



ANGLICAN DIOCESE OF GRAFTON

POLICIES AND PROCEDURES

SUBJECT: PRIVACY POLICY		PROCEDURE REFERENCE NUMBER GEN-001
DATE APPROVED 27 February 2025 by Bishop-in-Council		REVISION NUMBER Version 3 – Replacing Version 2 dated 17 October 2022
IMPLEMENTATION DATE 27 February 2025	REVIEW DATE AND FREQUENCY 3 Yearly	RESPONSIBLE FOR REVIEW Bishop-in-Council

1. PURPOSE

To protect the privacy of all personal data held by the Diocese, parishes and chaplaincies.

2. SCOPE

This policy applies to the Diocese, all agencies of the Diocese (including Anglican Funds Grafton Diocese), Parishes and Chaplaincies within the Diocese who do not have their own Privacy Policy. Unless the context clearly requires otherwise, a reference to the 'Diocese' in this policy includes an agency, Parish or Chaplaincy of the Diocese covered by this policy. The Diocese may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the Diocese's operations and practices and to make sure it remains appropriate to the changing church environment.

3. POLICY STATEMENT

The Anglican Diocese of Grafton ("Diocese") acknowledges and respects the privacy of all individuals and is committed to complying with the Privacy Act 1988, and the Privacy (Enhancing Privacy Protection) Act 2012 together with the Australian Privacy Principles ("APPs") which sets out a number of principles concerning the strict protection of all personal information held by all entities, agencies, organisations and individuals throughout Australia. The Diocese, in adopting this Policy, acknowledges the respect and value of all people and the trust in which the individual provides such personal information to it.

All personal information held by the Diocese, its agencies, Parishes and Chaplaincies that is within the meaning of "personal information" under the Privacy Act, will be treated in accordance with the APPs.

To the extent that the Diocese holds health information it is also committed to complying with the NSW Health Privacy Principles contained in the Health Records and Information Privacy Act 2002 in addition to the APPs.



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4. DEFINITIONS

Definitions within this Policy conform to those in section 6 of the Privacy Act 1988.

“Personal information” - means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

“Sensitive information” – includes information or opinion about such things as an individual’s racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

“Employee Record” – means a record of personal information relating to the employment of an employee, including health, engagement and resignation, training, conditions of employment, performance, salary or wages, membership of trade unions, sick and other leave, etc.

“Health Information” - generally speaking, is a special subset of personal information about an individual's health or a disability, including information about an individual's wishes regarding the provision of health services, genetic or biometric information, wishes regarding organ donation or any personal information collected in the course of providing a health service.

5. AUSTRALIAN PRIVACY PRINCIPLES

The Australian Privacy Principles (APPs) replace the previous National Privacy Principles and Information Privacy Principles and apply to most organisations (except small businesses) and government agencies both in Australia and on Norfolk Island. A link to the APPs can be found at Appendix A. In summary the APPs set out the minimum requirements for dealing with Personal Information. Broadly speaking, they cover:

- Consideration of Personal Information Privacy – the open and transparent management of personal information



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- Collection of Personal Information
- Dealing with Personal Information – its use or disclosure
- Use in direct marketing
- Sharing of information with overseas entities
- Use or disclosure of government-related identification codes
- Integrity and trust about personal information
- Access to, and correction of personal information
- Making a complaint about use of private information

Exception in relation to employee records: Under the Privacy Act and NSW *Health Records and Information Privacy Act 2002*, the APPs and Health Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the Diocese’s treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the Diocese and employee.

6. COLLECTION OF PERSONAL INFORMATION

The Diocese must not collect personal information unless it is reasonably necessary for one or more of their activities and functions.

6.1 The Types of Personal Information Collected

Personal information held by the Diocese is collected for the administrative, pastoral and missional purposes of church ministries and may include (but is not limited to) personal information, including sensitive information, such as:

- name and date of birth
- current and previous address
- telephone, fax and mobile phone numbers
- email addresses
- spouse’s name
- date of baptism, confirmation, ordination or consecration
- incident/emergency information



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- employment information including qualifications
- WH&S information
- police and working with children checks
- state of health of an individual

This personal information may be collected about a number of persons who come into contact with the Diocese, including but not limited to:

- clerics licensed by the Bishop,
- laity licensed to minister in a parish or ministry region,
- laity appointed or elected to Diocesan boards and committees,
- laity elected to positions of authority in parishes or ministry regions,
- laity involved with ministries to youth and children,
- AFGD account holders, and
- job applicants, staff members, volunteers and contractors.

