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1. PURPOSE

1.1. The CRCA is committed to handling personal and sensitive information responsibly and consistently with the Australian Privacy Principles and applicable privacy, health-records and safeguarding obligations.

1.2. This policy outlines how the CRCA collects, uses, discloses, stores, secures and disposes of personal information in a way that supports safeguarding, privacy, trust and accountability.

2. BIBLICAL AND THEOLOGICAL BASIS

2.1. 1 Corinthians 4:2 calls those entrusted with responsibility to be faithful. Personal and sensitive information is a trust that must be handled carefully and honestly.

2.2. Genesis 1:27 affirms that every person bears the image of God. Respecting privacy is one way the CRCA honours the dignity of each person.

2.3. Romans 12:5 reminds the church that members belong to one body. Privacy, confidentiality and appropriate information sharing protect trust within that body while allowing safeguarding action where needed.

3. SCOPE

3.1. This policy applies to all staff, volunteers, pastors, elders, leaders, contractors and affiliates associated with the CRCA.

3.2. It applies to personal and sensitive information held by the CRCA in physical and digital formats, including information connected with safeguarding incidents, reports, complaints, training, recruitment, pastoral care, risk management and related matters.

4. VALUES

4.1. The CRCA is committed to the following values so that the safety and well-being of all people remain at the forefront of decisions and actions.

4.1.1. **Scriptural teachings - upholding safety and dignity:** central to the Church's teaching is the call to embody love, mercy and justice. Colossians 3:17 calls all things to be done in the name of the Lord Jesus, and Luke 18:16 shows Jesus welcoming children and affirming their place in the kingdom. The responsibilities in this policy are therefore carried out in a way that honours the dignity, voice and safety of each person.

4.1.2. **Zero tolerance:** the CRCA has a zero-tolerance approach to abuse and harmful behaviour. The responsibilities in this policy must never be used to suppress, minimise or ignore concerns about safety, harm or abuse.

4.1.3. **Transparency and accountability:** the CRCA fosters a culture of openness, appropriate information sharing, feedback and accountable action.

4.1.4. **Shared responsibility:** safeguarding is everybody's responsibility and requires the participation of local churches, personnel, members and denominational safeguarding structures.

4.1.5. **Empowerment:** the CRCA supports people to understand their rights, speak up, raise concerns and contribute to the development of safer church environments.

4.1.6. **Integrity:** the CRCA fosters honest, ethical and respectful engagement at all levels of church life.

5. DEFINITIONS

5.1. Terms defined in the National Safeguarding Policy apply to this policy unless this section gives a more specific operational meaning.

5.2. **Personal information** means information or an opinion about an identified individual or an individual who is reasonably identifiable.

5.3. **Sensitive information** means personal information that attracts higher protection, including information about health, beliefs, membership, criminal record, biometrics or other categories recognised under applicable privacy law.

5.4. **Health information** means personal information about a person's health, disability, injury, service use or health-related support needs.

5.5. **APP entity** means an organisation or agency covered by the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

5.6. **Privacy breach** means unauthorised access, disclosure, loss, misuse, interference, alteration, destruction or inappropriate handling of personal information.

5.7. **Notifiable data breach** means an eligible data breach that must be assessed or notified under the Notifiable Data Breaches scheme where the Privacy Act applies.

5.8. **Authorised disclosure** means disclosure of information permitted or required by law, consent, safeguarding necessity, policy, statutory reporting, Police, regulator, court, tribunal or another lawful pathway.

5.9. **Consent** means voluntary and informed agreement to a specified collection, use or disclosure of personal information, unless another lawful basis applies.

5.10. **De-identification** means removing or altering information so that the person is no longer identified or reasonably identifiable in the relevant context.

6. POLICY

6.1. Confidentiality and APP benchmark: to the extent that the Privacy Act 1988 (Cth) and the Australian Privacy Principles apply to a CRCA entity or activity, the CRCA complies with those requirements. Across CRCA safeguarding activities, the CRCA adopts the Australian Privacy Principles as a good-practice benchmark unless a higher legal, regulatory or safeguarding standard applies.

