

# West Preston Baptist Church (WPBC) PRIVACY POLICY

The [purpose](#) of this policy is to detail how West Preston Baptist Church handles, uses and manages personal information, in compliance with the Australian Privacy principles.

## Background

### The Privacy Act:

From 12 March 2014 the [Privacy Act](#) includes [13 Australian Privacy Principles](#) (APPs) that outline how APP entities (i.e. churches) must handle, use and manage personal information.

Personal information is information or an opinion that identifies or could reasonably identify an individual. Some examples include name, address, telephone number, date of birth, gender, medical records, bank account details, and commentary or opinion about a person.

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### Australian Privacy Principles – A Summary:

#### **APP 1: Open and transparent management of personal information**

Ensures that the church manages personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.

#### **APP 2: Anonymity and pseudonymity**

Requires the church to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

#### **APP 3: Collection of solicited personal information**

Outlines when the church can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.

#### **APP 4: Dealing with unsolicited personal information**

Outlines how the church must deal with unsolicited personal information.

#### **APP 5: Notification of the collection of personal information**

Outlines when and in what circumstances the church must notify an individual of certain matters relating to the collection of personal information.

#### **APP 6: Use or disclosure of personal information**

Outlines the circumstances in which the church may use or disclose personal information that it holds.

#### **APP 7: Direct marketing**

The church may only use or disclose personal information for direct marketing purposes if certain conditions are met.

#### **APP 8: Cross-border disclosure of personal information**

Outlines the steps the church must take to protect personal information before it is disclosed overseas.

**APP 9: Adoption, use or disclosure of government related identifiers**

Outlines the limited circumstances when a church may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.

**APP 10: Quality of personal information**

A church must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. A church must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

**APP 11: Security of personal information**

The church must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.

**APP 12: Access to personal information**

Outlines the church's obligations when an individual requests to be given access to personal information held about them by the church. This includes a requirement to provide access unless a specific exception applies.

**APP 13: Correction of personal information**

Outlines the church's obligations in relation to correcting the personal information it holds about individuals.

**For more information on the Australian Privacy Principles:**

Office of the Australian Information Commissioner  
GPO Box 5218, Sydney NSW 2001  
1300 363 992  
enquiries@oaic.gov.au  
www.oaic.gov.au

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**WPBC Privacy Collection Notice:**

Personal information provided by you and collected by WPBC will be used in conformity with our Privacy Policy, which can be found at [Privacy Policy.pdf \(wpbc.org.au\)](#) or a copy can be obtained from our Administrator, [admin@wpbc.org.au](mailto:admin@wpbc.org.au).

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# PRIVACY POLICY

WPBC (ABN: 93 6204749 20) is committed to protecting your privacy in accordance with the 13 Australian Privacy Principles (APPs) from Schedule 1 of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*, which amends the *Privacy Act 1988*.

This policy sets out how we will collect, use, store, disclose and de-identify your personal information.

**The types of information we collect:**

The types of personally identifiable and/or sensitive information we collect from you or from others about you may include, but is not limited to, the following:

- your full name, gender and contact details (address, telephone numbers, email, etc)
- donation history
- personal credit card and/or bank account details
- Working With Children Check number & expiry date (where required)
- National Police Record number and date (where required)
- complaint details
- professional and practice information including qualifications
- health/medical information
- religious information (including attendance, denominational/baptism details)
- identity of persons who have authority to collect your children from church activities
- records of visits to you, phone calls with you, and discussions around pastoral matters
- records of any communications that you have with us
- any idiosyncratic or personal information we obtain from you or others about you

**Why we collect private information:**

We do not use the information in any way other than in the furtherance of our objects and purposes.

We collect information about people so as to allow us to communicate with them, introduce them to our organisation, promote the Gospel to them, pray and provide other Christian services to them and inform them of the work we do.

We might also use your information for the following purposes:

- for the immediate reason for which you have provided it to us (for example, to enable us to process your request, payment, registration, etc)
- to maintain contact with you about our work, to report to you about our work, or to encourage you to learn about what we do
- any other purpose directly related to our work and for which you have provided consent (where it is reasonably required by law)

**How we collect information:**

We may collect information from you either directly or from third parties. Information we collect from third parties may be by formal or informal means.

Where we collect information from third parties and it is not personal information that is contained in a Commonwealth record, we will take reasonable steps to destroy or de-identify the information as required by law.

