

# Privacy Policy

1. POLICY 1 ----- COOKIE POLICY
2. POLICY 2 — -----WORK-SEEKER FEE STATEMENT
3. POLICY 3 — -----EMPLOYMENT AGENCY COMPLIANCE STATEMENT
4. POLICY 4 ----- AI AND AUTOMATED TOOLS NOTICE
5. POLICY 5 — -----SAFEGUARDING AND PROTECTION POLICY
6. POLICY 6 — -----MODERN SLAVERY AND ETHICAL RECRUITMENT POLICY
7. POLICY 7 — -----ACCESSIBILITY STATEMENT
8. POLICY 8 — -----EMPLOYER CODE OF CONDUCT
9. POLICY 9 — -----CANDIDATE CODE OF CONDUCT
10. POLICY 10 — -----EQUALITY, DIVERSITY AND INCLUSION POLICY
11. POLICY 11 — -----ANTI-BRIBERY AND ANTI-CORRUPTION POLICY
12. POLICY 12 — -----WHISTLEBLOWING POLICY
13. POLICY 13 ----- DATA RETENTION AND DISPOSAL POLICY
14. POLICY 14 — -----EMPLOYER VERIFICATION POLICY
15. POLICY 15 — -----CANDIDATE VERIFICATION POLICY
16. POLICY 16 — -----CYBER SECURITY AND INFORMATION SECURITY POLICY
17. POLICY 17 — -----VULNERABILITY DISCLOSURE POLICY
18. POLICY 18 — -----SANCTIONS, ANTI-MONEY LAUNDERING AND FINANCIAL CRIME POLICY
19. POLICY 19 -----COMPLAINTS HANDLING PROCEDURE
20. POLICY 20 ----- RECRUITMENT FEES, COMMISSION AND COMMERCIAL TRANSPARENCY POLICY

## **POLICY 1 — COOKIE POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

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## 1. PURPOSE

This Cookie Policy explains how Open Nurses®, operated by Open Jobs Ltd, uses Cookies and similar technologies when Users access or interact with our websites, applications, platforms and digital services.

This Policy should be read together with:

- Volume 1 — Master Terms of Service;
- Volume 4 — Privacy, Cookies, Data Governance and Information Security Policy;
- any applicable privacy notices published by Open Jobs Ltd.

By continuing to use Open Nurses®, Users acknowledge that Cookies and similar technologies may be used in accordance with this Policy and applicable legal requirements.

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## 2. WHAT ARE COOKIES?

Cookies are small text files placed on a computer, mobile device, tablet or other internet-enabled device when visiting a website.

Cookies help websites:

- operate correctly;
- remember preferences;
- improve user experience;

- maintain security;
- analyse website performance;
- support service functionality.

Cookies may be temporary (session cookies) or remain on a device for a specified period (persistent cookies).

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### 3. TYPES OF COOKIES WE USE

#### 3.1 Strictly Necessary Cookies

These Cookies are essential for the operation of Open Nurses®.

Examples include:

- account login authentication;
- security verification;
- fraud prevention;
- session management;
- load balancing;
- website functionality.

Without these Cookies, certain services may not function properly.

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#### 3.2 Functional Cookies

Functional Cookies help Open Nurses® remember choices and preferences.

Examples include:

- language preferences;

- location preferences;
  - accessibility settings;
  - user interface customisation;
  - dashboard preferences.
- 

### 3.3 Performance Cookies

Performance Cookies assist Open Jobs Ltd in understanding how Users interact with Open Nurses®.

Examples include:

- page performance monitoring;
- service reliability analysis;
- error identification;
- operational improvements.

Information collected may be aggregated and anonymised where possible.

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### 3.4 Analytics Cookies

Analytics Cookies help Open Jobs Ltd understand website usage and improve services.

Examples include:

- visitor statistics;
- traffic patterns;
- user behaviour analysis;
- content effectiveness measurement.

Analytics information may be collected through approved third-party providers.

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### 3.5 Marketing and Advertising Cookies

Marketing Cookies may be used to:

- measure advertising performance;
- understand campaign effectiveness;
- improve marketing communications;
- present relevant promotional content.

These Cookies will only be used where legally permitted and, where required, with User consent.

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## 4. SIMILAR TECHNOLOGIES

Open Nurses® may also use:

- web beacons;
- pixels;
- tracking scripts;
- software development kits (SDKs);
- local storage technologies;
- device identifiers;
- session technologies.

These technologies may perform functions similar to Cookies.

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## 5. THIRD-PARTY COOKIES

Certain Cookies may be placed by authorised third-party providers including:

- analytics providers;
- cloud service providers;
- payment providers;
- security providers;
- communication providers;
- advertising partners.

Third-party providers operate under their own privacy and cookie policies.

Open Jobs Ltd does not control third-party policies.

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## 6. COOKIE CONSENT

Where required by applicable law, Open Nurses® will request consent before placing non-essential Cookies on a User's device.

Users may:

- accept all Cookies;
- reject non-essential Cookies;
- customise preferences;
- withdraw consent at any time.

Consent choices may be updated through available Cookie preference tools.

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## 7. MANAGING COOKIES

Most web browsers allow Users to:

- view Cookies;
- delete Cookies;
- block Cookies;
- manage preferences;
- receive notifications before Cookies are placed.

Disabling certain Cookies may affect the functionality and performance of Open Nurses®.

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## 8. SECURITY AND FRAUD PREVENTION

Cookies and related technologies may be used to:

- protect User Accounts;
- detect suspicious activity;
- prevent fraud;
- support cybersecurity measures;
- maintain Platform integrity.

Such processing may occur without separate consent where necessary for security purposes and permitted by law.

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## 9. DATA RETENTION

Cookie retention periods vary depending upon:

- Cookie category;
- operational requirements;

- legal obligations;
- User preferences.

Some Cookies expire automatically when a browsing session ends, while others remain until deleted or expire.

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## 10. CHANGES TO THIS POLICY

Open Jobs Ltd may amend this Cookie Policy from time to time.

Updates may occur due to:

- legal changes;
- regulatory requirements;
- technological developments;
- service improvements.

Updated versions will be published on Open Nurses®.

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## 11. CONTACT INFORMATION

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

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## 12. FINAL PROVISIONS

This Cookie Policy forms part of the Open Nurses® Legal Framework.  
Nothing within this Policy limits rights available under applicable Data Protection Laws, Privacy Laws or Consumer Protection Laws.

Open Jobs Ltd reserves the right to implement, modify, replace or discontinue Cookies and similar technologies as necessary for lawful operation, security, service delivery and continuous improvement of Open Nurses®.

## **POLICY 2 — WORK-SEEKER FEE STATEMENT**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

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### 1. PURPOSE

Open Nurses® is committed to fair, transparent and ethical recruitment practices.

This Work-Seeker Fee Statement explains Open Nurses®'s position regarding recruitment fees, work-finding services, optional subscriptions and candidate-related charges.

This Policy applies to all Candidates, job seekers, healthcare professionals, students, workforce users and individuals using Open Nurses® to discover employment or career opportunities.

This Policy should be read together with:

- Volume 1 — Master Terms of Service;
- Volume 3 — Candidate Terms and Subscription Terms;
- Volume 4 — Privacy, Cookies, Data Governance and Information Security Policy;
- applicable service-specific terms and notices.

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## 2. NO RECRUITMENT FEES TO CANDIDATES

Open Jobs Ltd does not charge Candidates recruitment fees or work-finding fees for obtaining employment opportunities through Open Nurses®.

Candidates are not required to pay Open Jobs Ltd in order to:

- search opportunities;
- view vacancies;
- create an account;
- create a professional profile;
- submit job applications;
- communicate with Employers through authorised Platform functionality;
- be considered for employment opportunities.

Open Nurses® does not sell employment opportunities and does not guarantee employment outcomes.

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## 3. FREE ACCESS PRINCIPLE

Open Nurses® supports accessible workforce participation.

Candidates may access core job-seeking services without payment, including:

- account registration;
- profile creation;
- CV uploads;
- vacancy discovery;

- opportunity alerts;
- job applications;
- account management tools.

Availability of services may vary over time.

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#### 4. OPTIONAL SUBSCRIPTION SERVICES

Open Nurses® may offer optional subscription products designed to enhance a Candidate's experience.

Examples may include:

- profile enhancement tools;
- career development resources;
- CV optimisation tools;
- interview preparation resources;
- educational materials;
- premium support services;
- enhanced account functionality.

These services are entirely optional.

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#### 5. SUBSCRIPTIONS ARE NOT WORK-FINDING SERVICES

Optional subscriptions are not recruitment fees and are not charges for obtaining employment.

Subscription purchases:

- do not constitute payment for work-finding services;

- do not purchase access to jobs;
- do not purchase interviews;
- do not purchase sponsorship opportunities;
- do not purchase employment outcomes.

Subscription services provide additional tools and resources only.

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## 6. EQUAL OPPORTUNITY PRINCIPLE

Open Nurses® is committed to fair access to opportunities.

Employers remain solely responsible for recruitment decisions.

Subscription purchases do not:

- guarantee interviews;
- guarantee applications will be reviewed;
- guarantee sponsorship;
- guarantee employment;
- influence employer hiring decisions.

Candidates who do not purchase subscriptions remain eligible to apply for opportunities available through Open Nurses®.

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## 7. EMPLOYER RESPONSIBILITY FOR HIRING DECISIONS

Open Jobs Ltd does not control employer hiring decisions.

Employers remain responsible for:

- recruitment decisions;

- interviews;
- candidate selection;
- employment offers;
- sponsorship decisions;
- workforce requirements.

Open Nurses® cannot guarantee outcomes arising from employer decisions.

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## 8. OPTIONAL PROFESSIONAL SERVICES

Where Open Jobs Ltd offers separate professional services, such services shall be clearly identified before purchase.

Examples may include:

- professional registration support;
- document review services;
- training programmes;
- educational services;
- career advisory services;
- immigration support services provided through authorised arrangements.

Such services are separate from job-finding activities and shall be governed by their own terms where applicable.

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## 9. THIRD-PARTY CHARGES

Candidates may incur costs payable to third parties, including:

- professional registration bodies;

- educational institutions;
- examination providers;
- visa authorities;
- government agencies;
- training providers.

Such charges are not recruitment fees charged by Open Jobs Ltd.

Open Jobs Ltd is not responsible for fees imposed by third parties.

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## 10. REPORTING CONCERNS

Candidates who believe they have been improperly charged, misled or subjected to unethical recruitment practices may contact Open Jobs Ltd.

Reports may include concerns relating to:

- unauthorised fees;
- fraudulent activity;
- misleading representations;
- unethical recruitment practices;
- misuse of Platform services.

Open Jobs Ltd may investigate such concerns in accordance with applicable policies.

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## 11. COMPLIANCE COMMITMENT

Open Jobs Ltd is committed to operating Open Nurses® in accordance with applicable laws, ethical recruitment principles and workforce protection standards.

Open Jobs Ltd opposes:

- worker exploitation;
  - recruitment fee abuse;
  - forced labour;
  - deceptive recruitment practices;
  - unlawful discrimination;
  - unethical workforce practices.
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## 12. CHANGES TO THIS POLICY

Open Jobs Ltd may amend this Policy from time to time to reflect:

- legal developments;
- regulatory guidance;
- operational improvements;
- service developments.

Updated versions may be published through Open Nurses® and related services.

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## 13. CONTACT INFORMATION

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

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## 14. FINAL STATEMENT

Open Nurses® believes that access to employment opportunities should be fair, transparent and ethical.

Candidates are never required to pay Open Jobs Ltd recruitment fees or work-finding fees in order to apply for jobs through Open Nurses®.

Optional subscriptions and professional services are entirely separate from recruitment outcomes and do not influence employer hiring decisions.

This Work-Seeker Fee Statement forms part of the Open Nurses® Legal Framework and shall be interpreted in accordance with applicable laws and the Open Nurses® Terms of Service.

### **POLICY 3 — EMPLOYMENT AGENCY COMPLIANCE STATEMENT**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

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## 1. PURPOSE

This Employment Agency Compliance Statement explains the operating model of Open Nurses®, the role of Open Jobs Ltd, and our commitment to conducting business in accordance with applicable recruitment, employment, data protection, consumer protection and workforce-related laws.

This Policy applies to:

- Candidates;

- Employers;
- Consultants;
- Partners;
- Subscribers;
- Users of Open Nurses®.

This Policy should be read together with:

- Volume 1 — Master Terms of Service;
- Volume 2 — Employer Subscription and Recruitment Services Agreement;
- Volume 3 — Candidate Terms and Subscription Terms;
- Volume 4 — Privacy, Cookies, Data Governance and Information Security Policy;
- Volume 5 — Consultant, Partner and Commercial Services Agreement;
- Volume 6 — Trust, Payments, Complaints and Enforcement Framework.

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## 2. ABOUT OPEN NURSES®

Open Nurses® is a healthcare workforce platform operated by Open Jobs Ltd.

The Platform may provide services including:

- job advertising;
- Candidate discovery;
- Employer subscriptions;
- recruitment support;
- consultant-supported recruitment;

- workforce solutions;
- professional networking;
- healthcare career services;
- workforce technology services.

Service availability may vary by location, service category and commercial arrangement.

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### 3. OPERATING MODEL

Open Nurses® may operate through one or more service models including:

#### Platform Services

Providing technology tools that allow Employers and Candidates to connect.

#### Recruitment Services

Providing recruitment support and Candidate introduction services to Employers.

#### Workforce Solutions

Providing workforce-related services, sourcing support and recruitment administration.

#### Consultant Services

Providing Consultant-assisted recruitment and business development support.

Different services may be subject to different legal and contractual arrangements.

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### 4. EMPLOYER RESPONSIBILITIES

Employers remain solely responsible for:

- recruitment decisions;
- interviews;

- candidate assessments;
- employment contracts;
- sponsorship compliance;
- right-to-work checks;
- onboarding processes;
- employment law compliance;
- workforce management.

Open Jobs Ltd does not become the employer of Candidates unless expressly stated in a separate written agreement.

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## 5. CANDIDATE PROTECTION PRINCIPLES

Open Jobs Ltd supports fair and ethical recruitment practices.

Candidates shall not be required to pay Open Jobs Ltd recruitment fees or work-finding fees in order to obtain employment opportunities through Open Nurses®.

Open Jobs Ltd does not sell employment opportunities and does not guarantee employment outcomes.

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## 6. RECRUITMENT SERVICES

Where recruitment services are provided, Open Jobs Ltd may:

- source Candidates;
- facilitate introductions;
- coordinate communications;
- support recruitment administration;

- assist workforce planning activities;
- provide Employer recruitment support.

Employers remain responsible for hiring decisions.

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## 7. CANDIDATE INTRODUCTIONS

Candidate introductions may occur through:

- applications;
- profile visibility;
- Consultant referrals;
- sourcing activities;
- recruitment campaigns;
- direct submissions.

Introductions may create commercial obligations between Open Jobs Ltd and Employers under applicable agreements.

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## 8. CONSULTANT AND PARTNER NETWORK

Open Jobs Ltd may engage:

- Consultants;
- referral partners;
- sourcing specialists;
- workforce advisers;
- business development representatives;

- commercial partners.

Such persons operate subject to contractual controls and compliance requirements.

Unless expressly authorised, Consultants may not bind Open Jobs Ltd contractually.

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## 9. FAIR RECRUITMENT COMMITMENT

Open Jobs Ltd is committed to:

- transparency;
- fairness;
- equality of opportunity;
- lawful recruitment;
- professional conduct;
- workforce protection;
- anti-discrimination principles.

Open Jobs Ltd opposes exploitative and deceptive recruitment practices.

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## 10. SPONSORSHIP AND IMMIGRATION MATTERS

Where vacancies reference sponsorship or immigration opportunities:

- Employers remain responsible for sponsorship compliance;
- immigration decisions remain with relevant authorities;
- Open Jobs Ltd cannot guarantee visa approvals;
- Open Jobs Ltd cannot guarantee sponsorship availability.

Candidates should independently verify immigration requirements where appropriate.

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## 11. DATA PROTECTION AND CONFIDENTIALITY

Personal Data processed through Open Nurses® shall be handled in accordance with:

- applicable Data Protection Laws;
- Volume 4 of the Open Nurses® Legal Framework;
- applicable privacy notices;
- contractual obligations.

Employers remain independently responsible for their own handling of Candidate information.

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## 12. COMPLAINTS AND REPORTING CONCERNS

Users may report concerns relating to:

- recruitment practices;
- misleading information;
- discrimination;
- fraud;
- compliance concerns;
- unethical conduct.

Open Jobs Ltd may investigate concerns in accordance with applicable policies.

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## 13. REGULATORY COOPERATION

Open Jobs Ltd may cooperate with:

- regulatory authorities;
- government bodies;
- law enforcement agencies;
- courts and tribunals;
- professional regulators;

where required by law or reasonably necessary for compliance purposes.

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#### 14. CONTINUOUS COMPLIANCE

Open Jobs Ltd seeks to maintain policies, procedures and operational controls designed to support ongoing legal and regulatory compliance.

Compliance programmes may evolve over time in response to:

- legislative developments;
- regulatory guidance;
- operational improvements;
- industry standards.

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#### 15. CHANGES TO THIS POLICY

Open Jobs Ltd may amend this Policy from time to time.

Updated versions may be published through Open Nurses® and related services.

Continued use of services following publication may constitute acceptance where permitted by law.

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## 16. CONTACT INFORMATION

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

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## 17. FINAL STATEMENT

Open Nurses® is committed to operating as a responsible healthcare workforce platform and recruitment services provider.

