



St Matthews Lutheran Church
Eastern Synod of the Evangelical
Lutheran Church in Canada

Board approved: November 22, 2022

Policy on Use & Protection of Member Information

St Matthews Lutheran Church

Purpose:

This policy is intended to provide congregational leaders and members with information and guidance on appropriate methods to be used in the lawful **Collection, Protection, Use, Storage and Retention** of member records and personal information.

Rationale:

Within this congregation – and all of society – there is a growing and ongoing need for effective and accurate information sharing. As well, there is a responsibility to recognize and maintain a balance between the demands for personal privacy and open communication. Our church thrives on formal and informal contact with members – be it through personal conversations, written or electronic contacts. Current and accurate member contact information is essential to these communications. This policy prescribes how such information is gathered, used and protected on an on-going basis.

Types of Information:

- 1) *Contact information* includes: names, addresses, phone numbers, e-mail addresses and other social media identifiers. Generally, this is *publicly available* information or information provided by members at their respective discretion.
- 2) *Personal information*: beyond basic contact information, this includes data that may identify a person. This includes sensitive or confidential information (such as health, social or criminal issues) to be used only by our pastors and administrative staff for ministry purposes. Such information is carefully safeguarded in the church register that includes paper copies, books and electronic storage.

Collecting, maintaining and protecting member information is the responsibility of pastors, our Board, and administrative staff. Ensuring the accuracy of information is a shared responsibility of members and staff. The Board designates the Board Secretary as **Privacy Officer** to help build member and staff awareness and compliance of this policy – and to guide development of effective procedures for collecting, using, managing, storing and deleting member records.

Consent to gather member information can be either *implied or explicit*. Implied consent usually refers to information that is publicly available. Explicit consent from members is required to gather additional personal information. It is generally understood that members' contact information will be used for church-related purposes. Members may withdraw

consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting the Office Administrator or Board Secretary.

Collecting and Using Member Information:

St. Matthews gathers information as required for its ministry planning, programming, communications, administration and record-keeping purposes. Member contact information may be shared under circumstances consistent with church activities. For example, the Board and its committees need to communicate regularly with each other, and with the wider church membership. Contact information is used regularly to:

- 1) Create and maintain membership lists (such lists cannot be shared with anyone for commercial purposes).
- 2) Communicate with the congregation and volunteers regarding church activities and other ministry efforts. Inform members about the life of the church, current events, service projects, up-coming special services and other activities.
- 3) Maintain subscriptions to church and church-related publications and resources.
- 4) Register members for church programs and related activities.
- 5) Gather information, ideas and opinions from surveys.
- 6) Compile and report statistical and historical information.
- 7) Committee or Board usage of Contact information shall be vetted by its respective Chair.

With permission from the person involved, additional sensitive personal information can be recorded in the church registry to assist pastors and leaders in the performance of their duties. This information is closely held and protected. (Refer to “Safeguarding” section mentioned below.

Financial contributions to the church are recorded for charitable tax reporting and bookkeeping purposes. Such contributions are managed by our Office Administrator only. Information is also gathered from church employees for payroll and tax purposes. This type of information remains exclusively with anyone or more of: the church’s accounting firm, treasurer, bookkeeper and the Office and Personnel Committee (O & P) and is subject to specific safeguards.

Safeguarding Member Information:

- 1) Personal information is protected by security safeguards appropriate to the sensitivity of the information. The church has a multi-layered protection system in place that includes physical measures, organizational measures and technological measures to protect all assets, including member records. For example, hallways, offices and the building perimeter are monitored with both video and motion detectors. The church office also has a vault for the protection and storage of records. Computer storage drives are regularly backed up to media that is stored off-site. Alternatively, remote storage of electronic records may be done to the “Cloud”. All computers are password protected and have anti-virus software installed. (Anti cyber-attack protection is also under consideration.)
- 2) Personal information cannot be shared with any third party unless specifically authorized by the related member. However, a legal or civil action could require access into church records via a properly issued court order.

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- 3) Any member of the congregation can access their information for review purposes, to correct errors, to update their information or to suppress sensitive information at their discretion. Such access can be arranged by contacting St Matthew's administrative staff or the Board Secretary.
- 4) Access by any given St. Matthews member to any other member's personal information is prohibited.
- 5) Electronic newsletters or news releases will include a means for recipients to unsubscribe.
- 6) A designated St Matthews privacy officer could help ensure that all staff and volunteers know the importance of keeping personal information confidential. The privacy officer could also offer guidance and educational support to ensure that proper collection, use, disclosure and retention principles are respected and applied when dealing with member information.
- 7) This policy shall be available on the church's website and in print upon request.

Accountability:

All who gather, process or use personal member information are accountable for complying with this privacy policy - and with related privacy compliance practices and procedures. Questions, concerns, or observations relating to privacy matters can be directed to the Board Secretary, pastors, or administrative staff.

Retention:

Personal information may be retained indefinitely by St. Matthews as the information is often used to compile statistical, archival and historical records about the church. Individuals may request that their personal information be deleted.

Non-Member information:

From time to time, non-member personal information (e.g. from renters or temporary donors) is also collected. It shall be treated the same as member information.

Resource Material:

- 1) ELCIC Eastern Synod website: "Compliance Practices to Protect Personal Information in the Eastern Synod"
- 2) Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) January 1, 2004 "Extract". While not specifically applicable to churches, the Act is a very useful guide for learning and thinking about privacy protection in any setting.
- 3) Information and Privacy Commissioner of Ontario "Fact Sheet – What is Personal Information?"
- 4) Christ the King Dietrich Bonhoeffer Lutheran Church "Privacy & Membership Information"
- 5) St Paul's Lutheran Church "Protecting Personal Information and Electronic Documents, March 15, 2010.