



The Council for Christian Education in Schools (trading as **ACCESS ministries**)

<b>POLICY NUMBER:</b>	POL GOV 04
Responsibility for Implementation/Review	Company Secretary
Date Last Amended	12/03/2014
Next (compulsory) Review	12/03/2015
Governance Oversight	Governance Committee

## 1. INTRODUCTION

This Policy applies to The Council for Christian Education in Schools Ltd (ABN 59 004 240 779) (referred to as '**ACCESS ministries**', 'we', 'our', 'us') and extends to and covers all operations and functions of that organisation.

All clients that have access to or use personal information collected and held by **ACCESS ministries** must abide by this Privacy Policy. **ACCESS ministries** makes this Policy available free of charge and can be downloaded from its website [www.accessministries.org.au](http://www.accessministries.org.au).

This Policy outlines **ACCESS ministries'** obligations to manage and protect personal information. **ACCESS ministries** is bound by the Australian Privacy Principles ('APPs') and the Privacy Act 1988 ('Privacy Act'). This Policy also outlines **ACCESS ministries'** practices, procedures and systems that ensure compliance with the Privacy Act and the APPs.

In this Privacy Policy:

- 'Clients' means customers, potential customers, service providers or suppliers, prospective employees, employees and contractors, relevant parties with whom we come into contact, volunteers, donors, supporters and stakeholders;
- 'Disclosing' information means providing information to persons outside **ACCESS ministries**;
- 'Individual' means any person whose personal information we collect, use or disclose;
- 'Personal information' means information or an opinion relating to an individual, which can be used to identify that individual;
- 'Privacy Officer' means the contact person within **ACCESS ministries** for questions or complaints regarding **ACCESS ministries'** handling of personal information;
- 'Sensitive information' is personal information that includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional

or trade association membership, sexual preferences and criminal record, and also includes health information; and

- 'Use' of information means use of information within **ACCESS ministries**.

## 2. WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We collect and hold the following kinds of personal information about individuals:

- name
- address
- phone numbers
- email addresses
- occupation
- bank account details
- drivers' licence details
- any other information that is relevant to the services that we provide.

## 3. HOW WE COLLECT PERSONAL INFORMATION

We generally collect personal information directly from the individual. For example, personal information will be collected when an individual opens an account with us, visits our website, or sends us correspondence. Sometimes we may collect personal information about the individual from a third party. When we are provided with personal information from a third party, we will take reasonable steps to ensure that the individual is or has been made aware of the matters set out in this Privacy Policy.

**ACCESS ministries** will not collect sensitive information unless the individual has consented or an exemption under the APPs applies. These exceptions include if the collection is required or authorised by law or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided, we may not be able to provide customers with the benefit of our services, or meet an individual's needs appropriately.

**ACCESS ministries** do not give individuals the option of dealing with them anonymously, or under a pseudonym. This is because it is impractical for **ACCESS ministries** to deal with individuals who are not identified.

## 4. UNSOLICITED PERSONAL INFORMATION

**ACCESS ministries** may receive unsolicited personal information about individuals. **ACCESS ministries'** employees are required to notify the Privacy Officer of all unsolicited personal information received by them. We destroy or de-identify all unsolicited personal information, unless the personal information is relevant to **ACCESS ministries'** purposes for collecting personal information.

## 5. ABOUT WHOM DO WE COLLECT PERSONAL INFORMATION?

The personal information we may collect and hold includes (but is not limited to) personal information about the following individuals

- customers;
- potential customers;

- service providers or suppliers;
- prospective employees, employees and contractors;
- other third parties with whom we come into contact;
- volunteers;
- donors, stakeholders and supporters.

## 6. WEBSITE COLLECTION

We collect personal information from our web site ([www.accessministries.com.au](http://www.accessministries.com.au)) when we receive emails and online forms. We may also use third parties to analyse traffic at that web site, which may involve the use of cookies. Information collected through such analysis is anonymous. Our website privacy policy can be accessed by clicking on the privacy button on our website.

