Anglican Long Service Leave Fund

Privacy Policy

Approved by the Anglican Long Service Leave Board on (LSLFB2025/04)

The Anglican Long Service Leave Fund (the Fund) is governed by the Anglican Church of Australia's *Long Service Leave Canon 2010* (the Canon). The Canon came into effect on 1 January 2015, after it had been 'assented to by Ordinance of each of the Dioceses that are participating dioceses under the Long Service Leave Canon 1992-1995' (s.2(1) of the Canon).

The Fund is an eligible charity, and the legal entity (Corporation) is a company limited by guarantee incorporated under the law of Victoria. The Fund was established to provide a benefit to participants to help meet the costs of long service leave. According to the Canon, participants may include individual clergy and lay ministers/chaplains and theological lecturers of participating Dioceses or participating organisations.

The Fund receives long service leave contributions paid by each Diocese and participating organisations, and from which benefits are paid to each Diocese and participating organisation in accordance with the Canon. This Privacy Policy applies to the Fund as a corporation and in its capacity as trustee.

We are committed to complying with the Privacy Act 1988 (Cth) (the Act) and the Australian Privacy Principles contained in the Act when handling your personal information. This privacy policy outlines how we collect, store, use, and disclose your personal information, including any sensitive information.

WHAT KINDS OF PERSONAL INFORMATION DOES THE FUND COLLECT AND HOLD?

Personal information about participants

The Fund maintains records of Anglican clergy and other approved participants. The personal information that we collect includes:

- full name and date of birth,
- primary and postal address,
- contact details (e.g. mobile number and email address),
- date of ordination,
- fund membership number,
- record of service history within the Fund, including participating organisations served with, commencement dates and cessation dates,
- period of eligible service, including the number of working days,
- accrued long service leave,
- long service leave taken,
- any other information provided to us by or on behalf of a participant.

We also collect personal bank account details to facilitate a benefit payment directly to a participant.

If you are a nominated 'Power of Attorney' (POA) or 'Authorised Contact' of a participant, we will collect, hold, and use your personal information to confirm your authority to act on behalf of that participant.

In the case of the board members of the Fund, the collected information includes their Director ID number.

HOW DOES THE FUND COLLECT AND HOLD PERSONAL INFORMATION?

Collecting personal information about participants

Information is primarily obtained from Dioceses and participating organisations. Dioceses and participating organisations active in the Fund provide this information in accordance with the Canon.

Dioceses and participating organisations are required to register with the Fund by providing their business details, including name, address, and contact information. The Fund may also collect the personal information of individuals authorised to manage the Dioceses or participating organisation's account on behalf of the organisation, including name and contact details. The Fund also retains details of financial transactions between the Diocese and participating organisations and the Fund.

When a Diocese or participating organisation engages a participant, it is obliged to inform us of the new participant's details and the date of the change. This is usually advised in a quarterly return, submitted by each Diocese and participating organisation. Collecting participant information via Dioceses and participating organisations is considered the most practical, reliable and unintrusive method.

Some of the information we collect may be provided by an individual participant, including when a participant is not engaged by a Diocese or participating organisation.

These records are maintained to calculate a participant's eligibility and entitlement to a long service leave benefit.

Participant records are kept indefinitely. The Fund considers this reasonable because clergy may return to working in the Anglican Church after leaving for a period, adding to their previous entitlement. Except where provided by the individual, information is not collected on individuals while outside the Anglican Church.

The Fund does not collect personal information about visitors to its website.

HOW WE HOLD PERSONAL INFORMATION - SECURITY

The Fund maintains a high level of security on its information base. Information is stored in the form of data and images and held in electronic format.

Data is held by a third-party software provider in Australia – a copy of their Security details is attached in Schedule 1.

Access to the information is restricted. Only authorised staff of the General Synod Office (GSO), acting as the administrator of the Fund, can access it, and authorisation is controlled by multifactor authentication. Access is restricted to the information GSO staff need to perform their specific jobs.

Participants can view their details online via the Participant's Portal which is password protected. Security precautions ensure participants can only view their own information, and unauthorised people cannot access the database. Firewalls prevent unauthorised access to the database.

Should unrequested personal information be provided to the Fund by participants, it will only be retained if it is reasonably necessary for us to administer the Fund as required under the Canon.

Unsolicited personal information that is not necessary for administration of the Fund will be deleted if it is in electronic format or, if it is in hardcopy, placed in secure document pouches or bins for certified destruction by our third-party contractor.

