

## PRIVACY POLICY

*Version:* 1.3  
*Contact:* Registrar

*Date of Issue:* February 2018  
*Review Date:* August 2021

### Introduction

To encourage sensitivity and appropriate respect for individuals in the collection and use of information for Church purposes.

To provide formal guidelines for the Diocese and Parishes to ensure protection of people's privacy in accordance with the Australian National Privacy Principles.

Encourage open and transparent management of personal information which aligns to the principles of the Diocese's Safe Church Policy.

To provide Parishes with a process for reporting data breaches or suspected data breaches to the Registrar to enable compliance with Notifiable Data Breaches (NDB) obligations introduced by the Federal Government in February 2018.

### Part A) PRIVACY PROTECTION GUIDELINES:

#### *1. Collection*

It is usual for the Parish Councils and the Diocese to collect personal information about Church members and potential Church members including their religious practices. In addition, it is usual for the Diocese and Parish Councils to collect information from service providers, contractors and agents. It is important that the collection of personal information is fair, lawful and not intrusive. A person must be told the name of our organisation, the purpose of collection and how to get access to their personal information and what happens if the person chooses not to give the information.

#### *2. Use and disclosure*

In relation to Church Members or potential Church members it would be usual to collect from such individual, the individual's name, contact details, date of birth and history of Church membership.

In relation to individuals acting as service providers, contractors or agents of the Diocese or of a Parish Council it would be usual to collect from such individual the individual's name,

contact details and relevant information concerning that individual's dealings with the Diocese or Parish Council.

Information should only be disclosed for the purpose it was collected (primary purpose) unless the person concerned has consented, or a 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.

### *3. Data quality*

Reasonable steps must be taken to ensure that the personal information collected, used or disclosed is accurate, complete and up-to-date.

### *4. Data security*

Reasonable steps should be taken to protect the personal information held from misuse, loss and from unauthorised access, modification or disclosure.

### *5. Openness*

A Privacy Policy information statement should be available outlining the information handling practices of the Diocese and Parish Councils and made available to anyone who asks for it.

### *6. Access and correction*

An individual has the right to access the personal information held by the Diocese or Parish Council about them. Unless exempted from doing so by law, individuals should be permitted access to their own records. It is intended that any request for such access be made through the Parish Rector or Office of the Diocesan Registrar.

### *7. Identifiers*

Identifiers that have been assigned by a Commonwealth Government agency (e.g. Tax File Number, Medicare number, Pension number etc.) should not be obtained, used or disclosed except where required by law (e.g. in the case of a Contractor – ABN No. or where funds are invested with the Diocese – TFN No.).

### *8. Anonymity*

Individuals should be given the option to interact with the Diocese or a Parish Council anonymously whenever it is lawful and practicable to do so.

### *9. Transborder data flows*

The Diocese and Parish Councils should 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.

*11. It is the policy of the Diocese that individual Parishes should adopt the Parish's own Privacy Policy.*

## Part B) DATA BREACH PROCEDURE:

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 a 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 contractor

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 report template is provided on the Diocesan website under the Parish Resources section <http://www.bendigoanglican.org.au/> by using the search function.

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. Once notified, the Registry team will work with the Parish to assess risks and take action.

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*Acknowledgement:*

*This policy has been adapted from the Diocese of Gippsland Privacy Policy. We thank them for their work in this area and their willingness to share it.*

\*\*\* **Attached** to this document is a **privacy policy** for each Parish to adopt and make available to those who have dealings with the Parish including Church Members. The document should only require modification where shown to become Parish specific.

Also attached is the **Privacy Policy Information Statement** for the Diocese

### *Policy Scope*

The Privacy Policy applies to Bishop in Council, Executive, church leaders and church workers, employees, parish members, volunteers and contractors.

### *Policy Responsibility*

The Bishop in Council is responsible for oversight of implementation and review of this policy.

Individual Parish Councils are required to adopt the attached Model Privacy Policy and report any known or suspected data breaches to the Registrar.

The Registrar is responsible for managing and reporting any notifiable data breaches within the Diocese in accordance with statutory obligations and making recommendations to mitigate risks.

### *Related Documents: Internal*

- Data Breach Report template available at <http://www.bendigoanglican.org.au/>
- About Notifiable Data Breaches – topic guide sheet, available under Parishes resources on Diocesan website <http://www.bendigoanglican.org.au/>
- Diocesan Clergy Manual – 5.7 Parish Records and Archives
- Diocese Privacy Information Statement (attached)
- Model Parish Privacy information policy (attached)

### *Related Documents: External*

- <http://www.oaic.gov.au/privacy/privacy-act/national-privacy-principles>

### *Reviewed March 2019*

*This policy was reviewed against the combined set of Australian Privacy Principles that were published on line in March 2018 (<https://www.oaic.gov.au/agencies-and-organisations/app-guidelines/>) during the first quarter of 2019 and found that no changes needed to be made.*

### *Approved by Bishop in Council:*

1 February 2018

<i>Policy History</i>	
<i>Policy created</i>	February 2018
<i>Policy reviewed</i>	March 2019
<i>Policy amended</i>	

## ANGLICAN DIOCESE OF BENDIGO PRIVACY POLICY INFORMATION STATEMENT

*Updated April 2018*

The Anglican Diocese of Bendigo (“**Diocese of Bendigo**”) 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 **Diocese of Bendigo** the information collected is confined to your name, contact details and relevant information concerning your dealings with the **Diocese of Bendigo**.

### *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 **Diocese of Bendigo** 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*

This document is available outlining the information handling practices of 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 Parish Rector or the 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, 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 **Diocese of Bendigo** anonymously whenever it is lawful and practicable to do so.

### *9. Transborder data flows*

The **Diocese of Bendigo** 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 Breaches*

Whilst the Anglican Diocese takes all reasonable care to protect individual's personal and sensitive data against unauthorised access, disclosure or misuse, in the event of a known or suspected data breach, the organisation will comply with its obligations under the Office of the Australian Information Commission.

All enquiries regarding this Privacy Information Statement should be referred to the Registrar [registrar@bendigoanglican.org.au](mailto:registrar@bendigoanglican.org.au) or phone 5443 4711.



ANGLICAN DIOCESE OF BENDIGO  
PRIVACY POLICY OF THE  
PARISH OF #####

**(Policy for adoption by each Parish, updated February 2018)**

The Parish Council of the Parish of #####<insert Parish name> 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.

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#### *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.

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

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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*

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 report template is provided on the Diocesan website under the Parish Resources section <http://www.bendigoanglican.org.au/>.

The template is designed to assist gathering all relevant information that is known at that time. It may also assist in identifying 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 – Data breach reporting form template, available on Diocesan website <http://www.bendigoanglican.org.au/>, search function under the Parish Resources tab
- Diocesan Clergy Manual – Refer 5.7 Parish Records and Archives.

### *Related Documents: External*

- <http://www.oaic.gov.au/privacy/privacy-act/national-privacy-principles>