Open Jobs Ltd seeks to support Employers, Candidates and workforce partners through transparent, ethical and legally compliant recruitment practices while maintaining the integrity, security and trustworthiness of the Open Nurses® ecosystem.

This Employment Agency Compliance Statement forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable agreements, policies and legal obligations.

### **POLICY 4 — AI AND AUTOMATED TOOLS NOTICE**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

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## 1. PURPOSE

This AI and Automated Tools Notice explains how Open Jobs Ltd may use Artificial Intelligence (“AI”), machine learning, automated systems, algorithms and related technologies within Open Nurses®.

This Notice promotes transparency regarding the use of automated technologies and should be read together with:

- Volume 1 — Master Terms of Service;
- Volume 3 — Candidate Terms and Subscription Terms;
- Volume 4 — Privacy, Cookies, Data Governance and Information Security Policy;
- applicable Privacy Notices and Platform Policies.

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## 2. COMMITMENT TO RESPONSIBLE AI

Open Jobs Ltd is committed to the responsible, lawful and ethical use of Artificial Intelligence technologies.

AI systems used by Open Nurses® are intended to:

- improve user experience;
- enhance service delivery;
- support recruitment activities;
- improve platform efficiency;
- assist workforce matching;
- strengthen security and fraud prevention.

Open Jobs Ltd seeks to implement appropriate safeguards when deploying AI technologies.

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### 3. TYPES OF AI AND AUTOMATED TOOLS

Open Nurses® may utilise technologies including:

- machine learning systems;
- recommendation engines;
- search optimisation systems;
- automated matching systems;
- fraud detection tools;
- cybersecurity monitoring systems;
- analytics systems;
- communication support tools;
- customer support technologies;
- content recommendation systems.

The technologies used may change over time.

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### 4. RECRUITMENT MATCHING TOOLS

AI systems may assist with:

- matching Candidates to opportunities;
- recommending vacancies;
- recommending Candidates to Employers;
- identifying relevant qualifications;
- highlighting skills and experience;
- improving search relevance.

These tools are intended to assist recruitment activities and do not guarantee employment outcomes.

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## 5. EMPLOYER DECISION-MAKING

Open Jobs Ltd does not control employer hiring decisions.

Employers remain responsible for:

- interviews;
- candidate assessments;
- hiring decisions;
- employment offers;
- sponsorship decisions;
- workforce planning.

AI tools provided through Open Nurses® do not replace employer decision-making.

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## 6. NO GUARANTEE OF OUTCOMES

Use of AI technologies does not guarantee:

- employment;
- interviews;
- sponsorship opportunities;
- applications being reviewed;
- placement outcomes;
- workforce availability.

AI recommendations are informational and supportive only.

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## 7. AUTOMATED PROCESSING

Open Jobs Ltd may use automated systems to:

- process applications;
- improve search functionality;
- identify suspicious activity;
- verify information;
- support account administration;
- improve operational efficiency.

Automated processing may occur with or without human intervention depending upon the nature of the activity.

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## 8. FRAUD PREVENTION AND SECURITY

AI and automated tools may be used to:

- detect fraud;
- identify unusual activity;
- prevent abuse;
- strengthen cybersecurity;
- protect User Accounts;
- maintain Platform integrity.

Security-related processing may occur where legally permitted and necessary for operational

protection.

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## 9. HUMAN OVERSIGHT

Open Jobs Ltd may implement human oversight for significant operational decisions where appropriate.

Human review may be applied to:

- complaints;
- account restrictions;
- fraud investigations;
- enforcement actions;
- compliance reviews.

The level of human involvement may vary depending upon circumstances.

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## 10. DATA USED BY AI SYSTEMS

AI systems may process information including:

- profile information;
- application information;
- skills and qualifications;
- usage information;
- communication records;
- technical information;
- account information.

Processing shall occur in accordance with applicable Data Protection Laws and the Open Nurses® Privacy Framework.

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## 11. FAIRNESS AND NON-DISCRIMINATION

Open Jobs Ltd seeks to design and operate AI systems in a manner that supports:

- fairness;
- transparency;
- accountability;
- equal opportunity;
- non-discrimination.

Open Jobs Ltd may periodically review systems to identify and reduce unintended bias where reasonably practicable.

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## 12. SYSTEM IMPROVEMENT

AI systems may be used to:

- improve platform functionality;
- improve recruitment services;
- improve user experience;
- improve service recommendations;
- enhance operational performance.

Open Jobs Ltd may continue developing AI capabilities as technology evolves.

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## 13. THIRD-PARTY AI SERVICES

Certain AI functions may be provided through authorised third-party technology providers.

Such providers may operate under separate contractual, privacy and security arrangements.

Open Jobs Ltd may implement appropriate safeguards when engaging third-party providers.

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#### 14. USER RIGHTS

Where applicable law provides rights relating to automated processing, Users may submit requests in accordance with Open Nurses® privacy procedures.

Requests may be subject to legal, operational and security limitations.

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#### 15. LIMITATIONS OF AI SYSTEMS

AI technologies are not perfect and may:

- produce inaccurate recommendations;
- generate incomplete results;
- fail to identify relevant opportunities;
- require human review.

Users should exercise independent judgement when relying upon AI-assisted outputs.

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#### 16. CHANGES TO AI TECHNOLOGIES

Open Jobs Ltd reserves the right to:

- introduce new AI systems;
- modify AI functionality;
- discontinue AI tools;

- replace technology providers;
- enhance automated services.

Changes may occur without prior notice where operationally necessary.

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## 17. CONTACT INFORMATION

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

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## 18. FINAL STATEMENT

Open Jobs Ltd believes that Artificial Intelligence should be used responsibly, transparently and in a manner that supports Users while preserving fairness, privacy and accountability.

AI technologies within Open Nurses® are designed to support recruitment, workforce development, security and service delivery, while Employers remain responsible for hiring decisions and Users remain responsible for their own professional and employment choices.

This AI and Automated Tools Notice forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Open Nurses® policies and agreements.

### **POLICY 5 — SAFEGUARDING AND PROTECTION POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

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## 1. PURPOSE

Open Nurses® is committed to promoting the safety, wellbeing, dignity and protection of all individuals who interact with the Platform and associated services.

This Safeguarding and Protection Policy establishes the principles, responsibilities and procedures designed to support the prevention, identification, reporting and management of safeguarding concerns.

This Policy applies to:

- Candidates;
- Employers;
- Consultants;
- Partners;
- Subscribers;
- Users;
- Contractors;
- Visitors interacting with Open Nurses® services.

This Policy forms part of the Open Nurses® Legal Framework and should be read together with all applicable Terms, Policies and Agreements.

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## 2. SAFEGUARDING COMMITMENT

Open Jobs Ltd is committed to creating and maintaining an environment that promotes:

- safety;
- dignity;
- respect;
- equality;
- wellbeing;
- lawful conduct;
- protection from harm.

Open Jobs Ltd seeks to take reasonable steps to support safeguarding and protection within the scope of its services.

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### 3. SAFEGUARDING PRINCIPLES

Open Nurses® operates according to the following safeguarding principles:

#### 3.1 Safety First

The welfare and protection of individuals shall be a primary consideration when safeguarding concerns arise.

#### 3.2 Respect and Dignity

All individuals should be treated fairly, respectfully and without discrimination.

#### 3.3 Prevention

Open Jobs Ltd supports proactive measures designed to reduce safeguarding risks and prevent harm.

#### 3.4 Accountability

Users remain responsible for their conduct and compliance with applicable safeguarding obligations.

### 3.5 Reporting and Action

Safeguarding concerns should be reported promptly and addressed appropriately.

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## 4. SCOPE OF PROTECTION

This Policy may apply to concerns involving:

- healthcare professionals;
  - healthcare students;
  - Candidates;
  - Employers;
  - Consultants;
  - vulnerable adults;
  - children and young people;
  - service users;
  - patients;
  - members of the public.
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## 5. TYPES OF SAFEGUARDING CONCERNS

Safeguarding concerns may include:

- physical abuse;
- emotional abuse;
- psychological abuse;
- sexual abuse;

- neglect;
- financial abuse;
- discriminatory abuse;
- bullying;
- harassment;
- coercion;
- exploitation;
- modern slavery;
- human trafficking;
- domestic abuse;
- online abuse;
- intimidation;
- inappropriate professional conduct.

This list is not exhaustive.

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## 6. USER RESPONSIBILITIES

All Users are expected to:

- act responsibly;
- respect the rights of others;
- maintain professional standards;
- avoid harmful conduct;

- comply with applicable laws;
- report safeguarding concerns where appropriate.

Users must not knowingly engage in behaviour that places others at risk.

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## 7. EMPLOYER RESPONSIBILITIES

Employers using Open Nurses® remain responsible for:

- workplace safeguarding;
- employee wellbeing;
- patient safety;
- workforce supervision;
- regulatory compliance;
- safeguarding training requirements;
- appropriate workplace policies.

Open Jobs Ltd does not assume responsibility for an Employer's internal safeguarding obligations.

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## 8. CONSULTANT AND PARTNER RESPONSIBILITIES

Consultants and Partners associated with Open Nurses® are expected to:

- comply with safeguarding principles;
- act professionally;
- report concerns appropriately;
- cooperate with safeguarding investigations where required.

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## 9. REPORTING SAFEGUARDING CONCERNS

Users should report safeguarding concerns as soon as reasonably possible.

Reports may relate to:

- suspected abuse;
- exploitation;
- safety concerns;
- professional misconduct;
- inappropriate behaviour;
- unlawful conduct.

Reports should include relevant information where available.

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## 10. SAFEGUARDING INVESTIGATIONS

Where a safeguarding concern is reported, Open Jobs Ltd may:

- assess available information;
- request additional information;
- review communications;
- review account activity;
- conduct internal investigations;
- cooperate with relevant authorities.

Investigations shall be conducted in a manner considered appropriate to the circumstances.

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## 11. EMERGENCY ACTIONS

Where Open Jobs Ltd reasonably believes that an immediate risk exists, it may take urgent action including:

- restricting access;
- suspending accounts;
- limiting Platform functionality;
- preserving records;
- escalating concerns to relevant authorities.

Such actions may occur without prior notice where necessary.

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## 12. CONFIDENTIALITY

Safeguarding information shall be handled sensitively and in accordance with applicable legal obligations.

Information may be disclosed where:

- necessary to protect individuals;
- legally required;
- required by regulators;
- required by law enforcement agencies;
- necessary for safeguarding investigations.

Absolute confidentiality cannot be guaranteed where safety concerns exist.

---

## 13. DATA PROTECTION

Safeguarding-related information may be processed in accordance with:

- applicable Data Protection Laws;
- Volume 4 of the Open Nurses® Legal Framework;
- privacy obligations;
- safeguarding requirements.

---

#### 14. REGULATORY AND LAW ENFORCEMENT COOPERATION

Open Jobs Ltd may cooperate with:

- safeguarding authorities;
- healthcare regulators;
- local authorities;
- law enforcement agencies;
- government departments;
- professional bodies;

where reasonably necessary or legally required.

---

#### 15. ACCOUNT ACTIONS

Open Jobs Ltd may take enforcement action where safeguarding concerns arise.

Actions may include:

- warnings;
- account restrictions;
- suspension;

- termination;
- reporting concerns to appropriate bodies.

The nature of any action shall depend upon the circumstances.

---

## 16. FALSE OR MALICIOUS REPORTS

Users must not knowingly submit false, misleading or malicious safeguarding reports.

Open Jobs Ltd may investigate misuse of safeguarding procedures and may take appropriate action.

---

## 17. TRAINING AND AWARENESS

Open Jobs Ltd may provide guidance, educational materials or awareness initiatives relating to safeguarding and protection.

Such resources may be updated periodically.

---

## 18. POLICY REVIEW

This Policy may be reviewed and updated periodically to reflect:

- legal developments;
- safeguarding best practice;
- operational requirements;
- service developments.

Updated versions may be published through Open Nurses®.

---

## 19. CONTACT INFORMATION

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## 20. FINAL STATEMENT

Open Nurses® is committed to supporting a safe, respectful and responsible environment for all Users.

Open Jobs Ltd recognises the importance of safeguarding and seeks to promote protection, accountability, wellbeing and professional conduct throughout its services and operations.

This Safeguarding and Protection Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

### **POLICY 6 — MODERN SLAVERY AND ETHICAL RECRUITMENT POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## 1. PURPOSE

Open Jobs Ltd is committed to conducting business ethically, responsibly and transparently.

This Modern Slavery and Ethical Recruitment Policy sets out Open Nurses®'s commitment to preventing modern slavery, human trafficking, forced labour, debt bondage, servitude, worker exploitation and unethical recruitment practices.

This Policy applies to:

- Candidates;
- Employers;
- Consultants;
- Recruitment Partners;
- Service Providers;
- Contractors;
- Suppliers;
- Users of Open Nurses®.

This Policy forms part of the Open Nurses® Legal Framework and should be read together with all applicable Terms, Policies and Agreements.

---

## 2. COMMITMENT TO ETHICAL RECRUITMENT

Open Jobs Ltd operates a zero-tolerance approach to:

- modern slavery;
- forced labour;
- involuntary labour;
- debt bondage;
- servitude;

- human trafficking;
- labour exploitation;
- coercive recruitment practices.

Open Jobs Ltd seeks to maintain recruitment practices that respect human rights, dignity, freedom and equality.

---

### 3. ETHICAL RECRUITMENT PRINCIPLES

Open Nurses® supports recruitment practices based upon:

#### 3.1 Transparency

Recruitment information should be accurate, honest and clearly communicated.

#### 3.2 Voluntary Employment

Employment must be entered into freely and voluntarily.

#### 3.3 Fair Treatment

Workers should be treated fairly and respectfully.

#### 3.4 Lawful Recruitment

Recruitment activities must comply with applicable laws and regulations.

#### 3.5 Protection of Workers

Workers should be protected from exploitation, abuse and unfair treatment.

---

### 4. PROHIBITED PRACTICES

Open Jobs Ltd opposes and prohibits involvement in practices including:

- forced labour;

- human trafficking;
  - slavery;
  - servitude;
  - debt bondage;
  - worker coercion;
  - threats or intimidation;
  - unlawful withholding of wages;
  - unlawful restrictions on movement;
  - exploitation of vulnerable individuals;
  - deceptive recruitment practices.
- 

## 5. NO RECRUITMENT FEES TO WORK-SEEKERS

Open Nurses® does not charge Candidates recruitment fees or work-finding fees for obtaining employment opportunities.

Open Jobs Ltd supports ethical recruitment principles that seek to prevent worker exploitation through inappropriate recruitment charging practices.

Optional subscription services remain separate from recruitment outcomes and do not constitute work-finding fees.

---

## 6. PASSPORTS, IDENTIFICATION DOCUMENTS AND PERSONAL PROPERTY

Open Jobs Ltd opposes the unlawful retention, confiscation or withholding of:

- passports;
- immigration documents;

- identity documents;
- personal property;
- professional registration documents.

Employers and Partners are expected to respect the rights of workers regarding their personal documentation.

---

## 7. EMPLOYER RESPONSIBILITIES

Employers using Open Nurses® are expected to:

- comply with applicable employment laws;
- maintain ethical recruitment practices;
- provide lawful working conditions;
- avoid exploitative conduct;
- treat workers fairly;
- respect human rights;
- support workforce wellbeing.

Employers remain responsible for their own employment practices.

---

## 8. CONSULTANT RESPONSIBILITIES

Consultants and Partners must:

- act honestly;
- avoid misleading conduct;
- support ethical recruitment;

- report concerns;
- comply with applicable laws and Open Nurses® policies.

Consultants must not participate in practices that facilitate worker exploitation.

---

## 9. SUPPLIER AND PARTNER EXPECTATIONS

Open Jobs Ltd expects suppliers, service providers and business partners to:

- operate ethically;
- comply with applicable laws;
- oppose modern slavery;
- implement reasonable compliance measures;
- cooperate with legitimate investigations.

Open Jobs Ltd may review relationships where concerns arise.

---

## 10. IDENTIFYING RISK

Potential indicators of modern slavery or exploitation may include:

- restricted freedom of movement;
- threats or intimidation;
- excessive recruitment debts;
- withholding of documents;
- exploitative living conditions;
- coercive employment arrangements;
- suspicious recruitment activity.

The presence of indicators does not automatically establish wrongdoing but may warrant further review.

---

## 11. REPORTING CONCERNS

Users are encouraged to report concerns relating to:

- modern slavery;
- labour exploitation;
- human trafficking;
- coercive recruitment;
- unethical recruitment practices.

Reports should be submitted as soon as reasonably possible.

---

## 12. INVESTIGATIONS

Open Jobs Ltd may:

- assess concerns;
- review available evidence;
- request information;
- conduct internal reviews;
- cooperate with authorities;
- take appropriate action.

Investigations may be conducted confidentially where appropriate.

---

### 13. ACCOUNT RESTRICTIONS AND ENFORCEMENT

Where concerns arise, Open Jobs Ltd may:

- issue warnings;
- request compliance information;
- restrict services;
- suspend accounts;
- terminate access;
- discontinue business relationships.

The nature of any action shall depend upon the circumstances.

---

### 14. REGULATORY COOPERATION

Open Jobs Ltd may cooperate with:

- law enforcement agencies;
- regulatory authorities;
- government departments;
- labour market authorities;
- professional regulators;
- safeguarding authorities;

where required by law or reasonably necessary.

---

### 15. TRAINING AND AWARENESS

Open Jobs Ltd may provide information, guidance or awareness materials designed to support ethical recruitment and the prevention of modern slavery.

