



Stromlo Christian Church
Weston Creek Community Centre
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PRIVACY POLICY - 2019

This statement outlines the Stromlo Christian Church Inc (Stromlo) policy on how Stromlo and its associated ministries are to use and manage personal information provided to or collected by it.

Stromlo respects and values the personal information entrusted to it. Stromlo will comply with the National Privacy Principles (NPPs) in the Commonwealth Privacy Act (1991), hereafter referred to as the Act, in all its dealings with your personal information.

The primary purpose of collecting this information is to enable Stromlo to provide spiritual and pastoral care and in meeting its legal obligations, to provide care for children while they are under its supervision, and to discharge its duty of care.

1. What kind of personal information does Stromlo collect? How is it collected?

Information collected by Stromlo about members of the Church and visitors to the various congregations is generally voluntarily provided by the member or visitor. This information generally relates to contact information, relationships within a family group and association of individuals with various groups or events within the Church context – such as membership of a life group or congregation.

1.1 Personal information you provide

Stromlo will generally collect personal information held about an individual in one of the following ways:

- forms completed either by the person or by a parent/guardian;
- meetings;
- interviews;
- emails;
- Attendance at life groups, services or other events;
- telephone calls.

1.2 Personal information provided by other people

In some circumstances Stromlo may be provided with personal information about an individual from a third party, e.g. a reference about an applicant for a position.

Personal information collected from children may be disclosed to their parents or guardians. Parents or guardians may seek access to personal information collected about them and their son/daughter as specified in part 5.3 of this policy.

1.3 Exception in relation to employee records

This policy does not apply in relation to the treatment of an employee record, where the information is directly related to a current or former employment relationship between Stromlo and the employee. These records are specifically exempt from the application of the Act.

2. How will Stromlo use the personal information you provide?

Stromlo will use personal information you provide for any of the following purposes:

- the provision of spiritual and pastoral care services to its community (the primary purpose);
- such other secondary purposes as are related to the primary purpose;
- any other purpose to which you have consented.

Stromlo will use health information for the primary purpose that you provide it for, and not for any other secondary purpose, unless one of the exceptions in the Act applies.

2.1 Children and their parents and/or guardians

Stromlo collects information about children and their parents and/or guardians to enable it to provide spiritual and pastoral care. Information may also need to be collected if Stromlo organizes other activities such as play groups or sporting events.

The purposes for which Stromlo uses personal information of children and their parents and/or guardians include:

- Communicating with parents and/or guardians about matters relating to their child's spiritual and pastoral care;
- Day to day administration;
- Satisfying Stromlo' legal obligations and allowing Stromlo to discharge its duty of care.

In some cases where Stromlo requests personal information about a child or parent and/or guardian

and the information is not obtained, the child may not be able to be enrolled in a Stromlo program for which the information was requested.

2.2 Adults

Information is used for purposes similar to those relating to children.

2.3 Job applicants, staff members, volunteers and contractors

The purpose of collecting information related to job applications, or information related to volunteers, contractors or members of staff is to assess the suitability of the person or persons for a particular role in Stromlo and, if successful, employ or engage the person or persons concerned.

The purposes for which Stromlo uses this information includes:

- Administering the person's employment or contract;
- Insurance requirements;
- Stromlo legal obligations.

2.4 Taxation

This information may also be used for accounting purposes, including complying with taxation requirements if required by law.

3. To whom might Stromlo disclose personal information?

Subject to the Act, Stromlo may disclose personal information held about an individual to:

- Government departments;
- Medical practitioners;
- Volunteers or staff who provide some form of service to members of Stromlo and need to know information for pastoral or duty of care reasons;
- People providing services to Stromlo;
- Recipients of Stromlo publications;
- Parents and/or guardians;
- Anyone you authorise Stromlo to disclose information to.

Information received from members of Stromlo or those who use its services may be used to seek financial or other forms of support from them. We will not disclose any personal information to third parties for fundraising purposes without obtaining your prior consent.

