



SPRING STREET CHRISTIAN CHURCH

# POLICY STATEMENT

## Privacy

Version: 2.0  
Issue Date: 13/10/2009  
Issued By: General Manager of Assemblies of God Toowoomba Property Limited

### **Approval**

This policy has been approved by the General Manager of Assemblies of God Toowoomba Property Limited, trading as Spring Street Christian Church and Yukana Retirement Village (AOGTPL). References to the policy may be included in information we provide to visitors, residents, church members and affiliates, company employees, and those whom we serve in the local community.

### **Enquiries**

If you have any enquiries about the content or operation of this policy, please contact the Information Desk on 07 4617 6777.

## 1. SCOPE

This Privacy Policy sets out Assemblies of God Toowoomba Property Limited's commitment to the protection of personal privacy. This policy applies to personal information that AOGTPL collects and holds in a record that is necessary to service its members, affiliates and those who use its services.

## 2. REFERENCES

Privacy Act 1988 (Commonwealth) (the Privacy Act), and the Privacy Amendment (Private Sector) Act 2000

## 3. DEFINITIONS

### 3.1. Access

This involves an organisation giving an individual information about themselves held by an organisation. Giving access may include allowing an individual to inspect personal information or giving a copy of it to them.

### 3.2. Disclosure

In general terms an organisation discloses personal information when it releases information to others outside the organisation. It does not include giving individuals information about themselves (this is 'access' see above).

### 3.3. Personal Information

Information or an opinion in any form, whether true or not, about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. For example details about your date of birth, marital status or health information. It includes all personal information regardless of its source.

### 3.4. Sensitive Information

Is a subset of personal information. It is information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices or criminal record.

### 3.5. Use

In general terms, use of personal information refers to the handling of personal information within an organisation including the inclusion of information in a publication.

## 4. POLICY

AOGTPL is committed to the protection of personal privacy. AOGTPL is bound by the ten National Privacy Principles that form part of the Privacy Act 1988 (Commonwealth) (the Privacy Act), and the Privacy Amendment (Private Sector) Act 2000 and believe that respect for privacy forms part of the ongoing trust we wish to develop with those we provide services to. This Privacy Policy describes how we treat personal information that we hold consistent with this legislation.

### 4.1. Collection

AOGTPL only collects personal information that is necessary to conduct our business or that is specifically and knowingly provided to us, this information will be collected by lawful and fair means and will not be collected in an unreasonable or intrusive way. Where practical any personal information will be collected directly from the individual concerned.

The personal information that we maintain is kept for the following purposes:

- To provide services as requested;
- To inform those we provide services to about updates or changes to the services we provide, including sending correspondence;
- Internal accounting and administration;
- To protect those we provide service to and us from fraud;
- To provide duty of care; and
- To provide pastoral care and support.

When collecting personal information we will make sure those providing it know:

- Who we are and how to contact us;
- How to access their personal information;
- The purposes for which the information was collected;
- Who we would usually disclose the personal information to;
- Any legislative requirements for collecting the personal information; and
- The main consequences (if any) if they do not provide us with this information.

When contacting someone whose information was given by a third party, for example an emergency contact, the company representative calling will inform them how they came into possession of their personal information.

### 4.2. Use and Disclosure

AOGTPL will not use or disclose or permit the use or disclosure of any personal information unless one or more of the following apply:

- The individual concerned has provided consent;
- A reasonable person would expect the information to be used or disclosed;
- It is in accordance with this Privacy Policy;

- We believe that the use or disclosure is necessary where we suspect fraud or unlawful activity has been, is being or may be engaged in;
- Use and disclosure is required or authorised by law;
- We believe the use or disclosure is necessary for the operation, development or administration of AOGTPL or services provided by Spring Street Christian Church or Yukana Retirement Village;
- We reasonably believe it is necessary to prevent any serious and imminent threat to any person's life, health or safety.

#### **4.3. Data Quality**

AOGTPL will make every reasonable effort to ensure that personal information we collect, disclose and use is accurate, complete and up to date.

#### **4.4. Data Security**

AOGTPL will make reasonable efforts to ensure that information we collect and keep is kept secure at all times. Access to information will be limited to those of our employees and volunteers who need it to carry out their duty of care and role functions.

