***Insert parish name***

**Privacy Policy**

The Privacy Act 2020 is primarily concerned with the protection of personal information and good information handling practices. It describes how to collect, use, and store personal information and the requirements around breaches.

The Office of the Privacy Commissioner is empowered by the Privacy Act 2020 to administer, monitor and enforce compliance. Among the many functions of the Privacy Commissioner's Office is that of investigating any alleged breaches and non-compliance of the Privacy Act.

Policy Statement

The parish of ***Insert parish name***  is committed to ensuring compliance with the Privacy Act 2020 and the Information Privacy Principles therein. ***Insert parish name***  will promote and protect the privacy of all associated individuals including parishioners, volunteers, staff, visitors, donors, contractors, and any others.

Purpose

To provide guidance on the following aspects of managing personal information:

* how we collect and store personal information
* what personal information we collect
* how we use and disclose personal information about individuals
* how individuals may access personal information relating to them that is held by ***insert parish name***
* how long personal information is stored for
* how to address complaints of breaches of privacy
* how we respond to the requirements of the Privacy Commissioner and the Privacy Act 2020

This policy applies in addition to any other policy and processes which may be adopted by the parish in relation to our specific functions or activities. In event of an inconsistency between this policy and any other policy or process, this policy prevails.

It is important that staff understand all parish information management, privacy, and confidentiality guidelines.

Scope

All parish staff, volunteers, individuals contracted to perform activities for the parish, and those who hold positions on governance and management committees that comprise the administrative and pastoral structure of the parish.

Procedure for Collecting, Using, Accessing, Correcting and Storing   
Personal Information

*(*The numbers in brackets [ ] refer to the relevant Information Privacy Principle)

Collection of Information

When ***insert parish name***  (we) collect personal information about an individual, we make known the purpose of collecting it, who will have access to it, and whether it is compulsory or optional information. We advise that individuals have the right to request access to, and correction of, their personal information.

Recording or photographing an individual is a form of collecting personal information. No one will be recorded including by photograph, video, or audio without their (or their parent or guardians) knowledge and, if necessary, consent.

We only collect personal information:

* for purposes connected with the function of the parish, and only when it is necessary to have this information [1]
* directly from the person concerned, or, if a minor, their parent, or guardian, unless it is publicly available from elsewhere, or the person's interests are not prejudiced when we collect the information from elsewhere [2]
* in a transparent and respectful manner recognising the potential vulnerability of the person involved [1,3,4]

We take reasonable steps to make sure personal information is correct, up to date, relevant and not misleading. [8]

Use of Information

Information is only used for the purposes for which it was obtained except in certain circumstances (for example, for statistical purposes where the person's identity is not disclosed). [10]

We safeguard people’s information and we do not release that information to third parties unless we are allowed, or required, to release information by law. This covers disclosure to persons other than those able to legitimately access material about others (such as a guardian of a minor).

Information about any person is not given to a third party without the person's knowledge, unless:

* the information is already publicly available
* it is being passed on in connection with a purpose for which it was obtained
* the right to privacy is over-ridden by other legislation
* it is necessary for the protection of individual or public health and safety [11, 12]

Access to Information

***Insert parish name***  is required to have a Privacy Officer. The Privacy Officer is the first point of contact regarding requests for access to personal information at the parish level.

The Privacy Officer is responsible for:

* Ensuring that the parish complies with the Act
* Dealing with requests made to the parish for access to, or correction of, personal information
* Working with the Privacy Commission during the investigation of complaints

If an individual, or their authorised agent (in writing), wants access to information we hold about them, we provide it, subject to the exceptions contained in sections 27 –29 of the Privacy Act. Access is not limited to “the file” and may include diary notes and/or other material in separate files.

In these circumstances the parish will:

* check the identity of the individual requesting the information
* provide assistance to the individual requesting the information if necessary
* identify if personal information is held and identify if any personal information is to be withheld pursuant to sections 27-29 of the Privacy Act
* respond to the request as soon as practicable but no later than 20 working days after the request is made (unless it is necessary to seek an extension)

Individuals may request correction of this information or, when not corrected, that a record of the request is attached to the information. [6,7]

Under the Privacy Act 2020, the Privacy Commissioner can direct agencies to provide individuals access to their personal information. The Privacy Officer is responsible for liaising with the Privacy Commissioner and the Diocesan Manager should a compliance notice be received.

Storage of Information

We have safeguards in place to protect personal information from loss, unauthorised access, use, or disclosure. These safeguards include the use of individual logins for computers, and lockable filing cabinets. We may require staff, volunteers, and third-party contractors to sign confidentiality agreements. [5]

We only keep information for as long as it is needed, and for the purposes for which it was obtained. [9]

Privacy Breach Procedure

Privacy breaches are the loss of personal information to a third party that has no right to that information. If a privacy breach is identified, the first step is to report to the parish Privacy Officer, and they may then consult with the Diocesan Manager.

The Privacy Officer will work with the parish through four steps:

1. Contain the breach and make a first assessment
2. Evaluate the breach
3. Notify affected people if necessary
4. Prevent the breach from happening again

If a privacy breach has caused (or is likely to cause) serious harm, the Privacy Officer will notify the Diocesan Manager, the Office of the Privacy Commissioner and affected individuals as soon as possible. Under the Privacy Act 2020, it is an offence to fail to inform the Privacy Commissioner when there has been a notifiable privacy breach. The threshold for a notifiable breach is ‘serious harm.’ This can be assessed by considering, for example, the sensitivity of the information lost, actions taken to reduce the risk of harm, the nature of the harm that could arise, and any other relevant matters.

Websites

All websites of ***insert parish name*** must be compliant with the Privacy Act 2020. The following guideline is provided as a template to inform website visitors about their privacy rights:

If you access our website, we may collect additional personal information about you in the form of your IP address and domain name.

Our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view so that we may serve you more effectively.

Our website may contain links to other websites or usage of third-party websites. We are not responsible for the privacy practices of linked websites, other than parish sites, and linked websites are not subject to our privacy policies and procedures. We are not responsible for risks and liabilities when engaging in any third-party websites or communication media and applications like Facebook, Twitter, WhatsApp, TikTok or Google. Please refer to the Terms of Use on individual websites for further details.