



Come & See

St Philip's Anglican Church O'Connor

Privacy policy

St Philip's Parish Council by resolution adopts this policy

Resolution date	3 March 2021
Electronic file name	PrivacyPolicy.docx
First introduced	July 2018
Next review	March 2022

Purpose

This *Privacy policy* summarises how St Philip's will deal with your personal information.

Commitment

St Philip's is committed to protecting your personal information in accordance with the *Privacy Act 1988 (Cth)* ("the *Privacy Act*") and the *Australian Privacy Principles* (APPs). We are bound by the APP as a ministry unit of the Anglican Diocese of Canberra and Goulburn.

By 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*.

Some parishioners may consider personal information such as addresses and contact information as sensitive. We acknowledged that and, through appropriate Parish procedures, we will handle and treat such information as sensitive information. However, under the *Privacy Act*, sensitive information has a specific definition (see below).

Definitions

The *Privacy Act* defines "*personal information*" and "*sensitive information*" which may be summarised as follows:

- Personal information*** means 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, sexual orientation, criminal record, political opinions/ association and religious beliefs/ association

Personal information

Where Parishioners are happy to provide it, we only collect personal information that is directly related to Parish activities and that is necessary for the provision of those services, or the proper administration of the Parish.

The principal circumstances in which sensitive information may be used include: for the Parish Directory, the Diocesan Parish Return and matters considered by Parish Council. Access may also be granted to other Parish leaders for purposes including the administration of: the rosters, the Youth Group, volunteer activities and pastoral care.

We collect a range of personal information, such as: names; phone number(s); residential, postal and email address(es); and date of birth; parental/carer contact details in relation to children and youth; and photos and videos of Parishioners involved in church activities.

Sensitive information

As St Philip's is a religious institution, by collecting information about our members and other contacts that relates to St Philip's, we are inherently collecting sensitive information about their religious beliefs as defined under the *Privacy Act*.

Beyond this, we collect sensitive information for two other purposes. On occasion through pastoral care we may collect health information, which we treat with the utmost discretion. In addition, we collect medical information that is necessary to ensure the safety of our children and youth, such as allergy information and emergency contacts for camps and other off-site activities.

Collection

We may collect your personal information in various ways, including: via telephone; and in writing (including by email, or other electronic means).

We will only collect sensitive information about you with your consent or your carer's consent,

If you provide us with sensitive information about yourself or persons in your care we will treat this as collection of such information with your consent.

The Parish website may direct users to other sites beyond the control of St Philip's. These sites may collect data or solicit personal information.

Storage and security

We only collect, hold and use 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 may be required by law.

Strict Parish practices and procedures have been put in place by Parish Council so that the information is only accessed on a need-to-know basis to enable Parish functions to be carried out by the designated persons. These purposes include the provision of our services and the proper administration of the Parish, such as through:

- Facilitating communication and involvement with activities and ministries of the Parish
- Any other uses identified at the time of collecting your personal information.

Personal information may be stored on Parish computer(s).

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

- Security procedures for access to our internal office areas
- IT security procedures including password protection.

No personal information is displayed on the Parish website or Parish social media accounts other than the names of Parish Officeholders on the website, nor does personal information other than names appear in the Parish Pewsheets which is also on the parish website.

Where we no longer need information for the purpose for which the information was collected, we will take reasonable steps to delete or destroy the information.

Disclosure

Some or all of your personal information may be available to the Rector, other clergy and parishioners, and other volunteers performing voluntary administrative roles. With consent, this information may be used by the Parish to communicate with parishioners and on social media.

With your consent, the Parish publishes your personal information in the Parish Directory. Hard copies of the Parish Directory are provided to Parishioners as requested. However, no personal information is displayed on the Parish website or Parish social media accounts other than the names of Parish Officeholders on the website.

We will not disclose information to third parties except in cases required by law or when completing reports for the Diocese on the operations of the Parish; this may include names and contact details of those who hold an elected or appointed position in the Parish.

