

St. Anne's Parish - Privacy Policy

Introduction:

St Anne's Seaford Parish (the Parish) comprises parishes, schools, tertiary institutions, health, aged, disability and social services providers and a wide variety of people, cultures and ministries all directed to proclaiming the good news of Jesus Christ.

St. Anne's Parish is committed to protecting the personal information it collects.

St. Anne's Parish recognises that the protection of an individual's privacy is important and is a requirement of the [Australian Privacy Principles \(APPs\)](#) contained in the [Commonwealth Privacy Act 1988 \(Cth\)](#). This Policy has been created to ensure that all personal, health or sensitive information provided to, collected or generated by the Parish is used and managed in accordance with the APPs. The Parish also acknowledges its responsibility to notify the Office of the Australian Information Commissioner (OAIC) where personal information is lost or subjected to unauthorised access, modification, disclosure or misuse in accordance with the Notifiable Data Breach Scheme (NDBS 2018).

The Parish will review and update this Privacy Policy to take into account any changes to relevant legislation, changes in technology, changes to the Parish's operations and practices to ensure it remains appropriate to the changing Parish environment.

Definitions:

Personal information: is any information, including an opinion, about a person whose identity is apparent, or can reasonably be determined, from the information or opinion – whether true or not - that is recorded in any form. For example, a person's name, address, phone number and date of birth (age).

Sensitive information: is information or opinion about a set of specific characteristics, including a person's racial or ethnic origin, political opinions or affiliations, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices; or criminal record. It also includes health information and its handling in Victoria is also regulated by the Health Records Act.

Data Breach: occurs where personal information is lost or subjected to unauthorised access, modification, disclosure or misuse in accordance with the Notifiable Data Breach Scheme (NDBS 2018).

Scope:

This policy applies to all permanent, fixed term and casual employees at St. Anne's Parish. It also extends to contractors and volunteers engaged to undertake work on behalf of the Parish.

St. Anne's Parish	Latest Update: 08.09.2020	
Version 2.0	Date of Next Review: 01.09.2022	

Responsibilities:

Parish's Responsibility:

The Parish Priest (or equivalent) & Members of the Parish Pastoral Leadership Team have a responsibility to:

- Collect, use and manage personal, health & sensitive information in accordance with processes outlined in this policy;
- Ensure all employees, volunteers and other relevant individuals are aware of the Parish's Privacy Policy;
- Promptly & appropriately intervene when they become aware of a breach of this policy;
- Report any Data Breach that has the potential to cause serious harm to the Office of the Australian Information Commissioner (OAIC);
- Comply with legislative requirements.

Employee/Volunteer Responsibilities:

- Familiarise themselves with this policy;
- Collect, use and manage personal, health & sensitive information in accordance with processes outlined in this policy;
- Report any Data Breach to the Parish Priest (or equivalent) or a member of the Parish Pastoral Leadership Team immediately upon becoming aware of the event.

What information does the Parish collect?

The Parish collects and holds personal and sensitive information that includes (but is not limited to):

- your name, address, telephone number, email address and other contact details;
- date of birth, gender, marital status and occupation;
- financial information, such as donation history and credit card details, for instance, when you provide such details directly to the Parish or on a collection envelope or an online donation form;
- identification documents, including driver license, passport, Working with Children Check card or proof of age card;
- your affiliation with and belief in the Catholic Church and your sacramental records; and
- photographs, videos and news stories in respect of Parish related events and activities.

Why does the Parish collect personal information?

The Parish collects and holds personal and sensitive information for various reasons (which we generally notify to you at the time of collection), including the following primary purposes:

- to administer the sacraments and to provide spiritual and pastoral care;
- to place your contact details on mailing lists and in computer databases in order to provide you with information about Parish related activities, workshops, lectures, seminars, retreats, events, issues and initiatives;
- to provide services or goods to you or a person nominated by you;
- to seek, receive and administer offerings and donations from you,
- to enable the Parish to provide services;
- to assess your employment and volunteer application; and
- to manage our volunteers.

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How does the Parish collect personal information?

St. Anne's Parish will generally collect personal information through:

- directly from application forms and registration forms completed by you or your guardian/responsible person;
- from face to face meetings;
- interviews;
- telephone calls;
- via our website; or
- by some other method (such as by post or email).

In the case of children, personal information will ordinarily be collected from their parents or guardians, unless specific and/or unusual circumstances require that the collection be made directly from the child.

Exception in relation to employee records: In accordance with the Commonwealth Privacy Act 1988 (Cth), the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the Parish's treatment of an employee record unless required by law or organisational policy where the treatment is directly related to a current or former employment relationship between the Parish and employee.

Your Consent

St. Anne's Parish requires you to consent to any collection, use or disclosure of your personal information by the Parish either explicitly in writing or orally or implied by conduct.

How will the Parish use the personal information you provide?

St. Anne's Parish generally uses the personal information you provide for the specific purpose for which it was collected or for secondary purposes when permitted by the Privacy Act or to which individuals have consented.

Communications to you from the Parish

With your consent we will send you emails or other communications, such as a newsletter, about the Parish and our activities (including information about marketing, promotional and research purposes), along with communications about Parish related activities, workshops, lectures, seminars, retreats, events, issues and initiatives from time-to-time.

Job Applicants and Contractors:

In relation to personal information of job applicants and contractors, the Parish's primary purpose of collection is to assess and (if successful) to engage the applicant, or contractor.

