35 Palmer Place
North Adelaide SA 5006

Privacy Policy

CCNA-POL-009

1. Purpose:

The Christ Church North Adelaide Inc. (CCNA)) respects the privacy of individuals. CCNA is committed to the collection, use, disclosure and management of Personal Information in accordance with the requirements of the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles.*

2. Scope:

This policy applies to all areas of CCNA and to all its activities. All employees, officeholders, volunteers, consultants, contractors and agents of CCNA are required to comply with this Policy when collecting Personal Information on the CCNA's behalf and when dealing with Personal Information in the CCNA's possession. Failure to do so may constitute grounds for disciplinary action.

3. Definitions:

- **Australian Privacy Principles (APP)** are as contained in the *Privacy Act 1988*.
- **Health Information** is Personal Information about
  - a person's physical or mental health or of a disability of that person
  - a person's expressed wishes about the future provision of health services
  - a health service provided or to be provided to a person
  - other personal information collected to provide a person with a health service.
  - An individual's expressed wishes about future provision of health services
- **Personal Information** is as defined in the *Privacy Act* and means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not'. The types of Personal Information that CCNA may collect, or hold includes the following:
  - Name
  - Contact details, including email address residential/business address, telephone number
  - Emergency contact details
  - Health Information
  - Date of birth
  - Gender
  - Religious affiliation
  - Employment history
  - Criminal history
  - Banking and credit card details
  - Tax file number
  - Records of donations and transactions
  - Academic record
  - IT access logs
  - Metadata from use of online services and facilities
- **Privacy Act** means the *Privacy Act 1988 (Cth)*.
- **Privacy Statement** means a notification to an individual that CCNA collects Personal Information that contains

  - The contact details of the area of CCNA responsible for the collection of the individual's Personal Information
  - The purpose for which the Personal Information is being collected
  - Any third parties to which CCNA may disclose the individual's Personal Information
  - Any consequences for the individual if the required Personal Information is not provided
  - Details of the complaint handling process
  - Details of how to obtain a copy of the Parish's/Church's Privacy Policy
- **Sensitive Information** is defined in the *Privacy Act* and includes
  - information or an 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 orientation or practices;
    - criminal record;
  - Health Information

4. Policy Principles:

4.1 Why we collect Personal Information

CCNA collects, holds, uses and discloses Personal Information in the course of carrying out functions and activities of CCNA. These functions and activities include:

- membership of one of our regular groups or regular attendance at events;
- financial contributions to support the ministry of CCNA;
- regular attendance at worship;
- maintaining registers of parish office bearers;
- ensuring compliance with Safe Ministry requirements of the Anglican Diocese of Adelaide;
- providing pastoral care;
- administering bequests and gifts;
- communicating with members of the Anglican community in the Diocese;
- incorporation of required information in the Anglican Diocese of Adelaide Synod's annual reports;
- communicating with the public, stakeholders and the media including through websites and social media; and
- enabling compliance with legislative requirements and contractual obligations with governments and their agencies.

Without the relevant Personal Information an individual may not be able to actively participate in the activities of CCNA.

4.2 Collecting Personal Information

1. CCNA will not collect Personal Information unless the information is directly related to or reasonably necessary for the performance of one or more of the Parish's/Church's activities.
2. CCNA will not collect Sensitive Information unless:
   a. It has the individual's consent to do so; or
   b. It is required or authorised by Australian law or a court order; or

c. Pursuant to an exemption under the *Privacy Act.*

3. CCNA will collect Personal Information by lawful and fair means, and where possible directly from the individual. CCNA regularly collects Personal Information in the following ways

   a. Forms, including on-line forms

   b. Correspondence

   c. Interviews and pastoral conversations

   d. As part of enrolment, registration processes and subscription to CCNA information services

   e. Direct contact, for example arising in the course of administrative activities or the provision of services

   f. From third parties with which CCNA or the Anglican Diocese of Adelaide collaborates

   g. Monitoring and logging of metadata from individuals' use of IT services and on-line facilities provided by Parish/Church.

4. When CCNA collects Personal Information from an individual, it will provide a Privacy Statement to the individual either at the time of collection or if that is not possible, as soon as reasonably practicable afterwards.

5. If CCNA receives Personal information that has not been solicited, and has no lawful basis for retaining the information, CCNA will destroy that information.

