



WAIKATO DIOCESAN
School for Girls

Privacy of Information Policy

NAG 6 - Compliance

Policy # 6.6

Rationale

Waikato Diocesan School for Girls (the School) is required to comply with the requirements of the Privacy Act 2020 (the Act) when dealing with personal information. Personal information is information about an identifiable individual (a natural person). The School will ensure that the privacy of staff, students, and other members of the School community is protected.

Policy Statement

This Policy sets out how the School will collect, use, disclose and protect personal information and does not limit or exclude the rights under the Act of any of the School's staff, students, and other members of the School community. The School will comply with the provisions of the Act and protect the privacy of staff, students, and other members of the School community.

Guidelines

1. The School will appoint a Privacy Officer who will ensure compliance with the Act and this Policy.
2. All staff will be made aware of the provisions of the Act and this Policy as it impacts on their roles in the School.

Purpose, source, and manner of collecting personal information

3. When collecting personal information about an individual, the School will disclose the purpose of collecting the information, who will have access to it, and whether it is compulsory or optional information. Individuals have the right to request access to, and correction of their personal information.
4. The School only collects personal information: -
 - a. for purposes connected with the functions or activities of the School, and only when it is necessary to have this information.
 - b. directly from the individual concerned or, if a student, from their parents/caregivers, unless the information is publicly available elsewhere and the person's interests are not prejudiced when the School collects the information from elsewhere.
5. Personal information will be collected for the following reasons, where relevant: -
 - a. To verify identity

- b. To provide service
 - c. To undertake credit or criminal record checks (where necessary)
 - d. To invoice for payment and to collect money owed (where relevant)
 - e. To respond to communications, including complaints
 - f. To protect and/or enforce the School's legal rights and interests, including defending any claim
 - g. In compliance with the Covid-19 Public Health Response Act (Vaccination) Order 2020 and Covid-19 Public Health Response (Covid-19 Testing) Order 2020, and any amendments.
6. Personal information will not be collected unlawfully or unfairly, or by means that intrude on the personal affairs of the individual.
7. At the time of enrolment the School will obtain consent from the student and her parents/caregivers to use photographs and other material for public relations and marketing purposes.

Storage, access, correction, and accuracy of personal information

8. The School will take reasonable measures to ensure any personal information it holds is stored securely and that there are reasonable safeguards against theft or loss, unauthorised access, misuse, modification or wrongful disclosure. While the School takes reasonable steps to maintain secure internet connections, if an individual provides the School with their personal information over the internet, the provision of that information is at the risk of the individual concerned.
9. The individual concerned is entitled to know what information the School holds about them.
10. Subject to certain grounds for refusal set out in the Act, the individual concerned has the right to access their personal information that the School holds. The individual may request correction of the information, and if that correction is not made, to request there be attached to the information a statement of the correction sought but not made.
11. The School will take all reasonable steps to ensure personal information held by the School is correct, relevant, complete, up-to-date, and is not misleading.
12. The School shall not keep personal information for longer than is required for the purposes for which the information was obtained, except in circumstances where the person's identity is not disclosed, such as statistical information.
13. Staff, such as the School Nurse, Deputy Principals and relevant Education Outside the Classroom (EOTC) staff, who have access to personal information relating to the health of any individual shall comply with the Health Information Privacy Code 2020, which applies to health information about identifiable individuals and applies to all agencies providing personal or public health services, including primary health organisations, district health boards, doctors, nurses, and pharmacists.


Holding, disclosing, and disposing of personal information


14. Information collected by or given to the School must only be used for the purposes for which it was collected or given or used otherwise in accordance with exceptions provided for under the Act.
15. The School may disclose personal information to:
- a. Any business that supports the School's services or products, including any person that hosts or maintains any of the School's IT systems (refer to the Digital Communications Policy)

- b. A credit reference agency for the purpose of credit checking, where necessary
 - c. The Ministry of Justice for criminal record checks, where necessary
 - d. A person who can require the School to supply personal information (such as a regulatory authority)
 - e. Any other person authorised by the Act or another law (such as a law enforcement agency).
16. No information is to be disclosed to another person or agency without the individual's written consent (unless the information is required to be provided by law). Information may only be shared with other parties without the individual's consent when it is already publicly available, or when it is being shared for the purpose for which it was obtained, or otherwise in accordance with exceptions provided for under the Act.
17. Private information will be disposed of in a secure manner.
- a. Hard copy information – will be disposed of through destruction via shredding or the services of a document control company.
 - b. Computers and other devices – the School's IT professional will wipe devices of any data where appropriate.
 - c. Email accounts and web services – the School will retain ownership of any email account it uses to send or receive personal information. When people with access to an account leave the School their access to the account will be removed. Email accounts will be deleted and administrator rights restricted in line with the School's Digital Communications Policy.

Unique identifiers

18. Where necessary, and when it is useful for administrative purposes, the School uses the National Student Number (NSN) or other personal ID numbers. Except for the NSN, the School does not use the same ID number for a student that another agency also uses for them. Unique identifiers are not assigned to individuals unless necessary to allow the School to carry out its functions or activities effectively.

Adopted by BOT:  Signed (BOT Chairperson)
13/4/22 Date

Adopted by PB:  Signed (PB Chairperson)
4.5.22. Date

Reviewed: 2021	Next review: 2024
----------------	-------------------