



LISTER PRESBYTERIAN HEALTH TRUST

DRAFT PRIVACY POLICY

Revised and updated: 26 June 2024

Introduction

The Lister Presbyterian Health Trust ('the Trust') exists to make grants with a health focus to local organisations and individuals consistent with the Trust Deed and the grant criteria established by the trustees.

The Trust collects personal information to the extent necessary to achieve this purpose and, when it does, the Trust treats this information with care and respect.

This Privacy Policy sets out our practices regarding the collection, use, storage, and disclosure of your personal information in compliance with the Privacy Act 2020. The policy relates to the collection of personal information via our interactions with you.

Terminology

In this Privacy Policy, the terms 'we', 'us', 'our' refer to the Lister Presbyterian Health Trust and the terms 'you' and 'your' refer to you as an applicant or trustee/advisory trustee or person who provides services to the Trust.

Information We May Collect and Retain

We collect a variety of personal information in carrying out our functions under the Trust Deed. The following table sets out the personal information that may be collected in each area of the Trust's operations, where this information is collected and/or stored and who this information is shared with. It includes information that may be collected by third parties acting as agents of the Trust.

Table 1. Trust Personal Information Matrix

Area	Personal Information	Where/Who
Trustees	Name, address, email, phone, spouse or partner, ID and verification documents.	Google Workspace, Spanning Backup for Google Workspace, Office at the Takapuna Community Services Building Secretary, chairperson. Charities Services
Grants: Organisations (Officers and key people. Referees, supporters)	Name, address, email, phone. Letters supplied from referees or supporters may contain additional personal information.	Google Workspace, Spanning Backup for Google Workspace, Office at the Takapuna Community Services Building Secretary, chairperson, trustees. Trust's auditor/reviewer.
Grants: Personal (Claimants, dependent persons, caregivers of dependent persons)	Name, address, email, phone, bank account, healthcare provider, personal information giving rise to application, financial information in support, details of other charitable assistance received, other relevant personal information supplied on application.	Google Workspace, Spanning Backup for Google Workspace, Office at Takapuna Community Services Building. Secretary, chairperson, trustees. Trust's auditor/reviewer.
Povey Scheme	Name, address, email, phone, bank account, eligibility category, detail of medical, dental, or optical expenses in respect of which a claim is made, details of other related financial assistance.	Google Workspace, Spanning Backup for Google Workspace, Office at - Takapuna Community Services Building. Secretary, chairperson, trustees. Trust's auditor/reviewer.
Administration (Advisers, contractors, chairperson)	Name, address, email, phone, bank account (as required), IRD Number (as required)	Google Workspace, Spanning Backup for Google Workspace, Office at. Takapuna Community Services Building Secretary, chairperson, trustees. Trust's auditor/reviewer.
Website	Contact details for secretary and chairperson. Names of trustees.	Church Resources General public

Where we use forms to collect personal information, we will always include a Privacy Statement setting out the information we are collecting, why we are collecting it, who we might share that information with, and your rights regarding that information.

Sample Privacy Statements can be found in Appendix 1: Privacy Statements.

Use of Personal Information

The personal information we collect will be used to:

- Assess, fulfil, and monitor applications for grants,
- Consult with others for the purpose of assessing applications for grants,
- Prepare communications in respect of application outcomes,
- Provide services you have authorised or requested,
- Provide you with information from the Trust and/ or a service that you are using,
- Verify your identity,
- Respond to any questions or correspondence from you,
- Satisfy reporting requirements under the Charities Act 2005,
- Obtain services from professional advisers, contractors and others that are necessary or expedient to enable the Trust to function,
- Carry out any other use that is authorised by you or is notified to you at the time of collection.

Disclosure of Personal Information

We may need to disclose your personal information to meet the purposes set out above. We will not disclose your personal information except in accordance with this Privacy Policy and the Privacy Act 2020.

We may disclose your personal information to:

- Our trustees, including any advisory trustee appointed by the trustees.
- Any third party you have authorised us to share your personal information with, or we have notified you that we may share your personal information with, and you have not objected,
- Government or law enforcement agencies, where we believe that such disclosure is reasonably necessary to assist with the maintenance of the law,
- Appropriate third parties where necessary to protect your safety or the safety of others,
- Suppliers of outsourced functions such as our auditors or financial reviewers, lawyers, administrators, or data storage providers,
- Any other agency where required or permitted by law.

