



# Privacy Policy

## Governance

<b>Supporting Procedures</b>	N/A
<b>Supporting Resources</b>	<a href="#">Best Practice Guide for Data Collection</a>
<b>Other Related Policies</b>	N/A
<b>Approval</b>	Archbishop in Council
<b>Endorsement</b>	
<b>Policy Owner</b>	Registry
<b>Date Effective</b>	27 February 2025
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<b>Version</b>	2.0
<b>Document Enquiries</b>	<a href="mailto:registryservices@melbourneanglican.org.au">registryservices@melbourneanglican.org.au</a>

## Scope

This policy applies to all Diocesan Centre Staff, Parishes, Authorised Anglican Congregations and associated bodies within the Anglican Diocese of Melbourne.

## Policy Statement and Purpose

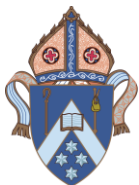
The Anglican Diocese of Melbourne (**ADOM, us, we, our**) is bound by the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth). This privacy policy outlines how ADOM handles “personal information”, the scope of which is defined in the APPs [here](#).

We will update this privacy policy when our personal information handling practices change and publish updates on our public website, [www.melbourneanglican.org.au](http://www.melbourneanglican.org.au).

## 1 Who we are

- 1.1 We provide Christian ministry, programs and activities throughout Melbourne and Geelong that:
  - (a) foster relationships between church members, and within the wider community, based on the teachings of Jesus Christ; and
  - (b) build and maintain a safe and secure environment where all people are, and feel, respected in line with our Safe Ministry Policy.
- 1.2 We collect, hold, use and disclose personal information to carry out our ministry, programs and activities.
- 1.3 This privacy policy applies to everyone in roles, offices and positions in our Diocese, including in the Anglican Centre, St Paul’s Cathedral, parishes, Authorised Anglican Congregations (‘AACs’) and associated bodies, such as opportunity shops and community groups. It also applies to everyone who provides personal information to ADOM.

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### 2 Collecting of your information

- 2.1 We try only to collect the personal information we need for the particular ministry, program or activity we are carrying out. We mainly collect personal information directly from you, when you give it to us through paper forms, online forms or over the phone.
- 2.2 We may collect your name, date of birth and contact details if you participate in ADOM ministry, programs or activities. For example, we have a copy of your marriage certificate if you get married at an ADOM parish or AAC. We may also collect photos and videos for our social media.
- 2.3 There may be other circumstances where we collect additional information from you for the purposes of satisfying third party requirements. We will seek your consent before doing so.

#### *Collecting sensitive information*

- 2.4 We may need to collect sensitive information about you, for example, if you want to be an employee or a holder of a role, office or position within an ADOM parish or AAC. This might include information about your health, religious affiliation, or criminal history via working with children checks, police checks and safe ministry checks.
- 2.5 Safe Ministry information may be collected directly from individuals by Kooyoora Ltd through their online screening application. ADOM may then collect this information from Kooyoora. Kooyoora is an independent professional standards body that ADOM works with to screen and clear people for service in roles, offices or positions within ADOM. Kooyoora's Privacy Statement can be found [here](#).
- 2.6 We may need to collect your health information to help us best understand your needs and enable you to participate in our ministry, programs and activities.
- 2.7 We will collect other personal information less often, but we may do so with your consent when it is necessary and relevant to us providing our ministry, programs and activities.

#### *Collecting through our website*

- 2.8 ADOM's public website is hosted in Australia. We will collect personal information that you provide to us, including your name and contact details, when signing up to mailing lists and registering for our events, or when submitting feedback on your experience with us.

#### *Collecting information through third parties*

- 2.9 There may be other circumstances where ADOM collects information through third parties, for example, for the purposes of fundraising or training. In these circumstances, your personal information will also be held by these third parties. Wherever possible, however, we will endeavour to collect your personal information from you directly.

#### *Anonymity*

- 2.10 Where possible, we will allow you to interact with us anonymously or using a pseudonym. For example, if you attend services in our parishes or AAC, unless required by the

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Government, we do not need to collect your name or other personal information. However, for some of our other ministry, programs and activities we do need to collect your name and contact information. If you want to work with us, including as a volunteer, it is not possible to interact with us anonymously or using a pseudonym, as we may be required to collect personal information, including your name, in order to conduct relevant screening.

### 3 Social Networking Services

- 3.1 We use social networking and streaming services including but not limited to X, Facebook, Instagram and YouTube to communicate with the public about our ministry, programs and activities. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for [X](#), [Facebook](#) and [YouTube](#) (a Google company) on their websites.
- 3.2 We also use artificial intelligence platforms in the course of our operations. Your information will be handled in accordance with our AI Usage Policy.

### 4 Disclosure

- 4.1 Common situations in which we disclose personal information are detailed below.

