

Privacy Policy

About this policy

This privacy policy explains how we manage your personal information. We may provide more details on how we manage your personal information when we collect your personal information. We manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles*. You can read our condensed policy by [clicking here](#). You can obtain more information by following the links.

Privacy Policy

Steps Staffing Solutions 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](#) (through our Website) or see our [contact details](#) at the end of this document..

When we collect your personal information we check that it is reasonably necessary for our functions or activities as a employment agency. 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. It is unlikely that your information may be disclosed to overseas recipients.

We retrieve your information when we need to use or disclose it for our functions and activities to provide our services to you and or your employer, including to fulfil your requests for information and employment opportunities and to manage the recruitment process for third parties and ourselves;

- To manage our client and business relationships;
- To provide assessment and other consulting services;
- To provide you important work related information including workplace health and safety, work rosters and other information relating to your engagement by Steps Staffing Solutions.
- The email addresses provided at registration allow us to send emails to individuals based on the areas of interest that they may indicate during the employment registration process;
- To send communications requested by you, answer enquiries and provide information about existing or new services;
- To provide your updated personal information to related bodies, our customers, contractors or service providers if such disclosure is required to administer our business functions or to provide our products and services to you;
- To update our records and keep your records up to date;
- To process and respond to any complaint made by you; and
- To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in

cooperation with any governmental authority of any country.

- 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](#).

What kinds of personal information do we collect and hold?

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.

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 and Labour Hire Employment Agency and is likely to differ depending on whether you are a work seeker, a client or a refereee.

For Work Seekers -

The type of information that we typically collect and hold about Work Seekers 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 but is not limited to your resume, licences/tickets, results of any skills or other testing, formal documents of certification/qualification:

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 includes but is not limited to:

- Position Descriptions
- Company Policy & Procedures
- Capability Statement

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 Work Seekers for particular jobs or particular types of work and includes but is not limited to:

- Name and Position within Company
- Name of Company that you may work for
- Contact details ie. Telephone or email address

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](#).

Purposes

The purposes for which we collect, hold, use and disclose your personal information are likely to differ depending on whether you are a Work Seeker, a Client, a Referee . The following sections are also relevant to our use and disclosure of your personal information relating to Our Policy on Direct Marketing and Overseas Disclosures.

For Work Seekers -

Information that we collect, hold, use and disclose about work seekers is typically used for work placement operations, recruitment functions, 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 to confirm identity and authority to provide references; work seeker suitability assessment and recruitment functions.

Our Policy on Direct Marketing

We may send you direct marketing communications and information about our products and services that we consider might be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email in accordance with applicable marketing laws such as the Spam Act 2003 (cth). You consent to receiving direct marketing communications and information from us. However, at any time you may opt out of receiving marketing communications for us by contacting us (see details below) or by using opt out facilities provided in the marketing communications and then we will ensure that your name is removed from our mailing list.

We do not provide your personal information to other organisations for the purposes of direct marketing without consent by you.

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 Work Seeker, 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 our policy on [Electronic Transactions](#) . See also the section on [Photos & Images](#)

For Work Seekers -

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. 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.

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.

For Referees -

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

Photos & Images

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.

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, submit a resume by email or through our website; and by other means if necessary for the proper performance of our functions and activities as a recruitment and Labour Hire Employment Agency.

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 OAIC's resource on [Internet Communications and other Technologies](#). You can [contact us](#) 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 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.

Information, such as call and message logs, emails, resume, identification, certificates and licences are attached to our Information Record System which is necessary for the proper performance of our functions and activities as a recruitment and Labour Hire Employment Agency.

Our Information Record System -

Steps Staffing Solutions utilizes FastTrack SkillsBase and Recruitment Manager as well as FastTrack Payroll Manager as its Information Record System. Our system is Cloud based server storage with information stored in electronic format. Hard copy files are retained

in a secured area for the length of time required to comply with legal requirements.

Information Security -

Steps Staffing Solutions's Information Record System is managed by a Specialist IT Provider. Our system is secured by layers of password protection, anti-spam and virus protection.

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.

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, Safety Consultants.

