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## ***POLICY – PRIVACY***

### Rationale:

The need to respect privacy is a fundamental element of the pastoral care of individuals at Reveal Church (the 'church'). Data must reasonably be collected and managed to facilitate such care and the day to day operations of the church. Reveal Church upholds rights to privacy protection under the National Privacy Principles contained in the Privacy Act 1988 (as amended).

Personal details are collected in order to administer relationship with the Church, to provide any personal ministry, and to provide information on church events and ministries. We only collect information where it is necessary to do so in order to provide a service to people or where we are required by law to do so (such as in relation to matters of staff employment and duty of care obligations to those under eighteen years of age). Without relevant personal details, the provision of certain ministry opportunities may be compromised.

### Aims:

To allow the church community and the wider public to hold clear expectations regarding the collection and management of data at Reveal Church.

### Implementation:

Privacy policy is derived from the Privacy Amendment (Enhancing Privacy Protection) Act 2012 which amends the Privacy Act 1988 and incorporates the Australian Privacy Principles. This policy document is to be made publicly available on the church website. Members are to be regularly advised of access to this policy and leaders are to be advised of procedures and implications annually.

#### *1. Personal Information We Collect*

- No leader should, however, acquire or seek to acquire personal information unless it is deemed to be 'reasonably necessary' for particular functions or activities and it is generally obtained with consent (subject to the disclosure exemptions in section 2). The sort of personal information we may collect, and which is updated at least annually, includes the items below. Name, address, phone numbers, email addresses, birth dates, photos and other such personal details so as to facilitate communication and identification related to pastoral care;
- Family member details;
- Details of donations where receipts for taxation purposes are required;
- Other financial records related to donations, payments or purchases;

- Minutes of scheduled meetings;
- Communications with the church (e.g. letters, prayer requests, emails);
- Involvement in ministries so as to provide a valid ministry relationship;
- Registration for courses and events;
- Records of visits, phone calls, emails, text messages and pastoral matters including those which may be deemed sensitive information required for the usual pastoral or discipleship operations of the church;
- Personal details related to leadership responsibilities such as Working With Children Checks, resumes, photos and identity documents.
- Staff details for superannuation, payroll and taxation purposes; and
- Information provided in surveys, registration forms, conversations, emails, online (and similar).

Personal information includes true or false information or opinions and any information by which an individual may be readily identified.

Reveal Church endeavours to keep personal information up to date and accurate. The church will also endeavour to protect personal information from misuse, loss or unauthorised access, modification or disclosure. To this end, it is an expectation of all leaders, volunteers and/or staff acting on behalf of Reveal Church to assist with such responsible use of information and avoid passing on any information gained without prior demonstrable approval from the relevant person(s). It is therefore expected that no personal details be used to solicit business or political support or for any other unauthorised means. Therefore, all personal information must be used for its primary intended purpose and all leaders should cooperate in ensuring its accuracy, completeness and relevance.

Requests for copies of information held may be requested in writing by the individual(s) concerned, and in accordance with the provisions of the church's constitution. A request may be made to modify personal data if it is believed to be inaccurate or incomplete. Requests for data may be denied in certain circumstances (such as when differentiating between the varying rights of access or confidentiality related to staff, leaders or official church partners) for which appropriate notification will be given.

## *2. Disclosure*

Reveal Church will not disclose personal information about any individual to any person within Australia or overseas except:

- (a) on a confidential basis to staff/leaders/partners of the church for church business or in connection with the church's activities in order to provide a service (e.g. in the church directory);
- (b) on a confidential basis to agents and other service providers that the church may use in the day to day operations of its activities (including where forwarded as required by law);
- (c) as needed in cases of a serious threat to a person's life or wellbeing;
- (d) as needed in cases of serious misconduct or unlawful activity;
- (e) as described in the church's constitution; or
- (f) with the prior consent of the individual(s) concerned.

See appendix for protocols on external communications.

Alleged breaches of this policy may be dealt with using the church's Relationships and Reconciliation policy.

### *3. Data Storage and Security*

Information supplied to the church is given with the understanding that the church will take reasonable steps to ensure its safe and secure storage for the duration that it is required. Data no longer required will be destroyed securely and appropriately, including any unsolicited personal information, unless it is unlawful to do so.

The internet is not considered to be a completely safe means of data transfer and the church cannot take responsibility for the loss or misuse of information transferred electronically.

If any personal information collected by the church is stored or managed by a third party on behalf of the church, the church will take all reasonable steps to ensure that the personal information will be held, used and disclosed by the third party consistently with the Australian Privacy Principles.

