

Privacy Policy

Contents

ECTION 1 - INTRODUCTION		
PURPOSE	2	
SCOPE	2	
DEFINITIONS	2	
ABBREVIATIONS	3	
LEGISLATIVE CONTEXT	3	
SECTION 2 - POLICY	4	
SECTION 3 - PROCEDURE	4	
SECTION 4 - GOVERNANCE	6	
RESPONSIBILITY	6	
VERSION CONTROL AND CHANGE HISTORY	8	
POLICY & PROCEDURE DIRECTORY REQUIREMENTS	8	
PUBLICATION	8	



SECTION 1 - INTRODUCTION

PURPOSE

St Alfred's is bound by the Australian Privacy Principles in the Privacy Act 1988 (Commonwealth), subsequent amendments and supporting Victorian state legislation.

This ensures the privacy of attendees, attendees' families, members, and church workers.

St Alfred's abides by this legislation, how personal information is collected, used, disclosed, and stored, and how this information can be accessed and corrected.

SCOPE

This policy applies to all attendees, attendees' families, members, and church workers at St Alfred's.

DEFINITIONS

Word/Term	Definition
Attendees	An attendee is anyone who has attended a St Alfred's event, whose information is collected, including parents or guardians of minors.
Australian Privacy Principles	The Australian Privacy Principles (or APPs) are the cornerstone of the privacy protection framework in the Privacy Act 1988 There are 13 Australian Privacy Principles, and they govern standards, rights and obligations around: a. the collection, use and disclosure of personal information; b. an organisation or agency's governance and accountability; c. integrity and correction of personal information; d. the rights of individuals to access their personal information.
Church workers	Any staff and volunteer who undertakes to perform tasks that contribute toward any aspects of operations at St Alfred's.
Members	Anyone who regularly attends services at St Alfred's.
Personal Information	Personal information refers to any information provided to the St Alfred's that is necessary for the performance of functions, such as first and last name, home or other physical address, telephone number or email address or any information given to St Alfred's in confidence which is held by St Alfred's and recorded in digital or hardcopy.
Responsible Person	Senior Minister or their delegate.



Sensitive	Personal information or an opinion about an individual's:
Information	a. Race or ethnic origin;
	b. Medical information;
	c. Political opinions;
	d. Membership of a political association;
	e. Religious beliefs or affiliations;
	f. Philosophical beliefs;
	g. Membership of a professional trade association;
	h. Membership of a trade union;
	i. Sexual preferences or practice;
	j. Criminal record.

ABBREVIATIONS

Word/Term	Definition
APP	Australian Privacy Principles
CRM	Customer Relationship Management system (Elvanto).
St Alfred's	St Alfred's Anglican Church, Blackburn North

LEGISLATIVE CONTEXT

Name	Location
APP	Australian Privacy Principles
Information Privacy Act 2000 (VIC)	Australian Law Reform Commission
Notifiable Data Breach Scheme under the	Office of the Australian Information Commissioner
Privacy Amendment (Notifiable Data Breaches) Act 2017	Federal Register of Legislation
Privacy Act 1988 and its subsequent amendments	Office of the Australian Information Commissioner
Privacy Amendment (Private Sector) Act 2000	Federal Register of Legislation
Privacy Amendment Act 2012 (Enhancing Privacy Protection)	Federal Register of Legislation
Privacy and Data Protection Act 2014	<u>Victorian Legislation</u>



SECTION 2 - POLICY

St Alfred's acknowledges and respects the right to privacy of individuals. St Alfred's is committed to protecting the privacy of attendees, attendees' families, members, church workers, staff, and volunteers. St Alfred's supports and endorses the APP contained in the Privacy Amendment (Private Sector) Act 2000 and will comply with these principles whenever personal information as defined by the Act is collected.

This policy is consistent with the recommendations of the Anglican Diocese of Melbourne.

SECTION 3 - PROCEDURE

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3.3 What personal information is collected

St Alfred's may require individuals to provide their name as part of collecting their personal information. St Alfred's will only do this where the purpose for the collection of the information requires the name of the person providing the information.

If an individual's name is not specifically required, then anonymity and pseudonymity is accepted, in accordance with principle 2 of the APP.

3.4 Accuracy

St Alfred's shall make reasonable efforts to ensure that personal records are kept current.

Attendees are encouraged to keep their personal information current.

3.5 Access

Subject to any exceptions allowed under State or Commonwealth Privacy Legislation, a Member or Attendee (the applicant) has the right to access the personal information held by St Alfred's that relates to them. Where access to the information is refused, St Alfred's must provide the applicant with the reason or reasons that access was refused within 30 days of the application being received.

Requests for access to the information must be made in writing and should be addressed to St Alfred's Office either to the postal address or email address shown on St Alfred's website. No charge shall be applied for access to the information.

