



DAUGHTERS OF
OUR LADY OF THE SACRED HEART
AUSTRALIAN PROVINCE

PRIVACY POLICY

2023

Rationale and Principle

- 1.1. The Daughters of Our Lady of the Sacred Heart of the Australian Province ('**OLSH**') are committed to the protection of the privacy of all with whom we come into contact including children and adults at risk.
- 1.2. The *Privacy Act 1988* (Cth) requires OLSH to handle any personal information collected in relation to an individual in accordance with the thirteen Australian Privacy Principles (APP's). As OLSH is part of a wider international Congregation, OLSH is also required to abide by the European Union *General Data Protection Regulation* (GDPR) and its seven principles.

Policy Statement

- 2.1 This Policy complies with the thirteen APP's pursuant to the *Privacy Act 1988* as well as the *Privacy Amendment (Notifiable Data Breaches) Act 2017*. Pursuant to the APP's, this Privacy Policy outlines:
 - The type of personal information OLSH collects and stores.
 - How personal information is collected.
 - The purpose for which information is collected.
 - Where and how information collected is stored.
 - How an individual may gain access to information stored about them.
 - How an individual may complain about our compliance with the APP's.

Key Responsibilities

- 3.1 The Provincial Leader and Council have responsibility to implement this Policy and to ensure OLSH's compliance with relevant legislation.
- 3.2 This Policy will be reviewed every three (3) years unless there is a legislative or regulatory requirement to do so earlier.

What is Personal Information & How is it Collected?

- 4.1 Personal information is information or an opinion about an individual from which the individual can be reasonably identified. OLSH may collect personal information from an individual including but not limited to a professed member of the Congregation, a novice or a woman wishing to enter the Congregation, an employee, volunteer, contractor, stakeholder or job applicant. In the course of its ministry OLSH may collect and hold:
- Personal information: including but not limited to names, addresses and other contact information; dates of birth, next of kin details, and financial information.
 - Sensitive information, including but not limited to, government identifying information (such as Medicare), religious beliefs, nationality, country of birth, membership of professional bodies, and criminal records.
- 4.2 OLSH will seek consent before obtaining this information from an individual and will act in accordance with the relevant legislative and regulatory requirements.
- 4.3 Personal information is collected for a number of reasons and can vary depending on how an individual is engaged by, or with, OLSH. OLSH collects personal information from an individual directly, where possible.

Collection and Use of Sensitive Information

- 5.1 OLSH will only collect sensitive information if it is reasonably necessary for one or more of the purposes outlined below and it has the individual's consent to do so.
- It is necessary to mitigate risk of or prevent a serious threat to safety, health or life.
 - A permitted general situation.
 - An additional, permitted health situation.
- 5.2 OLSH reserves the right to share sensitive information with external bodies or entities where necessary or when required to do so, in line with legal requirements.

How is Personal Information Used?

6.1 OLSH only uses personal information for the purpose for which it was reasonably collected.

OLSH's primary use of personal information includes but is not limited to:

- Satisfying legislative requirements in relation to the safeguarding of children and adults at risk.
- Supporting Province-based causes and activities.
- Administration and insurance purposes.

Storage of Personal Information

7.1 OLSH stores personal information in a variety of formats including but not limited to:

- Hard copy files.
- Databases.
- Personal devices, including laptop computers.
- Third party storage such as *Cloud* or *DropBox*.

7.2 OLSH takes all reasonable steps to protect personal information it holds from misuse, loss, unauthorised access, disclosure or modification.

7.3 These steps include but are not limited to:

- Restricting user-privilege and access to information by staff and Sisters depending on their role and responsibilities.
- Ensuring staff do not share access information such as login details.
- Ensuring hard copy files are stored securely in lockable cabinets in lockable rooms.
- Ensuring access to OLSH premises is secure at all times.
- Implementing physical security measures.

Disclosure of Personal Information

- 8.1 Personal information is used for the purpose for which it was given to OLSH. Personal information may be disclosed to government agencies, internal church bodies, employees, contractors, business partners or related entities, if an individual:
- Has given consent; or
 - Would reasonably expect their personal information to be disclosed in this manner.
- 8.2 OLSH may disclose personal information without consent in certain situations including but not limited to the following:
- It is required by law to do so.
 - To lessen, prevent, or mitigate the risk of a serious threat to the life or health of an individual(s) or to public safety.
 - To ensure the safety of children and adults at risk.

International Responsibilities

- 9.1 As the OLSH Australian Province is a Province of the wider OLSH Congregation, it must comply with General Data Protection Legislation (GDPR) and its seven principles. The GDPR sets out principles for the lawful processing of personal data. These principles are as follows:
- lawfulness, fairness and transparency;
 - purpose limitation;
 - data minimisation;
 - accuracy;
 - storage limitation;
 - integrity and confidentiality (security); and
 - accountability.
- 9.2 OLSH's commitment to compliance with the seven GDPR principles is outlined earlier in this policy and demonstrates how OLSH lawfully collects, stores and, where necessary, shares personal data.

Complaints

- 10.1 If you have any questions, concerns or complaints in relation to how OLSH has handled your personal or sensitive information, please contact OLSH directly to discuss the matter further. Further information relating to how OLSH investigates complaints can be found in the OLSH *Complaint Handling Policy*.
- 10.2 If you are unsatisfied with the response of the Province you may wish to take your complaint to the Office of the Australian Information Commissioner (OAIC). Contact details for OAIC are:
- Phone: 1300 363 992
 - Post: GPO BOX 5218, Sydney, NSW, 2001
 - Street Address: Level 3, 175 Pitt Street, Sydney, NSW, 2000
 - Website: <https://www.oaic.gov.au/about-us/contact-us/>

Information

Document version 2 prepared in April 2023 and authorised by the Provincial Leader of The Daughters of Our Lady of the Sacred Heart, Sr Philippa Murphy.

For any questions or feedback, please contact:

Safeguarding Co-ordinator
Daughters of Our Lady of the Sacred Heart
Provincial House
2 Kensington Road
KENSINGTON NSW 2033

Phone: 02 9663 3599

Email: safeguarding@olshaustralia.org.au

Website: www.olshaustralia.org.au