Information in the Parish Directory may not be given to a person who is not a member of the Parish without the permission of the person to whom the information relates. Parish Council explicitly prohibits the use of the Parish Directory for any commercial purpose.

Disclosure to overseas recipients

We will not disclose your personal information to any overseas recipients. However, the Parish does sometimes use overseas-based file hosting services, such as Dropbox.

Access to your personal information

You may access personal information that we hold about you. If you wish to access the personal information that we hold about you, or request that it be corrected or updated, you should contact the Parish Office using the contact details below.

Quality of information and correction

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, up-to-date or is misleading, you may be given access to update our records directly. Otherwise please contact the Parish member responsible for our provision of services to you, or if you are unsure who this

person is, the Parish Office using the contact details below, so that we can update our records accordingly.

Complaint handling

If you wish to make a complaint about a breach of this *Privacy Policy* or the *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 the Rector 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.

Changes to the Privacy policy

St Philip's may update this *Privacy Policy* from time to time, so please review it periodically on our website at www.stphilipsoconnor.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*.

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:

Parish Office

St Philip's Anglican Church

PO Box 6022

O'Connor ACT 2602

Email: comeandsee@stphilipsoconnor.org.au

Procedures

Preparedness

Scope

This policy applies to:

- Members of Parish Council
- Parishioners who Parish Council delegate to perform Parish communications, including the following roles that may involve handling personal data:
 - Parish office filing
 - Parish emails and rosters
 - Compilation of the Parish Directory
 - Maintenance of the Master Permission database and the operational subset
 - Operators of the Parish website
 - Operators of the Parish social media account
 - Operators of Pandora's social media account
 - Leaders of the Youth Group.

Recording and Storage

- The paper privacy permission forms submitted by parishioners represent the authority to publish or not publish personal information (appendix A).
- The forms are to be scanned in the Parish office and then shredded.
- The information relevant to the Parish Directory and publication permissions is to be maintained in a Master Permission database on the Parish computer in the Parish Office.
- A Permissions Form box shall be maintained in the church foyer and cleared weekly.
- The Parish database will be updated within two weeks of receiving new forms.

Designated Users and Access

- Access to the Permissions Forms and master database is limited to:
 - the Rector
 - Parishioners performing the functions of Parish Office filing, updating of the Permissions master database and compilation of the Parish Directory
- An operational subset database containing information from those parishioners who have asked for restrictions on the use of their personal details will be maintained with access to the following additional designated users:
 - Operators of the Parish website
 - Operators of the Parish social media account
 - Operators of Pandora's social media account.
- Restricted remote access to the subset database (such as via Dropbox) will be maintained to facilitate the practical operation of the Permissions arrangements.

Parish Council

- It is the role of Parish Council to designate parishioners to perform:
 - Parish Office filing
 - Compilation of the Parish Directory
 - Maintenance of the master Permission database and the operational subset
 - Operators of the Parish website

- Operators of the Parish and Pandora’s social media accounts, and
 - Back-ups for these roles for when the primary designees are not available
- Parish Council will monitor the implementation of the Privacy Policy.
- Parish Council will include a standing item in its meeting agenda about the Privacy Policy.

Monitoring and Correction Procedures

- Parishioners responsible for publishing parish material, in particular the Parish website and social media accounts, will need to monitor any incorrect implementation of the Permissions arrangements whilst they go about performing their functions.
 - They should know the names of all recognisable faces in images for upload and check these to ensure that none are on the restricted list (that is, the operational subset database). They should confirm with others the identity of any recognisable faces that they do not know.
- Parish Council should take prompt corrective action if the wishes of parishioners have not been complied with.
 - Corrective action should be completed within a week of the breach of procedures being identified or notified
 - The individual parishioners concerned should be notified as soon as possible and advised of the corrective action being taken.