6.2 Sensitive Information

The Diocese may from time to time collect sensitive information including information which is collected concerning working with children, police checks, and any information relating to misconduct is extremely sensitive.

The Diocese will also treat details of personal account balances and transactions relating to those accounts as sensitive information.

In the case of sensitive information, the Diocese, which is a non-profit organisation under the APPs, will only collect sensitive information:

- that is reasonably necessary for one or more of its functions and the individual to whom the information relates consents to the collection; or
- the information relates to the activities of the Anglican Church of Australia in the Diocese of Grafton and relates solely to Church members or people who have regular contact with the Diocese in connection with its activities; or



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- a permitted general situation exists in relation to the collection of that information such as:
 - ❖ the Diocese has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the Diocesan functions or activities has been, is being or may be engaged in; and the Diocese reasonably believes that the collection, use or disclosure is necessary in order for the Diocese to take appropriate action in relation to the matter;
 - ❖ The collection, use or disclosure is reasonably necessary for the purposes of a confidential alternative dispute resolution process;
 - ❖ it is unreasonable or impracticable to obtain an individual's consent to the collection, use or disclosure; and the Diocese reasonably believes that the collection, use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety.

The Diocese will always collect the information directly from the individual to whom the information relates unless it is unreasonable or impracticable to do so.

The provision of personal information by a person to the Diocese is voluntary. However, in some cases, if the person concerned chooses not to provide personal information it may limit their involvement with the Diocese – for instance, the Diocese may not be able to provide that person with necessary documents for ministry or be able to contact them when necessary. An individual is able to opt out of receiving non-essential communications from the Diocesan Office at any time. To change their Communications Indicator, they should contact the Diocesan Registry or, where the parish or agency sending the communication is clearly identifiable, then the parish or agency directly.

6.3 How Personal Information is Collected

The Diocese collects personal information in a number of ways, for example:

- directly on forms requested by the Diocesan Office, such as the Parish Annual Returns
- directly on forms which the person/s will be asked to complete,
- over the telephone directly with the person,
- upon advice from you but passed on via third parties such as the Parish Incumbent or a Parish Council Secretary,
- from publicly available sources of information (White Pages)



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- verbally from the individual in formal interviews in the context of pastoral care;
- images and recordings of individuals at church activities and events.

The Diocese may also generate personal information from other data which they hold – such as the compilation of rolls, i.e. for Diocesan Synod, for attendance at Diocesan training.

The Diocese will take such steps as are reasonable in the circumstances to notify an individual when it is collecting their personal information and about their rights in respect of that personal information. Collection notices meeting the requirements of the APPs will be used as far as reasonably practicable.



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7. THE USE OF PERSONAL INFORMATION

7.1 General

As mentioned above, the Diocese will only collect personal information if it is reasonably necessary for one or more of its activities and functions. The Diocese will only use such personal information for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which an individual has have consented. Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless an individual agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

The primary purposes for which the Diocese collects and uses personal information include:

- contacting the person by mail, telephone, email (including bulk email distribution), as and when necessary;
- emergency contact numbers;
- drawing up licences (lay and ordained);
- processing and retention of safe ministry and compliance records;
- drawing up Orders, Collations and other official Diocesan documents;
- marking anniversaries;
- for inclusion in the Diocesan Yearbook, the Australian Anglican Directory, the Diocesan Handbook, and other publications such as the Synod Business Paper, on its website, in the North Coast Anglican;
- incident reports and making insurance claims;
- maintaining Work Health Safety records;
- in the Bishop's Clergy Update (Ad Clerum);
- Working with Children Check forms;
- account information for Anglican Funds Grafton Diocese's operations;
- contract management;
- providing the information to businesses or service providers engaged by the Diocese to provide relevant services in connection with church functions and activities;



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- archival records management in accordance with Chapter 21 of the Diocesan Governance Ordinance 2008 and REG-003 Retention of Records;
- to keep parishioners informed about matters related to the Diocese, Parish or Chaplaincy through correspondence, newsletters and magazines;
- to satisfy the Diocese's legal obligations and allow it to discharge its duty of care;
- obtaining personal information about volunteers who assist the Diocese or Parish in its functions or conduct or associated activities, to enable the Diocese, Parish or Chaplaincy to work together;
- use in publications, including newsletter and on Diocese website.