## 7. WHY DOES ACCESS MINISTRIES COLLECT AND HOLD PERSONAL INFORMATION?

We may use and disclose the information we collect about an individual for the following purposes:

- to assist **ACCESS ministries** in providing a product or service to an individual;
- to consider and assess an individual's request for a product or service;
- to provide an individual with information about a product or service and invite an individual to marketing events;
- to protect our business and other customers from fraudulent or unlawful activity;
- to conduct our business and perform other management and administration tasks;
- to consider any concerns or complaints an individual may have;
- to manage any legal actions involving **ACCESS ministries**;
- to comply with relevant laws, regulations and other legal obligations; and
- to help us improve the products and services offered to our customers, and to enhance our overall business.

## 8. HOW MIGHT WE USE AND DISCLOSE PERSONAL INFORMATION?

**ACCESS ministries** may use and disclose personal information for the primary purposes for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose and in other circumstances authorised by the Privacy Act.

We use and disclose personal information for the purposes outlined in section 7 above. Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless the individual agrees otherwise, or where certain other limited circumstances apply (e.g. if required by law).

We engage other people to perform services for us, which may involve them handling personal information we hold. In these situations, we prohibit them from using personal information about the individual except for the specific purpose for which we supply it. We prohibit them from using your information for the purposes of direct marketing their products or services.

In relation to sensitive information held by us, wherever possible, **ACCESS ministries** will attempt to de-identify the information. We also undertake to take reasonable steps to delete all personal information about an individual when it is no longer needed.

## 9. TO WHOM MIGHT WE DISCLOSE PERSONAL INFORMATION?

We may disclose personal information to:

- a related entity of **ACCESS ministries**;
- an agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, debt collectors, mailing houses, or other advisors;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing our payments, payment merchants and other financial institutions such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts; and
- anyone else to whom the individual authorises us to disclose it or as required by law.

We may also collect personal information from these organisations and individuals, and will deal with that information in accordance with this Policy.

## 10. SENDING INFORMATION OVERSEAS

We will not disclose personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Act, or the APPs;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

## 11. MANAGEMENT OF PERSONAL INFORMATION

**ACCESS ministries** recognises how important the security of personal information is to clients. We will at all times seek to ensure that the personal information we collect and hold is protected from misuse, loss, unauthorised access, modification or disclosure. **ACCESS ministries** employees must respect the confidentiality of the personal information we collect.

Personal information is generally held in a computer data base. Information may also be held in paper files which are stored in secure areas. Computer-based information is protected through the use of access passwords.

In relation to our computer-based information, we apply the following guidelines:

- data ownership is clearly defined within **ACCESS ministries**;
- passwords are routinely checked;
- we change employees' access capabilities when they are assigned to a new position;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- the system automatically limits the amount of personal information appearing on any one screen;
- unauthorised employees are barred from updating and editing personal information;
- all personal computers which contain personal information are secured, physically and electronically;
- data is encrypted during transmission over the network;
- print reporting of data containing personal information is limited;
- **ACCESS ministries** has created procedures for the disposal of personal information; and
- personal information is overwritten to the extent possible when the information is no longer required.

**ACCESS ministries** performs all volunteer and employment procedures, including application and termination processes, in a confidential manner. All individual job attributes, such as classification information and salaries, are confidential.

Where we no longer require the personal information for a permitted purpose under the APPs, we will take reasonable steps to destroy it.

## **12. DIRECT MARKETING**

**ACCESS ministries** will only use or disclose personal information for the purposes of direct marketing, if the individual has consented to its use or disclosure for direct marketing. Individuals have the right to request to opt out of direct marketing and we must give effect to the request within a reasonable period of time.

In relation to sensitive information, **ACCESS ministries** may only use or disclose sensitive information about an individual for the purpose of direct marketing if the individual has consented to the use or disclosure of the information for that purpose.