Security

- Security of personal details will be maintained through the restricted access arrangements set out above.
- The Permissions Form box will be cleared weekly and Parish Directories will not be left unattended in the church foyer.
- No address, telephone or email address of parishioners will be published in the weekly Pewsheets.

Youth Group

- Youth group leaders have a duty of care to ensure they create a safe ministry space.
- A youth group leader should be responsible for collecting information necessary for safe ministry, including relevant personal information (such as contact details of parents/guardians/carers) and sensitive information (such as basic health and allergy information).
- The designated youth group leader should ensure their dealing with information collected for this ministry complies with the Australian Privacy Principles.
- Parish Council should include the Youth Group in its annual review of its *Privacy policy*.

Pandoras

- Parish Council should include Pandoras in its annual review of its *Privacy policy*.

Review

- Parish Council will review the Privacy Policy annually.
- Parish Council will inform the Parish about the purpose of the *Privacy policy* annually.
- The next review is due by March 2022.

Response

Parish Council will:

- Inform the Rector of a privacy breach.
- Remedy breach.
- Contact IT provider for assistance as required.

Recovery

Parish Council will:

- Ensure pastoral support is available to affected people.
- Ensure the Rector's contact details are widely known.
- Provide relevant information to relevant people and bodies if a breach occurs.
- Review data security if a breach occurs.
- Review procedures if a breach occurs.

Evaluation criteria for annual review

- Compliance with Australian Privacy legislation
- Breaches during year
- Survey random sample of Pews News and social media to check compliance
- Interview parishioners with key responsibilities for their views

Related documents

- *Privacy Act 1988* (Cth)
- Australian Privacy Principles are found in Schedule 1 of the *Privacy Act 1988* (Cth)
 - The APPs relate to collection, use, disclosure, quality, security, openness, access to and correction of personal information, including sensitive information.
 - The Office of the Australian Information Commissioner produces a useful resource *Privacy fact sheet 17: Australian Privacy Principles*
- St Philip's Permission Form (Appendix A).
- Diocesan template forms, such as the Community Volunteer Application form and the annual Parish Return.
- Anglican Diocesan Services (Andrew Guile - Director, Risk and Compliance) advised that the Diocesan *Privacy policy* for its Anglican Diocesan Services (latest version V1-010917) may be considered a template for ministry units, although there are some specific sections on the collection of sensitive information that may not apply at a parish level. It is available on the Diocesan website.

Change history

Amendment/ revision/ review	Date	Comments	Requested by
Parish Council adopted March 2021 Policy	17 March 2021	Alistair Davidson proposed to endorse the Policy and Denise seconded the motion.	
Review and revision	March 2021	Completed scheduled annual review & made necessary updates.	Parish Council
Review and revision	Oct 2019	Created Privacy Policy 2019 for external audience and refined internal procedures.	Parish Council
New policy	July 2018	Created implementation procedures for new Parish Permissions Form.	Parish Council

Appendix A St Philip's O'Connor Permissions Form
as at 20 June 2019

St Philip's Anglican Church
Information for Parish Directory

Adult 1:
(Title) _____ (Name) _____

Adult 2:
(Title) _____ (Name) _____

Children: _____

Address: _____
_____ State _____ Postcode _____

Postal address (if different): _____
_____ State _____ Postcode _____

Telephone: (home) _____ (work) _____ (mobile) _____

Email: _____

I consent to this information being included in the Parish Directory which will be distributed to all parishioners. The Directory is printed and not published on the internet.

If you are happy for your children to receive birthday cards from the parish, please include their preferred name and date of birth: _____

PTO

Privacy Statement

The Privacy Act 1988 protects your personal information. We collect it to help us with Parish activities, in accordance with this form. Otherwise we will only disclose it in very exceptional circumstances as set out in the Church's Privacy Policy.

St Philip's O'Connor Permissions Form

Photographs and video clips are taken in parish contexts from time to time. We will only publish photographs or videos of parishioners with consent.

