

# PARISH OF SOUTH DAREBIN – PRIVACY POLICY

## PURPOSE AND SCOPE

Commonwealth legislation prescribes a set of 'Australian Privacy Principles' that generally apply to departments and organisations, including the Anglican Diocese of Melbourne.<sup>1</sup> A copy of these principles is included as Attachment 1. In line with this, and as part of its approach to making the church safe for all people, the Diocese of Melbourne requires that all parishes and churches develop, adopt and abide by a policy on the collection, use and disclosure of information.

This policy applies to personal, health and sensitive information collected in the ordinary course of parish activity. This policy applies to all worship centres in the Parish of South Darebin.

The handling of personal, health or sensitive information disclosed confidentially in the context of individual pastoral care by a member of the clergy is not covered by this policy, but is governed by the relevant professional standards and codes of ethical conduct for the clergy. The Parish has a separate privacy policy covering its websites.

## POLICY STATEMENT

The Parish of South Darebin is committed to protecting the privacy, accuracy and security of all personal information and will apply the 'Australian Privacy Principles' as they apply from time to time.

Personal information shall only be collected where the information is reasonably necessary for the function and activities of the Parish and to the health, well-being and protection of its parishioners and visitors. We will take all reasonable steps to ensure that the personal information we collect and hold is accurate.

It is policy that all clergy, office bearers and other parishioners of the Parish respect the confidentiality of personal information held by the Parish and the privacy of individuals. We will take all reasonable steps to protect personal information from misuse, interference or unauthorised access.

Where possible, we will allow you to interact with us anonymously, for example when attending church services. For some ministry programs and activities we will need to collect your name and contact information and, if you want to work with us as a volunteer, you cannot interact with us anonymously.

## PROCEDURES

### Collection and use of Information

The Parish may collect names and addresses and other personal information from parishioners for the following purposes:

- Enrolment on the Parish Roll for voting, representation and membership purposes.
- Communicating parish business; for example intra parish contact related to financial, governance or management processes such as schedules or rosters.
- Disseminating information about activity in the community, such as working bees, parish luncheons, musical activity or newsletter distribution.
- Providing pastoral services such as visiting, healing, counselling; provision of services such as funerals, weddings and the sacraments of baptism and confirmation.
- Communicating with a nominated closest relative or other nominated person in the event of a medical or other emergency affecting a parishioner, or for other purposes with the consent of a parishioner.

The Parish may collect names and addresses and other personal, health or sensitive information (as appropriate) from non-parishioners for the following purposes:

- Making commercial arrangements for the hire of facilities or non-commercial arrangements for the use of the church or other facilities for the conduct of weddings, funerals, interments or other services.
- Making employment, contracting, leasing and payment arrangements with individuals or organisations.
- Responding to complaints, enquiries or other correspondence, or for other purposes with the consent of a non-parishioner.

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<sup>1</sup> Privacy Act 1988 (C'th)

The Parish may hold personal information for the purpose of:

- Maintaining a record of the informal and formal life of the Parish community, through collected artefacts, documents, photographs or other identifying images depicting church activities such as music performances, community sales, celebrations, commemorations, weddings, baptisms, confirmation or other events.
- Maintaining a record of the informal and formal life of the Parish community through copies of newspaper articles, newsletters or other documents, which may include personal information and/or identifying images.

The Parish will collect health information from parishioners only for the following purposes:

- Adjusting provision to cater for special dietary needs; for example, gluten-free wafers to be available at the Eucharist (on parishioner request).
- Providing assistance to people with a disability or identified health risk requiring specific first aid (on parishioner request).
- Completing an incident report or submitting an incident report to the Diocese of Melbourne, which includes reference to medical treatment following an injury or suspected injury sustained at the church.
- Where the information is required as part of a complaint procedure.

The Parish will collect sensitive information from parishioners or others only for the following purposes:

- Where the Diocese of Melbourne requires the church to hold information about a person's status with regard to their criminal record, and/or whether they hold a valid Working with Children Check.
- Where the information is required as part of a complaint procedure.

### **Storage**

Personal, health and sensitive information collected by the church will be stored appropriately and may only be used for the purpose for which it was collected.

Personal information about nominated emergency contacts will be held in a suitably non-public location, accessible only to authorised persons.

Sensitive information including information related to National Police Checks or other records relating to criminal record will be held confidentially in the relevant church Health and Safety files, paper and electronic.

Personal and other information about a parishioner who has died or left the parish, including information identifying their emergency contacts, shall be removed from use, and either be destroyed securely or retained in the church's documentary and image archive.

Church records containing identifying information, including images, will be held in the documentary archive storage area or safe, accessible only on application to the Vicar.

Personal, health and sensitive information collected for the purpose of a complaint procedure will be held in compliance with Diocesan requirements for handling a complaint, including a complaint with respect to protection of privacy.

### **Disclosure of Information**

Personal information may be distributed within the parish, for example via weekly pew bulletins, annual issue of the Parish Directory, church newsletters, or through other means, with consent.