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 -

Some of your personal information is likely to be disclosed to overseas recipients. 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.

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.

Access Policy

If you wish to obtain access to your personal information you should contact us. 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. For more information see our Complaints Procedure below -

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, who can be contacted during business hours (see contact details at end).

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;

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](#).

This Privacy Policy will be reviewed every two years.

If you wish to contact us please:

Phone: 07 5443 1905

Fax: 07 5443 1847

Email: admin@stepsstaffingsolutions.com.au

Post: P.O. Box 920, Maroochydore Q 4558



Steps Staffing Solutions is committed to being an ethically and morally responsible company and has developed an Integrated Management System that seeks to comply with AS/NZS 4801:2001 Guidelines for Work Health and Safety Management System: Specifications with Guidance for Use and AS/NZS ISO14001:2004 Environment Management Systems – Requirements with Guidance for Use.

Steps Staffing Solutions places the highest emphasis on Health, Safety and Environment Management in conducting its daily business. Steps Staffing Solutions recognises that legal compliance is regarded as a minimum standard and our objective is to ensure our activities are beyond statutory regulations, which conserve and protect the environment and support business goals, are strongly encouraged.

The Company believes this key objective will benefit all people involved in its activities and it will only be achieved through the constant promotion and improvement of working practices, control of health, safety and environment hazards, health, safety and environment awareness, and commitment to health, safety and environment on the part of every person involved including that of our labour hire workers and contractors.

To achieve these objectives Directors and Managers will ensure implementation of this policy and:

1. Promote health, safety and environment management at all work locations.
2. Ensure health, safety and environment practices and procedures are implemented and maintained throughout the Company, and are relevant to the operational activity, and comply with statutory requirements and promote the involvement of all personnel in the maintenance of a safe working environment.
3. Ensure appropriate emergency procedures exist in all work locations and that all personnel understand the procedures relevant to their location.
4. Provide instruction, training and supervision, dissemination of information and necessary resources to support health, safety and environment in the various areas of company activity.
5. Ensure that there is ongoing consultation and communication with all stakeholders.
6. Ensure the establishment of measurable objectives and targets for health, safety and environment to ensure continuous improvement.
7. Provide appropriate protective equipment to comply with statutory requirements and to meet the relevant needs of each area of work activity.
8. Ensure appropriate procedures are maintained for the reporting and review of all health, safety and environment incidents and situations likely to be hazardous to a safe working environment.
9. Ensure appropriate procedures are in place to promote effective claims management and rehabilitation.

All employees have a responsibility to follow all health, safety and environment policies and procedures and to report any hazards.

This Health, Safety and Environment Policy will be reviewed every two years.

Drugs and Alcohol Policy

Steps Staffing Solutions is committed to providing a safe and healthy working environment in accordance with legislative standards and best practice.

The company recognises that alcohol or drug misuse will impair an individual's ability to perform work safely and further, that alcohol or drug use is not permitted while operating a vehicle or attending construction workplaces. It is the policy of the company to protect its workers, Steps Staffing Solutions assets, the community and the environment in which it operates from hazards arising from alcohol or drug misuse in the workplace.

The consumption of alcohol and illegal or prescription drugs or having a blood alcohol content beyond ZERO while performing operation of a vehicle, plant or attending to construction workplaces is prohibited by law.

Consequently, Steps Staffing Solutions requires the performance of its workers, contractors and others to be unimpaired by drug or alcohol use or misuse whilst on company premises, customer's premises and in the performance of work. The illegal or unauthorised possession, consumption, sale or being under the influence of alcohol or illicit drugs whilst on Steps Staffing Solutions premises is strictly prohibited.

Steps Staffing Solutions views drug or alcohol dependency as a medical condition and encourages any worker with a problem to seek confidential support and treatment.

Any worker or contractor found to be in breach of this policy shall be subject to discipline in accordance with the worker's contract of employment.

Rehabilitation Policy

In the event of an injury or illness, Steps Staffing Solutions is committed to ensuring a process whereby workers are able to achieve restoration from occupational ill health or an injury to the fullest physical, mental, social, vocational and economic usefulness for which they are capable. It is a process, which begins at the moment of occupational injury or illness and continues until the worker is as fully recovered as possible to optimum health.

