

### 1. Introduction

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.

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

By following the links in this document, you will be able to find out how we manage your personal information as an APP Entity under the Australian Privacy Principles (APPs).

You will also be able to find out about the information flows associated with that information.

If you have any questions please contact us

#### 1.1. APP Entity

Alpha Services 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

#### 1.2. Information Flow

When we collect your personal information:

- we check that it is reasonably necessary for our functions or activities as an On-hire Firm
- 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, 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.

## 2. 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 an On-hire Firm and is likely to differ depending on whether you are:

- a Workseeker
- a Client
- a Referee

### 2.1. For Workseekers

The type of information that we typically collect and hold about Workseekers 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:

- Employment history
- Personal details
- Financial and taxation information
- Training and qualifications
- Registrations and memberships associated with your position

### 2.2. 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:

- Your employees contact details
- Information relating to your shift vacancies
- Occupational Health & Safety
- Payroll tax exemption status
- Corporate details

### 2.3. 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 Workseekers for particular jobs or particular types of work and includes:

- Your Personal information, including your name, contact details, position and place of work
- Opinions of the workseekers performance

### 3. Purposes

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

- a Workseeker
- a Client
- a Referee

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

- Our Policy on [Direct Marketing](#)

#### 3.1. For Workseekers

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

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

#### 3.2. 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;

#### 3.3. 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;
- Workseeker suitability assessment;
- recruitment functions;

#### 3.4. Our Policy on Direct Marketing

**Your Personal information may be used to enable us to send direct marketing to you.**

- We do not use third parties for marketing
- We will not use or disclose Personal Information for the purposes of direct marketing, unless the information is collected directly from the individual themselves and:
  - The individual would reasonably expect us to use or disclose the individual's Personal Information for the purpose of direct marketing ; and
  - We have provided the individual concerned with a means to "opt out" and they have not opted out.

- We will ensure all our activities with regard to direct marketing will be legal, especially with reference to the anti-spam legislation.

#### 4. 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 Workseeker
- a Client
- 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 the section in this policy on [Electronic Transactions](#)

See also the section on [Photos & Images](#)

##### 4.1. For Workseekers

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:

- We communicate with you through email
- We communicate with you via telephone or face to face

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.

##### 4.2. 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](#) and our Privacy Policy.

### 4.3. For Referees

Personal information about you may be collected when you provide it to us:

- in the course of our checking Workseeker references with you and when we are checking information that we obtain from you about Workseekers;

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.

### 4.4. Photos & Images

For Workseekers, your personal image will be collected upon registration and stored. You will also be issued with a photo ID badge as a means of identifying you as an employee of Alpha Services when you attend Client facilities.

### 4.5. 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 our newsletter;
- register as a site user to access facilities on our intranet;
- make a written online enquiry or email us through our website;
- 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.

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

## 5. 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.

We take a range of measures to protect your personal information from:

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

### 5.1. Our Information Record System

Personal and business information is stored by us in different ways, depending on the information we may store this information in hard copy or electronic format.

Alpha uses an electronic database to store information about our employees, our clients and referees. This database is internal however we may need to disclose or give access

to information to contracted service providers from time to time. A backup of all of our information is stored on our own server. Where necessary information can be accessed externally by authorised employees of Alpha this database is also available internally to our other office locations.

We may also choose to keep a hard copy of information. This hardcopy is stored on the premises.

### 5.2. Information Security

Alpha Services are committed to keeping secure the Personal Information you provide to us. We will take all reasonable steps to ensure the Personal Information that we hold is protected from misuse, interference, loss, from unauthorised access, modification or disclosure.

Our security measures include, but are not limited to:

- 1) Training our staff on their obligations with respect to your Personal Information
- 2) Use of passwords when accessing our data storage system
- 3) The use of firewalls and virus scanning tools to protect against unauthorised interference and access

Alpha Services will, as soon as practicable and in accordance with the law, destroy or de-identify any Personal Information that is no longer required for our functions.

## 6. Disclosures

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

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

Disclosure will usually be:

- internally and to our related entities
- to our Clients
- to Referees for suitability and screening purposes.
- to Commonwealth, State and Territory government agencies.

### 6.1. 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;
- Other On-hire firms that we sub contract with

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.

### 7. 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 our [Access Policy](#).

For more information about applying to correct your information see our [Correction Policy](#).

#### 7.1. Access Policy

If you wish to obtain access to your personal information you should contact our Privacy Co-ordinator.

You will be required to complete form 602 information access / change application form requesting information from us. You will need to be in a position to verify your identity, we will only disclose information requests to the person the information relates to.

We will endeavour to respond to all requests for information access within 5 business days. We may choose to communicate with you via telephone or electronic media.

Should the information you have requested be information that we cannot disclose by law, you will be notified in writing by the Privacy Coordinator.

#### 7.2. 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 ask you to complete form 602 information access / change application, requests to change information will not be accepted without a signed request.

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. We will only take such steps at the request of the person who the information relates to.

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.

We will endeavour to complete your request within 5 business days. Should we be unable to comply with your request for any reason we will notify you.

### Complaints

You have a right to complain about our handling of your personal information if you believe that we have interfered with your privacy.

For more information see our [Complaints Procedure](#).

#### 7.3. 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 Co-ordinator, whose contact details are:

**Chief Executive Officer**

Alpha Services Australia Pty Ltd

Phone: (03) 9365 1755

Fax: (03) 9331 7519

Email: [alpha@alphaservices.com.au](mailto:alpha@alphaservices.com.au)

You can also make complaints to the [Office of the Australian Information Commissioner](#)

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 Association Code and Dispute Resolution Rules do NOT constitute a recognised external dispute resolution scheme for the purposes of the APPs; but are primarily designed to regulate the good conduct of the Associations 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;



## Privacy Policy



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[www.alphanursing.com.au](http://www.alphanursing.com.au)

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.