



## GL RESOLUTION PRIVACY POLICY

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GL Resolution (ABN 37 137 380 360) (**GL Resolution, Us, We, Our**) has been engaged by the Department of Social Services (**DSS**) to operate the National Disability Abuse and Neglect Hotline (**Hotline**) and the Complaints Resolution and Referral Service (**CRRS**). More information on these services is available at: [Complaints and Report Abuse | Job Access](#).

This Privacy Policy outlines Our ongoing obligations to You in respect of how We collect and handle Your personal information when You engage with Us in relation to the Hotline and CRRS.

You can download a copy of this Privacy Policy from Our website ([glresolution.au](http://glresolution.au)) or You can request a free hard copy of this Privacy Policy by contacting Us directly at the details at the bottom of this Policy.

This Privacy Policy may be updated from time to time and the latest version is on Our website.

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#### **1. INTRODUCTION**

- 1.1. GL Resolution is committed to protecting the privacy of individuals and must comply with the *Privacy Act 1988* (**the Act**) and the Australian Privacy Principles (**APPs**). The Act regulates how GL Resolution can collect, hold, use, disclose, and dispose of personal information, and how You can access and correct personal information We hold about You.

- 1.2. Personal information is information or an opinion about an individual who is identified or reasonably identifiable, whether true or not and whether recorded in a material form or not.
- 1.3. Sensitive information is a subset of personal information that includes information relating to health, racial or ethnic origin, political opinions, association memberships, religious beliefs, sexual orientation, criminal history, generic or biometric information. Sensitive information is afforded greater protections under the Privacy Act.
- 1.4. The Privacy Act only applies to information about individuals, not to information about corporate entities such as businesses, firms or trusts. Detailed information on the Privacy Act can be found on the Office of the Australian Information Commissioner (OAIC) [website](#).

## **2. REMAINING ANONYMOUS OR USING A PSEUDONYM**

- 2.1. Generally, it is not possible for You to remain anonymous or adopt a pseudonym for GL Resolution to interact with You effectively. Requesting to remain anonymous or using a pseudonym can result in GL Resolution being unable to progress your matter or refer it to the appropriate entity to investigate.

## **3. PERSONAL INFORMATION WE COLLECT AND HOW WE HANDLE IT**

- 3.1. The personal information GL Resolution will collect from You will vary depending on Your interactions with Us.
- 3.2. The personal information You provide enables Us to contact You and effectively carry out Our business functions and activities related to the Hotline and CRRS.
- 3.3. The following table outlines who We collect personal information from, the types of personal information We collect and the purposes for which We may use and disclose the personal information.
- 3.4. We will collect the personal information of individuals who:
  - contact the Hotline to make a complaint or report or to request a referral, either on behalf of themselves or someone else;
  - contact CRRS to make a complaint, either on behalf of themselves or someone else;
  - are associated with a report or complaint to the Hotline or CRRS.
- 3.5. The type of personal information We will collect and hold includes:
  - information provided by the individual making a report or complaint to the Hotline or CRRS (including names and contact details of the caller, witnesses and related parties, details of disability, ethnicity, details of report or complaint, details of family members/advocates/supporters of call subject, type of disability support services received, opinions about others); and
  - information about matters referred to Us, including name, contact information, information about relevant incidents relating to third parties related to the matter, such as the other party/parties.
- 3.6. We will use and disclose the personal information We collect and hold to:

- operate and provide services pursuant to the Hotline and CRRS;
- provide information to those that engage with Us;
- administer interactions with Us and provide information to those that engage with Us;
- refer high-risk matters to the relevant law enforcement agencies and/or child protection agencies;
- refer callers to specialist support or referral services where necessary;
- provide call information directly to the Department of Social Services;
- provide Department of Social Services with reports which outline call volumes, response times, themes of calls, action taken and other items as requested;
- respond to any complaints or reports relating to Our services, including any external body or agency;
- comply with corporate governance, reporting and legal obligations.

3.7. Sensitive information may also be collected or held about You, including:

- (a) racial or ethnic origin;
- (b) health information;
- (c) political opinions or associations;
- (d) religious beliefs or affiliations;
- (e) philosophical beliefs;
- (f) professional or trade union memberships or associations;
- (g) sexual orientation or practices; or
- (h) criminal record.

3.8. We only collect sensitive information where it is reasonably necessary for Our functions and activities and either:

- (a) You have consented to the collection; or
- (b) We are required or authorised by law to collect Your sensitive information.

3.9. We may collect your voice recordings where You leave a voicemail message on Our phone number. Voicemail messages will be recorded in a file note and the file note stored, used and disclosed as part of our records.

3.10. Voice recordings will be stored for no more than 90 days following the voicemail message being recorded by You and after this date will be permanently deleted. The voicemail messages are collected and stored for the sole purpose of returning a call. Voicemail messages will not in any circumstances be disclosed outside of GL Resolution.

