

Policy Number: BG09

Policy Area: Board and Governance

Policy Title: Privacy and Confidentiality Policy



1. Overview

GMP is committed to upholding its legal and ethical obligation to protect the right to privacy of our Partners, Board members, Staff, volunteers, and representatives of external organisations and agencies we work with, and to maintain the confidentiality of the personal, missional and partnership information we hold about them.

2. Purpose

The purpose of this policy is to provide a framework that outlines GMP's commitment to meet these obligations and how this will be achieved.

3. Scope

The policy applies to all Board members, staff and volunteers, contractors and suppliers who handle personal and organisational information collected by GMP and its related entities. It applies to personal and organisational information for individuals that are external to GMP such as donors, recipients of development program projects, local and international Churches and suppliers.

By providing personal information to GMP, Board members, Staff, volunteers, external agencies, contractors and suppliers consent to the use, storage and disclosure of the personal information provided to GMP.

4. Responsibility

- a. The GMP Board is responsible for developing, adopting and reviewing the policy.
- b. The CEO is responsible for the implementation of the policy, for monitoring changes in privacy and confidentiality legislation, and for advising on the need to review or revise this policy as and when the need arises.
- c. All Staff and volunteers ensure their and others' compliance with the policy.

5. Background

GMP collects and administers a range of personal information of Partners (in Australia and internationally), staff, Volunteers and Board members for purposes including but not limited to:

- a. Administration of externally funded programs
- b. Program administration
- c. Delivery of services
- d. Human Resources and volunteer management
- e. Research and evaluation

GMP is committed to protecting the privacy of personal information it collects, holds and administers. Some of this information is restricted in its circulation for privacy, ethical and/or commercial reasons, or to safeguard the intellectual property of the organisation.

As a missional organisation, GMP has a special obligation to protect and uphold the right to confidentiality of our Partners and their recipients of the programs and projects in which we partner each organisation.

GMP recognises the essential right of individuals to have their personal information administered in a way that they would reasonably expect - protected on one hand, and made accessible to them on the other. These privacy and confidentiality values are reflected in and supported by our core values.

Our Privacy and Confidentiality Policy is compliant with the relevant legislation, for example:

- Privacy Act 1988
- Privacy and Data Protection Act 2014
- Fair Work Act 2009

6. Policy Statements

a. Privacy and Confidentiality

- i. The Australian Churches of Christ Global Mission Partners Inc. acknowledges the privacy of individuals.
- ii. We will only collect personal information with the prior knowledge and consent of a person and as a result of a donation to, or contact with, GMP.
- iii. We will only use personal information provided for the purposes for which it was collected - for example, to record names and addresses of those who donate to the work of GMP in order to issue receipts and provide information about the work of GMP.
- iv. Personal information will be removed or suppressed from mailing lists on request.
- v. We will not disclose personal information to a third party without consent.
- vi. We will not disclose personal information to other institutions and authorities except if required by law.
- vii. We will provide a copy of personal information held in our records within 14 days of a written request being received by GMP.
- viii. We protect the integrity of personal information from unauthorised access, improper use or alteration by restricting access to files and database records to only those personnel responsible for their maintenance and use.
- ix. All appeal response forms will include an opt-out option.
- x. Personal details of partners and beneficiaries will be shared only with their permission, on a need-to-know basis, and in accordance with GMP's Public Communication Policy.

b. Retention and Use of Records

- i. GMP is committed to establishing and keeping records in keeping with legislative requirements, accountability requirements and best

practice. This Policy is designed to assist all GMP staff in the management, use, access to, retention and destruction of:

- Administrative records (including, personnel, financial and accounting records, contracts, litigation, complaint handling and minutes).
 - The personal information of staff, and others.
 - All records/data/documents created by staff and volunteers arising from or in the course of their employment with GMP.
 - Business information held by GMP services or offices.
- ii. This policy applies to all records/documents held by GMP in any medium and seeks to ensure adequate records are maintained and these are managed effectively according to the legal, operational and information requirements.
 - iii. In general access to information is restricted to those to whom it is necessary for the effective performance of their work.
 - iv. Staff Records - Staff personnel records will be retained after a staff member concludes their service and will be retained with restricted access limited to the individual, the Manager of Finance and Administration and the Executive Officer.
 - v. Financial Records - Financial documents will be retained, whether in hard or soft copy for a period of time as advised by the GMP Auditor. When records are destroyed they will be disposed of securely.
 - vi. Documents created by staff in the course of their employment will be securely and regularly backed up and are the property of GMP. Such documents will be made available to their line manager when the staff member concludes their employment with GMP. The line manager will arrange the storage of the records.
 - vii. Documents related to GMP business activities including minutes and contracts. These records will be retained in a secure environment.
 - viii. Records of Complaints - all documents will be retained and stored securely with restricted access. Access is restricted to the Executive Officer (except when subject to the complaint) or the Chair of the GMP Board.
- c. Use and disclosure of records:
 - i. Use of personal information is restricted to the purpose for which it was collected. The information may be used beyond the initial purpose only where consent has been given.
 - ii. Access to information should be restricted to those to whom it is necessary for the effective performance of their work.

7. Related Policies

- a. BG07 Compliance Policy
- b. OS09 IT and Cyber Management Policy

8. Related Documents

- a. Privacy Act 1988
- b. Privacy and Data Breach Act 2014

TABLE 1. VERSION CONTROL TABLE

Version Number	Purpose/change	Author	Date
1	Integration of policies: G14 Privacy Policy G19 Retention and Use of Records Policy	Board	June2025