



Carey
Baptist
Church

Privacy Policy and Procedure

Rationale

This Privacy Policy details our commitment to protect people's privacy and how we comply with the Carey Board Privacy Policy. The procedures for this policy also describe:

- who we collect information from;
- the types of personal information collected and held by us;
- how this information is collected and held;
- the purposes for which your personal information is collected, held, used and disclosed;
- how you can gain access to your personal information and seek its correction;
- how you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled; and
- whether we are likely to disclose your personal information to any overseas recipients.

Scope

This policy applies to all activities of Carey Baptist Church, Harrisdale, its congregation, staff, volunteers and visitors.

Policy Statement

Carey Baptist Church is committed to protecting the privacy of information of all members of the church and their families, our staff, volunteers, visitors and participants in our activities or programs and to only use that information for the purpose it was collected, or as authorised.

It is our policy to ensure our collection, storage, usage and disclosure of information is in compliance with the requirements of the Privacy Act and the Australian Privacy Principles and is respectful of the dignity of each person.

Privacy Procedure

1. Who do we collect personal information from?

At Carey Baptist Church, we collect personal information from church members and their families (including children), job applicants, staff, volunteers and others; including contractors, visitors and others that come into contact with the Church and its ministries, including from online sources

It is noted that employee records are not covered by the Australian Privacy Principles where they relate to current or former employment relations between the Church and the employee.

2. What kinds of personal information do we collect?

The kinds of personal information we collect is largely dependent upon whose information we are collecting and why we are collecting it, however in general terms the Church may collect:

- 2.1. **Personal Information** including names, addresses and other contact details, dates of birth, next of kin details, financial information, and photographic images or videos.
- 2.2. **Sensitive Information** (particularly in relation to staff and volunteers) including government identifiers, Working with Children Checks, Police Clearance information, and criminal records.
- 2.3. **Health Information** (particularly in relation to children participating in Church activities) including medical conditions, allergy information, disabilities, immunisation details, nutrition and dietary requirements.

3. How do we collect your personal information?

How we collect personal information will largely be dependent upon whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you.

Where possible the Church has attempted to standardise the collection of personal information by using specifically designed forms (e.g. New Staff/ Volunteer Forms). However, we may also receive personal information by email, letters, notes, over the telephone, in face to face meetings, through financial transactions and from online sources. through surveillance activities such as the use of CCTV security cameras or email monitoring.

We may also collect personal information from other people (e.g. a personal reference) or independent sources (e.g. a telephone directory), however we will only do so where it is not reasonable and practical to collect the information from you directly.

3.1 **Unsolicited Information**

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as “unsolicited information”. Where we collect unsolicited information we will only hold, use and/or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not

have been collected by normal means then we will destroy, permanently delete or de-identify the information as appropriate.

3.2 Website data

We may collect information based on how individuals use our website. We use “cookies” and other data collection methods to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our website. This information is collected to analyse and improve our website, marketing campaigns and to record statistics on web traffic. We do not use this information to personally identify individuals.

4. How we use personal information

We only use personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Our primary uses of personal information include but are not limited to:

- 4.1. Providing on-site and off-site church activities, pastoral care, and aiding the operation of Church ministries.
- 4.2. Satisfying our legal obligations including our duty of care and child protection obligations.
- 4.3. Keeping Church members and parents informed as to Church community matters through correspondence and pamphlets.
- 4.4. Marketing, promotional and fundraising activities.
- 4.5. Supporting the activities of Church associations such as Baptist Churches WA;
- 4.6. Supporting community-based causes and activities, charities and other causes in connection with Church functions or activities.
- 4.7. Helping us to improve our day to day operations including training our staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis.
- 4.8. Church administration including for insurance purposes.
- 4.9. The employment of staff.
- 4.10. The engagement of volunteers.

We only collect sensitive information when reasonably necessary for one or more of these functions or activities, if:

- we have the consent of the individuals to whom the sensitive information relates, or
- the collection is necessary to lessen or prevent a serious threat to life, health or safety, or
- there is another permitted general situation (such as locating a missing person) or permitted health situation (such as the collection of health information to provide a health service) exists, or
- it's required for the compliance of legal or Safe Church requirements.