We collect personal information about supporters, donors, volunteers, employees, contractors and visitors to our events. We collect your information in the following ways:

- face to face contact
- electronically including through our website
- via social media messages or conversation
- during phone calls
- voice or image recordings
- whilst delivering and administering services at our facilities or other facilities
- from forms and other correspondence (both in writing and electronically)

We collect information by following the Australian Privacy Principle 5 (*procedures outlined in policy attachment: "Procedures for Collection Personal Information" or see below*)

**Disclosing your personal information:**

We only use your personal and sensitive information for the reason we collect it as set out above and for the purposes for which it was collected, or as otherwise permitted by law.

We will not disclose the above information that we collect to affiliates or third parties without your consent.

We don't rent, sell or exchange your information. The types of organisations to whom we normally disclose your personal information include those who help us administer our technology information systems, financial auditors and the Baptist Union of Victoria.

We take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations when handling your personal information.

**Disclosing your personal information overseas:**

Occasionally we may use overseas facilities or contractors to process or back-up information or to provide other services. As a result, we may disclose your personal information to our overseas facilities or contractors for these purposes.

Any disclosure of your personal information overseas does not change our commitment to safeguarding your privacy. We do not otherwise disclose or transfer your personal information overseas.

**How we protect your personal information:**

We take reasonable steps to ensure the security of personal and sensitive information we hold and to protect it against loss, misuse or unauthorised access, destruction, use, modification or disclosure.

Our IT systems are password protected and comply with applicable security standards. Only authorised personnel are permitted to access these details.

It is our policy to:

- permanently de-identify personal information where reasonable and possible; and
- destroy personal information once there is no longer a legal or business need to retain it

**Anonymity**

It is your right to be dealt with anonymously, provided that it is lawful and practicable.

We will try to accommodate a request for anonymity wherever possible, however we note that in some circumstances, this may prevent us from practically and effectively communicating with you.

**Third party websites:**

Our website may contain links to third party websites, and third party websites may also have links to our website.

Our privacy policy does not apply to external links or other websites.

The operators of other websites may collect your personal information. We encourage you to read the privacy policies of any website you link to from our website.

## **Cookies**

When you visit our website a record of your visit is logged. The following data is supplied by your browser:

- Your IP address and/or domain name;
- Your operating system (type of browser and platform);
- The date, time and length of your visit to the website; and
- The resources you accessed and the documents you downloaded.

This information is used to compile statistical information about the use of our website. It is not used for any other purpose.

If you do not want 'cookies' to be used please adjust your browser settings to disable them.

## **Accessing, updating or changing your information:**

You can access your information by asking us. Occasionally, we may need to refuse your request to access information, for example, where granting you access would infringe someone else's privacy.

You can update or change your information with us by contacting the church office.

## **Changes to the WPBC Privacy Policy:**

WPBC may have to update this Privacy Policy from time to time, for example to comply with changes to the Privacy Act. This Privacy Policy was last updated on 9<sup>th</sup> April 2022.

## **If you have concerns or a complaint:**

If you require more information regarding the WPBC Privacy Policy, access or correction enquiries, or if you have a complaint regarding potential privacy breaches or how your personal information is handled, please contact:

Church Secretary  
secretary@wpbc.org.au  
108A Cramer Street, Preston 3072

If you're not satisfied with how we have handled your complaint you can also contact the Office of the Australian Information Commissioner (OAIC) on [www.oaic.gov.au](http://www.oaic.gov.au). The OAIC is a government body independent of us. It has the power to investigate complaints about possible interference with your privacy.

## **Attachments**

- *Procedures for Collection Personal Information*
- *WPBC privacy statement on collecting personal information*

## Document Control

Document revision	
Review Period:	12 months
Next review due:	February 2025

Document control					
Version number	Description	Author	Position	Approval Date:	Approved by:
1	Development of policy, to replace outdated privacy policy	Kylie Kendall, BUV, adapted by Jonathan Mynard.	Deacon Secretary	5/4/22	Deacons
2	Policy review	Faye BUTler	deacon	5/2/24	deacons

# Procedures for Collection of Personal Information- WPBC

Australian Privacy Principle 5 requires that an organisation must disclose the following information to an individual either before, at the time of, or as soon as possible after, collecting their personal information:

- the organisation or agency's identity and contact details
- the fact and way in which the organisation or agency collected your personal information
- if collecting your personal information is required or authorised by law
- the reasons the organisation or agency collected your personal information
- the consequences if the organisation or agency doesn't collect your personal information
- the organisation or agency's usual disclosures of the kind of personal information being collected
- information about the organisation or agency's privacy policy
- if the organisation or agency is likely to disclose personal information to overseas recipients, and if practical, the countries where they are located

The "WPBC Privacy Statement when collecting personal information" contains all of the above information in clear, plain language. This is hereafter referred to as "the blurb". See *below*

Collecting personal information via online forms:

- Design the form as a 2x page experience
- 1st page: Display the blurb, with an "I understand" button that must be selected for the individual to continue to the next page
- 2nd page: Display form fields for data collection. Form fields should be clear as to which are mandatory and which are optional
- 2nd page: a consent tick box at the end of the form must be selected before the form can be submitted. Something like: "I consent to my personal information being collected and used by West Preston Baptist Church". "Submit" button at the end.
- Tick box should be mandatory, the individual should not be able to "Submit" until the box has been ticked. If the individual doesn't consent, their form will not be submitted.

