PRIVACY AND INFORMATION MANAGEMENT & SECURITY POLICY

VERSION:	1.2
LAST APPROVED:	20 MAR 2024
APPROVED BY:	COUNCIL OF ELDERS

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1 PURPOSE OF POLICY

1.1 The development of trust is of critical importance for fruitful relationships in life generally and the church in particular. This is because people are made in the image of God and therefore are worthy of dignity and respect. Consequently, Eastside is committed to protecting individual privacy and managing information with integrity, diligence and loving concern.

1.2 Content developed by Eastside will also be proactively managed to ensure it can be of greatest benefit to the kingdom of God.

Blessed are those whose ways are blameless,
who walk according to the law of the Lord.
(Psalm 119:1)

But seek first his kingdom and his righteousness…
(Matt 6:33)

1.3 This policy sets out Eastside's commitment to the protection of the privacy of individuals, the management of data collected by Eastside, and the management of content developed by or for Eastside.

2 APPLICATION

2.1 This policy applies to the protection of all information, data and content that Eastside collects and develops.

2.2 This policy sets obligations for Eastside personnel with access to or control of data and content.

2.3 Eastside is not required to comply with the *Privacy Act 1988* (Cth). However, in general we seek to satisfy the Australian Privacy Principles to help manage the privacy of individuals known to Eastside.

3 GUIDING PRINCIPLES AND ACTIONS

3.1 All persons who are members of or attend Eastside give implicit consent to the collection, storage and use of personal information and data in accordance with this policy.

3.2 Eastside will only collect, hold and use personal information for:

- 3.2.1 providing loving support, pastoral care or discipleship.
- 3.2.2 contacting people who volunteer in any of the church's ministries, activities or events.
- 3.2.3 providing people with information about progress with our ministries and projects.
- 3.2.4 managing the employment of staff members.
- 3.2.5 administration of the church and its activities.
- 3.2.6 enabling financial giving, receipting and payments for people.

3.3 All personal information collected by Eastside must be handled within a secure and confidential environment (including a secure IT environment) and disposed of after use except where required to be retained by law. Schedule 1 sets out minimum requirements for different record types.

3.4 Where necessary, additional controls must be implemented for the storage of certain data, subject to a risk assessment. At a minimum, this includes the storage of debit and credit card information.

3.5 Personal information collected by Eastside must not be provided to an external party or organisation (other than IT service providers, including cloud services) unless explicit consent is granted or where required by law.

3.6 Staff and volunteers must only be provided access to personal information to the extent required to achieve one of the purposes in Guiding Principle 3.2. In granting access, Eastside must ensure staff and volunteers are aware of their responsibilities under this policy and, if required, have appropriate resources and training.

3.7 Any content developed, published or shared by Eastside should be for the purpose of blessing Eastside and other local churches and ministries and to build the church where possible. Content that dishonours the Lord Jesus or any other person must not be developed, published or shared by Eastside.

3.8 Any content developed by or for Eastside must be managed in accordance intellectual property law. To the extent of any uncertainty, content developed for Eastside is assumed to be the property of Eastside except where otherwise stated.

3.9 Where deemed necessary by the Eldership, Eastside will develop any other procedures or documents necessary to give further effect or clarity to this policy.

4 RELATIONSHIP TO CONSTITUTION AND OTHER POLICIES

4.1 To the extent of any inconsistency between this policy and the Constitution, the latter prevails, except as required by law.

4.2 The Child Safe and Vulnerable Persons Policy and Financial Policy and associated procedures may provide additional information regarding the management of personal information.

4.3 Any breaches of this policy are to be handled in accordance with the issue / incident requirements of the Risk and Compliance Policy.

Schedule 1 – Minimum Record Retention Times

Date of Revision	
Approved by	
Description of Change	

Table 1 sets out the minimum periods of time that records of different types must be held.

Table 1 – Minimum Record Retention Times

Record type	Minimum holding period
Financial	7 years
Operational	7 years
Human resources	7 years
Governance	7 years
Pastoral care – except where potentially pertaining to legal matters	2 years
Pastoral care – where potentially pertaining to legal matters	7 years
Records under the Child Safe and Vulnerable Persons Policy	45 years
Unspecified	7 years or longer if required by law