

Privacy Policy

Adoption Date 22 June 2015
Last Review 13 April 2017
Next Review 13 April 2020
Revision Number 4



1 REVIEW POLICY

This policy shall be reviewed every three years.

2 CIRCULATION

Public.

3 PURPOSE

Privacy Policy summarises how Anglican Churches Springwood handles personal information.

4 CONTENT

4.1 Commitment

We are committed to protecting your personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles, though our church is not legally bound by the Act.

By visiting our website, using any of our services or otherwise providing us with your personal information (or authorising it to be provided to us by someone else), you agree to your personal information being handled as set out in this Privacy Policy.

This privacy policy does not cover how we will deal with the personal information of those who apply for employment with us. This is covered in a separate policy – “Sydney Diocesan Secretariat Privacy Policy – Employment Applications”.

4.2 Definitions

For the purposes of this policy:

Personal Information is information or an opinion about an identified individual or an individual who is reasonably identifiable.

Sensitive Information includes information about your health, your race or ethnic origin, political opinions and religious beliefs.

4.3 Personal Information

Anglican Churches Springwood only collects personal information that is necessary for the provision of our services. This includes but is not limited to information about:

- Members (and prospective members) of Anglican Churches Springwood
- Clergy, ordinands and lay ministers
- Officeholders, employees and volunteer workers of Anglican Churches Springwood
- Other people with whom we come in contact

Anglican Churches Springwood may collect a wide range of personal information such as name, phone number(s), residential and postal address, email address(es), date of birth, qualifications, educational and/or experience. We will only collect this information where it is reasonably necessary for the provision of our services.

4.4 Sensitive Information

Some personal information that we collect may also be sensitive information.

The most common form of sensitive information we collect is in relation to religious beliefs. For example, we may seek information about your religious beliefs (including your assent to a statement of faith) and your broader involvement in ministry activities, for the purpose of determining your suitability for appointment to a position. We may also need to collect information related to medical conditions such as allergies and known behavioural issues with children.

4.5 Collection and Storage

Anglican Churches Springwood may collect your personal information in various ways, including via telephone, our website, in writing (including by email or other electronic means) and/or through online forms/surveys, whether hosted on a third-party website or our own.

4.5.1 Sensitive Information – Anglican Churches Springwood will only collect sensitive information about you with your consent unless:

- we are otherwise allowed or required by law to collect that information, or

- the information relates to our activities and relates solely to members of Anglican Churches Springwood or to individuals who have regular contact with us in connection with our activities.
- If you provide us with sensitive information about yourself which is necessary for the provision of our services, we will treat this as collection of such information with your consent.

4.5.2 Third Parties - In most situations we collect your personal information directly from you. However, we may also collect information from third parties if it is impractical to collect it directly from you.

4.5.3 Unsolicited Personal Information - If we receive personal information about you that we have not requested (unsolicited personal information) we will generally, unless otherwise required or permitted by law, delete or destroy it as soon as practical after receiving it. If you provide us with unsolicited personal information about yourself we may retain this information if it is necessary for the provision of our services or to comply with our legal obligations, or we do so with your consent.

4.5.4 Collection of Personal Information required by law - In certain circumstances we may be required or permitted by law to collect certain personal information about you. For example, we may need to collect your name, residential address, country of residence, date of birth, and other types of personal information to comply with our legislative obligations. You do not have to provide us with your personal information but if you do not provide us with the personal information that we need, we may not be able to provide services or assistance to you.

4.5.5 Storage - Anglican Churches Springwood will, at its discretion, store personal information through the use of internal servers and/or Online Third party databases. Where third party sites are used, all care will be taken to ensure they have the appropriate security measure and guarantees provided to the Church regarding the security of its data.

In the event of data breach, Anglican Churches, Springwood will inform its members as soon and reasonably possible and advise any actions to mitigate the effects of the breach.

4.6 Purpose of Personal Information

Anglican Churches Springwood only collects, holds and uses personal information for the purposes for which it was provided, related purposes that we consider to be within your reasonable expectations or as permitted or required by law. Such purposes may include –

- contacting you regarding matters of church life that you have an interest in, including the dissemination of information about church activities;
- seeking your views on a social/moral issue to assist in planning teaching programs;
- assessing your suitability for nomination, election or appointment to a council, committee or ministry;
- convening meetings of councils, committees and ministries;
- processing authorised payments to and from you;
- providing you with services that have been requested; and
- any other uses identified at the time of collecting your personal information.

4.7 Disclosure

Any personal information provided to us may be disclosed, if we consider it appropriate, to other entities of the Anglican Church Diocese of Sydney, including the Archbishop's Office and Diocesan Registry (including the Professional Standards Unit).

