employees permission.

## **4. Complaints and contact details**

Anyone who feels that there has been an unwarranted invasion of their privacy should contact Patsy Downes, Operations Manager (Privacy Officer) who can be contacted on (02) 9262 5656.

Further information about the NPP or Command Recruitment Group's policies relating to privacy issues can be obtained from the Privacy Contact Officer.

## **5. Access**

Subject to some exceptions that are set out in the National Privacy Principles, you can gain access to the personal information that we hold about you.

We do refuse access if it would interfere with the privacy rights of others persons or if it breaches any confidentiality that attaches to that information.

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.

We might impose a moderate charge in providing access. Our Privacy Co-ordinator would discuss these with you.

You should also anticipate that it may take a little time to process your application for access as there may be a need to retrieve information from storage and review information in order to determine what information may be provided.