Storage and Disposal of Personal Information

Your personal information may be held by:

- The Secretary, and the Chairperson and other trustees including advisory trustees, to the extent necessary for the performance of their functions and duties,
- The Trust's Information Technology platform providers, including Google for Google Workspace, Spanning Backup, and Church Resources for the Website (NB. Our Website collects user information and lists the names of the trustees and contact information for the Trust, but no other personal information is uploaded to the Website.),
- Advisers and contractors retained by the Trust to the extent necessary for the purpose of advising the Trust or providing services to the Trust.
- Charities Services (for officers of the Trust)

Disposal of Collected Personal Information

We will not retain your personal information for any longer than we have a lawful purpose to use it or a legal requirement to retain it. The Trusts Act 2019 requires the trustees to retain all core documents of the Trust, including documents necessary for the administration of the Trust (s. 45). We also need to retain sufficient information of our grant-making activity to provide evidence, if necessary, that the Trust is carrying out a charitable purpose and to satisfy the requirements of a review/audit of the Trust's annual financial accounts.

Storage and Disposal of Personal Information (cont.)

We usually apply the following guidelines in respect of grant applications.

Grant applications, including supporting documentation, are retained in electronic form as follows.

Document	Retention Time Frame	Actioned By
Organisation Grant Application (Successful)	2 years after annual review/audit is completed	Secretary and Chairperson
Individual Grant Application (Successful)	Until annual review/audit is completed	Secretary and Chairperson
Povey Scheme Grant Application (Successful)	Until annual review/audit is completed	Secretary and Chairperson
All Unsuccessful Grant Applications	Until annual review/audit is completed	Secretary and Chairperson
Accountability Reports	Until annual review/audit is completed for the period they were received.	Secretary and Chairperson

Paper records are destroyed by shredding after filing in Google Workspace.

Electronic records held in Google Workspace are destroyed, when necessary, by permanently deleting them. Emails with grant application information attached are permanently deleted when the attachments are saved.

Copies downloaded to a trustee's personal computer or device, and any print copies made, are deleted one month after the meeting at which the application is disposed of. This does not apply to the chairperson as the trustee nominated to hold "the other documents specified in section 45" of the Trusts Act 2019 (see s. 46).

We may retain details of name of applicant, date of application, amount applied for, amount granted/declined and a brief general description of purpose for historical and statistical purposes.

We may retain anonymised information for historical and publicity purposes and to comply with the rules around financial reporting.

Security and Privacy Breach

Whether your personal information is stored by us locally, with our data storage providers, or by third parties on our behalf, we will take all reasonable steps to ensure that it is protected against loss, misuse and unauthorised access, use, modification, or disclosure. Some personal information may be held in the cloud or on servers located offshore.

The steps the Trust takes to ensure security of personal information include the following.

Cyber Security

The Trust laptop uses virus protection and undergoes current updates.

The use of free Wi-Fi on the Trust laptop is not permitted.

Links or emails from unknown or suspicious sources are not opened.

Access to the Trust's Google Workspace account (formerly G-suite) is restricted to the Secretary and Chairperson. Each has a unique password that is changed at least every six months and is not shared with anyone else except in the event of a handover to a new Secretary or Chairperson.

Files containing personal information are normally shared through a time-limited download link and not as an attachment to an email.

Shares to files and folders are read-only.

Links to files and folders containing personal information required for a meeting of the Trust include an expiry date of one week after the relevant meeting date.

An audit is run quarterly of all shares that are currently active on Google Workspace.

Deleted files containing personal information will be cleared out regularly to ensure, as far as possible, that they cannot be easily recovered.

Security and Privacy Breach (cont)

Paper Security

The Trust's paper records are stored in a secure office at the Takapuna Community Services Building, 5-7 The Strand, Takapuna

Copies in the possession of the Secretary or individual trustees for the purpose of carrying out their functions are handled with due care and respect for the confidentiality and security of personal information.

In the event of a privacy breach that it is reasonable to believe has caused serious harm to an affected individual or individuals, or is likely to do so, we must notify the Privacy Commissioner as soon as practicable after becoming aware of that privacy breach.

