

PRIVACY POLICY

Introduction

Anglican Diocesan Services (“ADS”, “we” or “us”) provides corporate services to ministry units and agencies of the Anglican Diocese of Canberra & Goulburn.

Purpose

This Privacy policy outlines how we will deal with your personal information.

Commitment

We are committed to protecting your personal information in accordance with the Privacy Act 1988 and the Australian Privacy Principles.

By visiting our website, 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 managed as set out in this Privacy policy.

Definitions

For the purposes of this policy:

<i>Personal information</i>	is information or an opinion about an identified individual or an individual who is reasonably identifiable but does not include employment records.
<i>Proper administration of the Diocese</i>	means any act of practice which is – (a) performed pursuant to or under an ordinance or resolution of the Synod or Bishop in Council of the Anglican Diocese of Canberra & Goulburn or a canon of the General Synod of the Anglican Church of Australia (b) reasonably necessary to give effect to an ordinance or resolution of the Synod or Bishop in Council (c) a discharge of the duties or exercise of the powers and authorities, however arising, of the Bishop of Canberra & Goulburn (d) undertaken by or on behalf of the Registry, ADS or an officer of the Diocese in the course of administering the affairs of the Diocese including legislative compliance (e) performed pursuant to or that is reasonably necessary to give effect to a service level agreement between ADS and a ministry unit or agency (f) otherwise identified in this policy as necessary for the proper administration of the Diocese, or is incidental thereto.

<i>Sensitive information</i>	includes personal information about your health, race or ethnic origin, political opinion, religious beliefs, family members or criminal history.
<i>Employment records</i>	means personal information that directly relates to a current or former employment relationship.

Personal information

ADS only collects personal information that is necessary for the proper administration of the Diocese. This includes but is not limited to information about:

- Members and prospective members of boards, councils or committees of the Anglican Diocese of Canberra & Goulburn
- Trustees of church trust property
- Clergy, ordinands and lay ministers
- Officeholders and volunteers of ministry units and agencies
- Clients, foster carers and household members of Anglicare’s children’s services
- Next-of-kin for emergency contact

ADS collects a wide range of personal information such as name, date of birth, phone number, residential and postal address, email address, next-of-kin, qualifications, educational attainment and/or work experience.

Sensitive information

Some personal information that we collect may also be sensitive information. The most common forms of sensitive information we collect are:

<i>Religious beliefs</i>	including the church you attend, your assent to a statement of faith, broader involvement in ministry activities, and related information for the purpose of determining your eligibility for election or appointment to a position within the Diocese, professional standards, and related purposes.
<i>Health information</i>	including information on illness, injury and treatment, and related information for the purpose of meeting our obligations under WHS law, workers’ compensation, salary continuance insurance and related purposes. COVID-19 vaccination status as required by regulation or where its collection is an identified requirement of a person’s role
<i>Criminal history</i>	including charges, convictions and matters pending before the court, and related information, for the purpose of meeting our

	obligations to protect vulnerable clients, conduct risk assessments, investigations and related purposes.
--	---

Collection & security

ADS may collect your personal information in various ways including via telephone, our website (including through entry into an online database), in writing (including by email or other electronic means) and/or through online forms/surveys, whether hosted on a third party website or our own. We may hold your personal information in either electronic or hard copy form.

Sensitive information

We will only collect sensitive information about you with your consent unless:

- We are otherwise required or permitted by law to collect that information, or
- The information relates to religious belief and your activities as a member of the Anglican Church or your regular contact with us in connection with faith-based activities.

If you provide us with sensitive information about yourself which is necessary for the proper administration of the Diocese, we will treat this as collection of such information with your consent.

Third parties

In most situations we collect your personal information directly from you. We may also collect information from third parties if it is impractical to collect it directly from you. For example, we may collect information from the wardens and/or rector of your church or parish, the Australian Criminal Intelligence Commission, your treating physician and/or anyone else you have authorised to deal with us on your behalf.

We may also seek to collect information about someone else from you for the purpose of proper administration of the Diocese. You must not provide us with personal information about another person unless the disclosure is otherwise required or permitted by law or you have consent from that person to do so. We may also collect your personal information from publicly available sources.

Unsolicited personal information

If we receive personal information about you that we have not requested, we will generally, unless otherwise required or permitted by law, delete or destroy it as soon as is practicable after receiving it. If you provide us with unsolicited personal information about yourself we may retain this information if it is necessary for the proper administration of the Diocese or required by law or we do so with your consent.

Collection of personal information required or permitted by law

In certain circumstances we may be required or permitted by law to collect personal information about you. For example we may need to collect your name, gender, residential address, date of birth, criminal history and other related information to comply with our legal obligations.

You do not have to provide us with your personal information but if you do not provide us with the personal information that we need, we may not be able to provide services or assistance to you.

Anonymous or pseudonymous contacts

We collect personal information for particular purposes that do not generally lend themselves to anonymous or pseudonymous contacts but you are welcome to bring to our attention any issues or concerns you have with being identified and we will make reasonable efforts to address any concerns on a case-by-case basis.

Security

We regard the security of your personal information as a priority and take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure, and we use a number of physical, administrative, personnel and technical measures to protect your personal information. These measures include:

- Security procedures for access to our internal office areas
- Security procedures within our offices (including locked cabinets and file rooms)
- IT security procedures including password protection, drive access restrictions, firewalls, intrusion detection and site monitoring
- A requirement for staff to maintain confidentiality as appropriate as outlined in workplace policies and employment contracts
- Service contracts including confidentiality agreements with service providers.