The secondary purposes include:

- keeping archival records of parish members via its electronic data management system.

In addition to the above, the Parishes also collect personal information for the following primary purposes:

- inclusion or amendment of details in the Parish Electoral Roll,
- requests for public prayer,
- Parish Registers, i.e. Marriage, Funeral, Baptism, Confirmation
- Delegation Registers, i.e. Marriage of Divorced persons, Marriage outside a Church, Chalice Assistants,
- Cemeteries, Memorial Gardens and Columbarium Registers
- Parish Facilities Hire
- Use in church rosters
- Involvement in and provision of Parish community programs

7.2 Public Prayers

Information included in public prayers is personal and consideration for the rights of the individual involved must be respected. As far as reasonably practicable the consent of the person to be prayed for must be sought before making it public. If the Parish is unable to obtain the individual's consent, it will only make the prayer request public if it is able to do so in a manner that protects the identity of the person. The Diocese recommends that only the first name of the person for whom the prayer is to be offered should be used.



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7.3 Sharing information between the Diocese, its agencies, Parishes and Chaplaincies

Ordinarily there will be a flow of information between the Diocese, its agencies, Parishes or Chaplaincies. In the course of being used for the purposes for which it is collected, personal information collected by one of these entities may be shared with another of these entities. This will ordinarily only occur to the extent necessary for the personal information to be used for the above purposes – and will be subject to any specific direction otherwise from the individual to whom the personal information relates. By providing your personal information to the Diocese, agency, a Parish or Chaplaincy, an individual is giving consent to it being shared in this manner.

The personal account and transaction information collected by Anglican Funds Grafton Diocese will not be shared between agencies of the Diocese.

8. DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

The Diocese does not reveal personal information to other organisations other than

- through the Diocesan Year Book which sets out:
 - ❖ contact details of clergy, their dates of ordination and when they entered the Diocese,
 - ❖ the name of those lay and ordained persons appointed or elected to Diocesan committees and boards,
 - ❖ the name and contact details of people in positions of responsibility within Diocesan groups, parishes and associations.
- through the Australian Anglican Directory;
- through distribution within the Diocese of updated contact details of clergy linked to parishes and others licensed by the Bishop;
- to other people within the Diocesan structures who may need to make contact.
- anyone an individual authorises the Diocese to disclose information to;
- anyone to whom the Diocese are required or authorised to disclose the information by law;
- for the purpose of public safety and to assist the investigation of matters in the interests of public safety;
- law enforcement agencies such as the police; and



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- other businesses or service providers engaged to provide services to the Diocese, agency, Parish or chaplaincy in connection with the church functions and activities.

The Diocese will only disclose personal information, including sensitive information, in the Diocesan Year Book and Australian Anglican Directory to the extent that it is reasonably necessary to do so or the person affected has specifically consented to that disclosure.

The information contained in the Diocesan Year Book and the Australian Anglican Directory are updated annually, with details of clergy and laity no longer holding a position on a Diocesan committee/board or within a Parish are removed.

The Diocese does not expect to be sharing information with overseas recipients except in limited circumstances or where one of the above publications are shared with overseas partners.

In the limited circumstances that the Diocese may need to disclose personal information overseas, it will not do so without either:

- taking reasonable steps, in the circumstances, to ensure that the overseas recipient does not breach the APPs;
- reasonably believing that the overseas recipient is subject to a law or binding scheme which provides substantially similar protection for personal information as the APPs;
- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the APPs or other applicable privacy legislation.

