

Checklist

Protection of Personal Information



Privacy Standards Policy

This document will help you assess the way personal information is being handled by your parish or agency, and to identify where changes may be needed in order to meet the Privacy Standards Policy of the Diocese, which protects personal information. The Policy and associated procedures and guidelines are available on the Diocesan website.

The checklist below notes the types of personal information most parishes or agencies of the Diocese collect and keep. You may have other types of records not specifically listed below. If so, you should ask yourself the same questions about the way records are collected, stored, accessed, retrieved and disposed of.

Personal information is any factual or subjective information, recorded or not, about an identifiable individual. Personal information includes information in any form, such as: name, home address and home phone number, age, marital status, family members' names, photographs or digital images of a person, employee files, identification numbers, ethnic origin, evaluations, disciplinary actions, the existence of a dispute, opinions, comments, social status, income, credit records, donation information, loan records or medical records.

Personal information does **not** include the name, title, business address or business telephone number of an employee or volunteer of an organization.

Some types of records that contain personal information

- Membership records/client lists/donor lists
- Financial records
- Pastoral care records
- Medical records (e.g. parish nursing)
- Personnel records
- Newsletters and bulletins
- Websites
- Photo directories

Please do not hesitate to contact the Privacy Officer of the Diocese if you have any questions or concerns.

Assessment checklist

In assessing your handling of personal information, ask yourself the following questions in relation to each type of record your parish or agency maintains.

1. What personal information do we collect?
2. Why do we collect it? Is it collected for an appropriate and specific parish or agency purpose or is some information collected as a 'nice to have on file'?
3. How do we collect it? Is personal information collected in such a way so as to maintain the individual's privacy?
4. Do we tell persons from whom information is collected the reason it is collected, what it will be used for and how long it will be retained? Do we obtain their consent for the collection, use and retention at the time of the collection? Do we record that consent in our records? Do we ask parents/legal guardians for permission to include a child's personal information, including photographs?
5. What do we use the information for? Is it only for the stated purpose or is information collected for one purpose used for other purposes without the consent or knowledge of the person from whom it was collected?
6. Where do we keep it? How is it secured? Do we keep personal information in a locked cabinet? Is more sensitive personal information kept more secure than less sensitive information? (See Procedures and Guidelines document)
7. Who has access to it or uses it? Do only those persons who have a parish- or agency-assigned duty to have access or use the information have such access?
8. To whom is it disclosed? Is it disclosed only with the consent of the person from whom the information was gathered? Or is information sometimes disclosed under some other circumstances? Are these other circumstances consistent with the diocesan Privacy Policy?
9. When is personal information disposed of? Is such information held only as long as needed? Are legal requirements considered before information is disposed of?
10. How is it disposed of? Is the information destroyed in such a way that it is unreadable?