Personal information that is no longer required will be destroyed before disposal.

#### **4.5. Openness**

AOGTPL will be honest about the actual use of information that is collected and the type of personal information that we keep. Information we keep varies on the individuals involvement level and includes, but is not limited to,

- Name, date of birth, gender and contact details;
- Any medical or emergency contact details provided by an individual or their parent or guardian to enable us to fulfill our duty of care;
- Familial relationships;
- Details of programs, services or events attended, volunteered at or registered for;
- Basic details of pastoral care visits including the pastors name, date and time;
- Financial and bank details supplied to enable direct debit or credit card payments or donations;
- Details of significant religious decisions, events or anniversaries relevant to church ministry;
- Details of Police Checks or Working with Children Check Blue Cards and reference checks; and
- Details of qualifications held

#### **4.6. Access and Correction**

All people have a right to access the personal information we store about them. When we are informed that information that is currently accessible and in use is inaccurate, incomplete or out-

of-date, then we will correct it. Requests to correct or change information that is not easily accessible or likely to be used will be at the General Manager's discretion.

Updates and corrections to personal information that is in use can be made by contacting the Information Desk.

All requests to view or delete personal information should be directed in writing to the General Manager.

When a written request is received by the General Manager or delegate, they will arrange a time for

- the person to view the information; or
- for the information to be deleted by an authorised staff member within 14 days unless:
  - it is unlawful to provide the information; or
  - the request poses a serious and imminent threat to the life or health of any individual; or
  - the request has an unreasonable impact on the privacy of other individuals; or
  - the request is frivolous or vexatious; or
  - there is another exception under law

If the General Manager determines that an exception applies, they will notify the person making the request and give their reasons for the exception. The General Manager or delegate may require the individual concerned to provide adequate identification before processing a request.

Any fees charged for accessing information will be on a cost recovery basis only. No fee will be charged to request access to information.

#### **4.7. Identifiers**

AOGTPL will not adopt any government identity numbering system.

AOGTPL will not use or disclose a Commonwealth government identifier in a way which is inconsistent with the purpose for which they were originally issued. They will only be used where such use or disclosure is either:

- necessary for the company to fulfil its obligations to the agency that assigned the identifier to the individual, or
- in the interest of health or safety

#### **4.8. Anonymity**

Where it is lawful and practical to do so, AOGTPL will give people the option of interacting with us anonymously. It should be recognised that anonymity will restrict the ability of the company to contact and provide care for the person and it may limit the person's ability to volunteer or be involved in certain activities.

AOGTPL will not use identifiable images of individuals for any marketing or promotional purposes without their knowledge and consent.

#### **4.9. Trans border data flows**

AOGTPL will only transfer personal information overseas where

- it is at the request of the person whose information is being transferred; or
- the information is being transferred to the individual concerned; or
- the transfer meets the requirements of National Privacy Principle 9 and the transfer is personally approved by the General Manager or Board of Officers of AOGTPL

#### **4.10. Sensitive Information**

AOGTPL will only collect or use sensitive information where it is necessary for us to exercise our duty of care, is legally required or it is information about directly related to religious beliefs and our core business as a Church.

## Privacy Work Practice Guidelines – Spring Street Christian Church

### 1. Collection

All forms and documents used to collect personal information will contain the following elements

- a brief explanation of why the information is being collected, this can be in the form of the document title eg *'Main Event Registration Form'*. If this information is to be used for a secondary purpose, for example updating the details on the church database, this should be explicitly stated and, if practical, an option provided to opt out; and
- information on the identity of the organisation collecting the information including at least a registered trading name (Spring Street Christian Church) or company name (Assemblies of God Toowoomba Property Limited) and the company ABN (41 010 636 469); and
- information on how to contact us including at least a postal address and telephone number; and
- information on what other organisations may have access to this information. For example details provided on a PCOM form may be available to both Spring Street and Adelaide and a registered trading or company name and ABN must be provided for both entities; and
- the following privacy statement

*Spring Street Christian Church collects and uses your personal information for the purposes of church administration and pastoral care. If you are providing us with information about another individual, for example an emergency contact, you are responsible to gain their permission. If you do not provide us with the information requested we may not be able to provide you with service you are requesting. You can access and update your personal information by calling 07 4617 6777 during business hours. To view our privacy policy please visit [www.springstreet.com.au](http://www.springstreet.com.au)*

This privacy statement will also be displayed at the Information Desk.