Reveal Church has a public web site at [www.reveal.church](http://www.reveal.church) which is available to anyone. There is no personal data stored on this site. Certain documents may, however, be provided on a restricted basis (e.g. to leaders) in a manner compliant with this policy and with the Australia Privacy Principles.

Personal belongings are the responsibility of all attendees at any church services, events or other activities. These should not be left unattended at any time and Reveal Church does not take responsibility for or insure for any items (including vehicles) lost, damaged, stolen, or left behind on its premises or at any other location connected with such activities, except where a specific arrangement has been made regarding its use for church activities.

Courses, handbooks, messages, songs and other works undertaken by leaders or volunteers of the church remain the joint intellectual property of those making substantial or entire contributions to them as well as to Reveal Church. Rights to income generated by such intellectual property should be negotiated with the senior minister or delegated representative by the relevant person(s) involved as long as they are in the service or employ of the church.

The church takes no direct responsibility for the opinions expressed or for the personal use or misuse of social networking websites, chat rooms, email, text messaging or other communication means by people associated with the church in an unofficial capacity. Nevertheless, the church may seek to address issues of a moral, legal or spiritual concern regarding opinions expressed and/or the content of communication in the interests of spiritual growth and guidance, conflict resolution, personal welfare or protection.

### *4. Recording of Video, Audio or Images*

The Church may record video, audio or images of services, events and other activities for promotional, teaching and information purposes. By attending these services, events and activities, individuals consent to the church taking the video, audio and images and using and disclosing them for such purposes.

Consent is not, however, given for: personal recording of video, audio or images; or for using equipment designed to acquire video, audio or images; or for using, sharing or disseminating personal electronic, photographic or other such images by individuals. In such cases, permission should always be sought from the individual(s) concerned or, in the case of those under eighteen years of age, their parent or guardian.

Entry to the site grants consent for the church to record video or still images for security purposes and to therefore share such images with police, as required.

Review:

This policy shall be reviewed annually by the church Eldership Board.

Date: August 2017

## Appendix: External Communications Protocol

Communications that could be deemed to represent the church should follow the protocols described below and in other policies and procedures. No individual should contact any organisations or individuals on behalf of Reveal Church unless they are specifically authorised to do so.

In the event of a crisis (an emergency situation or any other incident likely to have a significant impact upon the church), the church's emergency management plan should be followed, ensuring an urgent response and maximisation of safety for all concerned. Communicating about the events at hand will use the protocols below.

1. As with all external communications, competing interests of transparency, accuracy, integrity and privacy need to be managed and therefore minimal information will be provided concerning incidents.
2. Communications by the senior minister or delegate in regard to a crisis will typically acknowledge the existence of an incident and that appropriate steps are being taken to investigate the situation with more information being made available when it is at hand. Such a statement may include objective data such as the date, time and general nature of an incident and who it involved. Further requests for information from church members, members of the public or the media will typically be politely declined.
3. No attempt should be made to hide or run from scrutiny but the integrity of the church and persons involved in any incident should be respected with the presumption of innocence in the absence of further inquiry. Any crisis situation requires objectivity and a measured response.
4. The staff ministry team will function as the church's crisis communications team, as needed, to assist the senior minister or delegate in formulating appropriate responses and to liaise with the safety management officer and appropriate personnel regarding elements of the implementation of the emergency management plan.
5. The church office, staff, leaders and volunteers involved with managing any crisis will indicate to church members, members of the public or the media that they are not in a position to comment on the matter concerned. Exceptions will apply to immediate family members and emergency service personnel but will be restricted to essential information and refrain from commentary and interpretation.
6. Questions will not otherwise be answered and supplementary information will not be provided no matter how intense or ongoing any requests may be. No "off the record" conversations will be held in relation to crisis matters.
7. Comments and actions in regard to any incident that has occurred should not purport to make an instinctive judgment on any responsibility or otherwise for that incident.
8. The media will not typically be engaged regarding their requests for information or opinion in any incident, other than as described above, no matter how widespread the media attention, in which case the nature of any communication will be at the discretion of the senior minister or other delegated person.
9. Any media pressure or pursuit should not be engaged and a person subjected to such behaviour should calmly continue about their business without agitation or panic and allow the church to pursue any response at a later time.
10. Any agreement by the senior minister or delegated person to communicate with the media further will warrant a recording being made of the full conversation as a condition of proceeding and as a means of cross referencing any later usage of that communication.