3.11. Phone calls are not recorded.

#### **4. HOTLINE MATTERS**

- 4.1. The Hotline is a free and independent service for reporting abuse and neglect of people with disability.
- 4.2. GL Resolution may receive a Hotline report through either a telephone call to 1800 880 or 052 or email to [hotline@glresolution.au](mailto:hotline@glresolution.au).
- 4.3. Reports to the Hotline may be made by either the individual that has experienced abuse or neglect, or another person on their behalf.
- 4.4. GL Resolution will collect personal information from the caller, or emailer, relating to the matter being reported, including:
  - (a) name, date of birth and contact details (email, street address and phone number) of the caller;
  - (b) name, date of birth and contact details of the person who experienced abuse or neglect (email, street address and phone number);
  - (c) disability of the person who experienced abuse or neglect;
  - (d) information about the service or situation where the abuse or neglect has happened, or is happening;
  - (e) the name of the person(s) responsible for the abuse or neglect.
- 4.5. GL Resolution will use information received through a Hotline report to:
  - (a) provide immediate advice to callers, where possible;
  - (b) provide details of referral to callers, where appropriate;
  - (c) listen to the caller and take a record of the information received.
- 4.6. GL Resolution will disclose information received through a Hotline report to:
  - (a) Department of Social Services, who funds the Hotline service – whose privacy policy is available at: [Privacy Policy | Department of Social Services](#);
  - (b) the government body that funds the service that is the subject of the report, if there is one;
  - (c) law enforcement, where appropriate;
  - (d) child protection agencies, where appropriate;
  - (e) an agency able to investigate or address the report, such as an ombudsman or complaints-handling body;
  - (f) the NDIS Quality and Safeguards Commission, for NDIS complaints;
  - (g) NSW Ageing and Disability Commissioner for domestic complaints within NSW;
  - (h) SA Adult Safeguarding Unit for domestic complaints within South Australia.

#### **5. CRRS MATTERS**

- 5.1. The CRRS is a free and independent service for people with a disability who are users of Australian Government funded:
  - (a) Disability Employment Services (DES);

- (b) Australian Disability Enterprises (ADE); and
  - (c) Disability Advocacy Services.
- 5.2. GL Resolution may receive a CRRS report through either a telephone call to 1800 880 or 052 or email to [crrs@glresolution.au](mailto:crrs@glresolution.au) or through use of the Online Complaints Form ([Online Complaint Form | Job Access](#)).
- 5.3. Complaints to the CRRS Hotline may be made by either the user of the Australian Government funded service, or another person on their behalf.
- 5.4. GL Resolution will collect personal information from the caller, or emailer, relating to the matter being reported, including:
- (a) name, date of birth and contact details (email, street address and phone number) of the caller;
  - (b) name, date of birth and contact details of the person who is the user of the service (email, street address and phone number);
  - (c) disability of the person impacted;
  - (d) information about the service or situation;
  - (e) the details of the Australian Government funded service provider, and the names of any relevant individuals employed by the funded service provider;
  - (f) details, including name and contact information, of any witnesses to the complaint.
- 5.5. GL Resolution will use information received through a CRRS report to:
- (a) provide immediate advice to callers, where possible;
  - (b) provide details of referral to callers, where appropriate;
  - (c) listen to the caller and take a record of the information received.
- 5.6. GL Resolution will disclose information received through a CRRS report to:
- (a) Department of Social Services, who funds the Hotline service, whose privacy policy is available at: [Privacy Policy | Department of Social Services](#);
  - (b) Department of Employment and Workplace Relations, whose privacy policy is available at: [Privacy - Department of Employment and Workplace Relations, Australian Government](#);
  - (c) law enforcement, where appropriate;
  - (d) child protection agencies, where appropriate;
  - (e) the service provider complained about;
  - (f) the government body that funds the service that is the subject of the complaint;
  - (g) an agency able to investigate or address the report, such as an ombudsman or complaints-handling body.

## **6. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?**

- 6.1. In most cases GL Resolution will collect information from You directly. This may be via email, online and written forms, phone calls, verbal conversation or other forms of correspondence, writing or recording.

- 6.2. We may also collect Your personal information via the following third parties:
- (a) the former provider of the services, WorkFocus Australia as part of transition of services to Us;
  - (b) service providers You have complained about;
  - (c) Your family, friends, advocates or supporters that engage with Us;
  - (d) Your authorised representative;
  - (e) Government agencies such as the Department of Social Services;
  - (f) publicly available sources;
  - (g) regulators; and
  - (h) any other government or law enforcement bodies where required by law.
- 6.3. From time to time, We may obtain personal information from other third parties where it is impractical to obtain it directly from You. When We do so, We will take reasonable steps to ensure that We make You aware of the collection of Your personal information in accordance with the Act.
- 6.4. In some circumstances, We may collect and handle personal information of an individual who has not had direct dealings with Us. For example, where We receive a complaint or report regarding an individual whose family member, advocate or supporter has contacted Us either on behalf of the individual or in the absence of their knowledge.
- 6.5. If We receive unsolicited Personal Information about You, it will be handled in accordance with the Act. We may keep a record of unsolicited personal information if permitted by the Act. If not, Our policy is to destroy or de-identify the personal information as soon as practicable, provided it is lawful and reasonable to do so.