Training initiatives may be introduced or updated periodically.

---

## 16. DATA PROTECTION

Information relating to investigations or reports may be processed in accordance with:

- applicable Data Protection Laws;
- Privacy Policies;
- safeguarding requirements;
- legal obligations.

---

## 17. NON-RETALIATION

Open Jobs Ltd seeks to ensure that individuals who raise concerns in good faith are not subjected to retaliation through Open Nurses® services.

This protection does not apply to knowingly false or malicious reports.

---

## 18. POLICY REVIEW

This Policy may be reviewed and updated periodically to reflect:

- legislative developments;
- regulatory guidance;
- industry best practice;
- operational requirements.

Updated versions may be published through Open Nurses®.

---

## 19. CONTACT INFORMATION

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## 20. FINAL STATEMENT

Open Jobs Ltd is committed to promoting ethical recruitment and opposing all forms of modern slavery, human trafficking, forced labour and worker exploitation.

Open Nurses® seeks to maintain recruitment practices that respect human rights, dignity, equality, freedom and professional integrity.

This Modern Slavery and Ethical Recruitment Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

### **POLICY 7 — ACCESSIBILITY STATEMENT**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## 1. PURPOSE

Open Jobs Ltd is committed to making Open Nurses® accessible, inclusive and usable for all individuals, regardless of ability, disability, age, technology or circumstances.

This Accessibility Statement explains our commitment to improving accessibility across our websites, applications, digital services and associated platforms.

This Statement applies to:

- Candidates;
- Employers;
- Consultants;
- Partners;
- Subscribers;
- Visitors;
- Users of Open Nurses®.

This Statement forms part of the Open Nurses® Legal Framework and should be read together with applicable Terms, Policies and Privacy Notices.

---

## 2. ACCESSIBILITY COMMITMENT

Open Jobs Ltd believes that everyone should be able to access information, opportunities and services provided through Open Nurses®.

We are committed to:

- promoting digital inclusion;
- reducing accessibility barriers;
- improving user experience;

- supporting assistive technologies;
- continuously enhancing accessibility standards.

---

### 3. ACCESSIBILITY OBJECTIVES

Open Nurses® seeks to provide services that are:

- understandable;
- perceivable;
- operable;
- robust;
- inclusive;
- user-friendly.

Accessibility improvements may be implemented as technology and services evolve.

---

### 4. ACCESSIBILITY FEATURES

Open Nurses® may support features including:

- keyboard navigation;
- scalable text;
- responsive design;
- screen reader compatibility;
- alternative text where appropriate;
- accessible forms;
- colour contrast considerations;

- mobile accessibility support.

Availability may vary across different services and technologies.

---

## 5. ASSISTIVE TECHNOLOGIES

Open Nurses® aims to support commonly used assistive technologies including:

- screen readers;
- voice recognition software;
- keyboard-only navigation tools;
- screen magnification software;
- accessibility extensions and plugins.

Compatibility may depend on user devices, browsers and third-party technologies.

---

## 6. ACCESSIBILITY STANDARDS

Open Jobs Ltd seeks, where reasonably practicable, to align accessibility improvements with recognised accessibility principles and industry best practices.

Accessibility standards and implementation approaches may evolve over time.

---

## 7. CONTINUOUS IMPROVEMENT

Accessibility is an ongoing process.

Open Jobs Ltd may:

- review accessibility performance;
- identify barriers;

- implement improvements;
- update accessibility features;
- enhance user experience.

Not all improvements can be implemented immediately, but accessibility considerations form part of ongoing development activities.

---

## 8. THIRD-PARTY CONTENT AND SERVICES

Open Nurses® may incorporate third-party services, integrations, applications or content.

While Open Jobs Ltd seeks to work with reputable providers, it cannot guarantee the accessibility of independent third-party systems outside its direct control.

---

## 9. ACCESSIBILITY FEEDBACK

Users are encouraged to provide feedback regarding accessibility issues, barriers or suggestions for improvement.

Feedback may include:

- technical accessibility concerns;
- navigation difficulties;
- content accessibility issues;
- compatibility concerns;
- requests for assistance.

Open Jobs Ltd values accessibility feedback and may use it to improve services.

---

## 10. ALTERNATIVE COMMUNICATION METHODS

Where reasonably practicable, Open Jobs Ltd may consider alternative methods of communication or assistance for Users experiencing accessibility difficulties.

Availability may depend upon:

- operational capabilities;
  - technical limitations;
  - legal requirements;
  - the nature of the request.
- 

## 11. REASONABLE ADJUSTMENTS

Open Jobs Ltd may consider reasonable accessibility-related requests where appropriate and practicable.

Requests shall be assessed on a case-by-case basis taking into account:

- operational requirements;
  - technical feasibility;
  - legal obligations;
  - available resources.
- 

## 12. ACCESSIBILITY LIMITATIONS

Despite ongoing efforts, certain areas of Open Nurses® may not yet achieve full accessibility.

Examples may include:

- legacy content;
- third-party systems;

- externally supplied materials;
- archived information.

Open Jobs Ltd aims to address accessibility issues where reasonably practicable.

---

### 13. REPORTING ACCESSIBILITY ISSUES

Users who encounter accessibility barriers are encouraged to contact Open Jobs Ltd.

Reports should include:

- a description of the issue;
- the affected page or feature;
- device and browser information where available;
- any relevant supporting information.

Providing detailed information may assist investigation and resolution.

---

### 14. INVESTIGATION OF ACCESSIBILITY CONCERNS

Open Jobs Ltd may:

- review reported concerns;
- assess technical issues;
- seek further information;
- implement corrective measures where appropriate.

Resolution times may vary depending on the complexity of the issue.

---

### 15. ACCESSIBILITY AND DATA PROTECTION

Information submitted in connection with accessibility requests may be processed in accordance with:

- applicable Data Protection Laws;
- Privacy Policies;
- legal obligations.

---

## 16. POLICY REVIEW

This Accessibility Statement may be reviewed and updated periodically to reflect:

- technological developments;
- accessibility improvements;
- legal requirements;
- operational changes.

Updated versions may be published through Open Nurses®.

---

## 17. CONTACT INFORMATION

Open Nurses®  
Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## 18. NO GUARANTEE OF UNIVERSAL ACCESSIBILITY

While Open Jobs Ltd seeks to improve accessibility continuously, it cannot guarantee that every feature, page, device, browser or third-party service will be fully accessible at all times.

Accessibility improvements remain an ongoing objective.

---

## 19. COMMITMENT TO INCLUSION

Open Jobs Ltd values diversity and inclusion and seeks to ensure that Open Nurses® remains accessible to the broadest possible community of Users.

Accessibility forms an important part of our commitment to fairness, equality and opportunity.

---

## 20. FINAL STATEMENT

Open Nurses® is committed to creating a digital environment that supports accessibility, inclusion and equal access to opportunities.

Open Jobs Ltd will continue working to improve accessibility across its services and welcomes feedback that helps achieve this goal.

This Accessibility Statement forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

### **POLICY 8 — EMPLOYER CODE OF CONDUCT**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## 1. PURPOSE

This Employer Code of Conduct establishes the standards of behaviour, professionalism, integrity and compliance expected from Employers using Open Nurses®.

The purpose of this Code is to promote:

- fair recruitment;
- ethical hiring;
- professional conduct;
- lawful employment practices;
- candidate protection;
- workforce integrity;
- platform trust and safety.

This Code applies to all Employers, hiring organisations, recruitment teams, authorised users, representatives and associated entities using Open Nurses®.

---

## 2. COMMITMENT TO PROFESSIONAL STANDARDS

Employers shall conduct recruitment and workforce activities in a manner that is:

- lawful;
- professional;
- ethical;
- respectful;
- transparent;
- accountable.

Employers are expected to maintain standards that protect Candidates, service users, workers

and the reputation of Open Nurses®.

---

### 3. COMPLIANCE WITH LAWS

Employers must comply with all applicable laws, regulations and professional obligations relating to:

- recruitment;
- employment;
- equality;
- immigration;
- sponsorship;
- health and safety;
- safeguarding;
- data protection;
- anti-discrimination requirements.

Employers remain solely responsible for their legal obligations.

---

### 4. HONESTY AND ACCURACY

Employers must ensure that information provided through Open Nurses® is accurate, truthful and not misleading.

This includes:

- company information;
- vacancy details;
- employment terms;

- salary information;
- sponsorship information;
- workplace information.

Misleading or deceptive information is prohibited.

---

## 5. FAIR RECRUITMENT PRACTICES

Employers shall:

- recruit fairly;
- assess Candidates objectively;
- avoid discriminatory conduct;
- communicate professionally;
- provide accurate information during recruitment processes.

Employers should promote equal opportunity wherever reasonably practicable.

---

## 6. CANDIDATE RESPECT AND DIGNITY

Employers shall treat Candidates with dignity, fairness and respect throughout all recruitment and employment processes.

Employers must not engage in:

- harassment;
- bullying;
- intimidation;
- abusive conduct;

- discriminatory behaviour;
  - exploitative practices.
- 

## 7. SPONSORSHIP AND IMMIGRATION COMPLIANCE

Where sponsorship opportunities are advertised, Employers must:

- hold appropriate authorisations where required;
- comply with applicable immigration requirements;
- provide accurate sponsorship information;
- avoid misleading immigration-related representations.

Open Jobs Ltd does not assume responsibility for Employer sponsorship compliance.

---

## 8. DATA PROTECTION AND CONFIDENTIALITY

Employers shall:

- protect Candidate information;
- maintain confidentiality;
- process Personal Data lawfully;
- comply with applicable Data Protection Laws.

Candidate information obtained through Open Nurses® must only be used for legitimate recruitment and workforce purposes.

---

## 9. USE OF CANDIDATE INFORMATION

Employers must not:

- sell Candidate information;
  - transfer Candidate information without lawful authority;
  - misuse Candidate data;
  - create unauthorised databases from Candidate information;
  - use Candidate information for unrelated purposes.
- 

## 10. SAFEGUARDING RESPONSIBILITIES

Employers are expected to maintain safeguarding standards appropriate to their operations.

This may include:

- safeguarding policies;
- reporting procedures;
- workforce protection measures;
- patient safety obligations;
- service user protection measures.

Employers remain responsible for their own safeguarding arrangements.

---

## 11. MODERN SLAVERY AND ETHICAL RECRUITMENT

Employers shall support ethical recruitment practices and must not participate in:

- modern slavery;
- human trafficking;
- forced labour;

- debt bondage;
- worker exploitation;
- coercive employment practices.

Employers are expected to uphold fair and ethical workforce practices.

---

## 12. PROFESSIONAL COMMUNICATIONS

Employers shall communicate professionally with:

- Candidates;
- Consultants;
- Open Jobs Ltd personnel;
- Platform Users.

Communications must be respectful, lawful and appropriate.

---

## 13. PLATFORM INTEGRITY

Employers shall use Open Nurses® responsibly and must not:

- misuse Platform functionality;
- interfere with services;
- circumvent agreed fees;
- create false vacancies;
- manipulate recruitment activity;
- engage in fraudulent conduct.

---

#### 14. PAYMENT OBLIGATIONS

Employers remain responsible for satisfying:

- subscription charges;
- recruitment fees;
- service charges;
- contractual payment obligations.

Employers must not intentionally avoid legitimate commercial obligations.

---

#### 15. COOPERATION WITH INVESTIGATIONS

Employers agree to cooperate with reasonable requests relating to:

- complaints;
- investigations;
- compliance reviews;
- safeguarding concerns;
- fraud prevention activities.

Failure to cooperate may result in enforcement action.

---

#### 16. REPORTING CONCERNS

Employers are encouraged to report concerns relating to:

- fraud;
- misuse of services;

- safeguarding issues;
- unethical conduct;
- security concerns;
- compliance matters.

Reports may be investigated in accordance with Open Nurses® policies.

---

## 17. ENFORCEMENT ACTIONS

Where breaches of this Code occur, Open Jobs Ltd may:

- issue warnings;
- request corrective action;
- restrict services;
- suspend access;
- terminate accounts;
- discontinue commercial relationships.

Actions shall be determined according to the circumstances.

---

## 18. NO ENDORSEMENT

Compliance with this Code does not constitute:

- certification;
- accreditation;
- regulatory approval;
- endorsement by Open Jobs Ltd.

Employers remain independently responsible for their operations.

---

## 19. POLICY REVIEW

This Employer Code of Conduct may be reviewed and updated periodically to reflect:

- legal developments;
- operational requirements;
- industry standards;
- service improvements.

Updated versions may be published through Open Nurses®.

---

## 20. FINAL STATEMENT

Open Nurses® seeks to maintain a trusted, professional and ethical recruitment environment for healthcare professionals and workforce organisations worldwide.

Employers using Open Nurses® are expected to uphold the principles of integrity, fairness, transparency, professionalism and lawful conduct.

This Employer Code of Conduct forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

---

## CONTACT INFORMATION

Open Nurses®  
Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

## **POLICY 9 — CANDIDATE CODE OF CONDUCT**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

### **1. PURPOSE**

This Candidate Code of Conduct establishes the standards of behaviour, professionalism, honesty and integrity expected from Candidates using Open Nurses®.

The purpose of this Code is to promote:

- fair recruitment;
- professional conduct;
- truthful representation;
- respectful communication;
- platform integrity;
- user safety;
- ethical participation.

This Code applies to all Candidates, job seekers, healthcare professionals, students, subscribers and Users seeking opportunities through Open Nurses®.

This Code forms part of the Open Nurses® Legal Framework and should be read together with all applicable Terms, Policies and Agreements.

---

## 2. PROFESSIONAL CONDUCT

Candidates are expected to conduct themselves professionally when interacting with:

- Employers;
- Consultants;
- Open Jobs Ltd personnel;
- other Platform Users.

Candidates should act respectfully, responsibly and ethically at all times.

---

## 3. ACCURACY OF INFORMATION

Candidates must ensure that information submitted through Open Nurses® is:

- truthful;
- accurate;
- current;
- complete.

This includes:

- qualifications;
- registrations;
- licences;
- certifications;

- employment history;
- immigration status;
- contact information.

False or misleading information is prohibited.

---

#### 4. DOCUMENT AUTHENTICITY

Candidates must only upload genuine and lawful documents.

Examples include:

- CVs;
- certificates;
- registration documents;
- licences;
- identification documents;
- supporting materials.

Candidates must not submit forged, altered, misleading or fraudulent documentation.

---

#### 5. PROFESSIONAL REGISTRATION RESPONSIBILITIES

Candidates remain responsible for maintaining any required:

- professional registrations;
- licences;
- certifications;
- memberships;

- authorisations.

Open Jobs Ltd does not guarantee the validity or status of professional registrations.

---

## 6. IMMIGRATION AND RIGHT-TO-WORK RESPONSIBILITIES

Candidates remain solely responsible for:

- immigration compliance;
- visa status;
- work authorisation;
- right-to-work requirements;
- sponsorship eligibility.

Candidates must not knowingly provide inaccurate immigration-related information.

---

## 7. RESPECTFUL COMMUNICATION

Candidates shall communicate professionally and respectfully.

Candidates must not engage in:

- harassment;
- abusive behaviour;
- threatening conduct;
- discrimination;
- intimidation;
- offensive communications.

Professional standards apply to all Platform communications.

---

## 8. PLATFORM INTEGRITY

Candidates shall use Open Nurses® responsibly and in accordance with applicable agreements.

Candidates must not:

- manipulate Platform systems;
- interfere with services;
- create deceptive accounts;
- misuse subscriptions;
- attempt unauthorised access;
- engage in fraudulent conduct.

---

## 9. HONEST APPLICATION PRACTICES

Candidates shall submit applications honestly and in good faith.

Candidates must not:

- misrepresent qualifications;
- misrepresent employment history;
- misrepresent experience;
- misrepresent registration status;
- submit false references.

Employers rely upon the accuracy of information provided by Candidates.

---

## 10. CONFIDENTIALITY

Candidates should respect confidential information received during recruitment processes.

Confidential information should not be disclosed without lawful authority or permission.

Candidates remain responsible for protecting their own account information and credentials.

---

## 11. DATA PROTECTION AWARENESS

Candidates should exercise reasonable care when sharing:

- Personal Data;
- professional information;
- identification documents;
- confidential materials.

Candidates are encouraged to review Open Nurses® Privacy documentation before submitting information.

---

## 12. SAFEGUARDING AND USER SAFETY

Candidates shall contribute to a safe environment by:

- acting responsibly;
- respecting others;
- reporting safeguarding concerns;
- avoiding harmful conduct.

Candidates must not knowingly engage in behaviour that places others at risk.

---

### 13. MODERN SLAVERY AND ETHICAL RECRUITMENT

Candidates are encouraged to report concerns relating to:

- exploitation;
- coercion;
- trafficking;
- unethical recruitment practices;
- worker abuse.

Open Jobs Ltd supports ethical recruitment and worker protection principles.

---

### 14. REPORTING CONCERNS

Candidates are encouraged to report concerns relating to:

- fraud;
- scams;
- safeguarding issues;
- discrimination;
- security concerns;
- misuse of services.

Reports may be investigated in accordance with applicable policies.

---

### 15. COOPERATION WITH INVESTIGATIONS

Candidates agree to cooperate reasonably with:

- investigations;
- compliance reviews;
- safeguarding enquiries;
- fraud prevention activities;
- complaint reviews.

Failure to cooperate may affect Platform access.

---

## 16. ACCOUNT SECURITY

Candidates remain responsible for maintaining the security of:

- login credentials;
- authentication methods;
- devices used to access Open Nurses®.

