

Privacy Policy

December 2021



1. Background

At Albury Bible Church (ABC), we consider it very important that the details we have received from visitors and members are kept confidential. When it comes to handling people's details, we want to be and be seen to be above reproach.

2. Purpose

This policy forms the basis of how Albury Bible Church uses and manages personal information provided to, or collected by it for the well-being of members and associates in its care and for the reasonable functions of the Church.

This policy outlines how ABC protects an individual's personal information. Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable.

This policy demonstrates that ABC respects the privacy of individuals and families and places a high priority on integrity in its handling of information provided to the Church. It seeks to protect the rights of all people who provide information to the Church, in accordance with relevant legislation.

3. Applicability and Scope

This Policy pertains to Members, Employees, Volunteers and Visitors.

It covers digital and hard-copy records. This includes, but is not limited to, ABC's online database, website, and information forms.

4. Responsibilities

Admin Committee

Ensure the implementation of this policy within the Church.

Authorisation of staff and volunteers to access records.

Security of storage for sensitive hardcopy records.

Develop and maintain procedures for collection, storage, disclosure, and disposal of Personal Information and Sensitive Information.

Develop and maintain procedures for complaints, access and enquiries regarding Personal Information held by the Church.

Develop and maintain procedures for handling data breaches and unauthorised disclosure of personal information. (eg. Investigation of data breaches; Privacy Breach Register; Records of investigation; Notification re: Eligible Data Breaches).

Establish guidelines on information handling and privacy obligations for relevant volunteers and staff. (eg. sign confidentiality agreement).

Consider privacy principles when planning what information to be collected to operate an event.

5. Policy Statements

Management of Personal Information

To be open and transparent: policies and associated documents concerning how ABC manages personal information are published on the website or are available on request.

Albury Bible Church is committed to ensuring personal information provided and maintained to the Church is managed carefully and respectfully.

The Church will ensure that other agency/service providers (eg. online hosting, technical computer support) adhere to our standards,

Collection of Personal Information

The church collects and holds information including (but not limited to) personal information, including health and other sensitive information, about:

- Members, regular attending non-members, visitors and other people who may come into contact with the Church, including children and parents/guardians as a consequence of their participation in Church life;
- Job applicants, staff members and their families, volunteers and contractors;

Before information is collected, or as soon as practicable afterwards, the Church will make reasonable efforts to advise the individual to whom the information relates aware of the purpose of collection.

Personal information is only used for the purposes of, and use by, Albury Bible Church.

Storage of Personal Information

Personal information is stored and accessed through our online church community membership database (Elvanto). Members of ABC can be given a personal login allowing access Elvanto. Elvanto has privacy functions that are set by the system administrator.

Database Access

This section outlines expectations of church members who actively serve the Church by entering, editing, retrieving and managing of personal data of members of the congregation within the data base.

ABC ministry staff have limited access to the database, as it is a fundamental shared resource and ministry tool. Access is given to ministry staff members by the database administrator.

Use and Disclosure of Personal Information

The primary purpose of collecting personal information is to enable the Church to support your participation in the ministry activities and events of the church and to enable members, adherents and guests to participate in these activities. Personal information will not be disclosed to any other entity outside church unless it relates directly to the functions and activities of church, and your consent has been obtained or is implied by your initiation of, or involvement in, a particular process or activity (eg. external provider of safe ministry training).

Access to newcomer's personal information is limited to those authorised to do so and those involved in following up the person.

Prayer in church regularly may include prayer for the needs of specific individuals. The pastoral team will ensure those identified have confirmed they are happy to be prayed for during the church meeting.

Memberships of The Church recorded in the data base are used to document quorum and voting rights at the annual general meetings.

Where possible, members are given the opportunity to 'opt out' of photos or video recordings being used publicly.

The Elvanto database is used to locate and utilise the contact details of members. This ensures contact information is up to date, and privacy features of the program assist in ensuring people's contact information is protected and used appropriately and wisely.

Updating Information

We recognise the importance of ensuring your information is current, accurate, complete and relevant.

Members and adherents who have a login to Elvanto can view and update their own personal information at any time.

An individual may obtain access to any personal information which the Church holds about them; and to advise the Church in writing of any perceived inaccuracy and to seek correction to their information.

When personal information is no longer needed for the purpose for which it was collected, it will be destroyed or de-identified.

Protecting Information

To ensure personal information is protected from misuse, unauthorised access, alteration, disclosure or loss, privacy measures include:

- practices and expectations of staff and volunteer administrators relating to privacy and information management (eg. confidentiality agreements)
- practices and expectations of members in relation to privacy matters
- a response plan relating to a breach of privacy or information security.