Personal information identifying a child will not be included in material distributed within the parish, including in pew bulletins, the Parish Directory, the church newsletter or other routine exchanges of information, except with the consent of a parent or guardian.

Personal information will not be made available to visitors or members of the general public through materials displayed in the church, except by consent (where reasonably obtainable).

Personal information identifying individuals by full name, email addresses or phone numbers, or other identifying information, will not be published on a Parish website, except with consent.

Personal information about a parishioner, including their email address, will not be disclosed to others via an email message, except with consent.

Personal, health and sensitive information will not be disclosed to any organisation or individual outside the parish except with consent, by a requirement under the law, or for historical or family research purposes at the discretion of the Vicar.

A person about whom the Parish holds personal, health or sensitive information may access, modify or withdraw permission to hold this information at any time, on request to the Vicar or other responsible person.

Health information will only be made available to those who need to know the information for the purpose it was provided, except with consent.

### **Accessing and Correcting Personal Information**

You have the right to ask for access to personal information held by the Parish about you and to ask us to correct that personal information. You may be asked to verify your identity before we give you access.

### **Unauthorised Disclosure of Personal Information**

In accord with the Notifiable Data Breaches Scheme, where the Parish identifies, or has been informed, that there has or may have been an unauthorised disclosure of personal information, the Parish will immediately contain the data breach, assess the nature of the breach and seek professional advice on the appropriate response which may include taking action to remediate any risk of harm, notification to any individuals possibly affected and to the Australian Information Commissioner<sup>2</sup> and reviewing the incident to prevent future breaches.

### **HOW TO MAKE A COMPLAINT**

If you are unhappy with any aspect of the collection, use or disclosure of your personal, health or sensitive information by the Parish or consider that we have breached the Australian Privacy Principles, and wish to make a complaint, in the first instance, contact the Vicar of the Parish or the Diocese of Melbourne's Privacy Officer. If your complaint is not resolved to your satisfaction, you can contact the Office of the Australian Information Commissioner at <[www.oaic.gov.au/about-us/contact-us](http://www.oaic.gov.au/about-us/contact-us)> or on phone 1300 363 992.

### **RELATED DOCUMENTS**

Australian Privacy Principles, Office of the Australian Information Commissioner

Office of the Australian Information Commissioner <[www.oaic.gov.au](http://www.oaic.gov.au)>

Privacy Policy, Anglican Diocese of Melbourne, 2022

*Privacy Act 1988 (C'th)*

*Professional Standards Act 2009* (Diocese of Melbourne)

Website Privacy Policy – All Saints (n.d.)

### **ATTACHMENTS**

Australian Privacy Principles.

### **DEFINITIONS**

**Authorised persons:** Authorised persons may include any of the people authorised by the Diocese of Melbourne to occupy specific governance or functional roles within the parish including the Vicar or other licensed cleric, and appointed or elected lay people, at any of the centres.

**Health information:** Health information includes anything about the health or disability of a person; for example, special first aid requirements, medications, known allergies or risk factors, details of medical supervision.

**Personal information:** Personal information includes information or opinion that could identify a person or allow someone to identify a person; for example, first and family names, gender, private addresses, telephone numbers, email addresses, information about occupations, professions or workplaces, work email addresses or workplace street addresses.

**Sensitive information:** Sensitive information includes racial or ethnic origin, political affiliations, philosophical beliefs, membership of a trade union or other association, sexual orientation or practices, criminal record.

**The Parish:** The Parish means either or both worship centres of the Parish of South Darebin: All Saints, Northcote and St James the Great, Thornbury, and their clerical and elected lay leaders.

### **DATE OF APPROVAL / DATE OF REVIEW**

26 February 2024 / 26 February 2027. Note: This policy supersedes the Privacy Policy 2016.

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<sup>2</sup> Note: It is mandatory to notify the Australian Information Commissioner of certain categories of data breach.

# Australian Privacy Principles — a summary for APP entities

from 12 March 2014



Australian Government  
Office of the  
Australian Information Commissioner

## **APP 1 — Open and transparent management of personal information**

Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.

## **APP 2 — Anonymity and pseudonymity**

Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

## **APP 3 — Collection of solicited personal information**

Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.

## **APP 4 — Dealing with unsolicited personal information**

Outlines how APP entities must deal with unsolicited personal information.

## **APP 5 — Notification of the collection of personal information**

Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.

## **APP 6 — Use or disclosure of personal information**

Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.

## **APP 7 — Direct marketing**

An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.

## **APP 8 — Cross-border disclosure of personal information**

Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.

## **APP 9 — Adoption, use or disclosure of government related identifiers**

Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.

## **APP 10 — Quality of personal information**

An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

## **APP 11 — Security of personal information**

An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.

## **APP 12 — Access to personal information**

Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.

## **APP 13 — Correction of personal information**

Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.

[www.oaic.gov.au](http://www.oaic.gov.au)

For private sector organisations,  
Australian Government  
and Norfolk Island agencies  
covered by the *Privacy Act 1988*