

# PRIVACY POLICY

## 1. Introduction

Victoria's privacy laws regulate how government bodies use and disclose personal information. 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.

## 2. Scope

- 2.1 This policy applies to personal, health and sensitive information collected in the ordinary course of church activity.
- 2.2 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.
- 2.3 This policy applies to all centres in the Parish of South Darebin.

## 3. Definitions

- 3.1 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.
- 3.2 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.
- 3.3 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.
- 3.4 The church means any of the centres of the Parish of South Darebin: All Saints Northcote, St James the Great, Thornbury, and St Paul's Fairfield, and their clerical and elected lay leaders.

- 3.5 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.

#### **4. Collection of information**

- 4.1 The church may collect names and addresses and other personal information from parishioners for the following purposes:
- 4.1.1 Enrolment on the Parish Roll for voting, representation and membership purposes.
  - 4.1.2 Communicating church business; for example intra parish contact related to financial, governance or management processes such as schedules or rosters.
  - 4.1.3 Disseminating information about activity in the community, such as working bees, parish luncheons, musical activity or newsletter distribution.
  - 4.1.4 Providing pastoral services such as visiting, healing, counselling; provision of services such as funerals, weddings and the sacraments of baptism and confirmation.
  - 4.1.5 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.
- 4.2 The church may collect names and addresses and other personal, health or sensitive information (as appropriate) from non-parishioners for the following purposes:
- 4.2.1 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.
  - 4.2.2 Making employment, contracting, leasing and payment arrangements with individuals or organisations.
  - 4.2.3 Responding to complaints, enquiries or other correspondence, or for other purposes with the consent of a non-parishioner.
- 4.3 The church may hold personal information for the purpose of:
- 4.3.1 Maintaining a record of the informal and formal life of the church 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.

4.3.2 Maintaining a record of the informal and formal life of the church community through copies of newspaper articles, newsletters or other documents, which may include personal information and/or identifying images.

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

4.4.1 Adjusting provision to cater for special dietary needs; for example, gluten-free wafers to be available at the Eucharist (on parishioner request).

4.4.2 Providing assistance to people with a disability or identified health risk requiring specific first aid (on parishioner request).

4.4.3 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.

4.4.4 Where the information is required as part of a complaint procedure.

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

4.5.1 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.

4.5.2 Where the information is required as part of a complaint procedure.

## **5. Storage, use and disclosure of information**

5.1 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.

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

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

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

- 5.5 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.
- 5.6 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.
- 5.7 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.
- 5.8 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.
- 5.9 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).
- 5.10 Personal information identifying individuals by full name, email addresses or phone numbers, or other identifying information, will not be published on the church website at <http://www.allsaintsnorthcote.org.au>, except with consent.
- 5.11 Personal information about a parishioner, including their email address, will not be disclosed to others via an email message, except with consent.
- 5.12 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.
- 5.13 A person about whom the church 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.
- 5.14 Health information will only be made available to those who need to know the information for the purpose it was provided, except with consent.

## **6. Making a privacy related complaint**

- 6.1 A person who is unhappy with any aspect of collection, use or disclosure of personal, health or sensitive information covered by this policy should make a complaint in the first instance to the Vicar.

## **7. Related documents**

*Professional Standards Act 2009 updated 2012*

<http://www.melbourneanglican.org.au/Whoweare/Governance/professionalstandards/Documents/Professional-Standards-Act-2009-updated-2012.pdf>

*Code of Good Practice for Clergy*

<http://www.melbourneanglican.org.au/Whoweare/Governance/professionalstandards/Documents/Code-of-good-practice-for-clergy.pdf>

*Protocol for complaints of misconduct against a church volunteer [churchwarden or other authorised layperson]*

<http://www.melbourneanglican.org.au/Whoweare/Governance/professionalstandards/Documents/Church-volunteer-protocol-mar-2013.pdf>