Many of these elements can be achieved by utilising the appropriate letterhead.

### 2. Use and Disclosure

Spring Street Christian Church will only use or disclose personal information in ways a reasonable person would expect the information to be used or disclosed.

- Personal information will only be entered on the church database where it has been gained with a clear intent that the information is available for the church to use for future contact. For example – an email to reception giving a change of address, an enrolment form, a form explicitly provided for updating personal details.

- Personal information, including whether a person attends the church, will not be given out to any person who is not a staff member or authorised volunteer or used for non ministry purposes.
- Any disclosure to protect the life and safety of any person will be documented. For example, information given to the Department of Child Safety or emergency services.
- Where personal information is required to allow attendance, for example in a children's program, that information will only be used for the purpose provided. For example information provided by a visitor to allow their child to visit Kids Church on a one off basis will not be used for any purpose other than allowing that visit.

Where a request is made to disclose or use sensitive information, for example requests for public prayer for illness, these requests should be in writing or via email directly from the person concerned, or if they are incapacitated and are a church affiliate or member, their next of kin.

Where a request is made by a third party or written confirmation is unavailable any prayer or announcement will be in an unidentifiable way. For example 'please pray for the friend of a church member who has been hospitalised'.

### 3. Data Quality

To keep information correct and up to date Spring Street Christian Church will

- Have forms available at all church services for members and affiliates to update their details
- Regularly remind church members and affiliates to update their details
- Annually require all enrolment forms for Under 18s to be updated

The receptionist will be responsible for updating general data on the church database including

- Entering updates provided on Under 18s Enrolment Forms and Church details forms and contacting the person concerned to clarify the correct information when data quality appears poor. For example, calling someone to check the street number when entering an address that is hard to read.
- Updating or removing incorrect contact details when mail is returned or telephone numbers are out of date.
- Ensuring that requests for 'do not mail' and silent telephone numbers are indicated on the database.
- Making reasonable attempts to obtain updated contact details when details are known to be out of date.

Staff will inform the Receptionist when they become aware that information is incorrect or out of date.

### 4. Data Security

All paper based personal information will be stored in lockable facilities that require either

- a key that is not on the master key system; (eg lockable filing cabinet, individually keyed office)
- a Grand Master key; (eg the MSO office) or
- an electronic code (eg a safe)

All users of the computer network will comply with the Computer and Network Use Policy.

All paper based personal information that is no longer required will be shredded.

## 5. Identifiers

Medicare Card numbers will only be collected where it is required to fulfil our duty of care (eg for children) and will only be disclosed for the purpose of gaining medical treatment for the relevant person.

Centrelink Customer Reference Numbers will only be collected where permitted or required by law and will only be disclosed as an identifier to an appropriate government department (DEEWR, FAO or Centrelink).

## 6. Anonymity

Where it is operationally possible we will give people the option to interact with us anonymously or with minimal information being recorded. This means.

- People may attend our church services or programs that are open to the public, purchase resources, eg CDs or books, or make donations without providing us any personal information.
- Where, for legal reasons, a person cannot attend a program or use a service without providing us with personal information we will explain why the information is required and provide an option to give minimal information or information that will not be entered on the church database for other uses. For example a visitors form for Under 18s programs.

## 7. Sensitive Information

Sensitive information including information about pastoral appointments and medical and health information will be afforded a higher level of security than general private information. This means that

- Information about the specific nature of pastoral care appointments will be stored in secured facilities that are accessible only to relevant authorised staff.
- Under 18s enrolment forms, volunteer registration forms and any other paper based record that potentially contains government identifiers or medical information is locked in a restricted area when not in use and is never left unattended in public areas.