6. CCNA will give individuals the option of not identifying themselves, or of using a pseudonym except where

   a. CCNA is required or authorised by Australian law to require an individual's identify, or

   b. It is impracticable for CCNA to do so.

7. Other than the purposes specifically identified in this Policy, CCNA will only use or disclose Personal Information for purposes that the individual would reasonably expect CCNA to use or disclose that information for, being a secondary purpose that is directly related to the Parish's/Church's primary purpose of collection.

8. CCNA will not use Personal Information for the purpose of direct marketing unless CCNA has obtained the individual's consent to do so.

9. CCNA may disclose Personal Information to third parties as follows:

   a. External service providers, to the extent necessary to enable the external service provider to provide the contracted services to CCNA.

   b. Government departments and agencies to satisfy reporting requirements

   c. To Synod Office and other Anglican entities

   d. To the Professional Standards Office of the Anglican Diocese of Adelaide or of another religious organisation.

10. Some third parties to whom CCNA discloses Personal Information may be located overseas. If CCNA discloses Personal Information to an overseas recipient, it will:

    a. Obtain the consent of the individual to do so; or

    b. Ensure the overseas recipient is subject to a law that has the effect of protecting the Personal Information in a substantially similar way to the Australian Privacy Principles; or

    c. Include a term in its contract with the overseas recipient that requires the overseas recipient to deal with the Personal Information in a manner that is consistent with the Australian Privacy Principles.

4.3 Integrity of Personal Information

CCNA will take reasonable steps to:

1. Ensure that Personal Information that it collects, uses or discloses is accurate, complete and up-to-date.
2. protect the Personal Information held by it from misuse, interference, loss, unauthorised access, modification or disclosure.
3. to destroy or de-identify Personal Information if it is no longer necessary for CCNA to retain the Personal Information.
4. Not publish personal information such as individual names in Intercessions when mentioning prayers for the sick or ongoing prayers in any on-line form. This will only be in printed copies of pew sheets provided to Parishioners in attendance at Church and this is subject to review at any time as required.

4.4 Access to and Correction of Personal Information

1. CCNA will provide access to an individual's Personal Information on receipt of a request by that individual within a reasonable period, unless CCNA has a lawful reason for refusal.
2. CCNA encourages individuals who have regular dealings with it, to keep CCNA informed of any changes to their Personal Information.

4.5 Changes to this privacy policy

If this privacy policy changes, you will be informed of the new Privacy Policy of CCNA.

4.6 Breaches and complaints

1. Any CCNA employee or officeholder who becomes aware of an actual or suspected loss or unauthorised use, access, modification, disclosure or other misuse of Personal Information is to notify the Parish Priest and the Diocesan Privacy Officer immediately.
2. If an individual believes that their Personal Information has been dealt with in a manner that is inconsistent with this Policy or with the Australian Privacy Principles, the individual can make a complaint by contacting the

   CCNA Privacy Officer,
   35 Palmer Place
   North Adelaide, SA 5006
   Email: rector@ccna.asn.au
3. Complaints will be processed in a reasonable time, and individuals will be advised in writing of any action the Diocesan Privacy Officer has taken to address the complaint.
4. If you are not satisfied with the handling of your complaint you can refer it to the Office of the Australian Information Commissioner.

   Contact details:

   Office of the Australian Information Commissioner
   GPO Box 5218, SYDNEY NSW 2001

   Privacy Hotline 1300 363 992 (9.00am – 5.00pm EST Monday to Friday) (for the cost of a local call anywhere in Australia)
   Fax: +61 2 9284 9666
   Web: https://www.oaic.gov.au/
   Email: enquiries@oaic.gov.au

5. Responsibilities

5.1 Select Vestry

The Select Vestry is responsible for

1. Strategic oversight of the implementation of this Policy to ensure:
    a. compliance with the Australian Privacy Principles, and
    b. an ability to deal with inquiries or complaints from individuals about CCNA's compliance with the Australian Privacy Principles.
2. Reviewing this policy every 2 years, and
3. Approving this policy.

5.2 The Rector as the Privacy Officer

The Rector as the Parish Privacy Officer is responsible for

1. Implementing appropriate practices, procedures and systems that ensure compliance with the Australian Privacy Principles.
2. Reporting to Select Vestry on the implementation of appropriate practices, procedures and systems that ensure CCNA's compliance with the Australian Privacy Principles.
3. Ensuring that individuals' complaints concerning compliance issues are handled effectively,
4. Reporting to Select Vestry of any other privacy matters that have been raised,
5. Reviewing this policy every 2 years; and
6. Keeping Select Vestry informed of any material changes in Privacy law and their impact on CCNA's operations.

