



# PRIVACY POLICY

## CONTENTS

|   |   |   |
|---|---|---|
| 1 | PURPOSE.....                            | 1 |
| 2 | SCOPE.....                              | 1 |
| 3 | POLICY STATEMENT .....                  | 1 |
| 4 | RESPONSIBILITIES .....                  | 2 |
|   | Compliance, monitoring and review ..... | 2 |
|   | Reporting.....                          | 3 |
|   | Records management.....                 | 3 |
| 5 | DEFINITIONS .....                       | 3 |
| 6 | RELATED LEGISLATION AND DOCUMENTS ..... | 3 |
| 7 | FEEDBACK.....                           | 3 |
| 8 | APPROVAL AND REVIEW DETAILS.....        | 3 |
| 9 | APPENDICES .....                        | 3 |

## 1 PURPOSE

To set out the policy on how the Diocese of North West Australia uses and manages personal information provided to or collected by it according to the *Privacy Act 1988 (Cth)*.

## 2 SCOPE

This policy sets out:

- The standard by which we handle personal information
- The kinds of personal information the Diocese collects and holds
- The way the Diocese collects personal information
- The purpose for which the Diocese collects and holds personal information
- The rights of individuals to access the personal information we hold about them
- How to make a complaint about the accuracy or handling of their information
- Whom to contact if more needs to be known about our approach to privacy

## 3 POLICY STATEMENT

The Diocese is committed to protecting the personal information of individuals in accordance with the *Privacy Act 1988* and the Australian Privacy Principles (APP) and as described below.

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

Personal information is collected in an open and transparent manner as outlined in the Procedure Appendix 1 as modified from time to time.

### APP 2 Anonymity and pseudonymity

Individuals must have the option of not identifying themselves or using a pseudonym when providing information of a sensitive nature.

### APP 3 Collection of solicited material

Information collected must be 'reasonably necessary' for the Diocese's functions or activities.

#### **APP 4 Unsolicited personal Information**

If the Diocese receives personal information it did not solicit then a decision must be made as to whether the information is necessary to the function or activities of the Diocese and if not the information is destroyed or deidentified.

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

The Diocese must inform individuals that it is collecting and storing information and why the information is necessary either at the time of collection or as soon as practical thereafter.

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

The Diocese must only use the collected information for the purpose for which it was collected. Otherwise the Diocese must notify the individual and obtain consent for use for another purpose unless the information is required under Australian law or a court or tribunal order or Police action or applies to a critical health situation.

#### **APP 7 Direct marketing**

The Diocese may use collected private information for the purpose of direct marketing as it applies to the purpose and mission of the Diocese. An individual has the right to request removal from direct marketing communication.

#### **APP 8 Cross Border disclosure of information**

Before the Diocese discloses personal information about an individual to an overseas recipient, the Diocese must take reasonable steps to ensure that Australian Privacy Principles are not breached.

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

The Diocese will not use government related identifiers as its own identifier unless required or authorised by an Australian law or court or tribunal order.

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

The Diocese will take steps to ensure that personal information is accurate, up to date and complete and that any information disclosed is accurate, up to date and complete.

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

The Diocese will take reasonable steps to ensure that information is protected from misuse, interference and loss and that unauthorised access, modification or disclosure is prevented. Should this occur, the Diocese will notify individuals of the data breach as soon as reasonable following the discovery of the event. The Diocesan Information Technology Policy has a direct bearing on data security. In the case of an external audit, a Diocesan officer will remain present to ensure that the Auditor only accesses the records they require and not personal information.

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

The Diocese will allow, on request by the individual, access to the information held about them except where the Diocese reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual or to public safety or would unreasonably impact on the privacy of other individuals.

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

The Diocese will take reasonable steps to correct information it holds to make it accurate, up to date, complete and not misleading. If as a result of a request to access personal information, the Diocese is notified of an error or omission in the information, it will make the changes unless there is reason to refuse in which case, a written notice outlining reasons for refusal will be provided and mechanisms available for complaint will be provided.