## Privacy Work Practice Guidelines – Yukana Retirement Village

### 1. Collection

All forms and documents used to collect personal information will contain the following elements

- a brief explanation of why the information is being collected, this can be in the form of the document title eg *'Application for Residency'*. If this information is to be used for a secondary purpose, for example providing information to visiting clergy, this should be explicitly stated and, if practical, an option provided to opt out; and
- information on the identity of the organisation collecting the information including at least a registered trading name (Yukana Retirement Village) or company name (Assemblies of God Toowoomba Property Limited) and the company ABN (41 010 636 469); and
- information on how to contact us including at least a postal address and telephone number; and
- information on what other organisations may have access to this information. For example details provided related to special meal requirements may be available to both Yukana Retirement Village and Cater Care Australia and a registered trading or company name and ABN must be provided for both entities; and
- the following privacy statement

*Assemblies of God Toowoomba Property Limited, trading as Yukana Retirement Village collects and uses your personal information for the purposes of village administration and personal care. If you are providing us with information about another individual, for example an emergency contact, you are responsible to gain their permission. If you do not provide us with the information requested we may not be able to provide you with the services you are requesting. You can access and update your personal information by calling 07 4631 5678 during business hours. To view our privacy policy please visit [www.yukana.com.au](http://www.yukana.com.au)*

This privacy statement will also be displayed at the Information Desk.

Many of these elements can be achieved by utilising the appropriate letterhead.

Private or personal meetings or discussions with residents, management and staff must not include any individual not directly involved in the issues to be discussed, unless the prior approval of individuals directly involved has been granted.

### 2. Use and Disclosure

Yukana Retirement Village will only use or disclose personal information in ways a reasonable person would expect the information to be used or disclosed.

- Access to personal information will be restricted to those staff who need to use it to fulfil their duties. For example medication details will be restricted to personal care staff rather than cleaning staff.
- Personal information, including personal phone extension numbers, will not be given out to any person who is not a staff member or authorised volunteer or used for non work related purposes.
- Any disclosure to protect the life and safety of any person will be documented. For example, information given to a resident's emergency contacts or emergency services.

Where a request is made to disclose or use sensitive information, for example requests for publication of information in the Yukana newsletter, these requests should be in writing or via email directly from the person concerned, or if they are incapacitated and are a resident, their next of kin.

### 3. Data Quality

To keep information correct and up to date Yukana Retirement Village will

- Have forms available at the Information Desk for residents to update their details
- Remind residents to update their details whenever we become aware there may have changed

The receptionist will be responsible for updating general data on the village database including

- Updating or removing incorrect contact details or forwarding addresses when mail is returned or telephone numbers are out of date.
- Ensuring that requests for 'do not mail' and silent telephone numbers are respected.
- Making reasonable attempts to obtain updated contact details when details are known or suspected to be out of date.

Staff will inform the Receptionist when they become aware that information is incorrect or out of date.

The Care Coordinator and personal care staff will be responsible for updating personal health and medical information which will be secured separately to general personal information and only available to Coordination and Care staff.

### 4. Data Security

All paper based personal information will be stored in lockable facilities that require either

- a key that is not on the master key system (eg lockable filing cabinet, individually keyed office);  
or
- an electronic code (eg a safe).

All users of the computer network will comply with the Computer and Network Use Policy.

All paper based personal information that is no longer required will be destroyed, eg by shredding.

Private or personal meetings or discussions with residents, management and staff must be held in an environment that assures privacy (for example, in a closed office).

Except in an emergency, management and staff of Yukana Retirement Village must not enter a resident's accommodation unit without prior approval to do so by the resident. Before entering the resident's accommodation, management and staff must knock and announce their arrival.

## 5. Identifiers

Medicare Card numbers will only be collected where it is required to fulfil our duty of care and will only be disclosed for the purpose of gaining medical treatment for the relevant person.

## 6. Anonymity

Where it is operationally possible we will give people the option to interact with us anonymously or with minimal information being recorded. This means, for example, that residents' personal guests may visit without providing us personal information.

## 7. Sensitive Information

Sensitive information including information about pastoral appointments and medical and health information will be afforded a higher level of security than general private information. This means that

- Information about the resident's health and medications will be stored in secured facilities that are accessible only to relevant authorised staff.
- Any other paper based record that potentially contains government identifiers or medical information is locked in a restricted area when not in use and is never left unattended in public areas.