

Approved by: David Penny  
Coordinator of the Curia  
Date: 17 September 2014  
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## DIOCESE OF BROKEN BAY PRIVACY POLICY

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### 1. INTRODUCTION AND PURPOSE

The Diocese of Broken Bay ("Diocese") as part of the Roman Catholic Church conducts a range of activities in order to fulfil its mission of proclaiming the good news of Jesus Christ. Those activities include parishes, schools and welfare agencies as well as charitable works. In conducting those activities the Diocese collects personal information.

The information is collected to enable the Diocese to minister to the faithful and to fulfil its canonical and civil law obligations under the Code of Canon Law and under Civil Law (both State and Commonwealth).

The Diocese is bound by the Privacy Amendment (Enhancing Privacy Protection) Act 2012, amending to the Privacy Act 1988 (Cth) ("Act"), which includes the 13 Australian Privacy Principles (APP's).

The Diocese respects the rights of individuals to keep their personal information private and to ensure that it is accurate.

This policy describes ways in which the Diocese gathers, stores, disseminates and disposes of personal information.

### 2. SCOPE

This policy applies to the Diocese and to all of the agencies and organisations, which are part of that juridical person.

This policy applies to:

- Parishioners;
- Students in Diocesan schools and their parents or guardians;
- Students involved in SRE programs;
- Volunteers, contractors and prospective employees of the Diocese;
- Members of the general public;
- Any other parties to whom the Act applies.

This policy and the provisions of the Act do not apply to records or information held or collected on behalf of or relating to existing or former employees of the Diocese.

This policy applies where personal information is collected and/or used by Diocese.

### **3. WHAT IS PERSONAL INFORMATION?**

"Personal information" means information or an opinion, whether true or not and whether or not recorded in material form, about an individual whose identity is apparent, or can be reasonably ascertained, from the information or opinion. In addition to personal information, the Act also regulates the collection of sensitive information, including personal information about racial or ethnic origin, religion, criminal record, sexuality, and union activities. Sensitive information is also health information about an individual.

### **4. INFORMATION HELD**

The personal or sensitive information that the Diocese holds about you may include the following:

- Personal contact details;
- Sacramental records;
- Information relating to your application for employment;
- Any health information required by law;
- Any personal information about you that will enable the Diocese to satisfy its duty of care to other individuals with whom you may come into contact in the course of your involvement with the Diocese;
- Information relating to pastoral care needs;
- Information relating to a child's enrolment at a Diocesan school;
- Any other information about you that may be relevant to the contact that you have with the Diocese.

### **5. PURPOSE OF COLLECTION OF PERSONAL INFORMATION**

The Diocese collects personal information for many purposes, including:

- To minister to the faithful and to provide pastoral care;
- To fulfil educational needs and expectations in Diocesan schools;
- To provide welfare and support;
- Fundraising activities;
- To administer sacraments;
- To assess the employment applications of prospective employees;
- Other purposes that may arise from time to time.

### **6. COLLECTION OF PERSONAL INFORMATION**

The Diocese collects personal information in various ways, including:

- You providing personal information about yourself and/or your child to the Diocese, a parish, school, or Diocesan welfare agency;
- You providing the Diocese with your personal information and various documentation relating to possible employment with the Diocese;
- Other methods that may arise from time to time.

In addition to collecting personal information from you, sometimes the Catholic Diocese of Broken Bay collects personal information from a third party if it is unreasonable or impracticable to collect the information from you directly, for example, where the information is provided to the Diocese from parishes (for instance, personal information contained in collection envelopes).

## **7. YOUR CONSENT**

The Diocese will endeavour to collect your personal information directly from you. Where this is not possible, your consent will be sought prior to collecting your personal information from a third party. If your consent cannot be obtained, the Diocese will have regard to the requirements and exemptions of the Act before making such a collection.

In the case of children, personal information will ordinarily be collected from their parents or guardians, unless specific and/or unusual circumstances require that the collection be made directly from the relevant child.