## **4 RESPONSIBILITIES**

### **Compliance, monitoring and review**

- The Diocesan Privacy Officer (DPO) shall ensure compliance with this policy

- The DPO will monitor and respond to requests for disclosure of private information held.
- The DPO will report to Diocesan Council from time to time regarding compliance with this policy.

## Reporting

No additional reporting is required except as outlined in Responsibilities above.

## Records management

The Registry maintains all records relevant to administering this policy using its record keeping system.

## 5 DEFINITIONS

**Ministry Centre:** an Ecclesiastical District (Parish, Provisional Parish or Mission District) or Extra-parochial institution within the Diocese that delivers a religious or social service.

Terms not defined in this document may be found in the Diocesan Glossary at [www.anglicandnwa.org](http://www.anglicandnwa.org).

## 6 RELATED LEGISLATION AND DOCUMENTS

*Privacy Act 1988* (Cwth)

Australian Privacy Principles <https://www.oaic.gov.au/individuals/privacy-fact-sheets/general/privacy-fact-sheet-17-australian-privacy-principles>

Information Technology Policy

Procedure for Collecting Private Information

## 7 QUESTIONS & FEEDBACK

Church members may provide feedback about this document by emailing [registrar@anglicandnwa.org](mailto:registrar@anglicandnwa.org).

## 8 APPROVAL AND REVIEW DETAILS

| Certifications and Assent            | Details   | Signature | Date |
|--------------------------------------|---|-----------|------|
| Chair of Committees                  | Certified as printed in accordance with the regulation as reported  |           |      |
| Registrar                            | Certified as passed by the Diocesan Council   |           |      |
| Bishop                               | Assented  |           |      |
| Approval and Amendment History       | Details   |           |      |
| Original Approval Authority and Date | Diocesan Council 16/05/2018   |           |      |
| Next Review Date                     |   |           |      |
| Amendment Authority and Date         | Diocesan Council 16/05/2018; Diocesan Council 20/02/2019; Diocesan Council 21/08/2019   |           |      |
| Notes                                | This document consolidates and replaces the previous Privacy Policy, Privacy Statement Parish Notice and Privacy Statement Diocesan Notice; which replaced the previous Privacy Policy No 8.3 ( <i>Administration Manual</i> pp 61-65). |           |      |

## 9 APPENDICES

1. Guidelines for Collecting Personal Information

## GUIDELINES FOR COLLECTION PERSONAL INFORMATION

### What is personal information?

Section 6 of the *Privacy Act* defines 'personal information' as 'information or an opinion about an identified individual, or an individual who is reasonably identifiable. This includes a person's name and address, medical records, bank account details, photos, videos; even information about what an individual likes, their opinions and where they work.

### Questions to ask before collecting personal information

- Is the information you are collecting necessary to carry out your function or activity?
- Is the information accurate and how will you update or correct the information if necessary? What will you do about complaints about the information held?
- If information is to be used (such as photographs, video or names) in printed or computer-based media, have you obtained permission to use the data in that way? This particularly applies to children, but may also be appropriate to adults in some situations. It is always best to check!
- How is the information to be held?
- What protection is there of the data?
  - Who is to be able to access the data? Is training provided about data security?
  - Is it held in a locked "paper" file; are the keys kept in a secure location?
  - Is it in a secure computer file; are there robust passwords and firewalls surrounding the data? Is the security regularly checked? How often is the data backed up and how are the backups held?
  - How are individuals to be notified if there is a breach of security and privacy is threatened?
- How will the data be destroyed or de-identified when it is no longer needed?

If you are unsure of the answers to any of these questions, please talk to your Minister-in-Charge or the Diocesan Privacy Officer, who can be contacted at the Diocesan Office:

Email: [registrar@anglicandnwa.org](mailto:registrar@anglicandnwa.org)  
Telephone: (08) 9921 7277  
Post: PO Box 2783, Geraldton, 6531  
In person: 101 Cathedral Avenue, Geraldton