Suspected unauthorised access should be reported promptly.

---

## 17. PROHIBITED ACTIVITIES

Candidates must not:

- impersonate another person;
- create false identities;
- submit fraudulent documents;
- misuse Candidate or Employer information;
- interfere with recruitment processes;

- engage in unlawful activity through Open Nurses®.

Violations may result in enforcement action.

---

## 18. ENFORCEMENT

Where breaches of this Code occur, Open Jobs Ltd may:

- issue warnings;
- request corrective action;
- restrict access;
- suspend accounts;
- terminate accounts;
- report concerns where legally appropriate.

Actions shall be determined according to the circumstances.

---

## 19. POLICY REVIEW

This Candidate Code of Conduct may be reviewed and updated periodically to reflect:

- legal developments;
- operational requirements;
- industry standards;
- service improvements.

Updated versions may be published through Open Nurses®.

---

## 20. FINAL STATEMENT

Open Nurses® seeks to maintain a professional, ethical and trustworthy environment for healthcare professionals and workforce users worldwide.

Candidates using Open Nurses® are expected to uphold the principles of honesty, integrity, professionalism, respect and lawful conduct.

This Candidate Code of Conduct forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

---

## CONTACT INFORMATION

Open Nurses®  
Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

## **POLICY 10 — EQUALITY, DIVERSITY AND INCLUSION POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## ARTICLE 1 — PURPOSE AND SCOPE

### 1.1 Purpose

Open Jobs Ltd is committed to promoting equality, diversity, inclusion, fairness and respect throughout Open Nurses® and all associated services.

This Equality, Diversity and Inclusion Policy establishes the principles and standards expected of all Users and supports a recruitment environment that values diversity and equal opportunity.

---

## 1.2 Scope

This Policy applies to:

- Candidates;
- Employers;
- Consultants;
- Partners;
- Subscribers;
- Contractors;
- Service Providers;
- Users of Open Nurses®.

This Policy forms part of the Open Nurses® Legal Framework and should be read together with all applicable Terms, Policies and Agreements.

---

## ARTICLE 2 — EQUALITY PRINCIPLES

### 2.1 Commitment

Open Jobs Ltd is committed to providing services in a manner that promotes:

- equality;
- inclusion;

- fairness;
  - dignity;
  - respect;
  - opportunity.
- 

## 2.2 Core Values

Open Nurses® supports an environment where individuals are treated fairly regardless of background, personal characteristics or circumstances.

---

## 2.3 Equal Opportunity

Open Jobs Ltd seeks to promote equal opportunity throughout Platform operations, recruitment activities and workforce engagement.

---

## ARTICLE 3 — PROTECTED CHARACTERISTICS

### 3.1 Respect for Individuals

Open Nurses® supports equal treatment and respect for individuals regardless of characteristics protected by applicable law.

---

### 3.2 Examples

Protected characteristics may include:

- age;
- disability;
- gender reassignment;

- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

This list may vary depending upon applicable laws and jurisdictions.

---

## ARTICLE 4 — EQUAL OPPORTUNITY COMMITMENT

### 4.1 Recruitment Activities

Open Jobs Ltd supports recruitment processes based upon:

- merit;
- qualifications;
- skills;
- competence;
- lawful requirements.

---

### 4.2 Fair Access

Open Nurses® seeks to provide fair access to opportunities and services.

---

### 4.3 Platform Participation

Users should have the opportunity to participate in Platform activities without unlawful discrimination.

---

## ARTICLE 5 — RECRUITMENT AND SELECTION STANDARDS

### 5.1 Employer Expectations

Employers using Open Nurses® are expected to:

- recruit fairly;
  - assess Candidates objectively;
  - comply with applicable equality laws;
  - avoid discriminatory practices.
- 

### 5.2 Candidate Expectations

Candidates are expected to engage professionally and respectfully throughout recruitment processes.

---

### 5.3 Consultant Expectations

Consultants shall support recruitment activities in a manner consistent with equality and inclusion principles.

---

## ARTICLE 6 — ANTI-DISCRIMINATION REQUIREMENTS

### 6.1 Prohibited Conduct

Users must not engage in unlawful discrimination, victimisation or exclusionary practices.

---

## 6.2 Examples

Examples may include discrimination based upon:

- race;
- nationality;
- ethnicity;
- disability;
- religion;
- sex;
- sexual orientation;
- age;

or other protected characteristics.

---

## 6.3 Platform Integrity

Open Jobs Ltd may take action where discriminatory conduct is identified.

---

## ARTICLE 7 — HARASSMENT, BULLYING AND INAPPROPRIATE CONDUCT

### 7.1 Respectful Behaviour

All Users shall communicate and interact respectfully.

---

### 7.2 Prohibited Behaviour

Users must not engage in:

- harassment;

- bullying;
  - intimidation;
  - abuse;
  - threatening conduct;
  - offensive behaviour.
- 

### 7.3 Investigations

Reports of inappropriate conduct may be investigated in accordance with Open Nurses® policies.

---

## ARTICLE 8 — ACCESSIBILITY AND INCLUSION

### 8.1 Inclusive Access

Open Jobs Ltd seeks to make services accessible to the widest possible range of Users.

---

### 8.2 Accessibility Support

Accessibility considerations may include:

- assistive technology support;
  - accessibility improvements;
  - inclusive design principles.
- 

### 8.3 Continuous Improvement

Accessibility and inclusion measures may be reviewed and improved over time.

---

## ARTICLE 9 — EMPLOYER RESPONSIBILITIES

### 9.1 Compliance

Employers remain responsible for complying with:

- employment laws;
- equality laws;
- workplace inclusion obligations;
- anti-discrimination requirements.

---

### 9.2 Recruitment Practices

Employers should maintain recruitment practices that are fair, transparent and inclusive.

---

## ARTICLE 10 — CANDIDATE RESPONSIBILITIES

### 10.1 Respect for Others

Candidates shall treat other Users respectfully and professionally.

---

### 10.2 Professional Conduct

Candidates should contribute positively to an inclusive recruitment environment.

---

## ARTICLE 11 — CONSULTANT RESPONSIBILITIES

### 11.1 Equal Opportunity Support

Consultants shall support equal opportunity principles throughout their activities.

---

## 11.2 Professional Standards

Consultants must avoid discriminatory conduct and support fair recruitment practices.

---

## ARTICLE 12 — REPORTING CONCERNS

### 12.1 Reporting

Users are encouraged to report concerns relating to:

- discrimination;
- harassment;
- bullying;
- victimisation;
- exclusionary conduct.

---

### 12.2 Information Required

Reports should include sufficient information to assist review and investigation.

---

## ARTICLE 13 — INVESTIGATIONS

### 13.1 Review Process

Open Jobs Ltd may:

- review concerns;
- request information;

- assess evidence;
- conduct investigations.

---

### 13.2 Cooperation

Users are expected to cooperate reasonably with investigations.

---

## ARTICLE 14 — ENFORCEMENT

### 14.1 Corrective Measures

Where breaches of this Policy occur, Open Jobs Ltd may:

- issue warnings;
- request corrective action;
- restrict services;
- suspend accounts;
- terminate access.

---

### 14.2 Proportionality

Enforcement measures shall generally reflect the seriousness of the conduct concerned.

---

## ARTICLE 15 — POLICY REVIEW

### 15.1 Review Process

This Policy may be reviewed and updated periodically to reflect:

- legal developments;
- operational requirements;
- regulatory guidance;
- industry best practice.

---

## 15.2 Publication

Updated versions may be published through Open Nurses® and associated services.

---

## CONTACT INFORMATION

Open Nurses®  
Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## FINAL STATEMENT

Open Jobs Ltd believes that equality, diversity and inclusion contribute to stronger workplaces, fairer recruitment outcomes and better opportunities for healthcare professionals worldwide.

Open Nurses® is committed to fostering an environment based upon fairness, dignity, respect, inclusion and equal opportunity for all Users.

This Equality, Diversity and Inclusion Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

## **POLICY 11 — ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## ARTICLE 1 — PURPOSE AND SCOPE

### 1.1 Purpose

Open Jobs Ltd is committed to conducting all business activities with honesty, integrity, transparency and professionalism.

This Anti-Bribery and Anti-Corruption Policy establishes the standards, responsibilities and controls designed to prevent bribery, corruption, kickbacks, improper payments and unethical business practices throughout Open Nurses® and associated services.

---

### 1.2 Scope

This Policy applies to:

- Directors;
- Officers;
- Employees;
- Consultants;
- Partners;
- Employers;

- Contractors;
- Service Providers;
- Representatives;
- Users acting on behalf of Open Jobs Ltd.

This Policy forms part of the Open Nurses® Legal Framework and should be read together with all applicable Terms, Policies and Agreements.

---

## ARTICLE 2 — ANTI-BRIBERY COMMITMENT

### 2.1 Zero-Tolerance Approach

Open Jobs Ltd maintains a zero-tolerance approach towards:

- bribery;
- corruption;
- kickbacks;
- improper payments;
- dishonest financial arrangements;
- unethical business practices.

---

### 2.2 Ethical Business Conduct

All business activities shall be conducted fairly, lawfully and transparently.

Commercial success must never be pursued through unlawful or unethical means.

---

## ARTICLE 3 — DEFINITIONS

### 3.1 Bribery

Bribery means offering, promising, giving, requesting or accepting anything of value in order to improperly influence a decision, action or business outcome.

---

### 3.2 Corruption

Corruption means the abuse of power, position or authority for personal, financial or commercial gain.

---

### 3.3 Kickback

A kickback includes any payment, reward, benefit or advantage provided in exchange for preferential treatment or business advantage.

---

## ARTICLE 4 — PROHIBITED CONDUCT

### 4.1 General Prohibition

No person subject to this Policy shall:

- offer bribes;
  - receive bribes;
  - authorise bribes;
  - facilitate bribes;
  - conceal corrupt conduct;
  - participate in corrupt arrangements.
- 

### 4.2 Examples

Prohibited conduct may include:

- secret commissions;
  - improper referral payments;
  - undeclared conflicts of interest;
  - fraudulent invoices;
  - concealed financial benefits;
  - unlawful inducements.
- 

## ARTICLE 5 — GIFTS, HOSPITALITY AND BUSINESS COURTESIES

### 5.1 General Principles

Reasonable gifts, hospitality and business courtesies may be acceptable where they are:

- lawful;
  - proportionate;
  - transparent;
  - infrequent;
  - not intended to influence decisions improperly.
- 

### 5.2 Prohibited Gifts

Gifts or hospitality must not be offered or accepted where they could reasonably be viewed as:

- a bribe;
- an inducement;
- an improper influence;

- a conflict of interest.

---

### 5.3 Disclosure Requirements

Open Jobs Ltd may require disclosure of gifts, hospitality or benefits above specified thresholds.

---

## ARTICLE 6 — FACILITATION PAYMENTS

### 6.1 Prohibition

Facilitation payments are prohibited.

No person acting on behalf of Open Jobs Ltd shall make unofficial payments intended to secure routine actions or preferential treatment.

---

### 6.2 Exception

Where personal safety is at immediate risk, individuals should prioritise safety and report the matter as soon as reasonably practicable.

---

## ARTICLE 7 — RECRUITMENT INTEGRITY

### 7.1 Recruitment Standards

Recruitment activities must be conducted fairly and ethically.

Decisions must be based upon legitimate recruitment considerations and not improper influence.

---

### 7.2 Candidate Protection

Candidates must not be asked to provide improper payments, gifts or benefits in exchange for employment opportunities.

Open Nurses® does not charge Candidates recruitment or work-finding fees for obtaining employment opportunities.

---

## ARTICLE 8 — CONSULTANT AND PARTNER CONDUCT

### 8.1 Consultant Responsibilities

Consultants and Partners shall:

- comply with this Policy;
- avoid conflicts of interest;
- disclose relevant relationships;
- act transparently.

---

### 8.2 Commission Arrangements

Commission payments must:

- be contractually authorised;
- be properly recorded;
- reflect legitimate business activity;
- comply with applicable laws.

Undisclosed commission arrangements are prohibited.

---

## ARTICLE 9 — EMPLOYER RESPONSIBILITIES

### 9.1 Employer Conduct

Employers using Open Nurses® shall not:

- offer improper benefits;
- request unlawful payments;
- engage in corrupt recruitment practices;
- provide inducements designed to bypass legitimate processes.

---

## 9.2 Commercial Relationships

Employers are expected to maintain ethical and transparent business relationships.

---

## ARTICLE 10 — FINANCIAL CONTROLS

### 10.1 Accurate Records

All financial transactions should be:

- accurately recorded;
- properly authorised;
- supported by documentation;
- maintained in accordance with applicable requirements.

---

### 10.2 False Records

False, misleading or incomplete financial records are prohibited.

---

## ARTICLE 11 — CONFLICTS OF INTEREST

## 11.1 Duty to Disclose

Individuals must disclose conflicts of interest that may affect impartial decision-making.

---

## 11.2 Examples

Conflicts may include:

- personal relationships;
  - financial interests;
  - outside business interests;
  - undisclosed commercial arrangements.
- 

## ARTICLE 12 — REPORTING CONCERNS

### 12.1 Reporting Obligations

Users are encouraged to report concerns relating to:

- bribery;
  - corruption;
  - fraud;
  - improper payments;
  - unethical conduct.
- 

### 12.2 Good Faith Reporting

Reports should be made honestly and in good faith.

---

## ARTICLE 13 — INVESTIGATIONS

### 13.1 Investigation Rights

Open Jobs Ltd may:

- investigate allegations;
  - review records;
  - request information;
  - assess evidence;
  - conduct compliance reviews.
- 

### 13.2 Cooperation

Individuals subject to investigations are expected to cooperate reasonably.

---

## ARTICLE 14 — ENFORCEMENT ACTIONS

### 14.1 Corrective Measures

Where breaches occur, Open Jobs Ltd may:

- issue warnings;
  - require corrective action;
  - suspend services;
  - terminate relationships;
  - report matters to relevant authorities.
-

## 14.2 Severity

Enforcement measures shall reflect the seriousness of the conduct concerned.

---

## ARTICLE 15 — REGULATORY COOPERATION

### 15.1 Cooperation

Open Jobs Ltd may cooperate with:

- law enforcement agencies;
- regulatory authorities;
- courts;
- government departments;
- anti-corruption authorities;

where legally required or reasonably necessary.

---

## ARTICLE 16 — TRAINING AND AWARENESS

### 16.1 Awareness

Open Jobs Ltd may provide guidance, information or training relating to:

- anti-bribery obligations;
- ethical conduct;
- conflict management;
- compliance expectations.

---

### 16.2 Continuous Improvement

Awareness programmes may evolve over time.

---

## ARTICLE 17 — RECORD RETENTION

### 17.1 Documentation

Records relating to:

- investigations;
- disclosures;
- financial controls;
- compliance activities;

may be retained in accordance with applicable retention requirements.

---

### 17.2 Audit Support

Records may be reviewed for audit and compliance purposes.

---

## ARTICLE 18 — NON-RETALIATION

### 18.1 Protection

Open Jobs Ltd seeks to ensure that individuals who report concerns in good faith are not subjected to retaliation through Open Nurses® services.

---

### 18.2 Exception

This protection does not apply to knowingly false, malicious or misleading reports.

---

## ARTICLE 19 — POLICY REVIEW

### 19.1 Review Process

This Policy may be reviewed and updated periodically to reflect:

- legal developments;
- regulatory guidance;
- operational requirements;
- industry best practice.

---

### 19.2 Publication

Updated versions may be published through Open Nurses®.

---

## ARTICLE 20 — FINAL STATEMENT

Open Jobs Ltd is committed to maintaining the highest standards of honesty, integrity and ethical conduct.

Bribery, corruption and unethical business practices undermine trust, fairness and lawful business operations and will not be tolerated within Open Nurses®.

This Anti-Bribery and Anti-Corruption Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

---

## CONTACT INFORMATION

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email:

## **POLICY 12 — WHISTLEBLOWING POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

### **ARTICLE 1 — PURPOSE AND COMMITMENT**

#### **1.1 Purpose**

Open Jobs Ltd is committed to maintaining the highest standards of integrity, transparency, accountability and ethical conduct.

This Whistleblowing Policy establishes a framework that encourages the reporting of genuine concerns relating to wrongdoing, misconduct, unlawful activity, risks to individuals, regulatory breaches or unethical behaviour connected with Open Nurses® and associated services.

---

#### **1.2 Commitment**

Open Jobs Ltd encourages individuals to speak up when they reasonably believe that wrongdoing, misconduct or risks exist.

Concerns raised in good faith will be treated seriously and reviewed appropriately.

---

### 1.3 Scope

This Policy applies to:

- Candidates;
- Employers;
- Consultants;
- Partners;
- Contractors;
- Suppliers;
- Service Providers;
- Directors;
- Employees;
- Users of Open Nurses®.

This Policy forms part of the Open Nurses® Legal Framework.

---

## ARTICLE 2 — WHAT IS WHISTLEBLOWING?

### 2.1 Definition

Whistleblowing refers to the reporting of information that an individual reasonably believes shows actual, suspected or potential wrongdoing.

---

### 2.2 Good Faith Requirement

Reports should be made honestly and based upon a genuine belief that concerns may exist.

Absolute proof is not required before raising a concern.

---

## ARTICLE 3 — REPORTABLE CONCERNS

### 3.1 Examples of Concerns

Concerns may include:

- fraud;
- corruption;
- bribery;
- safeguarding failures;
- modern slavery;
- human trafficking;
- unlawful discrimination;
- data protection breaches;
- financial misconduct;
- security breaches;
- unethical recruitment practices;
- regulatory non-compliance;
- criminal activity;
- serious professional misconduct.

