

# Privacy Policy

This Policy applies to The Anglican Parish of St Stephen and St Mary, Mount Waverley, Victoria ('Parish'). This Policy sets out our obligation to manage and protect the personal information we hold about people.

We respect your privacy, and through this Policy and the way we do things, we will comply with the Australian Privacy Principles ('APPs') contained in the Privacy Act 1988 (Cth) ('Privacy Act').

## 1. The kinds of information we collect

'Personal information' is information or an opinion relating to a person, which could be used to identify that person. This may include names, dates of birth, contact details such as telephone numbers, email addresses or addresses, and information about your involvement at our Parish.

Some personal information, which we collect, is 'sensitive information'. Sensitive information may include information relating to a person's racial or ethnic origin, criminal record, and may also include health information.

## 2. How we collect personal information

We generally collect personal information directly from people. For example, a person may telephone, send us a letter or email, or speak with us in person. Also, we will collect personal information from forms filled out by people, during discussions, and from other people.

## 3. Whose personal information do we collect?

The type of information we may collect and hold includes (but is not limited to) personal information about:

- parishioners, particularly those on our rosters and in voluntary roles;
- other people we deal with;
- donors of money where receipts are required for taxation purposes; and
- employees.

## 4. How much personal information do we need?

We may require that a person provide their name as part of collecting their personal information. We will only do this where the purpose for the collection of the information requires the name of the person providing the information. If we do not specifically require a person's name as part of a collection then that person has the right to give us their name, to remain anonymous, or to provide the information under a pseudonym.

For example, if you are planning a baptism or a wedding with us, we would collect relevant information including identifying information.

In some circumstances, we may be provided with personal information about a person from somebody else, for example a referral from another person. Where this happens, we will take reasonable steps to ensure that people are aware of the matters set out in this Privacy Policy.

If personal information we request is not provided, we may not be able to process an individual's application to join the Parish's electoral roll, provide individuals with the benefit of our services, or meet an individual's needs appropriately.

## **5. Why do we collect personal information?**

We collect personal information so that we may:

- provide personal ministry services to our parishioners, and to others seeking assistance;
- prepare various records and documents used for Parish administrative purposes;
- issue receipts, including for tax deductible donations;
- help us manage and enhance our services; and
- meet our obligations as an employer.

## **6. Documents in which Personal Information is recorded include:**

### **a) Parish Registers**

We maintain registers of baptisms, weddings and funerals and it is intended that these be kept forever. Other records are kept in accordance with legislative requirements including tax and employment legislation.

### **b) Parish Electoral Roll**

A list of parishioners who are eligible to participate in Parish governance activities in accordance with the Parish Governance Act (2013) and associated regulations.

### **c) Parish Roll**

A comprehensive list of parishioners and their contact details is maintained for use by clergy, staff, and our Parish Wardens.

### **d) The Parish Directory**

If you would like to share all or some of your contact details with others you may ask to be included in the Parish Directory which only includes details of those who consent to their details being shared, and which is only distributed, in hard copy, to people included in the Directory.

### **e) Rosters and membership lists**

Rosters are also prepared for various duties associated with church services. Member lists are prepared by groups and organisations within the parish. Parishioners on those rosters and membership lists must respect the privacy of those whose details are included.

## **7. How might we use and disclose personal information?**

When we refer to 'use' of personal information, we mean use within the Parish for the purposes outlined above. When we use the word 'disclose', we mean providing the information to persons outside the clergy and staff of the Parish. Disclosure outside the clergy and staff of the Parish would be rare.

We use and disclose personal information for the following purposes:

- to provide personal ministry services to our parishioners;
- to provide personal ministry services to other persons who may seek our services;
- to provide individuals with the Parish Directory (if prior consent is obtained);
- to comply with our legal obligations or to comply with Diocesan Professional Standards requirements; and
- to help us manage and enhance our services.

We may use and disclose personal information for the primary purposes for which it is collected, for reasonably expected secondary purposes, which are related to the primary purpose and in other circumstances authorised under privacy legislation. Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless the person whose information is held agrees otherwise, or where certain other limited circumstances apply (for example where required by law or to comply with Diocesan Professional Standards requirements).

## **8. We do not use your information for marketing purposes**

We do not disclose personal or sensitive information we collect to others for the purpose of allowing them to direct market their products and services.

## **9. Providers of services to the Parish**

If we engage other people to perform services for us, this may involve that person handling personal information we hold. In these situations, we prohibit that person from using personal information about you except for the specific purpose for which we supply it.

In relation to sensitive information held by us, wherever possible, we will attempt to de-identify the information. We also undertake to delete all sensitive information about a person when it is no longer needed or relevant.

## **10. When will we disclose personal information?**

We may disclose personal information to:

- other parishioners;
- consultants we engage;
- regulatory authorities, if required by law;
- to comply with Diocesan Professional Standards requirements; and
- anyone else the person authorises us to disclose it to.

We also collect personal information from these organisations and individuals, and deal with that information in accordance with this Policy.

## **11. Sending information overseas:**

We will not send personal information to recipients outside of Australia without:

- obtaining consent (in some cases this consent will be implied); or
- otherwise complying with the APPs.

## **12. Social Media**

We use some social media websites, such as FaceBook. Users of those websites are able to upload content, including personal information, to the portions of those websites associated with the Parish. We will not request or require any person to upload personal information to social media websites. We will not record or collect any personal information uploaded to social media websites.

Users of social media websites are strongly advised to familiarise themselves with the privacy policies of those websites before uploading any personal information to those web sites.

Administration rights to our social media sites are restricted, and special care is taken with images of children and young people.

## **13. Images of your own children**

We understand that parents and guardians may wish to upload pictures of their own children enjoying parish activities on their own social media pages. Please take care not to include images of other children in these uploads.

## **14. Management of personal information**

The APPs require us to take all reasonable steps to protect the security of personal information.

The Parish takes reasonable steps to protect personal information from misuse, loss or unauthorised access, modification or disclosure, for example by use of physical security and restricted access to electronic records.

All personal information contained in hard copy documents held by the Parish is stored in locked offices, other than rosters which are occasionally left in the narthex for collection by Parishioners.

Where we no longer require the personal information for a permitted purpose under the APPs, we will take reasonable steps to destroy it, other than the Parish Registers referred to above.

## **15. Identifiers**

We will not use identifiers assigned by the Government, such as a tax file number, Medicare number or provider number, for our own file recording purposes.

## **16. How do we keep personal information accurate and up-to-date?**

We take reasonable steps to ensure that the personal information we hold is accurate, complete and up-to-date. We encourage people to contact us in order to update any personal information we hold about them. Our contact details are set out below.

You may access your own personal information. Subject to the exceptions set out in the Privacy Act, individuals may gain access to the personal information we hold about them by contacting our Privacy Officer.

If we refuse to provide the information, we will provide reasons for the refusal and inform the applicant of any exceptions relied upon under the Privacy Act.

A person's request for access to their personal information will be dealt with by allowing the person to look at their personal information at the Parish office. We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged for providing access. We will advise the likely cost in advance whenever practicable.

## **17. Updates to this Policy**

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing social environment.

## **18. Enquiries**

Our Vicar is our Privacy Officer. If you have any questions or wish to view or amend information about you, please contact us by telephoning 9807 3168.