



The Catholic Diocese of Sale

# Privacy Policy

6 March 2025

## Table of Contents

1.0 INTRODUCTION.....	3
2.0 PURPOSE .....	3
<b>2.1 Exception in relation to employee records .....</b>	<b>3</b>
3.0 PRINCIPLES.....	3
4.0 DEFINITIONS .....	3
5.0 COLLECTION OF INFORMATION .....	4
<b>5.1 Collection of personal information by the Catholic Diocese of Sale .....</b>	<b>4</b>
<b>5.2 What kinds of personal information does the Catholic Diocese of Sale collect? .....</b>	<b>4</b>
<b>5.3 How is personal information collected? .....</b>	<b>4</b>
<b>5.4 Anonymous interactions .....</b>	<b>4</b>
<b>5.5 The Catholic Diocese of Sale and Parish Websites .....</b>	<b>4</b>
<b>5.6 Access to information collected by the Catholic Diocese of Sale and Parish websites .....</b>	<b>4</b>
<b>5.7 Use of information collected by the Catholic Diocese of Sale and Parish websites.....</b>	<b>4</b>
6.0 HOW INFORMATION COLLECTED WILL BE USED AND DISCLOSED.....	5
<b>6.1 How will the Catholic Diocese of Sale and Parishes use personal information collected? .</b>	<b>5</b>
<b>6.2 Who is personal information disclosed to and stored with? .....</b>	<b>5</b>
<b>6.3 Overseas disclosures .....</b>	<b>5</b>
7.0 MANAGEMENT, SECURITY AND ACCESS TO INFORMATION COLLECTED .....	5
<b>7.1 Management and security of personal information.....</b>	<b>5</b>
<b>7.2 Access and correction of personal information .....</b>	<b>6</b>
8.0 ENQUIRY AND COMPLAINT PROCEDURES .....	6
<b>8.1 Enquiries, complaints and contact details.....</b>	<b>6</b>
<b>8.2 Complaint process .....</b>	<b>6</b>
9.0 EXPECTED OUTCOMES.....	6
10.0 REFERENCES .....	7
11.0 POLICY ADMINISTRATION SCHEDULE .....	7

## SAFEGUARDING COMMITMENT

The Catholic Diocese of Sale holds the care, safety and wellbeing of children, young people and adults at risk as a central and fundamental responsibility in all that we do.

This commitment is drawn from and inherent to the teaching and mission of Jesus Christ, with love, justice and the sanctity of each human person at the heart of the Gospel.  
We exercise zero tolerance for all forms of abuse.

## 1.0 INTRODUCTION

This Privacy Policy applies to the Catholic Diocese of Sale and its parishes. The Diocese of Sale is a geographic region of the Roman Catholic Church, dedicated to proclaiming the good news of Jesus Christ through ministry, social welfare, education, pastoral care, and worship. Our parishes and social welfare agencies serve both Catholics and non-Catholics, offering support and companionship to those seeking assistance or spiritual connection.

## 2.0 PURPOSE

This Privacy Policy explains how the Catholic Diocese of Sale and Parishes within the Diocese collect and manage personal information.

### 2.1 Exception in relation to employee records

This Policy does not apply to the Catholic Diocese of Sale handling of an employee record, which are exempt under the Australian Privacy Principles (APP's), when handling is directly related to current or former employment relationship between the Catholic Diocese of Sale and an employee. The Catholic Diocese of Sale and Parishes handle employee health records in accordance with the Health Privacy Principles in the *Health Records Act 2001* (Vic.).

## 3.0 PRINCIPLES

The Catholic Diocese of Sale is bound by the *Privacy Act 1988* (Cth) and the APP's in that Act and, in relation to health records, the *Health Records Act 2001* (Vic) and the Health Privacy Principles in that Act.

## 4.0 DEFINITIONS

**Personal information** is information or an opinion, whether true or not, about a person whose identity is apparent, or can reasonably be ascertained, from the information or opinion – that is recorded in any form. For example, a person's name, address, phone number and date of birth (age). De-identified information about a person can also be personal information.