Where an injury or illness does occur in the workplace, Steps Staffing Solutions is committed to ensuring that an injured worker is returned to safe, productive and fulfilling employment as soon as possible. In order to achieve this major goal of our policy, Steps Staffing Solutions will provide occupational rehabilitation, designed in conjunction with the worker and their Doctor, for a worker who incurs an injury or illness.

To ensure the success of this policy:

Management will:

- Strive to achieve an incident free workplace.
- Appoint a Rehabilitation Coordinator to manage the rehabilitation process.
- Provide suitable duties (where available) should a worker be unable to return to their

pre-injury duties temporarily as a result of the injury or illness.

- Provide vocational rehabilitation (where available) should an injured worker be unable to return to their pre-injury duties on a permanent basis.
- Ensure that legislative rehabilitation obligations are met.
- Commence rehabilitation after an injury or illness in accordance with medical advice.
- Liaise with all parties involved in planning and implementing rehabilitation.
- Monitor the progress of workers undergoing workplace based rehabilitation.

Workers will:

- Notify the Rehabilitation Coordinator of any injury or illness as soon as possible.
- To cooperate and participate fully in rehabilitation programs that are designed to assist return to work.

Alternative Duties

The provision of alternative duties would need to satisfy the following elements:

1. A program for graduated return to work will be established to meet each need.
2. The duties will be meaningful, contribute to the work environment and include task variety where this is practicable.
3. The injured worker's overall return to normal duties will be monitored to ensure that reasonable progress is being achieved.
4. Prior to provision of alternative duties being provided, the Rehabilitation Coordinator will consult with the following parties where applicable:
 - a. Injured worker
 - b. Treating Doctor
 - c. Rehabilitation Provider

Workplace Bullying and Harassment Policy

Steps Staffing Solutions is committed to promoting courtesy, trust and respect and to a working environment that is free from workplace bullying and harassment. This organisation finds workplace bullying and harassment unacceptable and will not tolerate it under any circumstance.

Workplace bullying or harassment has a detrimental effect on an organisation and on individuals. Workplace bullying or harassment may cause the loss of trained and talented workers, loss of profits, reduced productivity and morale, an unsafe working environment and create legal risks and legal costs for our business.

Individuals being bullied or harassed can become stressed, anxious, depressed, physically ill, sleep deprived, withdrawn, aggressive and vengeful or can lose self confidence and self esteem.

The Directors aim to eliminate workplace bullying by:

- Providing general training to all workers and management aimed at eliminating workplace bullying or harassment.
- Developing a code of conduct for all workers to understand and sign.
- Informing all workers and clients of this policy and how to make a complaint.
- Regularly reviewing the policy, grievance procedures and training of all workers.

All workers are required to behave responsibly by complying with this policy, to not tolerate

unacceptable behaviour of others, to maintain confidentiality when providing information in an investigation and to report any incidence of workplace bullying or harassment.

Managers and supervisors must ensure that workers are not bullied or harassed. They are required to personally demonstrate appropriate behaviour, promote the anti workplace bullying and harassment policy, treat complaints seriously and ensure where a worker makes, or is witness to, a complaint that they are not victimised.

Steps Staffing Solutions has grievance and investigation procedures to deal with workplace bullying and harassment. Any reports of workplace bullying or harassment will be treated seriously and investigated promptly, confidentially and impartially. A person making a complaint and/or a witness or workplace bullying or harassment will not be victimised.

Disciplinary action will be taken against a person or person/s who bully or harass workers or agents of this organisation, or who victimise a person who has made, or is a witness, to a complaint. A client who bullies or harasses may be banned from these premises.

Fatigue Management Policy

Steps Staffing Solutions is committed to providing a safe and healthy working environment. To further this commitment the following Fatigue Management Policy details the company's program to ensure that workers are not subjected to conditions that expose them to fatigue.

The Company acknowledges its obligations under legislative standards and Department of Transport Fatigue Management Guidelines and is committed to acting responsibly to ensure that its workers, operations, customers and the community are not placed at risk.

