

WPCCC Privacy Policy

For the use of personal information given to Waurn Ponds Community Church Inc.

PRIVACY POLICY	
VERSION	1
EFFECTIVE DATE	23 May 2023
REVIEW DATE	January 2025

Waurn Pond Community Church Inc (WPCCC) is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (the Privacy Act). The National Privacy Principles govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.oaic.gov.au

What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses and phone numbers.

This Personal Information is obtained in various ways including by correspondence, by telephone, by email, via our website www.wpccl.com.au, from media and publications, from other publicly available sources, and from third parties. We do not guarantee website links or policies of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to church members and attendees and for promotional activities. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing lists at any time by contacting us in writing via a letter or via email at info@wpccl.com.au.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

Sensitive Information

Sensitive information is defined in the Privacy Act to include 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.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

WPCCC Privacy Policy

Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances, we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Use & Disclosure

WPCCC will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose; for other uses, WPCCC will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
 - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
 - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety; or
 - the person has consented – staff and team must confirm with the person whether they can disclose their personal details (e.g., phone number) prior to disclosure.
- Use personal information collected for direct marketing where that person would reasonably expect it to be used for this purpose (and WPCCC has provided an opt out and the opt out has not been taken up).
- Provide the option for individuals to unsubscribe from further direct marketing communications.
- Send only essential personal information of relevant individuals overseas when required to by host countries/CRC Churches International (CRC) offices for WPCCC missions' trips, or for WPCCC approved IT services (e.g., cloud services/licensing), etc. WPCCC will take reasonable steps to ensure the information which is transferred will not be held, used or disclosed by the recipient that is inconsistent with the Australian Privacy Principles (APPs).

If the disclosure of sensitive information is necessary for research, or the compilation or analysis of statistics relevant to public health or safety, and it is impracticable for WPCCC to seek the individual's consent before the use or disclosure, WPCCC may make such a disclosure (conducted in accordance with Guidelines in the *Privacy Act 1988* Section 95A).

If WPCCC has sufficient reason to believe that an unlawful activity has been, is being, or may be engaged in, and the disclosure of personal information becomes a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities, WPCCC may make such disclosures.

WPCCC may further disclose personal information if its disclosure is mandated by an enforcement body or is required for the following:

- The prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction, or breaches of a prescribed law
- The enforcement of laws relating to the confiscation of the proceeds of crime
- The protection of the public revenue
- The prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct
- The preparation for, or conduct of proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.

WPCCC Privacy Policy

Where disclosure is mandated or required, the WPCCC Lead Pastor must be notified and a record of the use or disclosure retained in the WPCCC office. No disclosure will be made without the prior authorisation of the Lead Pastor or member of the Board of Elders.

WPCCC can release information to third parties where it is requested in writing by the person concerned.

Retention, Destruction & De-Identification

WPCCC will:

- Endeavour to ensure that personal information is protected from misuse, loss and unauthorised access, modification or disclosure.
- Destroy personal information once it is not required to be kept for the purpose for which it was collected, including from decommissioned computers and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information we hold, unless it is impracticable to deal with them on this basis.

Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

WPCCC has a Data Breach Response Plan which would be followed in the unlikely event of a breach.

Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact WPCCC in writing.

WPCCC will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

WPCCC can withhold an individual's access to their information for the following reasons.

- Providing access would:
 - Pose a serious and imminent threat to the life or health of any individual
 - Have an unreasonable impact upon the privacy of other individuals
 - Reveal the intentions of WPCCC in relation to negotiations with the individual in such a way as to prejudice those negotiations
 - Be unlawful or likely to prejudice an investigation of possible unlawful activity

WPCCC Privacy Policy

- The request for access is frivolous or vexatious
- The information relates to existing or anticipated legal proceedings between WPCCC and the individual, and the information would not be accessible by the process of discovery in those proceedings
- An enforcement body performing a lawful security function asks WPCCC not to provide access to the information on the basis that providing access would be likely to cause damage to the security of Australia.