The purposes for which the Parish uses personal information of job applicants/contractors include:

- administering the individual's employment or contract;
- for screening purposes;
- for insurance purposes;
- satisfying the Parish's legal obligations, e.g. with relation to child safety standards and child protection legislation.

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Volunteers:

St. Anne's Primary Parish also obtains personal information about volunteers who assist the Parish in its functions or conduct associated activities. This may include copies of their Working With Children Check (WWCC), reference checks, etc...

Does the Parish disclose personal information to anyone?

St. Anne's Parish may disclose your personal information, including sensitive information, held about an individual to:

- where you have consented to us doing so (by way of example, in providing us with your contact details, you may have consented to the Parish providing those details to another group, such as the Archdiocese);
- where required or authorised by law (for instance, in response to a subpoena or other court order); or
- to consultants, advisers or other third parties where that party has been contracted to provide administrative or other services to the Parish (and on the basis that that third party agrees to abide by this Privacy Policy).

Sending Information Overseas:

Personal information will only be disclosed by the Parish to recipients outside Australia with your express consent (on being informed that we will not be taking reasonable steps to ensure the overseas recipient will handle your information in the same way the Parish is required to) or we reasonably believe that:

- the information will be subject to protections which are substantially similar to those afforded by the APP's; and
- there are mechanisms available to you to enforce such protections.

Management and security of personal information:

St. Anne's Parish will take reasonable steps to safeguard your personal information it holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records. Where information is passed to external organisations or service providers acting on the Parish's behalf, adequate privacy safeguards will be implemented prior to the release of any information.

Notifiable Data Breach Scheme (NDBS)

In accordance with Section 26 of the Commonwealth Privacy Act 1988, St. Anne's Parish will immediately report any Eligible Breach of Data immediately to the Office of the Australian Information Commissioner (OAIC).

Eligible Data Breach occurs when personal information is lost or subject to unauthorised access, modification, disclosure, misuse or interference. Where a data breach has occurred and it is likely to result in 'serious harm' (physical, psychosocial, emotional, economic, financial harm or reputation damage) notification to the OAIC is required.

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Where the Parish suspects or believes that an Eligible Data Breach has occurred, the Parish will within 30 days conduct a risk assessment to determine the contributing factors and anticipated degree of harm to determine if the breach is 'eligible'. Examples of breaches which may be 'eligible' for notification may include:

- Hacking of databases containing personal information;
- The provision of personal information to the wrong person.

When a Breach of Data has been identified as 'eligible' the Parish will prepare and submit a Data Breach Statement to the OAIC as soon as is practical. This statement will include all relevant information including:

- a description of the breach;
- the type of information involved in the breach (personal, health, sensitive, financial);
- anticipated degree of harm;
- recommended actions for notifying those affected; and
- recommended actions to prevent reoccurrence.

Updating personal information:

St. Anne's Parish will take reasonable steps to update or correct, any personal information we hold about you to ensure it is accurate, complete, up-to-date, relevant and not misleading if we are satisfied this is required or if you request us to do so. Any person may seek to update their personal information held by the Parish by contacting the Parish's Administration Officer at any time.

The Australian Privacy Principles require the Parish to store personal information no longer than necessary.

Access to personal information:

You may request access to personal information that the Parish holds about you (using the Parish's contact details below).

The Parish will respond to all requests within a reasonable period and usually within 30 days. The Parish will need to verify your identity before providing you with access or updating your personal information.

The Parish will generally provide access unless an exception in the Privacy Act or the Health Records Act applies. If the Parish refuses your request, we will let you know our reasons for this in writing and how to complain if you are not satisfied with the decision.

Enquiries or Complaints

Individuals that would like further information about the way the Parish manages personal information or wish to complain as they believe that the Parish has breached the Australian Privacy Principles (APP) please contact the Parish Priest via stannesparish@gmail.com or (03) 9401 6398. The Parish will investigate any complaint and will provide a response to the complainant as soon as is practical.

The Parish reserves the right to refuse to investigate and deal with a complaint if the Parish considers it to be vexatious or frivolous.

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For more information about privacy you may contact the Office of the Australian Information Commissioner via email: enquiries@oaic.gov.au, phone: 1300 363 992 or post: GPO Box 5218, Sydney NSW 2001 Australia. Website: <http://www.oaic.gov.au>

Breaches of this Policy

St. Anne's Parish expects that all permanent, fixed term and casual employees who become aware of a breach of this policy will advise the Parish Priest (or equivalent) or a Member of the Parish Pastoral Leadership Team immediately.

The Parish will consider each breach of this policy in the context in which it has occurred and will determine the significance of the breach. Where the breach is deemed 'eligible' in accordance with the Notifiable Data Breach Scheme, the school will inform the Office of the Australian Information Commissioner (OAIC).

A serious breach may result in disciplinary action, which could result in termination of employment.

Changes to this Privacy Policy

The Parish may, from time to time, update or change this privacy policy to ensure that it reflects the acts and practices of the Parish as well as any changes in the law. Any changes will take effect from the time that they are posted at <https://cam.org.au/human-resources/resources/policies>. Please check periodically, and especially before you provide any personal information.

References:

Catholic Education Commission Victoria 2019; Sample Privacy Act;

Commonwealth Government 1988, *Privacy Act*;

Office of the Australian Information Commissioner (OAIC) 2014, Australian Privacy Principals;

Victorian Government 2001, *Health Records Act*;