Retention and destruction

We hold onto your personal information while ever we have need for it or until statutory timelines for retention are passed. This Privacy policy applies to personal information archived by us because we believe it may be required in future.

We securely destroy your personal information collected by us once we no longer need it or where statutory timeframes for retention are passed.

We take reasonable steps to destroy or de-identify personal information that is no longer needed and do not dispose of personal information by general waste disposal methods.

Purpose of collecting personal information

ADS only collects, holds and uses your personal information for the purposes for which it was provided, related purposes that we consider to be within your reasonable expectations or as required or permitted by law. These purposes include the proper administration of the Diocese, such as through:

- Convening and running sessions of the Synod and matters incidental thereto
- Contacting you regarding matters that you may have an interest in, such as those pertaining to a board, council or committee, or concerning your church or parish or the Anglican Diocese of Canberra & Goulburn generally
- Seeking your views on a social/moral issue to assist in shaping reports/submissions to Government and others
- Assessing your suitability for nomination, election or appointment to a board, council or committee
- Convening meetings of boards, councils and committees
- Recruiting for employees, volunteers and contractors
- Processing authorised payments to and from you
- Conducting background checks required for working with children or other vulnerable people
- Undertaking risk assessments and investigations in response to potential breaches of professional standards
- Providing you with services that have been requested, and
- Any other uses identified at the time of collecting your personal information.

Disclosure

Any personal information provided to us may be disclosed, if we consider it appropriate, to other entities of the Anglican Diocese of Canberra & Goulburn, including:

- Professional Standards Unit
- Anglican Church Property Trust Diocese of Canberra & Goulburn
- Anglican Investment and Development Fund
- Anglicare NSW South, NSW West & ACT
- Anglican schools

We will not disclose your personal information to an entity of the Diocese for the purpose of that entity soliciting donations from you.

We may also disclose your personal information to government bodies, regulators, law enforcement agencies and any other parties where required or permitted by law.

ADS may disclose your personal information to third party service providers, agents or contractors from time to time to help us provide our services. If we do this, we shall require those parties to protect your personal information in the same way we do.

We may also disclose your personal information to any other entities identified to you at the time of collecting your personal information or which you subsequently request or consent to us providing with your personal information.

Disclosure to overseas recipients

In general ADS does not disclose personal information to overseas recipients, although there may be some specific exceptions to this, for example organising for a delegation to attend a conference overseas. On such occasions we will seek your consent to disclose your personal information and will outline to you who it will be disclosed to and how it will be used by them.

Access

You may access personal information we hold about you subject to certain legal restrictions or exemptions. We will advise you where such restrictions or exemptions exist at the time of your request.

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

While we do not ordinarily charge you for a request to access personal information we reserve the right to charge a reasonable fee (which will be notified to you when we receive your request) for our time and expenses in the following circumstances –

- If an extended period of time is required to collate and prepare material for you, or
- If you wish to have documents photocopied or printed for you.

Quality of information and correction

We take reasonable steps to ensure that the personal information held 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 incorrect, incomplete or misleading you may be given access to update our records directly. Otherwise please contact the ADS staff member responsible for the provision of services to you or the General Manager using the contact details provided below.

In some case we may decline to make changes in the manner requested by you and in such case will provide you with a written notice explaining the reasons for our refusal. You may then provide us with a statement in respect to the need for correction and ask us to associate the statement with the information in question.

Employment records

Employment records are not considered personal information under the Privacy Act 1988 although we voluntarily include employment records within the application of this Privacy policy. The only exception to this is that no complaint lies to the Australian Privacy Commissioner for breach of this Privacy policy with respect to employment records - you may lodge a complaint with the General Manager using the contact details below.

Complaint handling

If you wish to make a complaint about breach of the Privacy policy or the Australian Privacy Principles please contact the General Manager using the contact details provided below.

You will need to provide us with sufficient details regarding your complaint for us to conduct an investigation, together with any supporting evidence.

We will investigate your complaint and determine the steps that we will undertake to resolve it. 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 that you provided us with any additional information.

If you are not satisfied with our decision on your complaint then you can contact us to discuss it further or raise your concerns directly with the Australian Privacy Commissioner via www.oaic.gov.au

Changes to this policy

We reserve the right to amend this Privacy policy from time to time so please review it periodically to check for any changes.

Your continued use of our services (including online services), requesting our assistance or providing further personal information to us (whether directly or via an authorised person) after this Privacy policy has been amended constitutes your acceptance of the amended Privacy policy.

Availability

This Privacy policy is available free of charge online at www.anglicancg.org.au or by contacting the General Manager on the contact details below. If you have a particular request for the Privacy policy in a format other than PDF then please mention this with your request.

Contact

Please contact us if you have a query relating to the Privacy policy or wish to raise an issue or make a complaint, using the following contact details –

The General Manager
Anglican Diocesan Services
Level 4, 221 London Circuit
GPO Box 1981
Canberra City ACT 2601

Telephone: (02) 6245 7101

Email: Business.Support@anglicands.org.au

Related documents

- Privacy Statement

Relevant legislation/guidelines

- Privacy Act 1988
- Australian Privacy Principles
- Website Privacy Policy
- Notifiable Data Breach Procedure
- Employment Records Policy

Feedback

Feedback on this policy can be emailed to Business.Support@anglicands.org.au

Compliance

Non-compliance with this Privacy policy by an ADS employee, volunteer or contractor may result in disciplinary action.