This list is not exhaustive.

---

### 3.2 Public Interest Concerns

Reports may relate to matters affecting:

- workers;
- Candidates;
- Employers;
- service users;
- patients;
- members of the public;
- Open Jobs Ltd;
- Open Nurses® operations.

---

## ARTICLE 4 — WHO MAY MAKE A REPORT?

### 4.1 Eligible Reporters

Reports may be submitted by:

- Candidates;
- Employers;
- Consultants;
- Employees;
- Contractors;
- Suppliers;
- Partners;
- members of the public;
- other stakeholders.

---

## 4.2 Anonymous Reports

Anonymous reports may be submitted.

However, the ability to investigate anonymous reports may be limited where insufficient information is provided.

---

## ARTICLE 5 — REPORTING PROCEDURES

### 5.1 Submission of Reports

Concerns may be submitted through approved reporting channels.

Primary contact:

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

### 5.2 Information to Include

Where possible, reports should include:

- details of the concern;
- relevant dates;
- involved parties;
- supporting evidence;
- contact information (if willing to provide).

---

### 5.3 Timeliness

Concerns should be reported as soon as reasonably practicable.

---

## ARTICLE 6 — CONFIDENTIALITY

### 6.1 Confidential Handling

Open Jobs Ltd will seek to handle whistleblowing reports sensitively and confidentially where reasonably practicable.

---

### 6.2 Disclosure Limitations

Information may be disclosed where:

- legally required;
- necessary for investigations;
- necessary to protect individuals;
- required by regulators;
- required by law enforcement authorities.

Absolute confidentiality cannot be guaranteed in all circumstances.

---

## ARTICLE 7 — NON-RETALIATION AND PROTECTION

### 7.1 Protection Principle

Open Jobs Ltd seeks to ensure that individuals who raise concerns in good faith are not subjected to retaliation through Open Nurses® services.

---

### 7.2 Examples of Retaliation

Retaliation may include:

- threats;

- intimidation;
  - harassment;
  - unfair treatment;
  - victimisation;
  - adverse actions.
- 

### 7.3 Reporting Retaliation

Concerns regarding retaliation should be reported immediately.

---

## ARTICLE 8 — ASSESSMENT OF REPORTS

### 8.1 Initial Review

Open Jobs Ltd may conduct an initial assessment to determine:

- the nature of the concern;
  - potential risks;
  - urgency;
  - appropriate next steps.
- 

### 8.2 Prioritisation

Concerns involving:

- safeguarding;
- fraud;

- exploitation;
- serious misconduct;
- criminal activity;

may be prioritised.

---

## ARTICLE 9 — INVESTIGATIONS

### 9.1 Investigation Rights

Open Jobs Ltd may:

- investigate concerns;
- review records;
- examine communications;
- assess evidence;
- request information;
- conduct compliance reviews.

---

### 9.2 Cooperation

Individuals involved in investigations are expected to cooperate reasonably.

---

## ARTICLE 10 — OUTCOMES AND CORRECTIVE ACTION

### 10.1 Possible Outcomes

Following review, Open Jobs Ltd may:

- take corrective action;

- implement safeguards;
- issue warnings;
- restrict services;
- suspend accounts;
- terminate relationships;
- refer matters externally.

---

## 10.2 Proportionality

Actions shall generally reflect the seriousness of the concern identified.

---

## ARTICLE 11 — FALSE OR MALICIOUS REPORTS

### 11.1 Misuse of Procedures

Knowingly false, malicious or misleading reports are prohibited.

---

### 11.2 Enforcement

Open Jobs Ltd may take action where whistleblowing procedures are intentionally misused.

---

## ARTICLE 12 — REGULATORY AND LAW ENFORCEMENT COOPERATION

### 12.1 Cooperation

Open Jobs Ltd may cooperate with:

- regulators;

- professional bodies;
- law enforcement agencies;
- safeguarding authorities;
- government departments;

where required by law or reasonably necessary.

---

## 12.2 Referrals

Concerns may be referred to appropriate authorities where warranted.

---

## ARTICLE 13 — RECORD KEEPING

### 13.1 Records

Open Jobs Ltd may maintain records relating to:

- reports;
- investigations;
- findings;
- corrective actions;
- compliance activities.

---

### 13.2 Retention

Records may be retained in accordance with applicable retention requirements.

---

## ARTICLE 14 — TRAINING AND AWARENESS

## 14.1 Awareness

Open Jobs Ltd may provide guidance or awareness materials relating to:

- whistleblowing;
  - reporting procedures;
  - ethical conduct;
  - compliance expectations.
- 

## 14.2 Continuous Improvement

Whistleblowing processes may be reviewed and improved periodically.

---

## ARTICLE 15 — POLICY REVIEW

### 15.1 Review Process

This Policy may be reviewed and updated periodically to reflect:

- legislative developments;
  - regulatory guidance;
  - operational requirements;
  - best practice.
- 

### 15.2 Publication

Updated versions may be published through Open Nurses®.

---

## ARTICLE 16 — GOOD FAITH REPORTING

### 16.1 Honest Reporting

Individuals making reports should do so honestly and based upon a genuine belief that concerns may exist.

---

### 16.2 No Requirement for Proof

Individuals are not expected to prove wrongdoing before raising a concern.

---

## ARTICLE 17 — WHISTLEBLOWING PRINCIPLES

### 17.1 Core Principles

Open Jobs Ltd seeks to operate whistleblowing arrangements based upon:

- transparency;
  - accountability;
  - fairness;
  - integrity;
  - confidentiality;
  - protection.
- 

### 17.2 Ethical Culture

Open Jobs Ltd encourages a culture where concerns can be raised without fear of inappropriate consequences.

---

## ARTICLE 18 — POLICY INTERACTION

## 18.1 Related Policies

This Policy should be read together with:

- Safeguarding and Protection Policy;
- Anti-Bribery and Anti-Corruption Policy;
- Modern Slavery and Ethical Recruitment Policy;
- Trust, Payments, Complaints and Enforcement Framework.

---

## 18.2 Consistency

Where concerns involve multiple policy areas, Open Jobs Ltd may apply several policies simultaneously.

---

## ARTICLE 19 — CONTACT INFORMATION

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## ARTICLE 20 — FINAL STATEMENT

Open Jobs Ltd believes that transparency, accountability and ethical conduct are essential to maintaining trust within Open Nurses®.

Individuals who raise genuine concerns help protect Candidates, Employers, Consultants, service users and the wider community.

Open Nurses® encourages responsible reporting and remains committed to reviewing concerns fairly, appropriately and professionally.

This Whistleblowing Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

## **POLICY 13 — DATA RETENTION AND DISPOSAL POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

### ARTICLE 1 — PURPOSE AND SCOPE

#### 1.1 Purpose

Open Jobs Ltd is committed to managing information responsibly throughout its lifecycle.

This Data Retention and Disposal Policy establishes the principles, requirements and procedures governing the retention, storage, archiving, review and disposal of information processed through Open Nurses® and associated services.

---

#### 1.2 Scope

This Policy applies to:

- Candidate information;
- Employer information;
- Consultant information;

- recruitment records;
- commercial records;
- payment records;
- complaint records;
- communication records;
- security records;
- operational records.

This Policy forms part of the Open Nurses® Legal Framework and should be read together with all applicable Privacy, Security and Data Governance policies.

---

## ARTICLE 2 — RETENTION PRINCIPLES

### 2.1 Core Principles

Open Jobs Ltd seeks to retain information only for as long as reasonably necessary to:

- provide services;
- comply with legal obligations;
- support business operations;
- resolve disputes;
- protect legitimate interests;
- maintain security.

---

### 2.2 Minimisation

Information should not be retained indefinitely unless required by law or legitimate business

necessity.

---

### 2.3 Review

Retention periods may be reviewed periodically.

---

## ARTICLE 3 — LAWFUL BASIS FOR RETENTION

Information may be retained where necessary for:

- contractual obligations;
- legal obligations;
- regulatory requirements;
- legitimate business interests;
- dispute resolution;
- fraud prevention;
- security purposes.

---

## ARTICLE 4 — CANDIDATE DATA RETENTION

### 4.1 Candidate Accounts

Candidate account information may be retained while accounts remain active.

---

### 4.2 Inactive Accounts

Inactive Candidate accounts may be retained for up to 24 months after the last meaningful activity, unless a longer period is required by law or legitimate business necessity.

---

#### 4.3 Application Records

Application and recruitment records may be retained for up to 6 years from creation or closure.

---

#### 4.4 Verification Records

Identity and verification records may be retained where necessary for fraud prevention, compliance and audit purposes.

---

### ARTICLE 5 — EMPLOYER DATA RETENTION

#### 5.1 Employer Accounts

Employer account information may be retained while accounts remain active.

---

#### 5.2 Commercial Records

Employer service records, recruitment agreements and commercial documentation may be retained for up to 6 years after termination of the relationship.

---

#### 5.3 Verification Information

Employer verification records may be retained for compliance, audit and fraud prevention purposes.

---

### ARTICLE 6 — CONSULTANT AND PARTNER DATA RETENTION

#### 6.1 Consultant Records

Consultant account information, agreements and commission-related records may be retained for up to 6 years following termination of the relationship.

---

## 6.2 Partner Records

Business partner information may be retained for contractual, legal and audit purposes.

---

# ARTICLE 7 — FINANCIAL AND PAYMENT RECORDS

## 7.1 Financial Records

Financial records may include:

- invoices;
- payment records;
- commission records;
- billing information;
- accounting records.

---

## 7.2 Retention Period

Financial and accounting records may be retained for a minimum of 6 years or longer where required by applicable law.

---

# ARTICLE 8 — COMPLAINT AND DISPUTE RECORDS

## 8.1 Complaint Records

Complaint files may be retained for up to 6 years after closure.

---

## 8.2 Dispute Records

Dispute-related information may be retained for the duration of proceedings and any applicable limitation periods.

---

## ARTICLE 9 — INVESTIGATION AND ENFORCEMENT RECORDS

### 9.1 Investigations

Records relating to:

- safeguarding concerns;
- fraud investigations;
- compliance reviews;
- enforcement actions;

may be retained where necessary for legal, regulatory and operational purposes.

---

### 9.2 Extended Retention

Certain records may be retained for longer periods where risk, legal obligations or ongoing investigations justify extended retention.

---

## ARTICLE 10 — SECURITY LOGS AND TECHNICAL RECORDS

### 10.1 Security Information

Security-related records may include:

- access logs;
- authentication records;
- audit trails;

- security alerts;
- incident reports.

---

## 10.2 Retention Period

Security logs may generally be retained for up to 12 months, unless longer retention is required for security, legal or investigative purposes.

---

## ARTICLE 11 — ARCHIVING PROCEDURES

### 11.1 Archiving

Information may be archived where active operational use is no longer required but retention remains necessary.

---

### 11.2 Restricted Access

Archived information may be subject to restricted access controls.

---

### 11.3 Security

Archived information shall be protected through appropriate organisational and technical measures.

---

## ARTICLE 12 — SECURE DISPOSAL

### 12.1 Disposal Principles

Where retention periods expire and information is no longer required, Open Jobs Ltd may securely dispose of information.

---

## 12.2 Disposal Methods

Disposal methods may include:

- secure deletion;
- anonymisation;
- destruction of physical records;
- irreversible removal from systems.

---

## 12.3 Verification

Open Jobs Ltd may maintain records confirming disposal activities.

---

## ARTICLE 13 — LEGAL HOLDS

### 13.1 Suspension of Disposal

Information may be preserved beyond normal retention periods where:

- litigation is anticipated;
- legal proceedings exist;
- investigations are ongoing;
- regulatory action is expected.

---

### 13.2 Hold Notices

Legal hold procedures may temporarily suspend normal deletion schedules.

---

## ARTICLE 14 — DATA SUBJECT RIGHTS

### 14.1 Rights Requests

Retention obligations may be balanced against rights relating to:

- access;
  - correction;
  - deletion;
  - restriction;
  - objection.
- 

### 14.2 Limitations

Certain information may be retained despite deletion requests where lawful grounds for retention exist.

---

## ARTICLE 15 — INTERNATIONAL DATA CONSIDERATIONS

### 15.1 Cross-Border Operations

Retention obligations may vary depending upon:

- jurisdiction;
  - legal requirements;
  - operational arrangements.
- 

### 15.2 Compliance

Open Jobs Ltd seeks to comply with applicable Data Protection Laws relating to retained information.

---

## ARTICLE 16 — RESPONSIBILITIES

### 16.1 Open Jobs Ltd

Open Jobs Ltd is responsible for establishing retention and disposal controls.

---

### 16.2 Users

Users remain responsible for information they independently retain outside Open Nurses® systems.

---

## ARTICLE 17 — AUDIT AND COMPLIANCE

### 17.1 Monitoring

Retention practices may be monitored periodically.

---

### 17.2 Reviews

Compliance reviews may be conducted to assess adherence to retention requirements.

---

## ARTICLE 18 — POLICY REVIEW

### 18.1 Review Process

This Policy may be reviewed and updated periodically to reflect:

- legal developments;
- regulatory guidance;
- operational requirements;

- industry best practice.

---

## 18.2 Publication

Updated versions may be published through Open Nurses®.

---

## ARTICLE 19 — CONTACT INFORMATION

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## ARTICLE 20 — FINAL STATEMENT

Open Jobs Ltd recognises the importance of retaining information responsibly while protecting privacy, supporting compliance and maintaining operational effectiveness.

Open Nurses® seeks to ensure that information is retained only for as long as necessary and disposed of securely when no longer required.

This Data Retention and Disposal Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

## **POLICY 14 — EMPLOYER VERIFICATION POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## ARTICLE 1 — PURPOSE AND SCOPE

### 1.1 Purpose

Open Jobs Ltd is committed to maintaining a trusted, secure and professional recruitment environment.

This Employer Verification Policy establishes the standards, procedures and controls used to verify Employers, organisations and hiring entities that access Open Nurses® services.

The purpose of verification is to:

- promote trust and transparency;
  - reduce fraud and misrepresentation;
  - support candidate protection;
  - improve platform integrity;
  - support regulatory compliance;
  - maintain recruitment quality standards.
- 

### 1.2 Scope

This Policy applies to:

- Employers;
- Healthcare Organisations;

- Hospitals;
- Care Homes;
- Domiciliary Care Providers;
- Supported Living Providers;
- Recruitment Clients;
- Government Organisations;
- Educational Institutions;
- Corporate Workforce Users;
- Any organisation using Open Nurses® for recruitment or workforce purposes.

---

## ARTICLE 2 — VERIFICATION PRINCIPLES

### 2.1 Trust and Transparency

Open Jobs Ltd seeks to verify organisations using Open Nurses® in order to support transparency and platform confidence.

---

### 2.2 Risk-Based Approach

Verification requirements may vary depending upon:

- industry sector;
- service type;
- geographical location;
- regulatory requirements;
- identified risks.

---

### 2.3 Ongoing Verification

Verification may be conducted:

- before onboarding;
- during service delivery;
- periodically during account use;
- when concerns arise.

---

## ARTICLE 3 — COMPANY VERIFICATION

### 3.1 Business Identity

Open Jobs Ltd may verify:

- legal entity names;
- company registration numbers;
- business status;
- ownership information;
- operating addresses.

---

### 3.2 Supporting Documentation

Employers may be required to provide documentation including:

- incorporation documents;
- registration certificates;
- regulatory registrations;

- trading information.

---

### 3.3 Verification Outcome

Verification does not constitute endorsement, accreditation or certification by Open Jobs Ltd.

---

## ARTICLE 4 — AUTHORISED REPRESENTATIVE VERIFICATION

### 4.1 Individual Verification

Open Jobs Ltd may verify individuals acting on behalf of Employers.

---

### 4.2 Information Requested

Verification may include:

- identity information;
- business email addresses;
- employment status;
- authority to represent the organisation.

---

### 4.3 Authority Confirmation

Employers may be asked to confirm that a User has authority to act on behalf of the organisation.

---

## ARTICLE 5 — CONTACT VERIFICATION

### 5.1 Contact Information

Open Jobs Ltd may verify:

- email addresses;
- telephone numbers;
- websites;
- business addresses.

---

## 5.2 Communication Verification

Verification communications may be used to confirm authenticity and account ownership.

---

## ARTICLE 6 — REGULATORY AND LICENSING VERIFICATION

### 6.1 Regulatory Checks

Where relevant, Open Jobs Ltd may verify:

- regulatory registrations;
- licences;
- operating permissions;
- professional registrations.

---

### 6.2 Healthcare Sector Verification

Healthcare organisations may be subject to additional verification requirements where appropriate.

---

## ARTICLE 7 — SPONSORSHIP VERIFICATION

## 7.1 Sponsorship Information

Where sponsorship opportunities are advertised, Open Jobs Ltd may verify:

- sponsor licence status;
  - sponsorship permissions;
  - recruitment authorisations;
  - publicly available regulatory information.
- 

## 7.2 No Guarantee

Verification activities do not guarantee sponsorship availability or immigration outcomes.

---

## ARTICLE 8 — FINANCIAL AND COMMERCIAL VERIFICATION

### 8.1 Commercial Assessment

Open Jobs Ltd may conduct reasonable checks relating to:

- payment capability;
  - commercial credibility;
  - contractual compliance;
  - recruitment activity.
- 

### 8.2 Risk Controls

Additional verification may be required where commercial risks are identified.