Except in certain circumstances, we must also notify an affected individual or, if it is not practicable to notify an affected individual or every member of a group of affected individuals, we must give public notice of the privacy breach.

Privacy Officer

The Trust has appointed the Trust Chairperson as the Privacy Officer.

The Chairperson can be contacted on email at chair@listerphtrust.org.nz or on mobile at 022 405 0164.

Right to Access and Correct Your Personal Information

You have the right to access or correct any personal information the Trust holds about you.

You can do so by:

Calling us on 021 828 839,

Emailing us at secretary@listerphtrust.org.nz, or

Writing to us at the Lister Presbyterian Health Trust, PO Box 33-276, Takapuna 0740.

Whichever way you make your request, we must take steps to ensure that you're authorised to do so. Please understand that we must do this to protect your privacy.

The Privacy Act permits us to withhold personal information from you in certain circumstances, such as where the information is commercially sensitive or legally privileged. We might also refuse to provide you with information that is also about other people if we think disclosure of this would be unwarranted. If we withhold information from you, we'll tell you why.

We're required by the Privacy Act to make a decision on your request – and convey this to you – within 20 working days. Where we cannot make a decision within 20 working days, we'll let you know and explain why.

Questions or Complaints

If you have a concern about the way we've handled your personal information, let us know. You can speak with our Privacy Officer using the contact details set out above and we'll try to resolve your concerns.

If we can't resolve your complaint for you, then you have the right to make a complaint to the Office of the Privacy Commissioner by:

Completing an online complaint form at www.privacy.org.nz, or

Writing to the Office of the Privacy Commissioner, PO Box 10-094, The Terrace, Wellington 6143.

Changes to Our Privacy Policy

From time to time, we may change this Privacy Policy, to reflect the evolution of our obligations or changes in the law. Please check the Privacy Policy periodically for changes.

Document Record

Version	5
Version Date	26 June 2024
Annual Policy Review	June 2025 -
Privacy Policy v.5 Adopted	26 June 2024
Privacy Policy v. 4 Adopted	29 November 2023
Privacy Policy v. 3 Adopted	30 November 2022
Privacy Policy v. 2 Adopted	23 June 2021
Interim Privacy Policy Adopted	24 March 2021

APPENDIX 1: PRIVACY STATEMENTS

Individual and Povey Scheme Applications

We collect personal information from you, including contact details, and other medical and financial information primarily to allow us to assess, fulfil, and monitor your application for a grant.

We may use or disclose this personal information for these, and other lawful purposes related to your application, but will only do so in accordance with the Lister Presbyterian Health Trust Privacy Policy and the Privacy Act 2020.

We will not retain your personal information for any longer than we have a lawful purpose to use it or a legal requirement to retain it.

You have the right to access or correct any personal information the Trust holds about you.

You can do so by:

Calling us on 021 828 839,

Emailing us at secretary@listerphtrust.org.nz or

Writing to us at the Lister Presbyterian Health Trust, PO Box 33-276, Takapuna 0740

Organisation Applications

Any personal information provided to us by an organisation in connection with its application for a grant is used primarily to allow us to assess, fulfil, and monitor that application.

We may use or disclose this personal information for these, and other lawful purposes related to your application, but will only do so in accordance with the Lister Presbyterian Health Trust Privacy Policy and the Privacy Act 2020.

We will not retain your personal information for any longer than we have a lawful purpose to use it or a legal requirement to retain it.

Any individual whose personal information is provided to the Trust in connection with this application has the right to access or correct this information and can do so by:

Calling us on 021 828 839,

Emailing us at secretary@listerphtrust.org.nz or

Writing to us at the Lister Presbyterian Health Trust, PO Box 33-276, Takapuna 0740

Trustees

We collect personal information from you including contact details, and ID and verification documents.

We collect your personal information to satisfy reporting requirements under the Charities Act 2005, legal obligations imposed by other Acts, and to obtain services from professional advisors, contractors and others that are necessary or expedient to enable the Trust to function.

We will not retain your personal information for any longer than we have a lawful purpose to use it or a legal requirement to retain it.

You have the right to access or correct any personal information the Trust holds about you.

You can do so by:

Calling us on 021 828 839,

Emailing us at secretary@listerphtrust.org.nz or

Writing to us at the Lister Presbyterian Health Trust, PO Box 33-276, Takapuna 0740