6.2. Sensitive information: sensitive information includes information about a person's racial or ethnic origin, religious beliefs or affiliations, health, sexual orientation, criminal record and other categories defined as sensitive information in the Privacy Act 1988 (Cth). Sensitive information is handled with additional care.

6.3. **Children's privacy:** information about children and young people is collected, used and disclosed only where necessary for safeguarding, pastoral care, education or CRCA activities, and with appropriate consent from a parent, guardian or other lawful authority where consent is required.

6.4. **Privacy and safeguarding:** privacy obligations operate alongside safeguarding duties. Where information must be shared to protect a person, comply with mandatory reporting, respond to a Reportable Conduct Scheme matter, follow a Police direction or comply with another lawful information-sharing pathway, the lawful safeguarding pathway is followed.

6.5. Notifiable data breaches: suspected unauthorised access to, disclosure of or loss of personal information is assessed without delay. Where an eligible data breach is confirmed under Part IIIC of the Privacy Act 1988 (Cth), the CRCA notifies the Office of the Australian Information Commissioner and affected individuals as required. Where a local church becomes aware of a suspected privacy or information-security breach involving safeguarding information, the Session / Church Council ensures the matter is escalated through the relevant CRCA safeguarding or privacy pathway without delay. The Safe Church Administrator may assist with record identification, system information, record-management support and notification logistics. The Safe Church Unit may provide safeguarding response advice where the breach relates to a safeguarding concern, complaint, disclosure or risk matter.

6.6. Cross-border disclosure: where the CRCA discloses personal information to a recipient outside Australia, the CRCA takes reasonable steps to ensure that the recipient does not breach the Australian Privacy Principles in relation to that information, consistently with Australian Privacy Principle 8.

6.7. **Direct marketing:** the CRCA does not use personal information for direct marketing except as permitted by Australian Privacy Principle 7. Where direct marketing occurs, the CRCA provides a simple opt-out mechanism and ceases direct marketing on request.

6.8. Access and correction: a person about whom the CRCA holds personal information may request access to that information or correction of it consistently with the Australian Privacy Principles. Requests may be made to the relevant local church, the authorised CRCA record-holder, meaning the local or denominational person or role authorised to hold or manage the relevant CRCA record, or the Safe Church Administrator where records are centrally held. The Safe Church Unit may provide safeguarding response advice where the request relates to a safeguarding concern, complaint, disclosure or risk matter.

6.9. Privacy complaints: a person who considers that the CRCA has handled their personal information inconsistently with this policy may raise the concern with the relevant local church, authorised CRCA record-holder, Safe Church Administrator, or through the Complaints Handling Policy. The Safe Church Unit may provide safeguarding response advice where the privacy concern intersects with a safeguarding concern, complaint, disclosure, statutory pathway or risk matter. Where the complainant is not satisfied with the CRCA's response, the complaint may be made to the Office of the Australian Information Commissioner where the Privacy Act applies.

6.10. **State and Territory privacy frameworks:** the CRCA also handles personal information consistently with applicable State and Territory privacy and health-records legislation to the extent those frameworks apply to CRCA activities in that jurisdiction.

7. PROCEDURES

7.1. **Information collection:** personal and sensitive information is collected only where it is reasonably necessary for CRCA functions, safeguarding, pastoral care, recruitment, training, reporting, complaints handling, risk management or related activities.

7.2. **Consent:** consent is sought where required and appropriate. Consent may be written, verbal or otherwise clearly indicated, unless a legal or safeguarding obligation permits or requires collection, use or disclosure without consent.

7.3. **Relevance and minimisation:** only information that is relevant to the purpose for which it is collected is collected and retained.

7.4. **Types of information:** the CRCA may collect contact details, role and training information, screening information, employment or volunteer information, pastoral or safeguarding information, complaint or report information, and other information required for CRCA activities or safeguarding functions.

7.5. **Methods of collection:** personal information may be collected through forms, online forms, surveys, emails, telephone calls, face-to-face meetings, interviews, reports, referrals, complaints, public sources and other lawful means.