---

## ARTICLE 9 — FRAUD PREVENTION

### 9.1 Fraud Controls

Verification activities may be used to identify:

- fraudulent organisations;
  - false identities;
  - misleading information;
  - suspicious recruitment activity.
- 

### 9.2 Investigation Rights

Open Jobs Ltd may investigate concerns relating to Employer authenticity.

---

## ARTICLE 10 — ONGOING MONITORING

### 10.1 Continuous Review

Open Jobs Ltd may periodically review Employer accounts.

---

### 10.2 Monitoring Activities

Reviews may include:

- profile reviews;
- compliance reviews;
- account activity reviews;
- complaint reviews;
- verification updates.

---

## ARTICLE 11 — REVERIFICATION REQUIREMENTS

### 11.1 Periodic Reverification

Employers may be required to undergo reverification from time to time.

---

### 11.2 Trigger Events

Reverification may occur where:

- information changes;
- ownership changes;
- compliance concerns arise;
- risk profiles change.

---

## ARTICLE 12 — VERIFICATION OUTCOMES

### 12.1 Approved Status

Employers that satisfy verification requirements may receive access to applicable services.

---

### 12.2 Conditional Approval

Open Jobs Ltd may impose conditions where additional information is required.

---

### 12.3 Refusal

Verification requests may be refused where concerns cannot be resolved.

---

## ARTICLE 13 — RESTRICTIONS, SUSPENSION AND TERMINATION

### 13.1 Restrictions

Open Jobs Ltd may restrict Employer access where:

- verification remains incomplete;
- concerns arise;
- information cannot be validated.

---

### 13.2 Suspension

Accounts may be suspended during investigations or verification reviews.

---

### 13.3 Termination

Open Jobs Ltd may terminate access where fraud, misrepresentation or serious compliance concerns are identified.

---

## ARTICLE 14 — APPEALS AND REVIEW

### 14.1 Right to Request Review

Employers may request review of certain verification decisions.

---

### 14.2 Supporting Evidence

Review requests should include relevant supporting information.

---

### 14.3 Final Determination

Open Jobs Ltd reserves the right to determine verification outcomes.

---

## ARTICLE 15 — DATA PROTECTION

### 15.1 Processing of Information

Verification information may be processed for:

- identity verification;
  - compliance purposes;
  - fraud prevention;
  - security purposes;
  - service administration.
- 

### 15.2 Privacy Compliance

Processing shall be carried out in accordance with applicable Data Protection Laws and Open Nurses® Privacy Policies.

---

## ARTICLE 16 — CONFIDENTIALITY

### 16.1 Confidential Handling

Verification information shall be handled in accordance with applicable confidentiality and privacy obligations.

---

### 16.2 Disclosure

Information may be disclosed where required by law, regulatory obligations or legitimate

compliance requirements.

---

## ARTICLE 17 — RECORD RETENTION

### 17.1 Retention

Verification records may be retained in accordance with applicable retention schedules and legal requirements.

---

### 17.2 Audit Support

Records may be retained for audit, compliance and investigation purposes.

---

## ARTICLE 18 — REGULATORY COOPERATION

### 18.1 Cooperation

Open Jobs Ltd may cooperate with:

- regulators;
- government authorities;
- law enforcement agencies;
- professional bodies;

where legally required or reasonably necessary.

---

### 18.2 Information Requests

Relevant information may be provided where permitted or required by law.

---

## ARTICLE 19 — POLICY REVIEW

### 19.1 Review Process

This Policy may be reviewed and updated periodically to reflect:

- legal developments;
  - regulatory requirements;
  - operational needs;
  - industry best practice.
- 

### 19.2 Publication

Updated versions may be published through Open Nurses®.

---

## ARTICLE 20 — FINAL STATEMENT

Open Jobs Ltd is committed to maintaining a trusted and professional recruitment environment through proportionate Employer verification procedures.

Verification supports transparency, fraud prevention, candidate protection and platform integrity while helping to ensure that organisations using Open Nurses® are authentic and appropriately authorised.

This Employer Verification Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

---

## CONTACT INFORMATION

Open Nurses®  
Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

## **POLICY 15 — CANDIDATE VERIFICATION POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

### ARTICLE 1 — PURPOSE AND SCOPE

#### 1.1 Purpose

Open Jobs Ltd is committed to maintaining a trusted, secure and professional recruitment environment for healthcare professionals and workforce users.

This Candidate Verification Policy establishes the standards, procedures and controls used to verify Candidate identity, qualifications, professional credentials and related information submitted through Open Nurses®.

The objectives of verification include:

- promoting trust and transparency;
- protecting Employers and Candidates;
- reducing fraud and misrepresentation;
- supporting recruitment integrity;
- improving platform safety;

- supporting regulatory compliance.

---

## 1.2 Scope

This Policy applies to:

- Candidates;
- Healthcare Professionals;
- Students;
- Job Seekers;
- Subscribers;
- Applicants;
- Workforce Users using Open Nurses® services.

This Policy forms part of the Open Nurses® Legal Framework and should be read together with all applicable Terms, Policies and Agreements.

---

## ARTICLE 2 — VERIFICATION PRINCIPLES

### 2.1 Trust and Integrity

Open Nurses® seeks to verify information provided by Candidates in order to support confidence, transparency and recruitment integrity.

---

### 2.2 Risk-Based Verification

Verification requirements may vary depending upon:

- role type;
- profession;

- service level;
  - regulatory requirements;
  - geographical location;
  - identified risks.
- 

### 2.3 Ongoing Verification

Verification may occur:

- during registration;
  - before applications;
  - during recruitment activities;
  - periodically throughout account use;
  - where concerns arise.
- 

## ARTICLE 3 — IDENTITY VERIFICATION

### 3.1 Identity Checks

Open Jobs Ltd may request information to verify Candidate identity.

---

### 3.2 Information Requested

Verification may include:

- full legal name;
- date of birth;

- address information;
- government-issued identification;
- photographic identification;
- other supporting documentation.

---

### 3.3 Verification Outcome

Identity verification supports recruitment integrity but does not constitute endorsement or certification.

---

## ARTICLE 4 — QUALIFICATION VERIFICATION

### 4.1 Academic Qualifications

Candidates may be required to provide evidence relating to:

- degrees;
- diplomas;
- certificates;
- educational achievements;
- professional training.

---

### 4.2 Supporting Documentation

Open Jobs Ltd may review academic documentation or request further evidence where necessary.

---

## ARTICLE 5 — PROFESSIONAL REGISTRATION VERIFICATION

## 5.1 Registration Checks

Where applicable, Open Jobs Ltd may verify professional registrations.

---

## 5.2 Examples

Verification may relate to:

- nursing registrations;
  - healthcare registrations;
  - professional licences;
  - regulatory memberships;
  - professional certifications.
- 

## 5.3 Independent Responsibility

Candidates remain responsible for maintaining valid registrations and licences.

---

## ARTICLE 6 — EMPLOYMENT HISTORY VERIFICATION

### 6.1 Employment Information

Candidates may be asked to provide information relating to:

- employment history;
- professional experience;
- career records;
- references.

---

## 6.2 Additional Evidence

Open Jobs Ltd may request supporting evidence where appropriate.

---

## ARTICLE 7 — RIGHT-TO-WORK AND IMMIGRATION VERIFICATION

### 7.1 Verification Activities

Candidates may be required to provide information relating to:

- work authorisation;
  - immigration status;
  - visa status;
  - sponsorship eligibility;
  - right-to-work documentation.
- 

### 7.2 Employer Responsibility

Employers remain responsible for conducting their own right-to-work and immigration checks where required by law.

---

## ARTICLE 8 — FRAUD PREVENTION

### 8.1 Fraud Controls

Verification activities may be used to identify:

- false identities;
- fraudulent documents;

- misrepresentation;
  - suspicious activity;
  - misleading information.
- 

## 8.2 Investigation Rights

Open Jobs Ltd may investigate concerns relating to Candidate authenticity or accuracy of information.

---

## ARTICLE 9 — DOCUMENT AUTHENTICITY

### 9.1 Genuine Documentation

Candidates must only submit genuine and lawful documentation.

---

### 9.2 Prohibited Conduct

Candidates must not submit:

- forged documents;
  - altered documents;
  - misleading information;
  - false qualifications;
  - fraudulent registrations.
- 

### 9.3 Consequences

Suspected document fraud may result in investigation, restrictions or termination of services.

---

## ARTICLE 10 — ONGOING MONITORING

### 10.1 Continuous Review

Open Jobs Ltd may periodically review Candidate information.

---

### 10.2 Monitoring Activities

Reviews may include:

- profile information;
- application records;
- verification records;
- account activity;
- reported concerns.

---

## ARTICLE 11 — REVERIFICATION REQUIREMENTS

### 11.1 Periodic Reverification

Candidates may be required to undergo reverification from time to time.

---

### 11.2 Trigger Events

Reverification may occur where:

- information changes;
- qualifications expire;
- registrations lapse;

- concerns arise;
- risk profiles change.

---

## ARTICLE 12 — VERIFICATION OUTCOMES

### 12.1 Approved Status

Candidates satisfying verification requirements may receive access to applicable services.

---

### 12.2 Conditional Verification

Additional information may be requested before verification is completed.

---

### 12.3 Refusal

Verification may be refused where information cannot be validated or concerns remain unresolved.

---

## ARTICLE 13 — RESTRICTIONS, SUSPENSION AND TERMINATION

### 13.1 Restrictions

Open Jobs Ltd may restrict access where verification remains incomplete.

---

### 13.2 Suspension

Accounts may be suspended while verification reviews or investigations are conducted.

---

### 13.3 Termination

Access may be terminated where serious fraud, misrepresentation or compliance concerns are identified.

---

## ARTICLE 14 — APPEALS AND REVIEW

### 14.1 Review Requests

Candidates may request review of certain verification decisions.

---

### 14.2 Supporting Information

Review requests should include relevant supporting evidence.

---

### 14.3 Final Determination

Open Jobs Ltd reserves the right to determine verification outcomes.

---

## ARTICLE 15 — DATA PROTECTION

### 15.1 Processing of Information

Verification information may be processed for:

- identity verification;
  - compliance purposes;
  - fraud prevention;
  - recruitment administration;
  - security purposes.
-

## 15.2 Privacy Compliance

Processing shall occur in accordance with applicable Data Protection Laws and Open Nurses® Privacy Policies.

---

## ARTICLE 16 — CONFIDENTIALITY

### 16.1 Confidential Handling

Verification information shall be handled sensitively and in accordance with applicable confidentiality obligations.

---

### 16.2 Disclosure

Information may be disclosed where:

- legally required;
  - necessary for investigations;
  - required by regulators;
  - required by law enforcement authorities.
- 

## ARTICLE 17 — RECORD RETENTION

### 17.1 Retention

Verification records may be retained in accordance with applicable retention schedules and legal requirements.

---

### 17.2 Audit Support

Records may be retained for audit, compliance and investigation purposes.

---

## ARTICLE 18 — REGULATORY COOPERATION

### 18.1 Cooperation

Open Jobs Ltd may cooperate with:

- professional regulators;
- government authorities;
- law enforcement agencies;
- licensing bodies;
- regulatory organisations;

where legally required or reasonably necessary.

---

### 18.2 Information Requests

Relevant information may be disclosed where permitted or required by law.

---

## ARTICLE 19 — POLICY REVIEW

### 19.1 Review Process

This Policy may be reviewed and updated periodically to reflect:

- legal developments;
- regulatory requirements;
- operational needs;
- industry best practice.

---

## 19.2 Publication

Updated versions may be published through Open Nurses®.

---

## ARTICLE 20 — FINAL STATEMENT

Open Jobs Ltd is committed to promoting trust, transparency and recruitment integrity through proportionate Candidate verification procedures.

Verification supports Candidate protection, Employer confidence, fraud prevention and platform security while helping to ensure that information shared through Open Nurses® is reliable and professionally appropriate.

This Candidate Verification Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

---

## CONTACT INFORMATION

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

## **POLICY 16 — CYBER SECURITY AND INFORMATION SECURITY POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## ARTICLE 1 — PURPOSE AND SCOPE

### 1.1 Purpose

Open Jobs Ltd recognises the importance of protecting information, systems, services and digital assets from unauthorised access, misuse, loss, disclosure, disruption and cyber threats.

This Cyber Security and Information Security Policy establishes the principles, controls and responsibilities designed to protect Open Nurses®, its Users, systems, data and business operations.

---

### 1.2 Scope

This Policy applies to:

- Open Nurses® websites;
- applications;
- databases;
- cloud infrastructure;
- digital services;
- Users;
- Employees;
- Consultants;
- Contractors;
- Service Providers;

- Third-Party Technology Partners.

This Policy forms part of the Open Nurses® Legal Framework and should be read together with all applicable Terms, Privacy Policies and Data Governance requirements.

---

## ARTICLE 2 — SECURITY OBJECTIVES

### 2.1 Security Principles

Open Jobs Ltd seeks to protect:

- confidentiality;
- integrity;
- availability;
- accountability;
- resilience.

---

### 2.2 Security Goals

The objectives of this Policy include:

- protecting User information;
- preventing unauthorised access;
- reducing cyber risks;
- supporting service continuity;
- maintaining trust and platform integrity.

---

## ARTICLE 3 — INFORMATION SECURITY GOVERNANCE

### 3.1 Governance Commitment

Open Jobs Ltd shall maintain appropriate organisational and technical measures to support information security.

---

### 3.2 Shared Responsibility

Security is a shared responsibility involving:

- Open Jobs Ltd;
  - Users;
  - Consultants;
  - Service Providers;
  - Technology Partners.
- 

## ARTICLE 4 — ACCESS CONTROL

### 4.1 Access Management

Access to systems and information shall be restricted to authorised persons and authorised purposes.

---

### 4.2 Authentication

Open Jobs Ltd may implement:

- passwords;
- multi-factor authentication;
- identity verification;
- access approval controls.

---

### 4.3 User Responsibilities

Users remain responsible for:

- protecting credentials;
- maintaining account security;
- reporting suspected compromise.

---

## ARTICLE 5 — DATA PROTECTION AND CONFIDENTIALITY

### 5.1 Information Protection

Open Jobs Ltd seeks to protect information from:

- unauthorised access;
- unauthorised disclosure;
- accidental loss;
- destruction;
- misuse.

---

### 5.2 Sensitive Information

Additional protections may be applied to:

- identity documents;
- professional registrations;
- payment information;

- verification records;
- recruitment records;
- Personal Data.

---

## ARTICLE 6 — SYSTEM SECURITY

### 6.1 Security Controls

Open Jobs Ltd may implement:

- firewalls;
- encryption technologies;
- intrusion detection systems;
- monitoring tools;
- anti-malware protections;
- access controls.

---

### 6.2 Continuous Improvement

Security controls may be updated periodically to address emerging risks.

---

## ARTICLE 7 — NETWORK SECURITY

### 7.1 Network Protection

Appropriate measures may be implemented to protect network infrastructure from unauthorised access and cyber threats.

---

## 7.2 Monitoring

Network activity may be monitored for:

- security events;
  - suspicious activity;
  - operational reliability.
- 

## ARTICLE 8 — APPLICATION SECURITY

### 8.1 Secure Development

Open Jobs Ltd seeks to incorporate security considerations into the design, development and maintenance of Platform services.

---

### 8.2 Security Reviews

Applications may be reviewed periodically to identify vulnerabilities and security risks.

---

## ARTICLE 9 — VULNERABILITY MANAGEMENT

### 9.1 Risk Identification

Open Jobs Ltd may assess systems for:

- vulnerabilities;
  - weaknesses;
  - misconfigurations;
  - emerging threats.
-

## 9.2 Remediation

Reasonable efforts may be made to address identified security risks.

---

## ARTICLE 10 — INCIDENT RESPONSE

### 10.1 Security Incidents

Security incidents may include:

- unauthorised access;
  - malware infections;
  - data breaches;
  - service disruption;
  - cyberattacks;
  - information compromise.
- 

### 10.2 Response Activities

Open Jobs Ltd may:

- investigate incidents;
  - contain threats;
  - preserve evidence;
  - implement corrective actions;
  - notify affected parties where required.
- 

## ARTICLE 11 — BUSINESS CONTINUITY AND DISASTER RECOVERY

## 11.1 Continuity Planning

Open Jobs Ltd may maintain measures designed to support continuity of critical services.

---

## 11.2 Recovery

Recovery procedures may be implemented following significant operational disruptions.

---

## ARTICLE 12 — THIRD-PARTY SECURITY

### 12.1 Third-Party Providers

Open Jobs Ltd may engage third-party providers for technology, infrastructure and operational services.

---

### 12.2 Risk Management

Reasonable efforts may be made to assess security considerations relating to third-party services.

---

## ARTICLE 13 — SECURITY MONITORING

### 13.1 Monitoring Activities

Open Jobs Ltd may monitor systems, services and activity for:

- security threats;
- fraud;
- misuse;
- operational anomalies.

---

## 13.2 Log Management

Security logs may be maintained to support:

- investigations;
- auditing;
- incident response;
- compliance.

---

## ARTICLE 14 — USER RESPONSIBILITIES

### 14.1 Security Obligations

Users should:

- maintain strong passwords;
- protect devices;
- safeguard credentials;
- report suspicious activity;
- comply with Platform security requirements.

---

### 14.2 Prohibited Activities

Users must not:

- attempt unauthorised access;
- interfere with systems;
- distribute malware;

- exploit vulnerabilities;
- bypass security controls.

---

## ARTICLE 15 — SECURITY TRAINING AND AWARENESS

### 15.1 Awareness

Open Jobs Ltd may provide guidance, information or awareness materials relating to cybersecurity and information security.

---

### 15.2 Continuous Improvement

Security awareness initiatives may evolve over time.