Breach of Privacy

A breach of privacy may result from mishandling information according to the Australian Privacy Principles.

A data breach concerns the security of personal information and involves the actual unauthorised access to, or disclosure of, personal information; or the loss of personal information where the loss is likely to result in unauthorised access or disclosure.

Causes may be malicious acts of third parties; human error; systems failure; or failure to follow information handling or data security measures resulting in accidental loss, access or disclosure.

If a data breach is suspected, or confirmed, the Church shall take remedial action as soon as is practicable to contain and limit the data loss or access; and to minimise the chance of serious harm to any individual affected by the breach.

The Church shall assess all suspected, or confirmed, data breaches to determine whether it is an Eligible Data Breach.

The Church shall investigate the circumstances, and take steps to address any issues and increase data security.

Complaints

Any concerns about the way the Church has handled the personal information it holds should be made in writing and directed to the Senior Pastor.

The Church will investigate the complaint and will notify the complainant of any decision in relation to your complaint as soon as practicable after it has been made.

If the Church is unable to resolve the complaint, the matter may be referred to the Information Commissioner.

Enquiries

For further information about the way the Church manages the personal information it holds, please contact the Church Office: Albury Bible Church, 374 Amatex Street, ALBURY NSW 2640, Phone (02) 6021 1910.

6. References

In designing this policy consideration has been made to information on the website of Office of the Australian Information Commissioner (OAIC): <https://www.oaic.gov.au>

7. Definitions

ABC: Albury Bible Church Inc.

Access criteria: A set of expectations required to be accepted and fulfilled by members requiring and having data base access

Administration Committee: Elected Administration Committee representatives.

Elvanto (also called the database): the data base software used by Albury Bible Church. also called the database.

Database Administrator: Super user with full functionality access.

Data Breach (Also referred to as Notifiable Data Breach): Under the Notifiable Data Breach Scheme an Eligible Data Breach occurs when 3 criteria are met:

- there is unauthorised access to, or unauthorised disclosure of, personal information, or a loss of personal information, that an entity holds

- this is likely to result in serious harm to one or more individuals, and
- the entity has not been able to prevent that likely risk of serious harm with remedial action.

Health Information: information or an opinion about: the health or disability (at any time) of an individual; an individual's expressed wishes about the future provision of health services to him/her; a health service provided, or to be provided, to an individual.

Leadership Team (LT): elected Church representatives.

Ministry staff: ministry team leaders.

Personal Information: information or an opinion, whether true or not, about an individual whose identity is apparent, or can reasonably be inferred from, the information or opinion, whether the information is recorded in a material form or not. It includes all personal information, regardless of its source.

Records: The Privacy Act regulates personal information contained in a 'record'. It includes a 'document' or an 'electronic or other device'. It covers a wide variety of material. A 'document' includes anything on which there is any writing, anything from which sounds, images or writings can be reproduced, drawings or photographs. It excludes a generally available publication (e.g. a telephone directory); or anything kept in a library, art gallery or museum for the purposes of reference, study or exhibition.

Remedial action: action taken to prevent unauthorised access or disclosure of personal information. If remedial action prevents the likelihood of serious harm occurring, the breach is not an eligible data breach. or breaches where personal information is lost, remedial action is adequate if it prevents the unauthorised access or disclosure of personal information.

Sensitive Information: personal information that is given extra protection and must be treated with additional care. It includes any information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, membership of a professional or trade association, philosophical beliefs, membership of a trade union, sexual orientation or practices, or criminal record. It also includes health information.

Serious harm: can be psychological, emotional, physical, reputational or other forms of harm.

8. Policy Review and Distribution

This policy and its procedures will be reviewed at least biannually by the Administration Committee, changes tabled, and approval minuted. Then the policy will be made available on the Albury Bible Church Website within four weeks of minuted approval.

Approved by Administration Committee on **19th December 2021**

To be reviewed by **19th December 2023**

Version Control

DATE	Version	NOTES
21 Nov 2020	1 Draft	This document incorporates "Albury Bible Church Data Base and Data access Procedure, adopted by Administration Committee November 2014, Reviewed: May 2020 (Version 2)".
1 May 2021	2 Draft	Procedural detail removed and minor corrections made.
25 Sept 2021		Responsibilities of Senior Pastor moved to Admin Committee.
10 Dec 2021		Minor changes.
19 Dec 2021		Approved by Admin Committee, and Review date set at 2yrs.