Individuals may also request that **ACCESS ministries** provides them with the source of their information. If such a request is made, **ACCESS ministries** must notify the individual of the source of the information free of charge within a reasonable period of time.

## **13. IDENTIFIERS**

We will not use identifiers assigned by the Government, such as a tax file number, Medicare number or provider number, for our own file recording purposes, unless one of the exemptions in the Privacy Act applies. **ACCESS ministries** endeavours to avoid data-matching, being the comparison of data collected and held for two or more separate purposes in order to identify common features in relation to individuals, as a basis for further investigation or action in relation to those individuals.

## **14. HOW DO WE KEEP PERSONAL INFORMATION ACCURATE AND UP-TO-DATE?**

**ACCESS ministries** is committed to ensuring that the personal information it collects, uses and discloses is relevant, accurate, complete and up-to-date.

We encourage individuals to contact us to update any personal information we hold about them. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless it is agreed otherwise. We do not charge individuals for correcting the information.

## **15. YOU HAVE THE ABILITY TO GAIN ACCESS TO YOUR PERSONAL INFORMATION**

Subject to the exceptions set out in the Privacy Act, individuals may gain access to the personal information that we hold about them by contacting the **ACCESS ministries** Privacy Officer. We will provide access within 30 days of the individual's request. If we refuse to provide the information, we will provide reasons for the refusal.

An individual's request for access to his or her personal information will be dealt with by allowing the individual to look at his or her personal information at the offices of **ACCESS ministries**. We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged for providing access.

## 16. UPDATES TO THIS POLICY

This Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

## 17. RESPONSIBILITIES

It is the responsibility of management to inform employees and other relevant parties about the **ACCESS ministries** Privacy Policy. Management must ensure that they advise **ACCESS ministries'** employees and other relevant parties of any changes to the Privacy Policy.

It is the responsibility of all employees and other relevant parties to ensure that they understand and comply with this Privacy Policy.

## 18. PRIVACY TRAINING

All new employees and volunteers are provided with timely and appropriate access to **ACCESS ministries'** Privacy Policy. All employees and volunteers are provided with opportunities to attend privacy training, which covers **ACCESS ministries'** obligations under the Act and the APPs. Employees must ensure that they understand the Privacy related issues that could adversely affect **ACCESS ministries** and its clients if not properly adhered to.

## 19. NON-COMPLIANCE AND DISCIPLINARY ACTIONS

Privacy breaches must be reported to management by employees and other relevant parties. Ignorance of the **ACCESS ministries'** Privacy Policy will not be an acceptable excuse for non-compliance. Employees or other relevant parties who do not comply with **ACCESS ministries'** Privacy Policy may be subject to disciplinary action.

## 20. INCIDENTS/COMPLAINTS HANDLING

**ACCESS ministries** has an effective complaints handling process in place to manage privacy risks and issues.

The complaints handling process involves:

- identifying (and addressing) any systemic/ongoing compliance problems;
- increasing consumer confidence in **ACCESS ministries'** privacy procedures; and
- helping to build and preserve **ACCESS ministries'** reputation and business.

Individuals can make a complaint to **ACCESS ministries** about the treatment or handling of their personal information by lodging a complaint with the Privacy Officer.

## 21. CONTRACTUAL ARRANGEMENTS WITH THIRD PARTIES

**ACCESS ministries** must ensure that all contractual arrangements with parties adequately address privacy issues. **ACCESS ministries** will make relevant parties aware of this Privacy Policy.

Third parties will be required to implement policies in relation to the management of an individual's personal information in accordance with the Privacy Act. These policies include:

- regulating the collection, use and disclosure of personal and sensitive information;
- de-identifying personal and sensitive information wherever possible;
- ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties; and

- ensuring that the personal and sensitive information is only disclosed to organisations which are approved by **ACCESS ministries**.