---

## ARTICLE 16 — REGULATORY COMPLIANCE

### 16.1 Compliance

Open Jobs Ltd seeks to comply with applicable:

- Data Protection Laws;
- cybersecurity obligations;
- regulatory requirements;
- contractual commitments.

---

### 16.2 Cooperation

Open Jobs Ltd may cooperate with regulators, authorities and law enforcement agencies where legally required.

---

## ARTICLE 17 — INFORMATION CLASSIFICATION

### 17.1 Categories

Information may be classified according to its sensitivity, confidentiality and business importance.

---

### 17.2 Protection Measures

Appropriate protections may be applied according to classification levels.

---

## ARTICLE 18 — POLICY VIOLATIONS

### 18.1 Enforcement

Violations of this Policy may result in:

- warnings;
- restrictions;
- suspension;
- termination;
- legal action where appropriate.

---

### 18.2 Investigations

Open Jobs Ltd may investigate suspected security violations.

---

## ARTICLE 19 — POLICY REVIEW

## 19.1 Review Process

This Policy may be reviewed and updated periodically to reflect:

- evolving cyber threats;
  - technological developments;
  - legal requirements;
  - industry best practices.
- 

## 19.2 Publication

Updated versions may be published through Open Nurses®.

---

## ARTICLE 20 — FINAL STATEMENT

Open Jobs Ltd is committed to maintaining appropriate cybersecurity and information security standards to protect Users, systems, information and business operations.

While no system can guarantee absolute security, Open Nurses® seeks to implement reasonable safeguards designed to reduce risk, support resilience and maintain trust.

This Cyber Security and Information Security Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

---

## CONTACT INFORMATION

Open Nurses®  
Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

## **POLICY 17 — VULNERABILITY DISCLOSURE POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Security Contact: [security@opennurses.com](mailto:security@opennurses.com)

General Contact: [contact@opennurses.com](mailto:contact@opennurses.com)

---

### **ARTICLE 1 — PURPOSE AND SCOPE**

#### **1.1 Purpose**

Open Jobs Ltd is committed to maintaining the security, integrity and resilience of Open Nurses® and associated services.

This Vulnerability Disclosure Policy establishes a framework through which security researchers, Users and members of the public may responsibly report security vulnerabilities discovered within Open Nurses® systems.

The purpose of this Policy is to:

- improve security;
- encourage responsible disclosure;
- reduce cybersecurity risks;
- support coordinated remediation;
- protect Users and information.

---

## 1.2 Scope

This Policy applies to:

- Open Nurses® websites;
- web applications;
- APIs;
- cloud infrastructure;
- authorised digital services;
- supporting technology environments controlled by Open Jobs Ltd.

---

## ARTICLE 2 — RESPONSIBLE DISCLOSURE PRINCIPLES

### 2.1 Good Faith Reporting

Open Jobs Ltd encourages responsible disclosure of vulnerabilities identified in good faith.

---

### 2.2 Security Partnership

Security researchers who act responsibly help improve the security of Open Nurses® and its Users.

---

### 2.3 Coordinated Disclosure

Open Jobs Ltd seeks to work cooperatively with reporters to investigate and address legitimate security concerns.

---

## ARTICLE 3 — HOW TO REPORT A VULNERABILITY

### 3.1 Reporting Channel

Security vulnerabilities should be reported to:

[security@opennurses.com](mailto:security@opennurses.com)

---

### 3.2 Information to Include

Reports should include where possible:

- vulnerability description;
  - affected system;
  - affected URL or feature;
  - reproduction steps;
  - screenshots or evidence;
  - potential impact;
  - contact information.
- 

### 3.3 Timely Reporting

Vulnerabilities should be reported as soon as reasonably practicable after discovery.

---

## ARTICLE 4 — AUTHORISED SECURITY RESEARCH

### 4.1 Permitted Activities

Open Jobs Ltd welcomes responsible security testing conducted in good faith.

Examples may include:

- identifying security weaknesses;
  - analysing exposed functionality;
  - reviewing security configurations;
  - reporting vulnerabilities.
- 

## 4.2 Good Faith Requirement

Security activities must be conducted solely for the purpose of improving security and not for personal gain or disruption.

---

## ARTICLE 5 — PROHIBITED ACTIVITIES

### 5.1 Restrictions

Individuals must not:

- access information that does not belong to them;
  - modify data without authorisation;
  - destroy information;
  - disrupt services;
  - conduct denial-of-service attacks;
  - deploy malware;
  - compromise User Accounts;
  - exploit vulnerabilities beyond what is necessary to demonstrate their existence.
- 

### 5.2 Privacy Protection

Researchers must avoid accessing, downloading, copying or retaining Personal Data wherever possible.

---

## ARTICLE 6 — INVESTIGATION PROCESS

### 6.1 Review

Open Jobs Ltd may:

- review reports;
  - assess risks;
  - validate findings;
  - request additional information.
- 

### 6.2 Prioritisation

Vulnerabilities may be prioritised based upon:

- severity;
  - impact;
  - exploitability;
  - risk to Users.
- 

## ARTICLE 7 — RESPONSE COMMITMENTS

### 7.1 Acknowledgement

Open Jobs Ltd aims to acknowledge vulnerability reports within a reasonable period.

---

## 7.2 Updates

Where appropriate, Open Jobs Ltd may provide updates regarding:

- investigation progress;
  - remediation efforts;
  - closure status.
- 

## 7.3 Resolution

Resolution timelines may vary depending upon complexity and severity.

---

## ARTICLE 8 — SAFE HARBOUR

### 8.1 Good Faith Protection

Where security research is conducted responsibly and in accordance with this Policy, Open Jobs Ltd generally does not intend to pursue legal action solely in relation to authorised vulnerability disclosure activities.

---

### 8.2 Conditions

Safe harbour considerations apply only where individuals:

- act in good faith;
  - avoid harm;
  - comply with this Policy;
  - cooperate with Open Jobs Ltd.
-

### 8.3 Limitations

Nothing in this Policy authorises unlawful activity or provides immunity from applicable laws.

---

## ARTICLE 9 — CONFIDENTIALITY

### 9.1 Responsible Handling

Security information should be handled responsibly.

---

### 9.2 Public Disclosure

Researchers are encouraged not to publicly disclose vulnerabilities until Open Jobs Ltd has had a reasonable opportunity to investigate and address the issue.

---

## ARTICLE 10 — NO BUG BOUNTY PROGRAMME

### 10.1 Current Position

Unless expressly stated otherwise, Open Nurses® does not operate a bug bounty programme.

---

### 10.2 No Financial Reward

Submission of a vulnerability report does not create any entitlement to payment, compensation or reward.

---

## ARTICLE 11 — SEVERITY CLASSIFICATION

### 11.1 Risk Categories

Vulnerabilities may be classified according to:

- critical;

- high;
  - medium;
  - low;
  - informational.
- 

## 11.2 Prioritisation

Higher-risk vulnerabilities may receive priority attention.

---

## ARTICLE 12 — SECURITY INCIDENTS

### 12.1 Escalation

Certain vulnerability reports may be treated as security incidents.

---

### 12.2 Response Measures

Open Jobs Ltd may implement:

- containment measures;
  - mitigation activities;
  - emergency controls;
  - corrective actions.
- 

## ARTICLE 13 — DATA PROTECTION

### 13.1 Information Processing

Information submitted under this Policy may be processed for:

- security purposes;
- investigations;
- compliance activities;
- risk management.

---

### 13.2 Privacy

Processing shall occur in accordance with applicable Data Protection Laws and Open Nurses® Privacy Policies.

---

## ARTICLE 14 — THIRD-PARTY SYSTEMS

### 14.1 External Services

Certain Open Nurses® services may utilise third-party providers.

---

### 14.2 Reporting

Reports involving third-party systems may be referred to relevant providers where appropriate.

---

## ARTICLE 15 — REGULATORY COOPERATION

### 15.1 Cooperation

Open Jobs Ltd may cooperate with:

- cybersecurity authorities;
- regulators;

- law enforcement agencies;
- government organisations;

where required by law or reasonably necessary.

---

## ARTICLE 16 — RECORD RETENTION

### 16.1 Security Records

Vulnerability reports and related records may be retained for:

- investigations;
- auditing;
- compliance;
- security improvement.

---

### 16.2 Retention Periods

Retention shall be managed in accordance with applicable policies and legal requirements.

---

## ARTICLE 17 — RESEARCHER EXPECTATIONS

### 17.1 Professional Conduct

Researchers are expected to:

- act responsibly;
- avoid disruption;
- communicate professionally;
- cooperate during investigations.

---

## 17.2 Ethical Behaviour

Security activities should be conducted ethically and lawfully.

---

## ARTICLE 18 — POLICY VIOLATIONS

### 18.1 Misuse

Individuals who misuse this Policy may be subject to:

- restrictions;
- account actions;
- legal remedies;
- referral to authorities where appropriate.

---

### 18.2 Investigation Rights

Open Jobs Ltd reserves the right to investigate misuse.

---

## ARTICLE 19 — POLICY REVIEW

### 19.1 Review Process

This Policy may be reviewed and updated periodically to reflect:

- emerging threats;
- legal developments;
- industry standards;

- operational requirements.

---

## 19.2 Publication

Updated versions may be published through Open Nurses®.

---

## ARTICLE 20 — FINAL STATEMENT

Open Jobs Ltd values responsible security research and welcomes good-faith vulnerability disclosures that help improve the security of Open Nurses®.

Through cooperation, transparency and responsible disclosure practices, Open Nurses® seeks to strengthen cybersecurity protections and maintain trust in its services.

This Vulnerability Disclosure Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

---

## SECURITY CONTACT

Security Team

Email: [security@opennurses.com](mailto:security@opennurses.com)

---

## GENERAL CONTACT

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

## **POLICY 18 — SANCTIONS, ANTI-MONEY LAUNDERING AND FINANCIAL CRIME POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

### ARTICLE 1 — PURPOSE AND SCOPE

#### 1.1 Purpose

Open Jobs Ltd is committed to conducting business in a lawful, transparent and responsible manner.

This Sanctions, Anti-Money Laundering and Financial Crime Policy establishes the principles, controls and procedures designed to prevent Open Nurses® and associated services from being used for money laundering, terrorist financing, sanctions evasion, fraud, financial crime or other unlawful activities.

---

#### 1.2 Scope

This Policy applies to:

- Employers;
- Candidates;
- Consultants;
- Partners;
- Contractors;

- Suppliers;
- Service Providers;
- Subscribers;
- Users of Open Nurses®;
- Commercial relationships involving Open Jobs Ltd.

This Policy forms part of the Open Nurses® Legal Framework and should be read together with all applicable Terms, Policies and Agreements.

---

## ARTICLE 2 — COMMITMENT TO COMPLIANCE

### 2.1 Compliance Commitment

Open Jobs Ltd seeks to comply with applicable:

- anti-money laundering laws;
- sanctions laws;
- financial crime regulations;
- anti-fraud requirements;
- anti-corruption obligations;
- regulatory requirements.

---

### 2.2 Zero-Tolerance Approach

Open Jobs Ltd maintains a zero-tolerance approach towards:

- money laundering;
- terrorist financing;

- sanctions violations;
  - fraud;
  - financial crime;
  - unlawful financial activity.
- 

## ARTICLE 3 — DEFINITIONS

### 3.1 Money Laundering

Money laundering refers to activities intended to conceal, disguise or legitimise the proceeds of criminal conduct.

---

### 3.2 Terrorist Financing

Terrorist financing includes the provision, collection or movement of funds or resources connected with terrorism or terrorist activities.

---

### 3.3 Financial Crime

Financial crime may include:

- fraud;
- bribery;
- corruption;
- sanctions evasion;
- identity fraud;
- payment fraud;

- cyber-enabled financial crime.

---

## ARTICLE 4 — SANCTIONS COMPLIANCE

### 4.1 Compliance Requirements

Open Jobs Ltd seeks to comply with applicable sanctions laws and restrictions.

---

### 4.2 Restricted Parties

Open Jobs Ltd may refuse, restrict or terminate relationships involving:

- sanctioned individuals;
- sanctioned entities;
- prohibited organisations;
- restricted jurisdictions;
- parties subject to legal restrictions.

---

### 4.3 Ongoing Monitoring

Sanctions compliance reviews may be conducted periodically.

---

## ARTICLE 5 — CUSTOMER AND BUSINESS VERIFICATION

### 5.1 Verification Activities

Open Jobs Ltd may undertake verification measures relating to:

- Employers;
- Consultants;

- Partners;
- commercial counterparties.

---

## 5.2 Information Requests

Verification may include requests for:

- identity information;
- business information;
- ownership information;
- supporting documentation.

---

## ARTICLE 6 — BENEFICIAL OWNERSHIP AND CONTROL

### 6.1 Ownership Transparency

Open Jobs Ltd may seek to identify beneficial ownership and control structures where appropriate.

---

### 6.2 Additional Checks

Additional verification may be requested where ownership structures create elevated risk.

---

## ARTICLE 7 — RISK-BASED APPROACH

### 7.1 Risk Assessment

Open Jobs Ltd may assess risks based upon:

- geography;

- business activity;
- payment patterns;
- transaction characteristics;
- regulatory factors.

---

## 7.2 Enhanced Review

Additional due diligence may be conducted where elevated risk is identified.

---

## ARTICLE 8 — PAYMENT MONITORING

### 8.1 Monitoring

Open Jobs Ltd may monitor payments and financial activity for unusual, suspicious or prohibited activity.

---

### 8.2 Examples

Examples may include:

- unusual payment patterns;
- inconsistent account activity;
- suspicious transactions;
- unexplained payment arrangements.

---

## ARTICLE 9 — FRAUD PREVENTION

### 9.1 Anti-Fraud Measures

Open Jobs Ltd may implement controls designed to detect and prevent:

- identity fraud;
- payment fraud;
- account fraud;
- recruitment fraud;
- cyber-enabled fraud.

---

## 9.2 Investigations

Suspected fraud may be investigated in accordance with applicable policies.

---

## ARTICLE 10 — REPORTING OBLIGATIONS

### 10.1 Internal Reporting

Users are encouraged to report concerns relating to:

- fraud;
- sanctions risks;
- suspicious activity;
- financial misconduct;
- money laundering concerns.

---

### 10.2 Good Faith Reporting

Reports should be made honestly and in good faith.

---

## ARTICLE 11 — INVESTIGATIONS

### 11.1 Investigation Rights

Open Jobs Ltd may:

- investigate concerns;
- review records;
- assess transactions;
- request information;
- conduct compliance reviews.

---

### 11.2 Cooperation

Users are expected to cooperate reasonably with compliance-related investigations.

---

## ARTICLE 12 — ACCOUNT RESTRICTIONS

### 12.1 Restriction Rights

Open Jobs Ltd may restrict services where:

- compliance concerns arise;
- verification remains incomplete;
- suspicious activity is identified.

---

### 12.2 Temporary Measures

Restrictions may remain in place while investigations are ongoing.

---

## ARTICLE 13 — SUSPENSION AND TERMINATION

### 13.1 Suspension

Accounts may be suspended where financial crime risks are identified.

---

### 13.2 Termination

Relationships may be terminated where:

- unlawful activity is suspected;
- sanctions concerns exist;
- serious compliance breaches occur.

---

## ARTICLE 14 — REGULATORY AND LAW ENFORCEMENT COOPERATION

### 14.1 Cooperation

Open Jobs Ltd may cooperate with:

- law enforcement agencies;
- regulatory authorities;
- government departments;
- financial crime authorities;
- sanctions enforcement bodies.

---

### 14.2 Information Disclosure

Information may be disclosed where legally required or reasonably necessary.

---

## ARTICLE 15 — RECORD KEEPING

### 15.1 Records

Open Jobs Ltd may maintain records relating to:

- verification activities;
- compliance reviews;
- investigations;
- financial transactions.

---

### 15.2 Retention

Records may be retained in accordance with applicable retention requirements.

---

## ARTICLE 16 — TRAINING AND AWARENESS

### 16.1 Awareness Measures

Open Jobs Ltd may provide information, guidance or awareness materials relating to:

- AML compliance;
- sanctions compliance;
- fraud prevention;
- financial crime risks.

---

### 16.2 Continuous Improvement

Compliance programmes may evolve over time.

---

## ARTICLE 17 — THIRD-PARTY RELATIONSHIPS

### 17.1 Third-Party Expectations

Open Jobs Ltd expects business partners and service providers to operate in accordance with applicable legal and ethical standards.

---

### 17.2 Compliance Reviews

Third-party relationships may be reviewed where compliance concerns arise.

---

## ARTICLE 18 — NON-COMPLIANCE

### 18.1 Enforcement

Where non-compliance is identified, Open Jobs Ltd may:

- issue warnings;
  - request corrective action;
  - restrict services;
  - suspend accounts;
  - terminate relationships;
  - refer matters to authorities.
- 

### 18.2 Proportionality

Actions shall generally reflect the seriousness of the concerns identified.

---

## ARTICLE 19 — POLICY REVIEW

### 19.1 Review Process

This Policy may be reviewed and updated periodically to reflect:

- legal developments;
- regulatory guidance;
- operational requirements;
- industry best practices.

---

### 19.2 Publication

Updated versions may be published through Open Nurses®.

---

## ARTICLE 20 — FINAL STATEMENT

Open Jobs Ltd is committed to protecting Open Nurses® from misuse, financial crime and unlawful activity.

Through proportionate verification, monitoring and compliance measures, Open Nurses® seeks to support lawful, ethical and secure business operations while protecting Users, commercial partners and the wider community.