Maintaining the Quality of your Personal Information

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Policy Updates

This Policy may change from time to time and is available on our website www.wpcc.com.au. WPCCC can provide a hard copy if required.

Privacy Policy Complaints and Enquiries

Complaints regarding an alleged breach of the Australian Privacy Principles or interference of privacy may be made to the WPCCC Board of Elders. WPCCC will conduct an assessment in a timely manner, follow the WPCCC Data Breach Response Plan if a data breach has occurred, and rectify any identified issues.

If you have any queries or complaints about our Privacy Policy, please contact us at:

- PO Box 285, Belmont VIC 3216
- info@wpcc.com.au
- 03 5241 1160

*Photos and images:

For children participating in any children's program (e.g. Go Kids, Go Tots on Sundays):

We request permission to take photographs or record video footage of your child for express use on publications, multi-media presentations or websites belonging to the church (internal use and publicly viewed). As you are aware, there are potential dangers associated with the posting of personally identifiable information on a website as global access to the Internet does not allow us to control who may access such information. These dangers have always existed, however we do want to celebrate your child and his/her experiences. No personally identifiable information regarding your child will be published or provided to other organisations or individuals, except where this information is required by law, for reporting suspected abuse or neglect, or in the case of an emergency (personal identifiable information includes participant names, residential addresses, email addresses and phone numbers.) You, as Parent/Carer, may choose to not have your child/children's images recorded by WPCCC by writing your

WPCCC Privacy Policy

instruction on the **Private Information Consent Form**, which will be given to you from time to time. If you would like a copy of our *Vulnerable People and Child Safety Policy and the Private Information Permission Form*, please contact the WPCCC office or call (03) 5241 1160.

For general use: WPCCC may use your photographs and digital images, video, and audio recordings for use in the following ways: publications, newsletters, campaigns, websites, social media platforms, other related methods of promotion, any future editions, and variations of the above, and both electronic and printed formats of the above. These images will be kept on our secure cloud-based system and will not be released to any third parties without your consent. When used for promotional purposes, no identifiable information will be attached.

***WPCCC Database**

WPCCC utilises a cloud-based system to hold your private information. This information includes:

- (1) Name, home address, mobile and/or home telephone numbers, email address/es.
- (2) Date of birth, marital status, allergy and medical alerts.
- (3) Baptism history, volunteer roles and involvement, Police Check / Working With Children Check status, pastoral follow-up notes.

The above information will not be released to any person or organisation outside WPCCC without your consent. The purposes for which this information is collected and stored include pastoral care, planning for church activities and events, and statistical reviews. The data will be stored within the WPCCC's cloud-based system with authority to view and edit granted only to members of the Board of Elders and the Office staff in order to fulfil the requirements of their appointments.

The rostering application – The application used for rostering has provided access to volunteers via a desktop and/or phone application, church volunteers will only see the names of other volunteers and the events schedule; they cannot access the church directory. However, the Team Leaders, who will be approved by the Board of Elders, will see the information listed at (1) above, of all volunteers when working on the monthly serving rosters.

Check-In Children's Programs – The application will be used for recording attendance of our children's program, and other events.

Should you wish to know more about the information system operated at WPCCC, a full version of the system provider's policy can be presented upon request. You may also seek to access your information held at WPCCC anytime by contacting the church office on (03) 5241 1160 during office hours.

1. REFERENCES & RESOURCES

- *Privacy Act 1988* including the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*
- Australian Privacy Principles <https://www.oaic.gov.au/privacy/australian-privacy-principles>
- Privacy Amendment (Public Health Contact Information) Bill 2020
- Moores Law Firm www.moores.com.au
- Office of the Australian Information Commissioner (OAIC) <https://www.oaic.gov.au/privacy/your-privacy-rights/your-personal-information/what-is-personal-information/>
- www.acnc.gov.au
- [Privacy and Data Protection Act 2014 \(Vic\)](#)