WHAT ARE THE PURPOSES FOR WHICH THE FUND COLLECTS, HOLDS, USES AND DISCLOSES PERSONAL INFORMATION?

Personal information about participants

The Fund collects information about participants to facilitate the payment of benefits and fulfil its duties as Trustees and for administration of the Fund, as prescribed under the Canon.

The purpose of the Fund is to ensure that clergy employed by Anglican organisations can take long service leave after completing the required qualifying service, regardless of how many Dioceses or participating organisations they have served during that time.

To support this, the Fund maintains records of participants and their service history across participating organisations. These records include details of service accrued within the Anglican Church, enabling the Fund to calculate long service leave entitlements accurately.

The Fund maintains details of Dioceses and participating organisations to enable them to gather information about their participants' service in the Anglican Church, to assist in the collection of contributions to the Fund.

Personal Details of Participants Not Currently Engaged by a Participating Organisation

For participants who are not currently engaged by a Diocese or participating organisation who apply for a long service leave payment benefit directly from the Fund, we will collect and hold information, including:

- bank account details, if you request a long service benefit payment directly from the Fund
- a death certificate, where required to substantiate the payment of a death benefit. In these circumstances, the details of the executor, personal representative, or presumed beneficiary will also be required to make a payment.
- medical certificates where required to validate entitlement to payment in lieu of terminal illness.

DISCLOSURE OF PERSONAL INFORMATION

Unless otherwise required by law, we will only disclose your personal information to a third party should we receive authorisation from you.

The Fund may release aggregated information that does not identify or include personal details of any individual, company, or business to its auditors, actuaries, or participating organisations. An example is the total benefits owed to participants based on gender and age, which actuaries use to determine the total fund liability, as outlined in the Fund's Annual Report.

The Fund does not disclose personal information to overseas recipients and does not currently engage any overseas third-party service providers who require personal information.

HOW MAY AN INDIVIDUAL ACCESS PERSONAL INFORMATION AND SEEK THE CORRECTION OF SUCH INFORMATION?

The Fund requires accurate information to carry out its business. It aims for the highest degree of accuracy possible within the practical limitations of gathering and updating information.

Individuals have a right under the Privacy Act 1988 (Cth) to request access to any personal information held about them. They can do so at any time via the Participants Online Portal or by contacting their Diocese or participating organisation.

If any information is found to be incorrect or inaccurate, the Fund will promptly act to replace the incorrect or inaccurate information with the correct and accurate record. If a participant considers any of their personal information held by the Fund to be incorrect, out-of-date, incomplete, irrelevant, or misleading, we will welcome a request for amendment.

Participants can amend their contact details via the Participant's Online Portal.

Should a participant's date of birth or banking details need amendment, they must do so via their Diocese or participating organisation, which will require evidence of the correct information to safeguard their privacy.

Where a Diocese or participating organisation refuses to make a change, the participant should direct their objection firstly to the relevant Diocese or participating organisation.

CONTACT

Participants wishing to query or change their personal data should contact their Diocese or participating organisation first. If your Diocese or participating organisation is unable to assist, you may contact us by any of the following methods:

- Emailing lslf@anglican.org.au
- Phone 02 8267 2700
- Writing to the Fund at Suite 5.02, Level 5, 323 Castlereagh Street, Haymarket NSW, 2000

On receipt of queries or requests for change of personal data, The Fund reserves the right to contact relevant Dioceses and Participating Organisations to ensure data integrity.

HOW CAN AN INDIVIDUAL COMPLAIN ABOUT A BREACH OF THE AUSTRALIAN PRIVACY PRINCIPLES. AND HOW WILL THE FUND DEAL WITH SUCH A COMPLAINT?

If you believe that there has been a privacy breach in relation to your personal or sensitive information, you can complain in writing via the above email, phone or mail channels.

The Fund will investigate your complaint. We will endeavour to provide a written response to your complaint within 30 days of receipt. However, when a matter requires a detailed investigation, a response could take longer than 30 days. We will advise you if this is the case.

If you are dissatisfied with the internal complaints process or have not received a response within 30 days, you can complain to the General Secretary of the Anglican Church of Australia General Synod in writing to generalsecretary@anglican.org.au.

CHANGES TO OUR PRIVACY POLICY

This privacy policy may be updated from time to time to reflect any new or different ways in which we collect, use, or disclose personal information. If we do update the policy, we will post an updated version on our website. The revised policy will take effect on the date of posting. This is the first version of this policy.