We will only use or disclose sensitive information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

5. Storage and Security of Personal Information

We store personal information in a variety of formats including on databases, in hard copy files, in cloud based services, and on personal devices including laptop computers, mobile phones, cameras and other recording devices. The security of your personal information is of importance to us and we take reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include:

- 5.1. Restricting access to information on Church databases to a need-to-know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- 5.2. Ensuring all staff are aware that they are not to reveal or share personal passwords.
- 5.3. Ensuring where sensitive and health information is stored in hard copy files that these files are stored in locked filing cabinets in lockable rooms. Access to these records is restricted to staff on a need-to-know basis.
- 5.4. Implementing physical security measures around Church buildings and grounds to prevent break-ins.
- 5.5. Implementing ICT security systems, policies and procedures, designed to protect personal information stored on our computer networks.
- 5.6. Implementing human resources policies and procedures, such as email and internet usage, and confidentiality policies, designed to ensure that staff follow correct protocols when handling personal information.
- 5.7. Undertaking due diligence when working with third-party service providers, including cloud-service providers, to ensure they are compliant as far as practicable with the Australian Privacy Principles or a similar privacy regime.

Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

Our website may contain links to other websites. We do not share your personal information with those websites and we are not responsible for their privacy practices. Please check their privacy policies.

6. Data Breaches

A data breach occurs when personal information is lost or subject to unauthorised access, modification, disclosure, or other misuse or interference. For churches, data breaches commonly occur due to internal human errors or a failure to follow information handling policies that result in personal information being inadvertently lost or disclosed to the wrong person.

If you become aware of a data breach or potential data breach, please notify the Privacy Officer at privacy@carey.asn.au.

7. Responding to Data Breaches

The Church will take appropriate, prompt action if we have reasonable grounds to believe that a data breach may have, or is suspected to have occurred. Depending on the type of data breach, this may include a review of our internal security procedures, taking remedial internal action, notifying affected individuals and Office of the Australian Information Commissioner (OAIC). Individuals will be notified of a data breach if they are at risk of serious harm, including serious

financial, mental or physical harm. If we are unable to notify individuals, we will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

8. When we disclose personal information

We only use personal information for the purposes for which it was given to us, or for purposes which are related (or directly related in the case of sensitive information) to one or more of our functions or activities. We may disclose your personal information to government agencies, volunteers, staff, recipients of Church publications, visiting pastors and youth leaders, our service providers, agents, contractors, business partners and other recipients from time to time, only if one or more of the following apply:

- 8.1. you have consented;
- 8.2. you would reasonably expect us to use or disclose your personal information in this way;
- 8.3. we are authorised or required to do so by law;
- 8.4. disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- 8.5. where another permitted general situation or permitted health situation exception applies;
- 8.6. disclosure is reasonably necessary for a law enforcement related activity.

9. Personal Information of Children and Young People

The Privacy Act does not differentiate between adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information. At Carey Baptist Church, we take a common sense approach to dealing with a child or young person's personal information and generally will refer any requests for personal information to the parents/carers. We will treat notices provided to parents/carers as notices provided to the child/youth, and we will treat consents provided by parents/carers as consents provided by the child/youth. We are however cognisant of the fact that children do have rights under the Privacy Act, and that in certain circumstances (especially when dealing with older children or youths, and especially when dealing with sensitive information), it will be appropriate to seek and obtain consents directly from the young person. We also acknowledge that there may be occasions where a child/youth may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

There may also be occasions where parents/carers are denied access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others, or result in a breach of the Church's duty of care to the child or youth.

10. Disclosure of personal information to overseas recipients

We may disclose personal information about an individual to overseas recipients in certain circumstances, such as when we are organising an overseas excursion, facilitating a student exchange, or storing information with a "cloud computing service" which stores data outside of Australia. We will however take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- 10.1. we have the individual's consent (which may be implied); or

- 10.2. we have satisfied ourselves that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- 10.3. we form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- 10.4. we are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

11. How we ensure the quality of your personal information

We take reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date. These steps include trying to ensure that the personal information is accurate, complete and up to date at the time of collection and when using or disclosing the personal information. On an ongoing basis we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information has changed.

Please contact us if any of the details you have provided have changed. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date.

12. How to gain access to your personal information we hold

You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us.

If we do not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

13. Privacy Complaints

If you wish to make a complaint about a breach by us of the Australian Privacy Principles, you may do so by providing your written complaint by email, letter or by personal delivery to any one of our contact details as noted below. You may also make a complaint verbally. We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we may seek further information from you in order to provide a full and complete response. Your complaint may also be taken to the Office of the Australian Information Commissioner.

14. How to Contact Us

You can contact us about our Privacy Policy or about your personal information by:

- Contacting our Privacy Officer at:
Phone: (08) 9394 9155
Email: privacy@carey.asn.au
51 Wright Rd, Harrisdale WA 6112
PO BOX 1409 Canning Vale WA 6970

If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.