6. Policy review

This Privacy Policy is subject to biennial review.

7. Further Information

Australian Government Office of the Australian Information Commissioner website link www.oaic.com.au

8. Relevant Legislation

- The Privacy Act 1988 (Cth)
- The Privacy Policy 2020 of the Anglican Diocese of Adelaide
- CCNA Privacy statement – See **Annexure A**

9. Review Process

All policies will be subject to regular review to ensure that they remain current, relevant, and effective. The review process will be conducted as follows:

1. **Frequency of Review:** Policies will be reviewed at least every five years unless otherwise indicated, or more frequently if required by changes in legislation, diocesan policies, or internal processes of CCNA. In thi8 instance the Privacy Policy will be reviewed every 2 years.

2. **Reviewer:** The Select Vestry, in consultation with relevant stakeholders, will be responsible for conducting the review of the policy. The Select Vestry may delegate the review to another individual or committee as appropriate.

10. Document Control information

Record of revisions			
Document Number:	CCNA-POL-009	**Current Version:**	TBA
Date created	31/08/2026	**Next Review Date**	31/08/2028
Review Frequency	2 yearly	**Document Author:**	Rector Stephen Bloor/ Lynne Doherty People's Warden/ Ian Thompson Governance Risk and Nominations Committee
Document Owner	Select Vestry	**Approved by**	Select Vestry

11. Document Revision History

Version	Date	Reviewed By	Approved By	Change Summary
1.0	15 April 2016	Rector and People's wardens	Select Vestry	NEW
2.0	30 January 2026	Rector and People's wardens	Select Vestry	
3.0	21 October 2026	People's warden & GR&N Committee	Select Vestry	Renamed and numbered, new Policy format and updates relating to legislation

Annexure A – CCNA Privacy statement

Christ Church North Adelaide Inc. (CCNA) Privacy Statement

Your privacy is important to us. We are committed to protecting your privacy and to ensure that we uphold your trust. This Privacy Statement is created in compliance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. This Privacy Statement together with Christ Church North Adelaide Inc. (CCNA) Privacy Policy, sets out how we handle your personal information.

What we collect

The information that we collect about you will vary depending on the nature of involvement and the activities that you choose to be involved in. We endeavour to only ask you for information that is reasonably necessary for the activities you are seeking to be involved in. You are not required to provide the personal and/or sensitive information that we request, but if you chose not to provide it, it may hinder or prevent your involvement or inclusion in some activities and communications and the degree of pastoral support and care that we can provide you with.

The information that we collect includes:

- contact details (name, address, telephone numbers, email, etc.);
- personal details (birthdate, marital status, gender, etc.);
- family details (spouse, children, etc.);
- education qualifications and occupation information (profession, job title, etc.).

Some personal information is considered ‘sensitive information’. At times we collect sensitive information about you, including:

- health information;
- religious information (attendance, denominational details, spiritual milestones)
- professional and practice information;
- criminal record; and
- credit card details.

When we may disclose your information to third parties

We handle personal information in accordance with our Privacy Policy. Below are some specific examples of where we may disclose your information to third parties.

- To comply with legislative reporting requirements, such as reporting to Australian Charities and Not-for-profits Commission.
- Providing relevant information to insurers for inclusion on our relevant insurance policies.
- External service providers contracted by CCNA to provide support services to CCNA (eg administration of mail outs, information technology services).
- Releasing information in response to a warrant, subpoena, summons or written demand from a government authority with the power to demand the information or where otherwise legally required to do so.
- Notification to police and other persons if necessary to protect you or someone else from a serious or imminent threat to life or health.

We use a variety of physical and electronic security measures including restricting physical access to our office and password protection on our software systems to prevent unauthorised access.

Generally, you have a right to access personal information we hold about you. If we deny your request in some circumstances we will tell you why. Please contact CCNA's Privacy Officer by telephone on 8267 2673 or by writing to the Privacy Officer of CCNA, 35 Palmer Place North Adelaide, SA 5006 or by email to rector@ccna.asn.au to ask for access to your personal information, if you have a complaint about the way we handle your personal information, or if you would like more information about our approach to privacy.