Fatigue can be caused by both work and non-work related factors. Non-work factors include family responsibilities, social activities, health issues—such as sleep disorders—study commitments, and sporting commitments. Work factors include shift work—especially night shift—and working extended hours.

Whilst not all people respond to fatigue in the same way, fatigue can cause reduced concentration, impaired co-ordination, compromised judgement and slower reaction times; ultimately increasing the risk of incidents and injuries.

Steps Staffing Solutions recognises that fatigue will impair a worker's ability to perform work safely. Workers are an integral part of the business operations and further, the importance of assisting its workers to ensure that fatigue does not become an issue in the workplace through appropriate education and rostering of working hours.

Managers and supervisors are accountable for managing fatigue by applying risk management processes contained in the Queensland Work Health and Safety Regulation 2011.

Where in charge of company vehicles during working hours, all Steps Staffing Solutions workers and subcontractors have a responsibility to themselves and other drivers and pedestrians.

In order to assist workers to understand and recognise the issues surrounding driver and operator fatigue, Steps Staffing Solutions has included Fatigue

Management in WHS training and all new workers will undergo the company induction which includes this important health and safety issue prior to commencing work.

Quality Policy

Steps Staffing Solutions aims to adhere to the guiding principles provided by the Private Employment Agents (Code of Conduct) Regulation 2005 which demands that we observe the highest standard of ethics and professional conduct including honesty, equity, integrity and social responsibility in our professional business operation.

We are committed to providing a high quality, high value recruitment and consulting services for permanent and/or temporary placements. Our commitment is to provide the best available candidates delivered within the shortest possible timeframe to satisfy the client's requirements.

This level of quality is achieved through adoption of a system of procedures that validates the competence of the Company to existing customers, potential customers, and independent auditing authorities.

Achievement of this policy involves all staff, who are individually responsible for the quality of their work, resulting in a continually improving working environment. This policy is provided and explained to each worker by the Quality Manager.

To achieve our policy Steps Staffing Solutions & Labour Hire will:

- a. maintain an effective Business Management System which complies with the Australian Standard ISO9001:2008 (Quality Systems),
- b. strive to achieve and maintain a level of quality which enhances the Company's reputation with customers,
- c. ensure compliance with relevant statutory and safety requirements,
- d. Endeavour, at all times, to maximize customer satisfaction with the services provided by Steps Staffing Solutions & Labour Hire and regularly seek client input.
- e. Periodically review and update the management system to suite changes in standards and delivery.

It is the responsible of the Directors to ensure that the Integrated Management System is being utilized correctly by all staff.

To achieve and maintain the required level of assurance the Quality Manager retains responsibility to compile, implement and integrate these requirements into our regular working processes and procedures and ensure that these are clearly defined, documented and maintained, with routine operation controlled by the Quality Assurance Coordinator.

We ask all personnel for their support and commitment to this policy



Training Policy

Steps Staffing Solutions is committed to being an ethically and morally responsible company and has developed an Integrated Management System that seeks to comply with AS/NZS 4801:2004 WHS Management Systems; AS/NZS ISO14001:2004 Environment Management Systems – Requirements with Guidance for Use; and AS/NZS ISO 9001:2008 Quality Management Systems.

Training is an integral part of the implementation of the integrated management system and

Steps Staffing Solutions will:

- Provide procedures and instructions to ensure safe systems of work for all workers;
- Provide information, instruction, training and supervision to workers; labour hire workers, and customers to ensure their safety

Each management representative is accountable for implementing this policy in their area of responsibility.

Senior Management is responsible for ensuring that:

- Resources are provided to give effect to this policy;
- Resources are allocated for induction of all new workers, including subcontractors, to the company;
- Resources are made available for training of workers in the safe performance of their assigned tasks;
- Records are maintained of all training;
- Training providers are appropriate to the type of training required; and
- Training needs are reviewed at annual performance reviews with all workers.

If you wish to contact us please:

Phone: 07 5443 1905
Fax: 07 5443 1847
Email: admin@stepsstaffingsolutions.com.au
Post: P.O. Box 920, Maroochydore Q 4558