## **7. WHY DO WE USE AND DISCLOSE YOUR PERSONAL INFORMATION?**

- 7.1. GL Resolution will generally only use or disclose Your personal information for the purposes for which it was collected.
- 7.2. We may use or disclosure of Your personal information for another purpose where:
- (a) You have provided consent;
  - (b) You would reasonably expect Us to use or disclose Your personal information for another purpose that is related to (or for sensitive information, directly related to) Our primary purpose of collection;
  - (c) We are authorised or required under law; or
  - (d) some exception otherwise exists in the Act.
- 7.3. We do not sell Your personal information to third parties.

## **8. HOW DO WE STORE AND SECURE YOUR PERSONAL INFORMATION?**

- 8.1. GL Resolution takes reasonable steps to protect Your personal information. In the event of a data breach, We are committed to complying with the requirements of the Act to the extent required at law.

- 8.2. Personal information may be stored in hard copy or electronic format in secure facilities that We own and operate, or that are owned and operated by Our service providers. Our service providers may store personal information overseas.
- 8.3. Our electronic databases are secured by a firewall and anti-virus software to ensure, so far as practicable, that it is not accessed by unauthorised parties.
- 8.4. We take reasonable steps to ensure that any software that stores Your personal information has appropriate security and policy measures to ensure Your personal information is not subject to loss, misuse, interference, or unauthorised access, modification or disclosure.
- 8.5. We take steps to destroy information relating to a matter at a date after seven years since the conclusion of their matter with Us. The exception to this is where We are required to store records for a longer period of time.

## **9. HOW CAN YOU ACCESS OR CORRECT YOUR PERSONAL INFORMATION?**

- 9.1. Please contact Our Privacy Officer (details below) if You would like to access or correct the personal information that We hold about You. Additionally, We may be able to delete the personal information We hold about You in some cases. We may request that You verify Your identity before We process any request, to preserve the security of the personal information We hold.
- 9.2. We may charge a reasonable fee for providing You with access to Your personal information, which will be confirmed at the relevant time.
- 9.3. If We refuse to provide You with access or to correct Your personal information, We will provide You with written notice setting out Our reasons and inform You of how to complain about the refusal.

## **10. HOW CAN YOU MAKE COMPLAINTS OR ENQUIRIES?**

- 10.1. If You have a complaint about how GL Resolution has collected and handled Your personal information, please contact Our Privacy Officer who will endeavour in the first instance to deal with Your complaint and take any steps necessary to resolve the matter.
- 10.2. If We are unable to resolve Your complaint, or if You are unhappy with the outcome, You may lodge a complaint with the OAIC (see [here](#) for further information).
- 10.3. For any queries about the personal information We hold about You or the way We handle personal information, please contact Our Privacy Officer.

## **11. DO WE DISCLOSE YOUR PERSONAL INFORMATION OVERSEAS?**

- 11.1. GL Resolution may disclose Your personal information to overseas parties where secured cloud services are used from time to time. Our suppliers may disclose personal information overseas.
- 11.2. If We disclose personal information overseas, We take reasonable steps to ensure that any overseas recipient does not breach the Act.
- 11.3. Where We disclose Your personal information overseas it will in most cases be to companies and storage facilities located in the United States. We will continue to update our Privacy Policy to reflect the countries to which We disclose personal information.

- 11.4. If You require that We do not disclose Your personal information overseas, please let Us know and We will take reasonable steps to attempt to facilitate Your request.

## **12. ONLINE FUNCTIONALITY**

- 12.1. GL Resolution may collect the following information through Our website, either Ourselves or through Google Analytics (which is hosted by a third party):
- (a) Your computer or device's IP address (collected and stored in an anonymised format);
  - (b) device screen size;
  - (c) device type, operating system and browser information;
  - (d) geographic location (country only);
  - (e) referring domain and out link if applicable;
  - (f) search terms and pages visited (clickstream data); and
  - (g) date and time when website pages were accessed.
- 12.2. We will treat any personal information collected through Our website in the same way as other personal information We collect.
- 12.3. A cookie is a piece of data sent from a website and stored in a user's web browser. We may collect cookies to understand how online services are used. We may use cookies for several reasons, including utilising cookies to remember Your log-in status and viewing preferences from a previous use of an online service.
- 12.4. Our website may also transfer cookies on computers and devices that access Our website for record-keeping purposes. You may be able to change Your browser preferences to reject all cookies before accessing Our website.
- 12.5. Our website contains links or references to other websites or organisations. We are not responsible for the privacy practices or content of linked third parties' websites. Third party websites may have their own privacy and security policies, which we encourage You to read before supplying any personal information to them.

## **13. GET IN TOUCH**

- 13.1. If You have any questions about how We collect or handle Your personal information, or if You would like to access or correct the personal information We hold about You, please get in touch using the below details.

### **The Privacy Officer**

GL Resolution (ABN 37 137 380 360)

Mail: GPO Box 1789 CANBERRA CITY ACT 2601

Phone: 1800 880 052

Email: [crrs@glresolution.au](mailto:crrs@glresolution.au)