7.6. **Use and disclosure:** personal information is used or disclosed for the purpose for which it was collected, a directly related purpose, a safeguarding or pastoral purpose, or where required or authorised by law.

7.7. **Accuracy and correction:** the CRCA takes reasonable steps to ensure that personal information is accurate, complete and up to date. If information is inaccurate, incomplete, out of date, irrelevant or misleading, reasonable steps are taken to correct it.

7.8. **Security:** personal information is protected through appropriate physical, digital and administrative safeguards, including access controls, record-management processes and secure handling of sensitive information.

7.9. **Data breach response:** suspected privacy or information-security breaches are escalated promptly through the relevant CRCA safeguarding or privacy pathway. The relevant local church, authorised CRCA record-holder or entity assists with immediate containment and fact-gathering. The Safe Church Administrator may assist with record identification, system information, access logs,

templates and notification logistics. The Safe Church Unit may provide safeguarding response advice where the breach relates to a safeguarding concern, complaint, disclosure or risk matter.

7.10. **Records:** privacy-related records are managed consistently with the Information Sharing and Record Keeping Policy and any retention schedule approved for the CRCA safeguarding system. Local churches remain responsible for local records within their control. The Safe Church Administrator maintains central records, registers, templates and systems where required by the CRCA safeguarding framework.

8. ROLES AND RESPONSIBILITIES

8.1. Role definitions used in this policy are consistent across the CRCA policy suite.

8.2. **Session / Church Council:** supports local compliance with this policy; ensures local personnel understand privacy expectations relevant to safeguarding, pastoral care, complaints, recruitment, training and church activities; and remains responsible for local records, local access controls and local information-handling practice.

8.3. **Safe Church Representative:** supports local privacy awareness and assists people to understand how privacy-related safeguarding concerns can be referred through the appropriate CRCA safeguarding pathways.

8.4. **Safe Church Administrator:** supports administrative, records-management, training-record, template, register, access-log and document-control functions relevant to privacy and information handling across the CRCA safeguarding system. This includes maintaining central records and systems where required by the CRCA safeguarding framework.

8.5. **Safe Church Unit:** provides safeguarding response advice, triage assistance and escalation support where privacy concerns intersect with complaints, disclosures, information sharing, statutory reporting, notifiable data breach assessment, Police matters or other safeguarding pathways. The Safe Church Unit supports, but does not replace, local church responsibility for local records or the Safe Church Administrator's records-management function.

8.6. **Safe Church Advisory Committee:** oversees policy effectiveness, high-risk privacy / safeguarding issues and continuous improvement through the Continuous Quality Improvement Policy.

8.7. **Personnel and members:** handle personal and sensitive information respectfully, protect confidentiality, use information only for authorised purposes and report privacy concerns or breaches.

9. BREACHES

9.1. Breaches of this policy are dealt with under the Disciplinary and Breach Response Policy. Serious breaches may also require notifiable data breach assessment, privacy complaint handling, Police reporting, statutory reporting, legal action or Church Order processes depending on the circumstances.

10. RELATED POLICIES

10.1. National Safeguarding Policy. Information Sharing and Record Keeping Policy. Complaints Handling Policy. Disciplinary and Breach Response Policy. HR / Recruitment Policy. Whistleblower Policy. Code of Conduct. Internet Usage Policy. Social Media Policy. Learning and Development Policy.

11. MONITORING AND REVIEW

11.1. This policy is reviewed every three years, or earlier where required by legislative change, regulator guidance, audit findings, serious incidents, a substantiated complaint, material safeguarding risk, or a decision of the Safe Church Advisory Committee. Feedback on this policy may be sent to the Safe Church Unit at scu@crca.org.au at any time.

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0.1	16/09/2025	16/09/2025	Not approved	Align Safeguarding	Initial consultation draft.
0.2	09/07/2026	09/07/2026	SCAC	Align Safeguarding	Statuary updates
0.3	28/07/2026	28/07/2026	SCAC (SIC)	Align Safeguarding	SCAC feedback
1.0	16/09/2026	16/09/2026	SCAC (SIC)	Align Safeguarding	First approved issue.