**Health information** is information or opinion about a person's physical, mental or psychological health or disability, that is also personal information – whether in writing or not. This includes information or opinion about a person's health status and medical history, immunisation status and allergies, as well as counselling records.

**Sensitive information** is information or opinion about a set of specific characteristics, including a person's racial or ethnic origin, political opinions, or affiliations, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information, health information and biometric information about an individual.

## **5.0 COLLECTION OF INFORMATION**

### **5.1 Collection of personal information by the Catholic Diocese of Sale**

The Catholic Diocese of Sale and Parishes collect information about individuals to perform one or more of its functions or activities, to service, support, resource and operate Parishes within the Diocese, including employees and ownership of Diocesan assets.

### **5.2 What kinds of personal information does the Catholic Diocese of Sale collect?**

The types of personal information the Catholic Diocese of Sale and Parishes collect depends on the relationship to the Catholic Diocese of Sale and the parish. The Catholic Diocese of Sale and Parishes hold personal information, including health and other sensitive information about:

- Name, contact details (including next of kin), date of birth, previous Parish and religion
- Parent(s), guardian(s) and/or carer(s) occupation and language background
- Volunteering information (including Working with Children Checks)
- Relevant financial information
- Photos and videos at the Catholic Diocese of Sale and Parish events
- Employment information including medical, financial, medical records, and work emails
- Contractors' payment and contact details.

### **5.3 How is personal information collected?**

Personal information held about an individual is collected either by the Catholic Diocese of Sale or Parishes directly through forms completed online, face-to-face meetings and interviews, in emails and from telephone calls.

### **5.4 Anonymous interactions**

The Catholic Diocese of Sale and Parishes need to be able to identify individuals with whom they interact and to collect identifiable information about them to facilitate charitable operations and provide services to the communities. However, in some limited circumstances some activities and interactions with the Catholic Diocese of Sale and Parishes may be done anonymously, which may include making an inquiry, complaint or providing feedback.

### **5.5 The Catholic Diocese of Sale and Parish Websites**

The Catholic Diocese of Sale and its parishes do not collect or store personal data from website visitors. Additionally, we do not use tracking technologies such as cookies or analytic tools to monitor visitor activity.

### **5.6 Access to information collected by the Catholic Diocese of Sale and Parish websites**

The Catholic Diocese of Sale and Parishes will not attempt to identify its website users by their browsing activities. However, in the unlikely event of an investigation, a law enforcement agency or other government agency may exercise its legal authority to inspect the ISP logs of the website.

### **5.7 Use of information collected by the Catholic Diocese of Sale and Parish websites**

Any information collected via the Catholic Diocese of Sale or Parish websites will only be used for the purpose for which it has been provided, and it will not be used for any other purpose without consent.

The Catholic Diocese of Sale and Parish websites do not provide facilities for the secure transmission of information across the internet. Users should be aware that there are inherent risks transmitting information across the internet.

## 6.0 HOW INFORMATION COLLECTED WILL BE USED AND DISCLOSED

### 6.1 How will the Catholic Diocese of Sale and Parishes use personal information collected?

The Catholic Diocese of Sale and Parishes will use and disclose personal information it collects to carry out relevant functions and operational activities, in particular planned giving, sacrament administration, and Diocesan support services which include:

- Duty of care responsibilities
- Confirm suitability of volunteers, job applicants and contractors
- Undertake fundraising appeals and communicate within the Diocese
- Help facilitate religious and sacramental programs
- Insurance purposes.

### 6.2 Who is personal information disclosed to and stored with?

The Catholic Diocese of Sale and Parishes may disclose personal information, including sensitive information, held about an individual to carry out relevant functions and activities which include:

- Parish Administration Communication and Engagement Management (PACEM)
- Recipients of publications, such as newsletters or publications on the Catholic Diocese of Sale or Parish websites
- Anyone authorised by the Catholic Diocese of Sale and Parishes to whom information may be disclosed
- Anyone to whom the Catholic Diocese of Sale and Parishes are otherwise required or authorised to disclose information to by law, including under child protection laws.

