

Catholic Diocese of Christchurch

Privacy Policy

Introduction

The Catholic Diocese of Christchurch [**CDoC**] is committed to promoting and protecting the privacy of all individuals associated with it, Staff Members, Volunteers, Visitors, Donors, Contractors, and any others. As part of our normal operation, we collect personal information.

We are committed to collecting, disclosing, and handling personal information in accordance with the Privacy Act 2020 (**“the Act”**) and its Information Privacy Principles (**“IPP”**) and with privacy law in the Code of Canon Law.

The Act describes how we may collect, use, store personal information and the requirements around breaches. The Office of the Privacy Commissioner is empowered by the Privacy Act 2020 to administer, monitor and enforce compliance.

Among the many functions of the Privacy Commissioner's Office is that of investigating any alleged breaches and non-compliance of the Privacy Act.

Purpose

The purpose of this Policy is:

- To ensure that we are compliant with the Act and the IPP and Canon Law, and
- to provide our expectations for:
 - how we collect and store personal information
 - why we collect personal information
 - what personal information we collect
 - how we use and disclose personal information about individuals
 - how individuals may access personal information relating to them that is held by CDoC
 - how personal information is disposed
 - how to address complaints of breaches of privacy
 - how we respond to the requirements of the Office of the Privacy Commissioner

It is important that all staff understand CDoC information management, privacy, and confidentiality practices.

This policy applies in addition to any other privacy policies, procedures and processes which may be adopted by CDoC.

Scope

All Diocesan staff, Volunteers and staff contracted to perform activities for the Diocese, and those who hold positions on boards and councils that comprise the governance structure of the Diocese.

Approved By

Chief Operating Officer

Approved Date

February 2026

Review Date

February 2028



Privacy Policy

Definitions

In this document:

“**Agency**” has the meaning as set out in the Privacy Act 2020 and in summary means a person, business, or organisation that collects and holds personal information about other people.

“**Privacy Act**” or “**the Act**” means the Privacy Act 2020.

“**Personal Information**” has the meaning as set out in the Privacy Act 2020, and in summary means information which is about an identifiable individual.

“**Sensitive Information**” has the meaning as set out in the Privacy Act 2020, and in summary means information about an individual that has some real significance to them, is revealing of them, or generally relates to matters that an individual might wish to keep private. For example, personal information about an individual’s racial or ethnic origin, religion, criminal record, or health information.

“**Volunteers**” are defined for our Privacy Policy and procedures as described in the Health and Safety at Work Act 2015:

Some volunteers are classified as volunteer workers and are treated as ‘workers’ under the Act (except for worker engagement, participation and representation purposes). You are a volunteer worker if:

- you are doing volunteer activities for a PCBU that has knowledge you are doing the work or has given consent for you to do the work;
- you volunteer for the PCBU on an ongoing and regular basis;
- the volunteer activities are an integral part of the business or undertaking;
- the activities are not:
 - participating in fund raising;
 - assisting with sports or recreation for an educational institute sports club or recreation club;
 - assisting with activities for an educational institute outside its premises or;
 - providing care for another person in the volunteer’s home.

Policy Statement

Purpose of Collection

We collect personal information from individuals for a range of purposes which are reasonably necessary for CDoC’s functions or activities. We are bound by the Act and will deal with personal information in accordance with both the Act and with this Privacy Policy.

Collection

We will endeavour to collect personal information directly from the individual with their consent. Where this is not possible, where practicable, written consent will be sought prior to collecting personal information from a third party.

For prospective employees, we may collect personal information by contacting referees.

Use and Disclosure

Personal information will be used for the purpose for which it was collected or for any other purpose where written consent has been given or where we have civil or canonical obligations that require us to do so under the Act, other civil legislation, or under Canon Law.



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We will not disclose personal information to third parties ultra vires (beyond the purpose for which the information was gathered) without prior written consent, notification, or unless we have civil or canonical obligations to do so under the Act, other civil legislation, or under Canon Law.

We may provide access to information to third parties where any of our services or functions are being outsourced (for example, IT support). In that circumstance, the third party will be required to comply with our privacy policy.

*Information
Storage and
Security*

We endeavour to take all reasonable steps to protect personal information we hold from risks such as loss or unauthorized access, destruction, use, modification, or disclosure. This will take into account any legal moratoriums or holds in place.

We endeavour to take all reasonable steps to ensure personal information is maintained in a secure environment, which can only be accessed by authorized staff or someone we have authorized to access the information and who is required to hold the information in confidence and protect privacy.

Please note that no data transmission over the internet or information stored on servers accessible through the internet can be guaranteed to be fully secure, but we will endeavour to take all reasonable steps to protect the personal information transmitted, and to ensure its security on our systems.

Where cloud computing is used, we will ensure that cloud computing solutions meet best practice security requirements.

*Access and
Correction Rights*

Individuals have a right to request a copy of their personal information and to request that their personal information be corrected or amended.

Notices will be provided to advise people how they may access and correct their personal information (e.g., an email or phone contact).

Privacy Officers

CDoC has a Privacy Officer who understands the privacy principles in the Act, oversees requests for personal information, complaints, and works to ensure their agency is compliant.

Additionally, we also have a National Privacy Officer, who provides advice to Privacy Officers of the CBCSL/NZCBC entities and Dioceses, and who may liaise with the Office of the Privacy Commissioner if there are any breaches, compliance notices and/or investigations, when needed or required.

*Breach and
Reporting*

Breaches of this policy include breaches of any of the IPP Principles under the Act. We will inform individuals concerned as soon as possible in the event of any privacy breaches.

Individuals who wish to report an alleged breach of this policy should follow the complaints procedure outlined in CDoC Breach Incident Management Plan (BIMP) document.

Notices will be provided to advise people how they may report a privacy breach (e.g., an email or phone contact).



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***Disclosure of
Information to
Third Parties***

Our website may contain links to other websites or usage of third-party websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures. We are not responsible for risks and liabilities when engaging in any third-party websites like Facebook, Twitter or Google. Please refer to the Terms of Use on individual websites for further details.

***Disclosure of
Information to
Third Party
Exceptions:
CathConnect-
Attendance Dues
System***

The Catholic Diocese of Christchurch as the Schools Proprietor uses CathConnect, CathConnect as the authorised diocesan system, to securely manage Attendance Dues information. Personal data collected for enrolment and invoicing is stored and handled in accordance with the Privacy Act 2020 and accessed only by authorised personnel.

***Changes to our
Privacy Policy***

We reserve the right to amend this privacy policy from time to time in order to ensure that it complies with current legal requirements, or in order to implement any changes to our services, e.g., when introducing new services. Any personal information held at the time of or obtained subsequent to the introduction of any amendment(s) to this policy, will be subject to the relevant amendment(s).

Approved by the General Manager, 22nd May 2023, for immediate implementation.