We will not disclose your personal information to any other entity for the purposes of that entity soliciting donations from you.

We may also disclose your information to government bodies, regulators, law enforcement agencies and any other parties where authorised or required by law.

Anglican Churches Springwood may disclose your personal information to third party service providers, agents or contractors from time to time to help us to provide our services. If we do this, we generally require those parties to protect your personal information in the same way we do.

We may also disclose your information to any other entities identified at the time of collecting your personal information or which you subsequently request or expressly consent to us providing with your personal information.

4.7.1 Disclosure to members of Anglican Churches Springwood - Anglican Churches Springwood does not make information available to members unless you have specifically agreed to:

- including your personal details in a printed Parish Directory
- making your details available in an online system accessible only by members with an approved login identity

In the case of an urgent telephone enquiry, where we reasonably expect that you will not mind having your contact details disclosed to a known party, we may pass on contact details for the purposes of that enquiry.

4.8 Visual Images

Photographs and videos are treated as personal information where a person's identity is clear or can be worked out from

the image. Consent is not required to collect images of individuals unless the image records sensitive information about the individual. The Church may, from time to time, take photographs or video of participants in church activities for promotional purposes. These images will only be used for the church's promotional purposes. The Church will take reasonable steps to ensure participants of church events are aware of details regarding data collection prior to its occurrence. In the case of children (under 18 years old) being recognisable in an image, the Church will seek to obtain parental permission before such images are used. No persons will be specifically identified in images published (including online images) by the Church without first receiving the approval of the individual to do so.

4.9 Protection

We take reasonable steps to protect any personal information that we hold from misuse, interference and loss and from unauthorised access, alteration and disclosure. For example, we implement the following security measures:

- security procedures for access to our internal office areas;
- security procedures within our offices (including, locked cabinets and file rooms for personal information that is particularly sensitive);
- IT security procedures including password protection, firewalls, intrusion detection and site monitoring; and
- a requirement for all staff to maintain confidentiality except insofar as disclosure is reasonably necessary for the proper performance of employment duties (as outlined in workplace policies and/or employment contracts).

4.10 Access

You may access personal information we hold about you, subject to certain legal restrictions or exemptions. Where such restrictions or exemptions exist, we will advise you of those reasons at the time of your request.

If you wish to access the personal information we hold about you or request that it be corrected or updated, you should contact our Privacy Officer using the contact details below.

We take reasonable steps to ensure that the personal information we hold about you is accurate, complete and up-to-date. However, we also rely on you to advise us of any changes to your personal information in a timely manner.

If there are any changes to your personal information or if you believe the personal information we hold about you is not accurate, complete or up-to-date, please update your information through your Elvanto profile if possible, or contact the Anglican Churches Springwood staff member responsible for our provision of services to you, or if you are unsure who this person is, our Privacy Officer using the contact details below, so that we can update our records accordingly.

4.11 Complaint Handling

If you wish to make a complaint about a breach of this Privacy Policy or Australian Privacy Principles, you can contact us using the contact details below.

You will need to provide us with sufficient details regarding your complaint together with any supporting evidence.

We will refer your complaint to our Privacy Officer who will investigate and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation within 30 days of the date your complaint is made or the date you provided us with any additional information.

If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au.

4.12 Changes to the Privacy Policy

Anglican Churches Springwood may update this Privacy Policy from time to time so please review it periodically on our website at springwoodanglican.org.au for any changes.

Your continued use of our services (including online services), requesting our assistance or the provision of further personal information to us (directly or via an authorised person) after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

Note to those conducting the next review of this policy: Anglican Churches Springwood does not have to comply with the Office of the Australian Informational Commissioner Notifiable Data Breaches Scheme due to an annual turnover of less than the legislated threshold. However, the scheme does provide guidelines for proper handling of a data breach which may be useful when reviewing and re-drafting this policy. For further information see: <https://www.oaic.gov.au/privacy-law/privacy-act/notifiable-data-breaches-scheme>.

5 CONTACT US

If you have a query relating to this Privacy Policy or wish to make a complaint, please contact us using the following contact details:

The Privacy Officer
Anglican Churches Springwood
28 Lawson Rd
Springwood NSW 2777
Ph: 02 4751 1065

6 REVISION AND REVIEW HISTORY

Revision Number	Date	Changes/Comments
1	22 May 2014	Initial adoption
2	13 April 2017	Update 3.8 Visual Images Update to the storage of information
3	25 May 2018	Correct error in section 2: Purpose
4	14 June 2018	Added note in section 3.12