## 22. PRIVACY AUDITS

**ACCESS ministries** will conduct periodic privacy audits in order to ensure that it is continuing to comply with its obligations under the APPs.

## 23. ENQUIRIES

Any questions about our privacy procedures, or if you wish to make a complaint about how we have dealt with your personal information you may lodge a complaint with us by contacting the **ACCESS ministries** Privacy Officer using the details that follow:

The Chief Privacy Officer **ACCESS ministries**  
People & Culture Division  
Locked Bag 3  
SURREY HILLS VIC 3127  
E: [compliance@accessministries.org.au](mailto:compliance@accessministries.org.au)  
Telephone: (+61) (03) 9811 0999

### Policy History

<b>ACTION</b>	<b>AUTHORITY</b>	<b>DATE</b>
First Approved	Board	25/02/2009
Amended	Governance	12/03/14
Updated	Governance	17/03/2014

## Privacy Statement – APP entities

### The Council for Christian Education in Schools Ltd

#### (ACCESS ministries)

**ACCESS ministries** is committed to ensuring the confidentiality and security of your personal information. Our Privacy Policy, which details our handling of information, is available upon request or by accessing our website [www.accessministries.org.au](http://www.accessministries.org.au)

#### 1. The entity collecting the information

The identity and contact details of **ACCESS ministries** are as follows:

The Chief Privacy Officer  
ACCESS ministries  
People & Culture Division  
Level 1, 603 Canterbury Road  
Surrey Hills VIC 3127  
E: [compliance@accessministries.org.au](mailto:compliance@accessministries.org.au)  
Telephone: (+61) (03) 9811 0999

#### 2. Circumstances of collection

We have collected information about you from:

- employee and volunteer application forms and other personal information required for the purposes of our employment or volunteer relationship
- benefit information
- student application forms
- website enquiry
- email
- telephone enquiry
- book orders
- marketing campaigns
- surveys
- donations and other forms of appeal
- criminal background checks

#### 3. Purposes of collection

**ACCESS ministries** collects and holds personal information for the purposes set out in the **ACCESS ministries** Privacy Policy.

#### 4. Consequences of not providing us with the information

If you do not provide some or all of the personal information requested by us, we may be unable to provide you with our products or services.

#### 5. Use and disclosure of information

We may use and disclose the personal information we collect about you for the following purposes:

- to assist **ACCESS ministries** in providing a product or service to you;
- to consider and assess your request for a product or service;
- to provide you with information about a product or service and invite you to marketing events;
- to protect our organisation and other customers from fraudulent or unlawful activity;
- to conduct our organisation and perform other management and administration tasks;

- to consider any concerns or complaints you may have;
- to manage any legal actions involving **ACCESS ministries**;
- to comply with relevant laws, regulations and other legal obligations; and
- to help us improve the products and services offered to our customers, and to enhance our overall organisation.

## 6. To whom might we disclose personal information?

We may disclose personal information to:

- a related entity of **ACCESS ministries**;
- an agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, debt collectors, mailing houses, or other advisors;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing our payments, payment merchants and other financial institutions such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts; and
- anyone else to whom the individual authorises us to disclose it or as required by law.

We may also collect personal information from these organisations and individuals, and will deal with that information in accordance with this Policy.

## 7. Overseas disclosure

We do not disclose personal information to overseas recipients.

## 8. Your rights

Our Privacy Policy contains information about how:

- you may access the personal information we hold about you;
- you may seek the correction of your personal information; and
- you may complain about a breach of the Privacy Act, including the APPs; and
- **ACCESS ministries** will deal with a privacy complaint.

## 9. Marketing material

We may use personal information we collect from you to send marketing material from time to time, unless you elect not to receive the material. We will not provide your personal information to any third party other than in accordance with our Privacy Policy.

## ACKNOWLEDGEMENT SECTION:

- I acknowledge that I have received and read **ACCESS ministries'** Privacy Statement.
- I do not wish to receive any promotional material from **ACCESS ministries**.

SIGNED: