

Aussie Locums

Privacy Policy

Aussie Locums are specialists in providing temporary, contract and permanent healthcare staff. Our network spans the whole of Australia. Our clients range from small locally owned and operated private practises, to national and international corporations, government departments and government owned corporations.

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. 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.

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.

Information Flow

When we collect your personal information:

- we check that it is reasonably necessary for our functions or activities;
- 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;
- 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; and
- 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.

Collection of Personal Data

Aussie Locums may collect personal information about you. 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 agency 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, such as name, address, phone number, and email address;
- Employment history, including previous employers, job titles, dates of employment;
- Education, qualifications, skills, and accreditations, such as degrees, certifications, and professional memberships;

- References, including contact details of supervisors or colleagues
- Personal characteristics, such as age, gender, and ethnicity (which may be collected for diversity monitoring purposes);
- Immigration status or work permit information, if applicable;
- Criminal record checks or other background checked, if required for the role; and
- Salary and benefits expectations, if requested by the employer.

We may also retrieve other descriptions of information such as references and employment aspirations during the course of your employment, for example, if you are considered for a particular employment position.

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:

- Company name and contact information;
- Information about the clients hiring needs, including job descriptions, required qualifications, and hiring timelines;
- 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;
- financial information, such as billing and payment details;
- feedback and evaluations of candidates provided by the client.

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, such as name, phone number, and email address
- 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);
- any other relevant information that can help the agency evaluate the candidate's suitability for the role.

Where applicable, the intentions for which we gather personal information and the repercussions of not providing it will be clarified at the time of collection.

When you visit our website, we may gather information you provide us with when:

- (a) Registering or subscribing to our services, or requesting additional services from any area of our website
- (b) you contact us regarding issues with our websites, or to make any enquiry, query, or comment, and;
- (c) you apply for online job advertised through Aussie Locums, you may need to provide (without limitations) information about your education, employment background, and accreditations. Your application will constitute your express consent to our use of this information, including to access your application and to allow us to carry out any checks, such as reference checking and other related activities as may be required of us under applicable law as recruitment specialists.

Aussie Locums may also collect information from public and third-party records.

Use and Disclosure of Personal Data

Aussie Locums retains, uses, and imparts your personal information for the purpose disclosed at the time of attainment, or otherwise as specified in this privacy policy. We will not utilise or impart your personal information for any other purpose without seeking your full consent, unless authorised or required by law. Generally, we will only utilise and disclose your personal information for the following purposes:

- (a) To provide our services to you.
- (b) To maintain our business relationship, where you are a user of our website, a client or candidate.
- (c) To enable you to submit your CV generally, to apply for specific jobs or to subscribe to our job alerts.
- (d) To match your details provided with job vacancies, to assist us in searching for a position that is most suitable for you and, where you provide your prior consent as a candidate on our database, to send your personal data to clients in order to apply for jobs.
- (e) To answer any inquiries submitted by you.
- (f) To forward market products and services, inform you of news and industry updates, events, promotions and competitions, reports, and other information. Where we do so, you will be able to unsubscribe from such communications.
- (g) Where you are registered as a candidate on our database, your personal data will be accessible by our consultants situated in Cairns, Queensland, Australia.
- (h) To utilise personal information to enable to development and marketing of other products and services, and to enhance our customer service, and to ensure that our services are valuable to you, including tailoring our website when you are logged in, to make it relevant to your specific needs.
- (i) To disclose information to trusted third parties where we have maintained a business relationship with them to provide services that you have requested, such as psychometric evaluations or skills tests, and who also provide services to us, such as professional advisers, IT consultants, mailing houses and function co-ordinators. These third parties must also comply with similar practices of privacy and confidentiality as Aussie Locums.
- (j) If, during the course of dealing with you Aussie Locums combines with or is acquired by another business, we may share personal data with the new owners of the business and their third parties. Should this occur, you will be sent notice of such an event.
- (k) We may also impart personal data when we are under a legal duty to do so, to our contracted service providers, insurers, professional advisors, and others with a proper interest in receiving your personal information for a lawful related purpose.
- (l) We may also impart personal data to regulatory or law enforcement authorities if they require us to do so, and;
- (m) We may also require your consent to collect, retain, utilise, and impart your personal data for any other intention not listed above, for example statistical 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, 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.

How your personal information is held

Personal information is held in our 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.

Our agency maintains a digital information record system to manage the personal information we collect. This system is designed to protect the privacy and security of the information we collect and store. We take a range of measures to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure and we regularly review and update our security practices to ensure compliance with applicable privacy laws and regulations.

Electronic Transfers

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.

Some apps might invite you to use your social media log-in details (e.g., Facebook or Google log-in usernames 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 Office of the Australian Information Commissioner's (OAIC) 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.

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.

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.

Sensitive Information

Sensitive information is an exclusive category of personal information under the Privacy Act 1988 (Cth). It is the information or an opinion about yourself, including racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal records, and past and current health information. Aussie Locums will provide you the intentions for the attainment of this information and will only be disclosed with your full consent.

Data Breach Notifications and 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.