#### *Safe ministry requirements*

- 4.2 We disclose safe ministry information, such as working with children clearances and police checks, to Kooyoora Ltd.

#### *Social media and photos*

- 4.3 We may disclose some of your personal information on our social media platforms, such as your name or a photo of you. We will take reasonable steps to seek your consent before using photos in which you are reasonably recognisable.

#### *Parish and AAC administration and compliance*

- 4.4 We may use your personal information within parts of ADOM, including between parishes and AACs. Parishes and AACs may also share information in a Parish Directory or with the Anglican Centre to provide updated information required by the Diocesan Information Regulations 2024. Past Diocesan yearbooks contain contact details of clergy and these may be accessible to people within the Diocese.
- 4.5 We disclose your personal information when required or authorised by Australian law to comply with our legal requirements, for example to meet our child safety obligations.

#### *Disclosure of sensitive information*

- 4.6 We only disclose your sensitive information for the purposes for which you gave it to us or for directly related purposes you would reasonably expect, or if you have consented to the disclosure or if the disclosure is otherwise authorised by law.

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### 5 Disclosure of personal information overseas

- 5.1 As the Anglican Centre's servers are hosted in Australia, we do not disclose personal information held on them overseas. Some Parishes and AACs may use cloud-based service providers, such as Google, that maintain servers around the world.
- 5.2 When you communicate with us through a social network service such as Facebook, Instagram or X, the social network provider and its partners may collect and hold your personal information overseas.

### 6 Quality of personal information

- 6.1 To ensure the personal information we hold is accurate, up-to-date and complete, we promptly update personal information when you tell us something may have changed.
- 6.2 We also regularly review the quality of personal information, for example, when a working with children clearance, clearance for ministry or service, or a clergy licence is renewed.

### 7 Storage and security of personal information

- 7.1 We hold personal information on our cloud storage, on servers, and in physical records stored in secure on-site facilities at the Anglican Centre and at our parishes and AACs. We retain effective control over any personal information held on our cloud storage and it stored securely, and the information is handled in accordance with the Australian Privacy Principles.
- 7.2 We take all reasonable steps to protect the security of the personal information we hold from both internal and external threats by assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information (data breaches) and taking measures to address those risks.
- 7.3 Examples of how we limit the risk of data breaches include:
  - (a) restrictions on who has access to different types of personal information (access controls). Specifically, clergy in a certain parish only have access to information about their parishioners, and only a very limited number of employees have access to clearance and licensing information;
  - (b) limiting the sharing of personal information between parishes and AACs;
  - (c) limiting the sharing of information with third party providers, and to the extent that this is required, ensuring they are compliant with the Australian Privacy Principles;
  - (d) requiring digital information in the Anglican Centre to be stored in ADOM databases (such as MS Dynamics, MS SharePoint and MS OneDrive) or on ADOM devices, and not locally on personal devices;
  - (e) strict password requirements, and
  - (f) locks on physical storage facilities such as filing cabinets or compactus.

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- 7.4 We deidentify or delete personal information in a secure manner (for example, by shredding) when we no longer need it. Due to archiving requirements of the National Redress Scheme, we generally archive records for 45 years, including in our Diocese archive centre.

### 8 Accessing and correcting your personal information

- 8.1 You have the right to ask for access to personal information we hold about you and to ask us to correct that personal information. You can ask for access, or a correction, by contacting the Anglican Centre, or your parish or AAC, and we will respond within 30 days on the basis of information we can access in that time.
- 8.2 The Anglican Centre, and some parishes and AACs, have systems to enable church members to update some of their own personal information online.
- 8.3 We will ask you to verify your identity before we give you access to your personal information or correct it. If we refuse your request, we will tell you the reasons in writing.

### 9 Notification of eligible data breaches

- 9.1 An eligible data breach happens if there is unauthorised access to, unauthorised disclosure of, or loss of personal information that is likely to result in serious harm to the individuals to whom the information relates.
- 9.2 When we become aware that there has been an eligible data breach, we:
- (a) will notify you, including about what steps we will take in response to the data breach; and
  - (b) must notify the Officer of the Australian Information Commissioner as soon as practicable using its Notifiable Data Breach Form [here](#).

### 10 How to make a complaint

- 10.1 If you wish to complain to us about how we have handled your personal information, you can contact us using the contact details below:

Privacy Officer / Registrar  
[registrar@melbourneanglican.org.au](mailto:registrar@melbourneanglican.org.au)  
209 Flinders Lane, Melbourne, Victoria, 3000  
+61 3 9653 4220

- 10.2 If you wish to complain about how we handle your personal information and feel we have not resolved your complaint to your satisfaction, you can contact the Office of the Australian Information Commissioner using the contact details below:

[www.oaic.gov.au/about-us/contact-us](http://www.oaic.gov.au/about-us/contact-us)  
GPO Box 5218, Sydney NSW 2001, Australia  
1300 363 992