

Privacy Policy

Version	V 5.0
Date Approved	August 2023
Approved by	Chief Executive Officer
Policy Owner	Privacy Officer, Diocesan & Corporate Services

1. PURPOSE

This Privacy Policy (“Policy”) summarises how we deal with your personal information. We recognise and respect every person’s right to privacy and confidentiality.

2. INTRODUCTION

Sydney Diocesan Services (“SDS”, “we” or “us”) provides administrative, secretarial, corporate and accounting services to certain bodies and organisations of the Anglican Church of Australia in the Diocese of Sydney.

3. SCOPE

This Policy applies to SDS. Other entities within the Sydney Anglican Office Group (SAOG) may opt-in to this Policy or adopt its terms.

4. COMMITMENT

We are committed to protecting your personal information in accordance with the *Privacy Act 1988* (Cth) 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 handled as set out in this Privacy Policy.

This Policy does not cover how we will deal with the personal information of those who apply for employment with us. This is covered in a separate policy – “Sydney Diocesan Services Privacy Policy – Employment Applications”.

5. DEFINITIONS

For the purposes of this Policy –

<i>Personal Information</i>	means information or an opinion about an identified individual, or an individual who is reasonably identifiable.
<i>Personally Identifiable Information</i>	means any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means.

<i>Proper Administration of the Diocese</i>	means any act or practice which is - (a) performed pursuant to or under an ordinance or resolution of the Synod or the Standing Committee of the Anglican Diocese of Sydney 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 the Standing Committee, (c) a discharge of the duties or exercise of the powers and authorities, however arising, of the Archbishop of Sydney (d) undertaken by or on behalf of the Registry, the Sydney Diocesan Services or an officer of the Diocese in the course of administering the central affairs of the Diocese (e) otherwise identified in this Policy as necessary for the proper administration of the Diocese or is incidental thereto.
<i>Sensitive Information</i>	includes information about your health, your race or ethnic origin, political opinions, or religious beliefs.
<i>Sydney Anglican Office Group</i>	includes Sydney Diocesan Services (SDS), the Endowment of the See Corporation (EOS), Ministry Training & Development (MTD), Anglican Church Growth Corporation (ACGC), the Office of the Director of Safe Ministry (ODSM) and Anglican Aid.

6. PERSONAL INFORMATION

SDS only collects personal information that is necessary for the provision of our services or 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 Church Diocese of Sydney
- ♦ trustees of church trust property
- ♦ clergy, ordinands and lay ministers
- ♦ officeholders of churches and parishes
- ♦ survivors of abuse or other individuals whose personal information is collected in the course of investigating complaints and processing applications for pastoral care and assistance
- ♦ complaints and feedback generally
- ♦ other people with whom we come in contact

SDS may collect a wide range of personal information such as name, phone number, residential and postal address, email address, date of birth, education/qualifications or experience. We only collect this information where it is reasonably necessary for the provision of our services or the proper administration of the Diocese.

We may also collect Government-related identifiers including but not limited to driver's license details, corporate governance information such as Director Identification Numbers as well as Working with Children Check (WWCC) clearance information.

7. SENSITIVE INFORMATION

Some personal information that we collect may also be sensitive information. Among the most common forms of sensitive information we collect is information about religious beliefs and values. For example, we may seek information about your religious beliefs (including your assent to a statement of faith), the church you attend and your broader involvement in ministry activities, for the purpose of determining your suitability for election or appointment to a position.

8. COLLECTION OF PERSONAL INFORMATION

SDS 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.

Sensitive Information

SDS will only collect sensitive information about you with your consent. Exceptions to this include where we are otherwise permitted or required by law to undertake such collection, or where a reasonable permitted situation arises in accordance with the Australian Privacy Principles.

If you provide us with sensitive information about yourself which is necessary for the provision of our services, 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. However, 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, your parish risk management coordinator, your parish safe ministry representative and/or anyone you have authorised to deal with us on your behalf.

We may also seek to collect information about someone else from you (for example, if you hold one of the positions listed in a paragraph above). However, you must not provide us with personal information about another person unless you have consent from that person to do so, have told them that their personal information will be handled in accordance with this Privacy Policy and have told them where they can find a copy of this policy. 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 (unsolicited personal information) we will generally, unless otherwise required or permitted by law, delete or destroy it as soon as practical after receiving it. If you provide us with unsolicited personal information about yourself, we may retain this information if it is necessary for the provision of our services or to comply with our legal obligations, or we do so with your consent.

Collection of Personal Information Required by Law

In certain circumstances we may be required or permitted by law to collect certain personal information about you. For example, we may need to collect your name, residential address, country of residence, date of birth, and other types of personal information to comply with our legislative 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.

9. PURPOSE OF COLLECTING YOUR PERSONAL INFORMATION

SDS only collects, holds and uses personal information for the purposes for which it was provided, related purposes that we consider to be within your reasonable expectations or as permitted or required by law. These purposes include the provision of our services and 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 have an interest in, such as those pertaining to a board, council or committee that you may be on, or concerning your church or the Anglican Diocese of Sydney 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;
- ♦ processing authorised payments to and from you;
- ♦ providing you with services that have been requested;
- ♦ maintaining the Diocesan Registry; and
- ♦ any other uses identified at the time of collecting your personal information.