4. How does Stromlo treat sensitive information?

Stromlo will not collect sensitive information about you unless you consent or it is required by law. If sensitive information is collected, then it will be used and disclosed only for the purposes for which it was provided, or for a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Stromlo does not normally collect health information, but in the event that they do so, it will only be in accordance with its obligations under the Act.

5. Management and security of personal information

Stromlo staff and volunteers are required to respect the confidentiality of personal information and the privacy of individuals.

5.1 Updating personal information

Stromlo endeavors to ensure that the personal information it holds is accurate, complete, and up to date. Persons may seek, and are encouraged, to update their personal information held by Stromlo by contacting the Stromlo Privacy Officer (email office@stromlo.org with the heading Privacy Officer).

Stromlo has procedures in place to ensure that it conducts reviews of the personal information that it holds to ensure that the personal information it has collected or proposes using or disclosing is actually complete and up to date.

Stromlo makes every effort not to store personal information longer than necessary.

5.2 Security of Personal Information

Stromlo has in place steps to protect the personal information it holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods which as a minimum standard includes storing paper records in locked cabinets and pass-word protected access rights to computers which contain computerised records of personal information.

Stromlo will take reasonable steps to destroy or de-identify personal information if it does not need it for any purpose for which it may have been used or disclosed.

Stromlo Staff and volunteers will not place the following types of information on a web-based server, although this information may be required to be stored in other forms:

- Personal financial account information, such as bank account details, credit card details, or giving records;
- Medical information;
- Pastoral counseling notes, or similar sensitive information.

5.3 You have the right to check what personal information Stromlo holds about you

Under the Act, and with some exceptions, an individual has the right to obtain access to any personal information that Stromlo holds about them, and to advise Stromlo of any perceived inaccuracy. Children will generally have access to their personal information through their parents and/or guardians.

To make a request to access any information Stromlo holds about you or your child, please contact the Stromlo Privacy Officer (email office@stromlo.org with the heading Privacy Officer). There are exceptions as to when Stromlo may provide you with access to personal information. It will depend upon the circumstances surrounding your request as to whether Stromlo can disclose that personal information to you. As such, each request for access to personal information will be assessed on a case by case basis.

Stromlo will not charge you for applying to lodge a request for access, but if it does provide the personal information there may be a charge associated with Stromlo complying with that request.

If Stromlo denies you access to personal information, you will be given reasons for that denial.

5.4 Consent and right of access to the personal information of children

Stromlo respects every parent and/or guardian's right to make decisions concerning their children's spiritual upbringing and care. Generally, Stromlo will refer any requests for consent and notices in relation to personal information of a child to the parent and/or guardian. Stromlo will treat consent given by a parent and/or guardian as consent given on behalf of the child, and notices to parents and/or guardians will act as notices given to the child.

5.5 You have the right to have information removed from Stromlo storage.

It is your right to have information removed from storage by Stromlo, subject to any legal requirements that may be placed on that information. If you wish to have information deleted a request should be submitted to the Stromlo Privacy Officer (email office@stromlo.org with the heading Privacy Officer). There may be cases where removal of information will exclude participation by a person in an event due to the requirements of Stromlo in discharging its duty of care (see also 2.1).

6. Identifiers

Stromlo does not adopt Commonwealth identifiers, such as Medicare numbers, to identify an individual.

7. Anonymity

If you make arrangements with Stromlo, you have the option of not identifying yourself whenever it is lawful and practicable that you not have to do so. Please contact the Stromlo Privacy Officer (email office@stromlo.org with the heading Privacy Officer) to implement this.

8. Enquiries

If you would like further information about the way Stromlo manages the personal information it holds, please contact the Stromlo Privacy Officer (email office@stromlo.org with the heading Privacy Officer).

Appendix I - Email

Stromlo makes use of email to communicate and adheres to the Spam Act 2003. The Spam Act has three steps of application; Consent, Identify and Unsubscribe.

Consent is given through the form of "Inferred Consent" from information taken from information slips and other transactions of personal information. In all transmissions

made by email, Stromlo will clearly identify that the message is from Stromlo and will give a short explanation as to how to unsubscribe from the mailing list.