3.6 Disclosure of Personal Information

St Alfred's will take all reasonable measures to prevent unauthorised access to or disclosure of personal information to third parties except in cases where required by law.

St Alfred's will request consent of the person for disclosure of personal information to third parties.

The information will be used for purposes including but not limited to the following,

- a. To provide St Alfred's related contact details and authorised private details to third parties in order to conduct the functions of St Alfred's;
- b. Part of a public submission to St Alfred's or committee meeting, published agenda papers, minutes of meeting, and electoral roll;
- c. Contact information in the database which will be made available to members of St Alfred's;
- d. To contracted service providers who perform various services for and on behalf of the church (all such contractors will be bound contractually to keep all information confidential).



3.7 Protection of personal information

St Alfred's shall store personal information in a safe and secure environment and take all reasonable care to ensure the confidentiality of personal information, protecting it from misuse, loss, or interference. This includes password protection for electronic systems and lockable cabinets for paper files (with keys removed).

Personal information is only kept for as long as it is required or as required by law, after which time, it will be disposed of securely.

In accordance with the Notifiable Data Breach Scheme, St Alfred's will notify individuals if there has been a data breach which potentially involved their personal information.

Notices will also be posted on St Alfred's website, that an eligible data breach has occurred.

3.8 Breach reporting

If any church worker becomes aware of or suspects a data breach, they shall report it as soon as practicable to the responsible person.

3.9 Complaints

If it is believed that privacy has been breached or there are complaints about how St Alfred's has handled the custody of personal information, complaints should be submitted in writing to St Alfred's Office either to the postal address or email address shown on St Alfred's website. The Office Administrator will then inform the wardens.

St Alfred's is committed to addressing and responding to all complaints in a timely manner.

SECTION 4 - GOVERNANCE

RESPONSIBILITY

Policy Owner	Governance Committee		
Responsible Person	Senior Minister		
Policy Oversight	Responsible person/Ministry Leaders		
Record Keeping	Office Administrator		
Wardens	Ensure resources are in place for the adequate secure storage, management of records and information in line with St Alfred's compliance obligations as laid out in this policy.		
	Foster a culture that promotes good recordkeeping, accountability practices and respect for individual's right to privacy.		
	Review and formally support this policy.		



Parish Council	Foster a culture that promotes good recordkeeping, accountability practices and respect for individual's right to privacy. Receive regular reporting with respect to compliance from Senior Minister. Approve and formally support this policy.		
Senior Minister	Ensure resources are in place for the adequate secure management of records and information in line with St Alfred's compliance obligations as laid out in this policy. Ensure that church members and church workers at St Alfred's, including the senior minister, ministers, staff, church wardens, parish council and any person who regularly works in a St Alfred's ministry, exercise responsible information management practices as outlined in this policy. Provide regular reporting with respect to compliance to Parish Council. Approve and formally support this policy.		
Business Manager	Ensure that the Privacy, Records and Information Management policies, procedures, guidelines, standards, and other documents are developed, reviewed, remain in line with compliance and legislative requirements and are approved by the Wardens and Parish Council. Liaise and collaborate with applicable St Alfred's staff and ministry areas to provide advice and support to ensure recordkeeping activities as outlined in this policy is adequately adhered to. Develop and maintain this policy. Review and approve any exceptions to the requirements of this policy. Take proactive steps to reinforce compliance of all stakeholders with this policy. Present each new administrative employee and volunteer leaders with a copy of this policy as part of their induction.		
Clergy, Ministry Leaders	Support and foster a culture within their team, which ensures sound recordkeeping practices in accordance with St Alfred's Records and Information Management policies and procedures. Immediately assess and report to the Business Manager any non-compliance instance with this policy. Present each new ministry employee and volunteer leaders with a copy of this policy as part of their induction.		
All other users	Be aware of obligations under this policy and ensure ongoing compliance. Report all non-compliance instances with this policy in writing to St Alfred's Office either to the postal address or email address shown on St Alfred's website. The Office Administrator will then inform the wardens.		



VERSION CONTROL AND CHANGE HISTORY

Version Number	Approval Date	Approved by	Review Date	Amendment
1.0	16 February 2015	Parish Council	February 2016	
2.0	September 2022	Parish Council	September 2024	

POLICY & PRO	CEDURE DIRECTORY REQUIREMENTS
CATEGORY	
Governance Com	mittee
KEYWORDS	
Privacy; intrusion; anonymity; anony	; privacy policy; invasion of privacy; rights to privacy; private; confidentiality; confidential;

PUBLICATION

For Group	Location
All church members and church workers at St Alfred's	https://stalfreds.elvanto.com.au/pages/governance/ https://www.stalfreds.org/about/parish-council/

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