10. DIRECT MARKETING

SDS generally does not engage in direct marketing, instead we contact individuals for purposes that are required for the proper administration of the Diocese and generally not for the promotion of goods or services. We will only use personal information for the purposes of research or marketing if:

- ♦ you have provided your consent; or
- ♦ it is impracticable to seek consent and you would reasonably expect us to communicate with you in such a way.

In such situations we will also provide you the ability to opt-out of communications.

11. DISCLOSURE

Any personal information provided to us may be disclosed, if we consider it appropriate, to other entities of the Anglican Church Diocese of Sydney.

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

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

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

Disclosure to Overseas Recipients

In general, SDS does not disclose your personal information to any 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.

12. STORAGE & SECURITY

We take reasonable steps to protect any personal information that we hold from misuse, interference and loss and from unauthorised access, alteration and disclosure. For example, we implement the following security measures –

- ♦ security procedures for access to our internal office areas;
- ♦ security procedures within our offices (including, locked cabinets and file rooms for personal information that is particularly sensitive);
- ♦ I.T. security procedures including password protection, firewalls, intrusion detection, cyber threat detection, vulnerability scanning, security permissions, file audit trails, and site monitoring; and
- ♦ a requirement for all staff to maintain confidentiality except insofar as disclosure is reasonably necessary for the proper performance of employment duties (as outlined in workplace policies and/or employment contracts).

Your personal information may be stored in a third-party data centre operated by Salesforce that may be located overseas. We access this data through the Internet. Salesforce's systems are subject to a number of internationally recognised privacy and security audits (see <http://trust.salesforce.com>).

13. DATA BREACHES

We take seriously any unauthorised access to, disclosure, or loss of personal information (data breach). The *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth) requires us to let you know if your information is impacted by certain data breach incidents. We will communicate to you if:

- ♦ there is unauthorised access to or disclosure of your personal information, or if your personal information is lost; and
- ♦ there is a reasonable chance that this could cause you serious harm, which may include physical, psychological, emotional, economic or reputation harm; and
- ♦ we have been unable to remedy the breach in a manner consistent with the Act.

SDS has a Data Breach Response Plan and may be required to communicate with the Office of the Australian Information Commissioner (OAIC).

14. ACCESS

You may access personal information we hold about you, subject to certain legal restrictions or exemptions. Where such restrictions or exemptions exist, we will advise you of those reasons 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 our Privacy Officer using the contact details below.

While we do not charge you for a request for accessing your personal information you should be aware that we may charge a reasonable fee (which will be notified to you once you make a request) for our time and expenses in the following circumstances –

- ♦ if an extended amount of time is required to collate and prepare material for you; or
- ♦ if you wish to have your files photocopied for you.

15. QUALITY OF INFORMATION & CORRECTION

We take reasonable steps to ensure that the personal information we hold 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 not accurate, complete, up-to-date or is misleading, you may be given access to update our records directly. Otherwise please contact the SDS staff member responsible for our provision of services to you, or if you are unsure who this person is, our Privacy Officer using the contact details below, so that we can update our records accordingly. In some cases, we may refuse to make changes in the manner requested by you, and in such case will provide you with a written notice that explains the reasons for our refusal. In such circumstances, you may provide us with a statement in respect to the need for correction and ask us to associate the statement with the information in question.

16. SOCIAL MEDIA

SDS may use social media or social networking services to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, however we only use social media to help us to communicate with you and the public. Respective social media companies and networks will also handle your personal information for their own purposes. These services have their own privacy policies.

17. ANONYMITY & PSEUDONYMITY

Where possible, we may allow you to interact with us anonymously or using a pseudonym. For example, if you contact us with a general question, we may opt to not ask for your name unless we need it to adequately handle your question.

However, for most of our functions and activities we usually need your name and contact information and enough information about the particular matter to enable us to fairly and efficiently handle your inquiry, request, complaint or application, or to act on your report.

18. COLLECTION OF INFORMATION - WEBSITE

Our public website www.sds.asn.au is hosted in Australia. There are several ways in which we collect information through our website:

19. WEB ANALYTICS

We use Google Analytics to collect data about your interaction with our website. The main purpose of collecting your data in this way is to improve your experience when using our site. We also use this data to understand and report on which content pages and downloads are accessed by visitors. We generally do not use statistical analytics to track or collect Personally Identifiable Information of visitors to our site.

20. COOKIES

Cookies are small data files transferred onto computers or devices by websites for record-keeping purposes and to enhance functionality on the website. Most browsers allow you to choose whether to accept cookies or not. The information generated by the cookie about your use of the website (including your IP address) may be transmitted to Google. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before accessing our website.

21. COMPLAINTS, FEEDBACK & PRAISE

If you wish to make a complaint about a breach of this Privacy Policy or Australian Privacy Principles, you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint together with any supporting evidence.

We will refer your complaint to our Privacy Officer who will investigate and determine the steps (if any) that we will take to resolve your complaint. 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 you provided us with any additional information.

22. CHANGES TO THIS POLICY

SDS may update this Privacy Policy from time to time so please review it periodically on our website at www.sds.asn.au for any changes.

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

23. CONTACT US

If you have a query relating to this Privacy Policy or wish to make a complaint, please contact us using the following contact details –

The Privacy Officer
Sydney Diocesan Services
PO BOX Q190
QVB Post Office 1230

Phone: (02) 9265 1571

Email: privacy@sydney.anglican.asn.au