Collecting personal information via paper forms:

- Include the blurb at the beginning, before the form commences
- Form fields should be clear as to which are mandatory and which are optional
- Add a consent tick box at the end of the form. Something like: "I consent to my personal information being collected and used by West Preston Baptist Church"
- Add a signature at the end of the form
- Forms that do not have a consent tick or signature should be considered invalid, and should not be stored or used

Collecting personal information via phone calls:

- The blurb should be read out over the phone, and the individual should agree to proceeding before any personal information is discussed. For example, after reading out the blurb the individual should be asked, "do you consent to your personal information being collected and used by West Preston Baptist Church?" to which the individual should respond "yes". This will be their consent.
- If they don't agree, then do not proceed to request the information.
- If they do agree, then when collecting information, disclose whether the information is optional. E.g. some people may not be comfortable disclosing their DOB, and would feel less pressured if they were advised upfront that it's optional.
- After the phone call, send the individual a confirmation email that includes the blurb.
- There is no legal requirement to record the phone call.

If someone asks to access the personal information that we hold about them:

- We should provide them with the personal information that we hold about them within 30 days. This would be all of the information collected and stored e.g. name, email address, etc. This could be provided in an email or over the phone.

If someone asks to access personal information about a person other than themselves:

- We should not provide the information, unless this was disclosed as one of the purposes/uses for their data collection in the blurb and they provided their consent.

If someone asks to correct the personal information we hold about them:

- If reasonable, we should make the correction within 30 days
- The request must come from the person whose information is being corrected. If someone wishes to correct another person's information, we should not make the correction until we confirm it directly with the individual.

If we wish to refuse someone's request to correct their information (e.g. if they ask us to delete their name or attendance records and we choose not to):

- We must provide in writing (email or letter):
  - Our reasons for refusing to correct the personal information
  - That the individual has a right to request that a statement be associated with their personal information (e.g. the statement may be that they think that their personal information is inaccurate, out of date, incomplete, irrelevant or misleading)
  - Information about how to make a complaint
- If the individual provides a statement, we must store it together with where their personal information is stored

If we proactively seek to refresh/update/correct personal information we hold about an individual (e.g. Paul's annual phone call):

- We are not legally required to collect explicit consent or make all the disclosures that we made when collecting the information in the first instance, unless the purpose of collection or uses of the information have changed since the initial collection.
- However, we may choose to do so out of an abundance of transparency (this is optional and can be done at Paul's discretion).
- This could be done verbally during the phone call, or via email after the phone call.

**Resources:**

- <https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference>
- <https://www.oaic.gov.au/privacy/australian-privacy-principles-guidelines/chapter-5-app-5-notification-of-the-collection-of-personal-information>



# WPBC Privacy Statement when collecting personal information via our website

*West Preston Baptist Church*

*Email – [contact@wpbc.org.au](mailto:contact@wpbc.org.au)*

**West Preston Baptist Church respects and upholds your rights to privacy protection under the National Privacy Principles contained in the Privacy Act.**

We collect your personal details in order to make contact with you, so that we can answer any questions you may have, and provide you with information on Church events and ministries.

**INFORMATION WE COLLECT** - the sort of information we may collect includes:

- Name
- Phone numbers and/or email addresses so we can communicate with you

**ACCESS TO AND DISCLOSURE OF INFORMATION:** The information collected about you will be shared with the Minister and deacons and will be passed on to ministry leaders as necessary in order to answer your questions. It will be used only for the ministry of this church and activities related to the church.

The information will not be released to any organisations outside of this church.

We endeavour to keep personal information up to date and accurate. We will also endeavour to protect your personal information from misuse, loss or unauthorised access, modification or disclosure.

**If you want a copy of your personal information we have on record** please make a request in writing to the church secretary. You can request that we modify your personal data if you believe it is not accurate, complete or up to date, or remove it from our records for any reason.

## **DATA STORAGE**

The church will take all reasonable steps to ensure that any personal information collected by the church will be held, used and disclosed in accordance with the National Privacy Principles. It will be stored securely (through password-protected documents or in locked filing cabinet in the Church Office)

## **Please note:**

You are under no obligation to provide any or all of the information requested.