This Sanctions, Anti-Money Laundering and Financial Crime Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

---

## CONTACT INFORMATION

Open Nurses®

Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](http://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

## **POLICY 19 — COMPLAINTS HANDLING PROCEDURE**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](http://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

### **ARTICLE 1 — PURPOSE AND SCOPE**

#### **1.1 Purpose**

Open Jobs Ltd is committed to providing professional, fair, transparent and efficient complaint handling procedures.

This Complaints Handling Procedure establishes the process through which complaints relating to Open Nurses® services may be submitted, investigated, reviewed and resolved.

---

#### **1.2 Objectives**

This Procedure seeks to:

- provide fair treatment;
- ensure complaints are considered appropriately;

- improve service quality;
- maintain trust and confidence;
- support accountability and transparency.

---

### 1.3 Scope

This Procedure applies to complaints relating to:

- Candidate Services;
- Employer Services;
- Consultant Services;
- Subscriptions;
- Recruitment Services;
- Billing and Payments;
- Account Actions;
- Platform Functionality;
- Privacy Concerns;
- Service Delivery.

---

## ARTICLE 2 — WHO MAY SUBMIT A COMPLAINT

### 2.1 Eligible Persons

Complaints may be submitted by:

- Candidates;

- Employers;
  - Consultants;
  - Subscribers;
  - Contractors;
  - Partners;
  - Service Providers;
  - Other Users affected by Open Nurses® services.
- 

## 2.2 Representatives

A complaint may be submitted through an authorised representative where appropriate.

---

## ARTICLE 3 — HOW TO SUBMIT A COMPLAINT

### 3.1 Contact Method

Complaints should be submitted to:

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

### 3.2 Required Information

Where possible, complaints should include:

- name of complainant;
- account details;
- contact information;
- description of concern;

- relevant dates;
- supporting evidence;
- desired outcome.

---

### 3.3 Supporting Documentation

Supporting documents may include:

- screenshots;
- emails;
- invoices;
- contracts;
- correspondence;
- other relevant evidence.

---

## ARTICLE 4 — COMPLAINT CATEGORIES

### 4.1 Examples

Complaints may relate to:

- account issues;
- recruitment services;
- subscription services;
- billing disputes;
- consultant conduct;

- employer conduct;
  - candidate conduct;
  - privacy concerns;
  - safeguarding concerns;
  - technical issues.
- 

## 4.2 Serious Matters

Complaints involving fraud, safeguarding, modern slavery, discrimination or unlawful activity may receive priority review.

---

## ARTICLE 5 — ACKNOWLEDGEMENT OF COMPLAINTS

### 5.1 Initial Acknowledgement

Open Jobs Ltd aims to acknowledge receipt of complaints within a reasonable period.

---

### 5.2 Reference Information

Acknowledgement may include:

- confirmation of receipt;
  - reference information;
  - next steps where appropriate.
- 

## ARTICLE 6 — INITIAL ASSESSMENT

### 6.1 Review Process

Open Jobs Ltd may conduct an initial assessment to determine:

- the nature of the complaint;
- urgency;
- risks involved;
- applicable policies.

---

## 6.2 Information Requests

Additional information may be requested where necessary.

---

## ARTICLE 7 — INVESTIGATION PROCEDURE

### 7.1 Investigation Rights

Open Jobs Ltd may:

- review records;
- assess evidence;
- examine communications;
- request clarification;
- conduct internal reviews.

---

### 7.2 Cooperation

Users are expected to cooperate reasonably with complaint investigations.

---

## ARTICLE 8 — RESPONSE AND OUTCOME

## 8.1 Possible Outcomes

Following review, Open Jobs Ltd may:

- provide clarification;
  - reject complaints;
  - uphold complaints;
  - implement corrective action;
  - restore services;
  - issue warnings;
  - provide refunds where appropriate.
- 

## 8.2 Communication

Outcomes may be communicated through email or other appropriate channels.

---

## ARTICLE 9 — RESPONSE TIMEFRAMES

### 9.1 General Timeframes

Response times may vary depending upon:

- complexity;
  - available evidence;
  - urgency;
  - operational circumstances.
-

## 9.2 Exceptional Circumstances

Additional time may be required where matters involve:

- legal issues;
  - safeguarding concerns;
  - fraud investigations;
  - regulatory involvement.
- 

## ARTICLE 10 — APPEALS PROCESS

### 10.1 Right to Appeal

Where appropriate, Users may request a review of certain complaint outcomes.

---

### 10.2 Appeal Submission

Appeals should include:

- reasons for review;
  - supporting information;
  - relevant evidence.
- 

### 10.3 Further Review

Open Jobs Ltd may conduct an additional assessment before issuing a final decision.

---

## ARTICLE 11 — SAFEGUARDING COMPLAINTS

### 11.1 Priority Handling

Safeguarding-related concerns may receive priority review.

---

## 11.2 Protection Measures

Open Jobs Ltd may take immediate protective measures where necessary.

---

## ARTICLE 12 — FRAUD AND FINANCIAL COMPLAINTS

### 12.1 Financial Concerns

Complaints relating to:

- payments;
- billing;
- subscriptions;
- fraud;

may be subject to enhanced review procedures.

---

### 12.2 Verification

Additional verification may be requested before resolution.

---

## ARTICLE 13 — PRIVACY AND DATA COMPLAINTS

### 13.1 Privacy Concerns

Complaints relating to data protection or privacy may be reviewed in accordance with applicable Data Protection Laws.

---

## 13.2 Additional Procedures

Certain privacy matters may require separate investigation procedures.

---

## ARTICLE 14 — COMPLAINT RECORDS

### 14.1 Record Keeping

Open Jobs Ltd may maintain records relating to:

- complaints;
  - investigations;
  - outcomes;
  - appeals.
- 

### 14.2 Retention

Complaint records may be retained in accordance with applicable retention schedules.

---

## ARTICLE 15 — CONFIDENTIALITY

### 15.1 Handling of Information

Complaints shall be handled as confidentially as reasonably practicable.

---

### 15.2 Disclosure

Information may be disclosed where:

- legally required;

- necessary for investigations;
- necessary to protect individuals;
- required by authorities.

---

## ARTICLE 16 — ABUSIVE OR VEXATIOUS COMPLAINTS

### 16.1 Misuse of Procedure

Open Jobs Ltd may restrict or refuse complaints that are:

- abusive;
- threatening;
- repetitive;
- malicious;
- frivolous.

---

### 16.2 Legitimate Complaints

Nothing in this Procedure limits the right to raise genuine concerns.

---

## ARTICLE 17 — REGULATORY AND LEGAL RIGHTS

### 17.1 External Rights

Nothing in this Procedure prevents Users from exercising rights available under applicable laws.

---

### 17.2 Independent Remedies

Users may pursue independent legal or regulatory remedies where available.

---

## ARTICLE 18 — SERVICE IMPROVEMENT

### 18.1 Learning from Complaints

Open Jobs Ltd may use complaint information to:

- improve services;
- identify risks;
- enhance processes;
- strengthen compliance.

---

### 18.2 Continuous Improvement

Complaint trends may be reviewed periodically.

---

## ARTICLE 19 — POLICY REVIEW

### 19.1 Review Process

This Procedure may be reviewed and updated periodically to reflect:

- operational requirements;
- legal developments;
- regulatory guidance;
- service improvements.

---

### 19.2 Publication

Updated versions may be published through Open Nurses®.

---

## ARTICLE 20 — FINAL STATEMENT

Open Jobs Ltd is committed to resolving complaints fairly, professionally and transparently.

Open Nurses® encourages Users to raise concerns where issues arise and seeks to provide a structured process for investigation, review and resolution.

This Complaints Handling Procedure forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Policies, Agreements and legal obligations.

---

## COMPLAINTS CONTACT

Open Nurses®  
Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

## **POLICY 20 — RECRUITMENT FEES, COMMISSION AND COMMERCIAL TRANSPARENCY POLICY**

Open Nurses®

Operated by Open Jobs Ltd

Effective Date: [Insert Publication Date]

Version: 1.0

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

---

## ARTICLE 1 — PURPOSE AND SCOPE

### 1.1 Purpose

Open Jobs Ltd is committed to conducting recruitment and commercial activities in a transparent, ethical and professional manner.

This Recruitment Fees, Commission and Commercial Transparency Policy explains how Open Nurses® generates revenue, when fees may arise, how commissions are calculated and the principles governing commercial relationships.

---

### 1.2 Scope

This Policy applies to:

- Employers;
- Candidates;
- Consultants;
- Recruitment Partners;
- Subscribers;
- Commercial Clients;
- Users participating in recruitment or subscription services.

This Policy forms part of the Open Nurses® Legal Framework and should be read together with all applicable Terms, Agreements and Commercial Schedules.

---

## ARTICLE 2 — TRANSPARENCY PRINCIPLES

### 2.1 Commitment

Open Jobs Ltd seeks to ensure that recruitment fees, subscription charges, commissions and commercial arrangements are communicated clearly and transparently.

---

## 2.2 Fairness

Commercial arrangements should be:

- lawful;
  - transparent;
  - proportionate;
  - contractually agreed;
  - professionally administered.
- 

## ARTICLE 3 — NO RECRUITMENT FEES CHARGED TO CANDIDATES

### 3.1 Candidate Protection

Open Jobs Ltd does not charge Candidates recruitment fees or work-finding fees for obtaining employment opportunities.

---

### 3.2 Free Access Principle

Candidates may access opportunity-searching and application services without paying recruitment fees.

---

### 3.3 Separate Subscription Services

Optional subscription services remain separate from recruitment outcomes and do not constitute work-finding fees.

Candidates may choose to purchase optional subscription services if they require additional

features or enhanced functionality. Such subscriptions are entirely voluntary and are not required to apply for, be considered for, or obtain employment opportunities through Open Nurses®.

---

## ARTICLE 4 — EMPLOYER RECRUITMENT FEES

### 4.1 Employer Responsibility

Employers may be charged fees for recruitment services provided through Open Nurses®.

---

### 4.2 Fee Structures

Fees may include:

- placement fees;
  - recruitment fees;
  - introduction fees;
  - subscription fees;
  - advertising fees;
  - workforce solutions fees.
- 

### 4.3 Contractual Basis

Applicable fees shall be governed by signed agreements, service contracts, quotations or published pricing structures.

---

## ARTICLE 5 — EMPLOYER SUBSCRIPTION SERVICES

### 5.1 Subscription Plans

Open Nurses® may offer subscription services to Employers.

---

## 5.2 Features

Subscription services may include:

- job advertising;
  - candidate search access;
  - employer branding tools;
  - recruitment management features;
  - workforce support services.
- 

## 5.3 Separate Agreements

Certain subscription services may be governed by additional terms.

---

# ARTICLE 6 — CONSULTANT COMMISSION ARRANGEMENTS

## 6.1 Consultant Relationships

Open Jobs Ltd may engage Consultants and Recruitment Partners to support business development, employer acquisition and recruitment services.

---

## 6.2 Commission Eligibility

Commission payments may arise where:

- an Employer has been introduced;
- a recruitment agreement is signed;

- recruitment services are delivered;
- contractual conditions are satisfied.

---

### 6.3 No Automatic Entitlement

Commission entitlement arises only where expressly provided under a written agreement.

---

## ARTICLE 7 — COMMISSION CALCULATION

### 7.1 Calculation Methods

Commission may be calculated by reference to:

- fixed fees;
- percentage-based fees;
- recurring revenue;
- subscription revenue;
- recruitment placements;
- commercial milestones.

---

### 7.2 Commercial Schedules

Specific commission rates shall be defined within applicable Consultant Agreements or Commission Schedules.

---

## ARTICLE 8 — COMMISSION PAYMENT CONDITIONS

### 8.1 Conditions Precedent

Commission payments may be subject to:

- receipt of payment by Open Jobs Ltd;
- successful service delivery;
- completion of contractual obligations;
- compliance with applicable agreements.

---

## 8.2 Verification

Open Jobs Ltd may verify commission eligibility before payment.

---

## ARTICLE 9 — PAYMENT TIMING

### 9.1 Payment Schedule

Commission payments may be processed in accordance with applicable agreements.

---

### 9.2 Delays

Reasonable delays may occur where:

- payment remains outstanding;
- disputes exist;
- verification is incomplete;
- compliance reviews are ongoing.

---

## ARTICLE 10 — INTRODUCTION FEES

### 10.1 Introductions

Applications, referrals, introductions or recruitment activities may constitute introductions for recruitment administration purposes.

---

## 10.2 Employer Liability

Employer obligations relating to introductions shall be governed by applicable agreements.

---

## ARTICLE 11 — DIRECT HIRING AND CIRCUMVENTION

### 11.1 Platform Protection

Employers and Users must not intentionally circumvent Open Nurses® services in order to avoid agreed recruitment fees or commissions.

---

### 11.2 Circumvention Activities

Examples may include:

- direct hiring outside agreed processes;
  - concealed introductions;
  - avoidance of contractual obligations;
  - deliberate fee avoidance.
- 

### 11.3 Recovery Rights

Open Jobs Ltd reserves the right to recover fees arising under applicable agreements.

---

## ARTICLE 12 — REFUNDS AND CREDITS

## 12.1 Refund Eligibility

Refund eligibility shall be governed by:

- applicable contracts;
  - service terms;
  - consumer rights where applicable.
- 

## 12.2 Service Credits

Service credits may be offered at Open Jobs Ltd's discretion.

---

# ARTICLE 13 — BILLING TRANSPARENCY

## 13.1 Invoices

Invoices may include:

- service descriptions;
  - applicable charges;
  - taxes;
  - payment due dates.
- 

## 13.2 Record Keeping

Open Jobs Ltd may maintain billing records for compliance, accounting and audit purposes.

---

# ARTICLE 14 — TAXATION

## 14.1 Tax Responsibility

Taxes may apply depending upon:

- jurisdiction;
- service type;
- regulatory requirements.

---

## 14.2 Compliance

Parties remain responsible for their own tax obligations unless otherwise agreed.

---

## ARTICLE 15 — CONFLICTS OF INTEREST

### 15.1 Disclosure

Consultants and representatives should disclose relevant conflicts of interest.

---

### 15.2 Transparency

Commercial decisions should be made transparently and professionally.

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## ARTICLE 16 — FRAUD PREVENTION

### 16.1 Commercial Integrity

Open Jobs Ltd may implement controls designed to prevent:

- commission fraud;
- payment fraud;
- recruitment fraud;

- financial misconduct.

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## 16.2 Investigations

Suspicious commercial activity may be investigated.

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## ARTICLE 17 — AUDIT AND VERIFICATION RIGHTS

### 17.1 Review Rights

Open Jobs Ltd may review records relating to:

- commissions;
- placements;
- subscriptions;
- recruitment transactions.

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### 17.2 Verification

Verification procedures may be used to confirm entitlement and compliance.

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## ARTICLE 18 — ENFORCEMENT

### 18.1 Corrective Measures

Where breaches occur, Open Jobs Ltd may:

- suspend services;
- withhold payments;
- recover fees;

- terminate agreements;
- pursue legal remedies.

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## 18.2 Serious Misconduct

Serious misconduct may result in immediate enforcement action.

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## ARTICLE 19 — POLICY REVIEW

### 19.1 Review Process

This Policy may be reviewed and updated periodically to reflect:

- legal developments;
- commercial requirements;
- regulatory guidance;
- operational needs.

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### 19.2 Publication

Updated versions may be published through Open Nurses®.

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## ARTICLE 20 — FINAL STATEMENT

Open Jobs Ltd believes that transparency, fairness and accountability are essential to maintaining trust within recruitment and workforce services.

This Policy establishes the principles governing recruitment fees, subscriptions, consultant commissions and commercial arrangements while helping to ensure that all parties understand their respective rights and obligations.

This Recruitment Fees, Commission and Commercial Transparency Policy forms part of the Open Nurses® Legal Framework and shall be interpreted together with all applicable Terms, Agreements, Schedules and legal obligations.

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## CONTACT INFORMATION

Open Nurses®  
Trading Name of Open Jobs Ltd

Company Number: 15096008

Website: [opennurses.com](https://opennurses.com)

Email: [contact@opennurses.com](mailto:contact@opennurses.com)

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## SCHEDULE 1 — COMMERCIAL REVENUE SOURCES

Open Nurses® may generate revenue from:

- Employer subscriptions;
  - Recruitment service fees;
  - Placement fees;
  - Introduction fees;
  - Advertising services;
  - Premium business services;
  - Consultant-supported recruitment services;
  - Workforce solutions services.
- 

## SCHEDULE 2 — CANDIDATE PROTECTION PRINCIPLE

Open Jobs Ltd does not charge Candidates recruitment fees or work-finding fees for obtaining employment opportunities.

Optional subscriptions remain entirely voluntary and separate from recruitment outcomes.

Candidates may subscribe only if they require additional features or services that are not necessary for accessing or applying for employment opportunities.

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### SCHEDULE 3 — COMMISSION PRINCIPLE

Consultant commissions arise solely under written agreements entered into with Open Jobs Ltd.

No commission entitlement exists without an applicable contractual arrangement.

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### SCHEDULE 4 — PAYMENT FLOW SUMMARY

Employer Agreement Executed

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Service Delivered

↓

Employer Payment Received

↓

Commission Eligibility Verified

↓

Commission Payment Processed

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Commercial Records Retained

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### SCHEDULE 5 — COMMERCIAL COMPLIANCE PRINCIPLES

All commercial activities conducted through Open Nurses® shall be guided by:

- transparency;
- fairness;

- accountability;
- contractual certainty;
- ethical business practices;
- legal compliance.