For prospective employees, the Diocese may collect personal information by speaking with referees. The Diocese may contact applicants' previous employers who have not been nominated as referees. Should this be the case, applicants will be advised prior to such contact being made.

In some limited circumstances, contractors who have confidentiality agreements in place with the Diocese may have access to your personal information.

## **8. WEBSITE**

By using this Site, you agree to be bound by this Privacy Policy. Whenever you submit personal information to the Catholic Diocese of Broken Bay, you consent to: (i) the collection, use, disclosure and storage of that information in accordance with this Privacy Policy; (ii) your personal information being used to improve the Site; and (iii) the receipt of emails or other communications about the Diocese and our activities (including information about marketing, promotional, and research purposes), along with communications about Catholic-Church-related activities, functions, issues and initiatives from time-to-time.

## **9. STORAGE OF INFORMATION**

The Diocese takes reasonable steps to protect and secure personal information from unauthorised access, loss, misuse, disclosure or alteration. These steps include restricted access to Diocesan offices and other areas where personal information is stored, and in computer files that can be accessed only by authorised individuals using login names and secret passwords. All parishes, schools, and welfare agencies of the Diocese are required to do the same. The Diocese will store personal information for such a period of time as the Diocese deems necessary.

## **10. DISCLOSURE OF PERSONAL INFORMATION**

Disclosure of your personal information will only be made, with your consent, to individuals or companies outside of the Diocese.

In some limited circumstances and providing confidentiality agreements are in place, contractors to the Diocese may have access to your personal information.

## **11. CROSS-BORDER DISCLOSURE**

Personal information will not be disclosed by the Catholic Diocese of Broken Bay to recipient outside Australia unless we reasonably believe that:

- the information will remain subject to principles for fair handling of the information which are substantially similar to Australian privacy principles;
- there are mechanisms that you can access to take action to enforce such principles; and
- the information will not be collected, held, used or disclosed by the recipients of the information in a manner inconsistent with this Privacy Policy.

## **12. ACCESSING YOUR INFORMATION**

You may request access to personal information that is held about you. Access to your personal information must be provided to you, except in specific circumstances as identified by the Act. To access your personal information, you must make a written request to the Parish Priest, Principal, or the Manager of the relevant agency. Should you be uncertain of whom to contact, please contact the Privacy Officer at [privacyofficer@dbb.org.au](mailto:privacyofficer@dbb.org.au).

## **13. ACCURACY OF INFORMATION**

The Catholic Diocese of Broken Bay will take reasonable steps to update or correct, as soon as possible, any information in our possession that you have previously submitted that is inaccurate, incomplete, out-of-date, irrelevant or misleading.

## **14. CONSEQUENCES OF NOT PROVIDING PERSONAL INFORMATION**

Subject to certain exceptions, the Diocese cannot collect your personal or sensitive information without your consent.

If you withhold your consent, however, the Diocese may be limited in its ability to:

- Attend to your welfare needs;
- Attend to your child's educational needs;
- Attend to any pastoral care or other ministry needs that you may have;
- Offer you employment;
- Deal with any inquiries, difficulties or concerns that you may have.

## 15. QUESTIONS AND COMPLAINTS

If you have any queries about this policy or wish to make a complaint about the manner in which the Diocese has handled your personal information, please contact the Privacy Officer at:

Email: [privacyofficer@dbb.org.au](mailto:privacyofficer@dbb.org.au)

Tel: +61 2 9847 0000

Fax: +61 2 9847 0501

Post : Privacy Officer  
Catholic Diocese of Broken Bay  
PO Box 340  
PENNANT HILLS NSW 1715

If the complaint is not resolved to your satisfaction, you may then wish to make a complaint to the Office of the Australian Information Commissioner, who is responsible for the enforcement of the Act.

You may contact the Office of the Privacy Commissioner's as follows:

Office of the Australian Information Commissioner (OAIC)

Telephone: 1300 363 992

GPO Box 5218

SYDNEY NSW 1042

Facsimile: 02 9284 9666

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)