I give permission for the following to appear on the parish website or parish social media sites (eg Facebook). Please note that the pew sheet is uploaded to the website.

Detail	Names without photos/ videos (Y/N)	Photos/ videos without names (Y/N)	Photos/ videos with names (Y/N)
Adult 1 full name			
Adult 1 first name			
Adult 2 full name			
Adult 2 first name			
Children's full name			
Children's first name			

Signed: _____

PO Box 6022 O'Connor, ACT, 2602 (02)61617334
comeandsee@stphilipsoconnor.org.au

Appendix B Notice to Parishioners

NOTICE TO PARISHIONERS

You may have noticed that for some time now St Philips has joined the Technological Age, with fancy websites and new-fangled social media accounts. While this makes it easier for us to communicate with one another it also leaves us with some legal obligations.

The Church has to comply with the same privacy law as government agencies and banks. The law is in place to protect people, not just to complicate matters. To protect you and ensure the church is doing the right thing we are putting a new process in place.

We would like all parishioners to complete the new Parish Directory and Permissions form. The purpose of this form is to ensure we understand exactly what you do and don't want us to do with your information.

Practice from now on will be not to include in the pew sheet any of your personal details such as address, telephone numbers or email addresses. If you are having an event at your home, parishioners should be referred to the Parish Directory for such details. It is important to remember that the pew sheet is published on the website.

Nor will we list your name or upload photos or video clips of you to the website or Parish Facebook unless we have your consent via the new Permissions Form.

We are interested in feedback as parishioners start to use the form.

Please bear in mind that in drawing up the form Parish Council have sought not to overcomplicate it with multiple layers of potential individual circumstances. If the form and the guidance from parishioners were too complicated, it would make the administration of the form very burdensome, if not impractical, and risk parishioners' wishes not being fulfilled.

Thank you for supporting our efforts to protect your privacy.

St Philip's Parish Council, July 2018

Appendix C St Pip's Youth Group Registration Form as at 20 June 2019

Ministry Program Registration Form

Name of program	St Pip's Youth Group
Name of child/young person	
Address of child/young person	
Phone contact for child/young person	
Name of parent/guardian	
Contact details for parent/guardian	
Name of person/s approved to provide transport to and from program	
Who has authority to collect this child? (If these details change, please notify the ministry coordinator in writing)	
Emergency contact person(s) and contact details	
Please describe any special requirements, or guardianship issues you need to inform us about	

Our Church is a place where Christ's gospel of love, forgiveness and reconciliation is taught and practiced and children have the option to receive prayer. It is a place where all who seek God's love and help can come in safety. All leaders in programs follow the Diocesan Code of Good Practice and Safe Communities of Faith (Copies available on request).

Behaviour Expectation: Children/young people attending this program are expected to be courteous to others and follow instructions of the ministry leaders during the program.

Parent/ Guardian permission:

- I give my permission for my son/daughter/ward (please circle as appropriate) to attend the abovementioned Ministry program.
- I have discussed the behaviour expectation with them and they have agreed to meet this expectation.
- I give permission for medical treatment to be accessed during a medical emergency. I understand I will be contacted immediately should urgent medical treatment be necessary.
- I give permission for my son/daughter/ward to be photographed to use as promotional material for our ministry program.

Signature: _____ Date: _____

Name: _____ (Parent or legal guardian)

Church Leadership Implementation Pack Anglican Diocese of Canberra & Goulburn, Version 2011, Form 29

Medical Information Form

INFORMATION FOR EMERGENCY USE ONLY

Name of child or young person	
Person to contact in an emergency	
Telephone number of emergency contact	
Name of family doctor	
Doctor's address	
Doctor's contact number	
Medicare number	
List any medical conditions your child suffers from	
List any allergies your child suffers from	
Medications to be administered in an emergency (including any specific directions for administering the medication)	

Parent / guardian signature: _____

Date: _____

Church Leadership Implementation Pack Anglican Diocese of Canberra & Goulburn, Version 2011, Form 29