**ANGLICAN DIOCESE OF BENDIGO**

**PRIVACY POLICY OF THE**

**PARISH OF ####**

**(Model Policy for adoption by each Parish)**

The Parish Council of the Parish of #### in the Anglican Diocese of Bendigo (“**Parish** **Council**”) commits to protecting the privacy of personal information regarding potential Church members, Church members, service providers, contractors and agents.

**1. Collection**

In most circumstances information is collected directly from you. This may be through correspondence, E-mail, in person and by telephone. Indicative information we may collect includes your name, contact details, date of birth, history of Church membership etc.

In relation to individuals acting as service providers, contractors or agents of the **Parish** **Council** the information collected is confined to your name, contact details and relevant information concerning your dealings with the **Parish** **Council**.

**2. Purpose of Collection**

The information is collected for the purpose of recording members of the Parish and its congregations and to enable the Parish and Diocese to communicate about the activities of the Church, its funding needs, programs and its philosophies.

In relation to individuals acting as service providers, contractors or agents, the **Parish** **Council** may use your information to access or use services provided by you or an organisation that you work for.

**3. Use and disclosure of information**

We will only use or disclose information for the purpose it was collected (primary purpose) unless the person has consented, or the secondary purpose is related to the primary purpose and a person would reasonably expect such use or disclosure. A normal secondary purpose is communication about our activities, funding needs and philosophies.

**4. Accuracy of Personal Information**

We will take all reasonable steps to ensure the information we collect is accurate, complete and up-to-date at the time of collection. If your circumstances change or if you have reason to believe our records are not accurate, complete or up-to-date please contact us immediately and we will take all reasonable steps to amend the information in accordance with the above criteria or an alternative may be discussed with you.

**5. Openness**

A Privacy Policy Information Statement is available outlining the information handling practices of the **Parish** **Council** and the Diocese of Bendigo and made available to anyone who asks for it.

**6. Access**

You may request the right to access the personal information that we hold about you. However, our discretion, duties and obligations under the Law may restrict your access. Given this, all reasonable actions will be taken to assist access or to address any reasons you have to seek access. If access is deniable we will provide you with reasons in accordance with the Law. If access is provided a reasonable fee may be charged for the time and other costs incurred in providing access. Individuals may apply for access to the personal information held about them by application to the Parish Rector or Diocesan Registrar.

**7. Identifiers**

Identifiers that have been assigned by a Commonwealth Government agency (e.g. Tax File Number, Medicare number, Pension number etc.) will not be adopted, used or disclosed except where required by law (e.g. in the case of a Contract).

**8. Anonymity**

Individuals are given the option to interact with the **Parish** **Council** anonymously whenever it is lawful and practicable to do so.

**9. Transborder data flows**

The **Parish** **Council** will only transfer personal information to a recipient in a foreign country in circumstances where the information will have the appropriate protection.

**10. Sensitive information**

Sensitive information will not be collected unless a person has consented to its collection, it is required by law, or the collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any other individual. . Sensitive information includes information relating to health, racial or ethnic background, or criminal records. Higher standards apply to the handling of sensitive information.

**11. Data Breach reporting process**

A data breach occurs when personal information is lost or subjected to unauthorised access, modification, use or disclosure or other misuse. The records may be stored electronically or paper based. Data breaches can be caused or exacerbated by a variety of factors, affect different types of personal information and have the potential to cause harm to individuals and the church.

Some examples of a data breach include but are not limited to the following:

* where a device such as mobile phone containing personal information of Parish members is lost or stolen
* where a database containing personal information is hacked
* a Parish makes personal information accessible or visible to others outside the organisation without permission
* an email containing personal or sensitive information is sent to an external party in error

unauthorised access to personal information by a church worker or independent contrac

If any church worker in a Parish is aware of a data breach or suspects a data breach, they should notify the Registrar as soon as practical.

A data breach reporting form is provided on the Diocesan website under the Parish Resources section <http://www.bendigoanglican.org.au/>.

The template is designed to assist in gathering all relevant information that is known at that time. It may also assist to identify what immediate remedial action the Parish can take to reduce the risk of potential harm to individuals.

Prompt action is generally the key to reducing the risk of harm. The Registry team will work with the Parish to assess risks and take action, once they have been notified.

**Policy Scope and Coverage**: All Parish leaders and members. Updated February 2018

**Related Documents: Internal**

* Anglican Diocese of Bendigo website <http://www.bendigoanglican.org.au/> - **Data breach reporting form template**. This template is for use by Parishes when reporting a data breach or suspected data breach to the Registrar.
* Diocesan Clergy Manual – Refer 5.7 Parish Records and Archives.

**Related Documents: External**

[**http://www.oaic.gov.au/privacy/privacy-act/national-privacy-principles**](http://www.oaic.gov.au/privacy/privacy-act/national-privacy-principles)