### 6.3 Overseas disclosures

The overseas locations may share personal information to the Diocese, as part of the selection process for overseas priests, and to obtain Australian visas, etc. and the Diocese will treat it like any other personal information that is collected, as per 5.2.

## 7.0 MANAGEMENT, SECURITY AND ACCESS TO INFORMATION COLLECTED

### 7.1 Management and security of personal information

The Catholic Diocese of Sale and Parishes are required to respect the confidentiality of personal information and privacy of individuals.

The Catholic Diocese of Sale and Parishes implement various measures and procedures to protect personal information it holds from any form of misuse, interference, loss, unauthorised access, modification or disclosure. This may include, but not limited to, locked storage of paper records, access protocol, password protected computerised records, high level security measures and encryption.

The Catholic Diocese of Sale and Parishes will respond to any incidents which may affect the security of the personal information it holds in accordance with the *Privacy Act 1988* (Cth). If the Catholic Diocese of Sale and its Parishes assess that anyone whose information is affected by such a breach is likely to suffer serious harm as a result, the Catholic Diocese of Sale and Parishes will notify the affected individual(s) and the Office of the Australian Information Commissioner (OAIC) of the breach.

Anyone concerned that the security of their personal information may have been compromised, should notify the Catholic Diocese of Sale and Parishes immediately so appropriate action can be taken.

## 7.2 Access and correction of personal information

Under the *Privacy Act 1988* (Cth) and the *Health Records Act 2001* (Vic.), an individual has the right to access personal information which the Catholic Diocese of Sale and Parishes hold about them (subject to certain exceptions) and advise the Catholic Diocese of Sale and Parishes of any perceived inaccuracy.

The person making a request will be required to verify their identity and specify what information they are seeking and may be charged a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the applicant will be advised of the likely cost in advance. If the Catholic Diocese of Sale and Parishes cannot provide access to that information or does not consider it needs correction, the applicant will be given a written notice explaining the reasons for the refusal of the request.

## 8.0 ENQUIRY AND COMPLAINT PROCEDURES

### 8.1 Enquiries, complaints and contact details

If a person would like further information about the way the Catholic Diocese of Sale and Parishes manage the personal information held or wish to make complaint in relation to the handling of personal information, it is necessary to contact the Catholic Diocese of Sale using the details below.

### 8.2 Complaint process

A complaint must be submitted in writing. Receipt of a complaint will be confirmed, and the complainant's identity may need to be verified. A response to the privacy complaint and a proposal resolution will usually be provided within 21 days.

**Contact:**

Mary Winter  
The Catholic Diocese of Sale Business Manager  
6 Witton Street (PO Box 1410)  
Warragul 3820  
Phone: (03) 5614 5141  
Email: [MaryW@sale.catholic.org.au](mailto:MaryW@sale.catholic.org.au)

If the complainant is not satisfied with the response or the decision, they may make a complaint to the Office of the Australian Information Commissioner whose contact details are:

GPO Box 5288  
Sydney NSW 2001  
Telephone: 1300 363 992  
[www.oaic.gov.au](http://www.oaic.gov.au)

## 9.0 EXPECTED OUTCOMES

The Catholic Diocese of Sale and Parishes are expected to collect, use and manage personal, sensitive and health information in accordance with procedures in this Policy and relevant legislation, ensuring quality and security of the information collected is maintained.

## 10.0 REFERENCES

- *Privacy Act 1988* (Cth)
- *Health Records Act 2001* (Vic)

## 11.0 POLICY ADMINISTRATION SCHEDULE

Policy Owner	Professional Standards Unit
Approval Authority	Bishop Greg Bennet The Catholic Diocese of Sale
Approval/Reviewed Date	Thursday, 6 March 2025
Version Number	Version 2.0
Modifications made this version	Simplify and replace the previous undated version.
Next review date by policy owner	March 2028  A review of this policy will be conducted every three years and may be subject to amendment prior to the review date as a result of: <ul style="list-style-type: none"><li>▪ relevant feedback from stakeholders, including children, young people, parents, carers and the community</li><li>▪ legislative changes</li><li>▪ a review of critical incidents</li><li>▪ a commitment to promote continuous improvement.</li></ul>