

Privacy Procedures at St Peter's Cathedral

At St Peter's Cathedral we take Privacy seriously. We have just reviewed our Privacy Policy and it is apparent that the policy is a legalistic statement, but we need something that more specifically states the way we will act.

We need to document practices that we intend to follow, and prohibit other practices that would weaken privacy. We need to monitor our adherence to our Procedures.

These procedures need to be followed by Clergy, Employees, and Lay Workers- both those who have elected positions like wardens and members of council, and those who have positions with need to contact other members of our congregation- like convener of welcomers, organiser of Cathedral Kids, etc.

There are a number of principles that are relevant to the implementation of Privacy Procedures

- A. Clergy have highly confidential discussions with members of congregation. This information must be protected with the highest level of confidentiality.**
- B. Members of the congregation give donations to the cathedral. The donors expect that their giving will be handled discreetly.**
- C. Members of the congregation give us their contact details and expect us to use them appropriately.**
- D. Information stored electronically is subject to risk of data theft. We must be confident that we have appropriate safeguards.**
- E. The Cathedral is an employer. Employment Law will govern how we handle data for employees which may be different to the way we handle congregation data**
- F. Sub-Groups**

1. Collecting and Storing of names and addresses, and more personal data

It is appropriate and expected that personal data of our congregation is given to us. This would obviously include contact details such as name, address, telephone numbers, email, details of children and other family members. Some of this information is held in the office. It could be held by other groups within the cathedral (Cathedral Kids, Friends, Choir, etc).

Everyone who has such data should use it discreetly.

We also have more specific details- health details; complaint details; prayer requests; health details; complaint details; financial giving and financial information; credit card details; Safe Ministry Information; attendance information; employment information; and any idiosyncratic or personal information we obtain from you or others about you.

Images of all people, of all ages, is personal data and identifies individuals. No image of a child should be recorded, or shared in any way without specific consent. An adult who does not wish their image to be used can apply in writing to the Privacy Officer.

2. Sharing of names, addresses and personal data

While it is always appropriate to share names and addresses with clergy, sharing details with “Team Leaders” should be on a need-to-know basis. And sharing names and addresses obtained from cathedral records to people who are “just members of the congregation” is never appropriate. It is essential to contact the person whose information is sought, and tell them the other person wants to get in touch with them. It is not inappropriate to share data between friends - so long as the data was not obtained from cathedral records or as part of your responsibilities at the cathedral. If you only know someone from the cathedral, they are not a “friend”, they are a “cathedral contact”.

Sharing personal information (beyond name and address) obtained from the cathedral is highly questionable. While members of the Pastoral Care Team are expected to share information with each other, passing the same information beyond team members is totally inappropriate.

Members of the Pastoral Care Team are appointed by the Dean. They have access to the Roll and other personal details of members of our community. They contact our community in the same way as our clergy do, for purposes of providing pastoral care.

3. Rosters and communicating with roster members

Group emails where every recipient can see every other recipient’s email address is not desirable. Where the group is small it is not a problem, but for a group of more than 15 it increases the list of email addresses gets to someone who will not respect privacy, and maybe use the list for inappropriate or commercial purposes.

4. Planned Giving, Recorder, Fund Raising

Planned giving donors expect their information to be used with discretion. In principle only the bookkeeper, the Recorder, and the treasurer should know the amount a donor has pledged to the cathedral.

If Cathedral Council establishes a fundraising committee, (maybe Music Foundation, Conservation, or Planned Giving) it would be appropriate that a wider group of people know who has been given in the past so they can seek donations in the future. The names of any such committee members should be reported to Cathedral Council.

5. Signed declaration of adherence to policy and procedures

On an annual basis clergy, employees, and volunteers with access to confidential information will sign a confirmation as follows

“I have read St Peter’s Cathedral’s Privacy Policy and Privacy Procedures and confirm that I understand these documents and will respect them and not pass any information obtained in my work at St Peter’s Cathedral to any person not authorised to receive it.”

6. Privacy Officer

St Peter's Cathedral will appoint a Privacy Officer who will:

- a. Review the Privacy Policy and Privacy Procedures annually, and submit them to the Council for reapproval.
- b. Obtain the annual declarations
- c. Be available to respond to any complaints received from members from our community.

Procedures for Sub-Groups- Cathedral Kids, Friends, Home Groups, Choir etc

Where we do intend to pass the information to the clergy, etc the sheet of paper on which name address, and contact details collected should state

“While we are taking your name and contact detail for the benefit of **(for example)** Cathedral Kids, this detail will be passed to clergy etc, and recorded. It is subject to our Privacy Policy and Procedures. If you have not already received a copy of the Privacy Policy, please refer to our website. <http://www.stpeters-cathedral.org.au/privacy-policy>”

NB this means that the group must collect an email for the person, not just a phone number.