Privacy on our website www.aussielocums.com.au

(a) Submitting your curriculum vitae (CV) and applying for jobs

- You may submit your CV to Aussie Locums via www.aussielocums.com.au, either for general consideration by our recruitment consultants for positions as they arise, or to apply for a particular job, specific to your job search.
- Once submitted, your CV will be sent directly to the relevant Aussie Locums recruitment consultant who will review your details and advise you whether you are to be accepted by our establishment for an official registration on our central recruitment database.
- This database, including your personal data, can be accessed by any of our recruitment consultants working in our office located in Cairns, Queensland, Australia.
- If you are accepted onto our database, our recruitment consultants will then contact you to set up an interview in person for candidates situated within the immediate local area of Cairns, Queensland, and for successful candidates nationally, a telephone interview or face to face interview via 'Zoom' will be conducted.
- You are able to update your CV at any time, simply by following the same procedures you were required to follow previously to submit a new or updated version of your CV via our website.

(b) Aggregate information about website visitors

- We collect information and statistics about all visitors to our website www.aussielocums.com.au, which is inclusive of; the most frequently accessed pages and most frequently used services
- We only utilise such data in aggregate form (the information will not identify any one individual)
- This information assists us in determining the most beneficial areas of our website and ways in which we can continually enhance our online and customer services to create an exceptional overall experience for our users
- Overall experience for our users

Information Transfer across International Borders

Aussie Locums serves users from all over Australia; we endeavour to provide you with the same services amongst these sectors. The nature of our business, operations and services requires us to transfer your personal information (on occasion) to other related companies. We may transfer the information we gather about you to countries other than your home country (or country of current location) other than the country that the information was originally collected.

- Where you are registered as a candidate on our central database, (in Cairns, Australia) your personal information may be imparted to other related counterparts within the confines of Australia. Before doing so, Aussie Locums consultants will contact you to acquire for full consent before any disclosure is undertaken.
- To different areas (departments) of Aussie Locums to enable the development and marketing of other products and services and to improve our customer service, and to make our services more valuable to you, including tailoring our website when you log on to make it relevant to you, personally

Due to the fact that Aussie Locums is spread across these different sectors of Australia, we will take appropriate steps to ensure that we comply with the appropriate confidentiality and privacy requirements and to ensure that your information is protected and handled in accordance with the legal requirements

and as specified within this privacy policy. However, 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.

Security

Aussie Locums practices reasonable steps to keep any provided personal information secure, accurate and up to date. The internet is not always a secure method of communicating personal information. Accordingly, while we endeavour to protect your personal information by implementing digital security measures in various parts of our website www.aussielocums.com.au

Aussie Locums cannot accept responsibility for the security of information you send or receive from us via internet transmissions, or for any unauthorised access or utilisation of that information. Where applicable, if we have web links to websites outside the confines of www.aussielocums.com.au, we cannot ensure that your privacy will be secure adherent with this privacy policy. You should consult any other advertised websites' privacy policies if you have an intention to transmit personal information via their web services, as we have no control over the, and are not responsible for any personal data that is submitted to or gathered by these third parties.

Access to Personal Information and Correction Policy

- 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.
- You may request access to update or delete your personal information held on the central Aussie Locums database, simply by contacting the current Aussie Locums office manager (as specified at the end of this privacy policy). We will ask you to verify your identity and for more information (if needed) regarding your request.
- Where you request your personal information to be updated and there is a dispute about the facts, we will make a note on your personal information of such a dispute
- 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.
- 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.
- If you are a current user of Aussie Locums and have created a customer account via our website www.aussielocums.com.au you are able to view, access and update any information by logging into your account.
- You may also request that Aussie Locums discontinues the use of your personal information and contacting you, and we will comply with your request i.e., if at any time you wish to stop receiving newsletters and updates from us, please use the "unsubscribe" link included in any emails (or any other material) sent to you.
- However, please be advised if this involves a request for deletion of your file, please be aware that we may not be required or retain the capacity to do so, particularly if and where your profile holds information about any of our other clients.

Complaints

You have a right to complain about our handling of your personal information if you believe that we have interfered with your privacy. 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 director, whose contact details are nichole@aussielocums.com.au or 07 4031 9991

You can also make complaints to the Office of the Australian Information Commissioner through the Commission's website and the means set out there via <https://www.oaic.gov.au/about-the-OAIC/contact-us> if you are not satisfied with our response to your complaint. More information about OAIC is available at: <http://www.oaic.gov.au/>. 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:

At Aussie Locums we aim to acknowledge receipts of complaint as soon as possible and commit to address and resolve complaints within no later than 10 working days of the admission of the complaint. In such circumstances, we will respond to your complaint in a reasonable and practical time.

- 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 established 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 [links to level 1: Access & 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.

Contact

For any further questions or queries in regard to this privacy policy, please contact Aussie Locums nichole@aussielocums.com.au

This privacy policy has been compiled in full accordance with the *Privacy Act 1988 (Cth)*; an Australian law which regulates the handling of personal information about individuals. This is inclusive of the collection, utilisation, storage and impartment of personal information. More information regarding the *Privacy Act 1988 (Cth)* can be attained from: <http://www.oaic.gov.au/privacy/privacy-act/the-privacy-act> .

ISO 9001:2015 REQUIREMENTS

Clause: 7 Support

7.1 Resources

7.1.1 General

7.1.2 People

7.1.5 Monitoring and measuring resources

7.1.6 Organisational knowledge

7.4 Communication

7.5 Documented information

7.5.1 General

7.5.2 Creating and updating

7.5.3 Control of documented information

Clause: 9 Performance evaluation

9.1 Monitoring, measurement, analysis, and evaluation

9.1.1 General

9.2 Internal audit

9.3 Management review

9.3.1 General

9.3.2 Management review inputs

9.3.3 Management review outputs

Clause: 10 Improvement

10.1 General

10.2 Nonconformity and corrective action

10.3 Continual improvement