However, by consenting to an individual's personal information being published in the above mentioned publications, they also consent to that information potentially being disclosed to our overseas partners without the Diocese taking reasonable steps to ensure the recipient complies with the APPs.

9. STORAGE OF PERSONAL INFORMATION

9.1 Storage at Diocese

Personal information collected by the Diocese will be held in either the Bishop's Registry (Diocesan Office) or at the Diocesan Records Office. In some cases, original documents which contain sensitive



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information (as defined by the Privacy Act) will be destroyed confidentially and the personal information contained on that record stored electronically.

The Diocesan Office maintains personal information in a secure manner via:

- an electronically secured network;
- system security including password protected access logons;
- building access security, with 24 hour “back to base” monitoring;
- staff reminders and training in the need to maintain confidentiality, and are required to enter into a confidentiality agreement with the Diocese;
- paper records are maintained in secured areas;
- records destruction occurs via secured destruction methods.

Some of the information stored electronically by the Diocese is stored on third party storage systems accessed via the internet (i.e. cloud storage). Such storage is through third parties that have well developed systems for privacy, security and record back up but may involve storage at sites outside of Australia.

9.2 Storage at Parish

Each Parish has in place steps to protect the personal information the Parish holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records. Generally, access is restricted to the extent necessary to complete a legitimate function.

The standard for each Parish is that the personal information is maintained on:

- a computer system with password protected access logon;
- paper records are filed in a lockable safe, filing cabinet, or other secure container;
- those with access are reminded of the need for confidentiality and care of the information;
- records no longer required are destroyed securely or relocated to the Diocesan Records Office in accordance with Chapter 21 of the Diocesan Governance Ordinance.

Personal information may also be held by relevant clergy and laity to the extent necessary for them to properly fulfil their ministerial roles. The Diocese provides training and support to its ministerial personnel to ensure they maintain the security of personal information whilst in their possession.



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9.3 Document retention policy

In accordance with APP 11.2, the Diocese will take such steps as are reasonable in the circumstances to destroy or de-identify any personal information it holds that is no longer needed for any purpose for which the information may be used or disclosed – unless the personal information is:

- a) subject to a legal requirement for its retention;
- b) in a document that is otherwise covered by the Chapter 21 of the Diocesan Governance Ordinance and REG-003 Retention of Records; or
- c) is subject to the limited exceptions from destruction or de-identification in APP 11.2.

10. ACCURACY OF PERSONAL INFORMATION

The Diocese takes all reasonable steps to ensure that the personal information collected, used or disclosed, is accurate, complete and current. However, the accuracy and currency of that information depends to a large extent on the information provided to the Diocese by those whose information it holds and uses.

For that reason, the Diocese requests that it is:

- kept informed of changes in personal contact details such as address, telephone numbers, and emails;
- informed of errors in the information it has on file;
- provided with contact information when elected or appointed to an office, board or committee

11. ACCESS BY INDIVIDUALS TO THEIR OWN PERSONAL INFORMATION

Under the Privacy Act 1988 and Health Records and Information Privacy Act 2002, an individual has the right to obtain access to any personal information which the Diocese holds about them and to advise the Diocese of any perceived inaccuracy. There are some exceptions to these rights set out in the applicable legislation, including where:



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- access to the personal information (if it is not health information) would pose a serious and imminent threat to the life or health of an individual;
- access would unreasonably impact on another individual's privacy, the request is frivolous or vexatious, or the information relates to current or intended legal proceedings;
- access to the information will adversely prejudice negotiations between the Diocese, Parish or Chaplaincy and the individual;
- access to the information would be unlawful; or
- access would be likely to prejudice the investigation of possible unlawful activities.

In addition to providing access to the information, the Diocese is also required to take reasonable steps to correct that information if the individual shows that the information is not accurate, complete or up to date.

If a person wishes to do so they should contact the Diocesan Registrar, in writing. Such requests will be met within 30 days of receiving the request. Failure to respond within 30 days may be construed as denial of access.

If the Diocese denies an individual access to personal information or refuses to update that personal information, it must give reasons in writing, within 30 days of receiving the request to the individual for this. Any denial to a request by an individual for access to personal information must be consistent with this policy. Each request must therefore be assessed on its merits.

12. PRIVACY CHECKLIST

The following checklist will assist in implementing this Privacy Policy within the Diocese, its agencies, parishes, and chaplaincies:

- Personal information should only be collected when it is necessary in order for the Parish to carry out its mission (e.g. Parish Electoral Roll, Baptism, Marriage and Confirmation Registers);
- Personal information collected should be accurate and current;



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- Personal information collected should only be disclosed for the purpose for which it is collected, or where the individual consents if there is a different purpose of disclosure;
- Individuals should be allowed access to personal information that concerns them and the opportunity to correct information that is out of date or incorrect, except where access to the information may be withheld;
- Information should be stored safely and reasonable steps should be taken to ensure that the personal information is not the subject of misuse or unauthorised access or disclosure,
- Sensitive information should not be collected without the consent (express or implied) of the affected individual or unless an exemption applies (e.g. employee records). In this context, sensitive information includes health information about parishioners or others collected for the purpose of public prayers;
- Personal information should be securely retained with access only available to authorised persons or those having a legitimate interest;
- Certain practices may have to be modified in the light of privacy laws (e.g. the collection of sensitive or health information, using personal information for direct mailing, provision of employment references to third parties);
- If any privacy complaint arises, it should be referred immediately to the Diocesan Registrar; and
- Employee records and stipendiary clergy records are treated differently and may contain additional information related to a person's employment or office.

13. PRIVACY OFFICER

The Diocesan Registrar is the Diocesan Privacy Officer. If any privacy complaint or question arises, it should be referred immediately to the Diocesan Registrar at:

The Diocesan Registrar
Anglican Diocese of Grafton
PO Box 4
Grafton NSW 2460



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14. COMPLAINTS MANAGEMENT

The APPs require all entities to have a procedure for complaints to be made against an entity relating to the handling of personal information. In this regard, this policy provides for a complaint, or concern, or problem which may be encountered with either the Diocese, an agency, a Parish or a Chaplaincy to be directed to the Diocesan Registrar who is the Diocesan Privacy Officer. The Diocesan Registrar will investigate the matters raised and make a determination about and action which should be taken. Complaints may also be received in the manner prescribed in GEN-005 Grievances.

If dissatisfied with the outcome, or have remaining concerns, an individual may contact the Information Commissioner via the details at <http://www.oaic.gov.au/privacy/privacy-complaints>.

15. LINKS AND SUPPORTING DOCUMENTS

The current Privacy Policy and the Australian Privacy Principles are available on the Anglican Diocese of Grafton Website www.graftondiocese.org.au

Also relevant to this Policy are the following documents which are also available on the Anglican Diocese of Grafton website.

- GEN-002 Faithfulness in Service
- GEN-005 Grievances
- GEN-008 Use of Social Media
- REG-001 Administration Code of Conduct
- REG-003 Retention of Record

16. FREQUENTLY ASKED QUESTIONS

Can I access my personal information?

Yes, Section 11 sets out the various ways to access your personal information.

Can I update or correct my personal information?

Yes, Section 11 sets out the various ways of updating / correcting your personal information.



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How do I make a complaint about the actions of the Diocese, a parish, or a chaplain?

Section 14 provides the steps to formally make a complaint.

How will the Diocese/Diocesan agency/Parish/Chaplaincy use my personal information?

The *Diocesan, Diocesan agency, Parish, and Chaplaincy* use of personal information is set out in section 7 of this Policy. Section 9 details the methods of protection of that information.

Will the Parish pass my information onto another organisation or person?

The Parish may share your information with the Diocese or other Parishes or Chaplaincies within the Diocese, as detailed in section 7. It may also disclose your information to persons or organisations outside the Diocese in the limited situations set out in section 8. However, ordinarily the Parish will not disclose your personal information to persons or organisations outside the Diocese. For instance, if someone requests the parish to provide your telephone number or email address, it would refuse to do so, but would perhaps ask for the enquirer's contact details to pass onto you for you to choose to make contact.

APPENDIX A

Office of the Australian Information Commission

AUSTRALIAN PRIVACY PRINCIPLES

A link to the Australian Privacy Principles is found here: <https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference>