

HOKOWHITU SCHOOL PRIVACY POLICY (2022)

PURPOSE

Hokowhitu School Board will ensure that the school maintains the highest levels of responsibility for the personal information that it collects, holds, and discloses in accordance with the requirements of the Privacy Act and other relevant legislation.

GUIDELINES

Privacy Officer

1. The Presiding Member of the Board will fulfil the role of Privacy Officer, in accordance with the Delegations Policy.
2. The responsibilities of the Privacy Officer include:
 - a. During the course of each Board term, auditing the school's protocols for the collection, holding, use, and disclosure of personal information to ensure they are in line with this policy.
 - b. Dealing with any complaints from the school community about possible privacy breaches, including determining whether it is notifiable.
 - c. Dealing with requests for access to personal information, or correction of personal information.

Collecting Personal Information

3. Personal information will only be collected that is necessary for the school to fulfil its legal roles and responsibilities.
4. Any forms intended to collect personal information will be accompanied by a clear privacy statement that explains:
 - a. Why the information is being collected.
 - b. Who will be able to access the information.
 - c. Whether a response is required or not, and the consequences of not responding.
 - d. The right to access and correct the information.
5. Signage will clearly identify areas where the school operates security cameras to help protect its physical assets

Holding Personal Information

6. All personal information must be held safely and securely:
 - a. Physical documents will be kept in lockable rooms and, where appropriate, lockable cabinets.
 - b. Electronic records will be protected by password.
 - c. The school will utilise cloud-based communication, storage, file-sharing, and educational services only after careful scrutiny of their privacy protections, and wherever possible will use paid rather than free versions of these services.
 - d. The school will only use secure forms of online financial payment.
7. Only authorised staff will have access to stored personal information.
 - a. Assessment data is only accessed by staff insofar as it is necessary for them to fulfil the

educational mission of the school, and as far as possible is to be treated in anonymous or aggregate form.

- b. Security camera footage is stored for a limited period on a password protected server and is accessible only to the Senior Leadership Team or Presiding Member of the Board of Trustees for purposes of ensuring safety or assessing possible criminal activity.
8. Personal information will only be held as long as it is required for the purpose it was collected, or as long as stipulated by legislative requirements.
 9. Requests by individuals for access to stored personal information will receive a response as soon as possible, and no later than twenty working days after the request.
 - a. Where a request for information is deemed legitimate in accordance with the principles of the Privacy Act, it will be actioned as soon as possible.
 10. Individuals have the right to request corrections to personal information held by the school.
 - a. If the school does not agree to the requested correction, the request must be recorded and stored with the individual's file.

Using and Disclosing Personal Information

11. Personal information will only be used for the purpose for which it was collected, including reporting to parents/guardians, or disclosed to agencies in accordance with legislative requirements and/or legal obligations.
12. In cases where the school or school staff are involved in sharing of learning support information as part of a group, a written protocol must first be established to ensure that the information is shared safely and appropriately.
 - a. The protocol will specify the purpose of the information sharing, the kind of information to be shared, the person(s) responsible for collating the information, processes for securely sharing and disposing of information, and the person responsible for the notification of any privacy breach.
 - b. Consent must be obtained before any personal information is shared with a learning support group, specifying why the information is being shared, who the information will be shared with, and what will happen with the information.
13. Board meetings will only discuss individuals in Part 2, and only when necessary for the school's governance.
 - a. Assessment data reported in Part 1 will be anonymised.
 - b. Health and safety incidents reported in Part 1 will be anonymised.
 - c. Matters of individual student discipline will only be discussed in Part 2, and only in the case of a suspension.
 - d. Staff leave and employment matters will only be discussed in Part 2.

Privacy Breaches

14. Any staff or Board member who becomes aware of a potential privacy breach must immediately notify the Presiding Member of the Board (as Privacy Officer).
15. In the event of a potential privacy breach the Privacy Officer will assess whether it is notifiable

(likely to cause serious harm) through use of the Office of the Privacy Commissioner’s NotifyUs online tool.

- a. If it is deemed to be a notifiable privacy breach, the Board will notify the affected individuals and the Office of the Privacy Commissioner as soon as it is practicably able to do so.
- b. If it is not deemed to be a notifiable privacy breach, the Board may still choose to notify the affected individuals and the Office of the Privacy Commissioner.

ASSOCIATED POLICIES/PROCEDURES/HANDBOOKS

Legislation

- Privacy Act 2020

Guidelines

- <https://privacy.org.nz/privacy-for-agencies/privacy-breaches/notify-us/>
- <https://www.education.govt.nz/our-work/changes-in-education/privacy-act-2020-resources-for-schools-and-early-learning-services/>
- Learning Support Delivery Model: A Guide for Groups Sharing Learning Support Information (Ministry of Education)
- Privacy in Schools: A Guide to the Privacy Act for Principals, Teachers and Boards of Trustees (Privacy Commissioner [2009])

School Policies, Procedures, and Other Documents

- Appointments Policy
- Assessment Policy
- Authorisation to Disclose Information Form
- Camp Parent Selection Procedure
- Communications Policy
- Delegations Policy
- Police Vetting Procedure
- Principal Appraisal Policy
- Staff Professional Growth Cycle Policy

Ratification date: 21 June 2022

Review date: Term 4 (October/December) 2025

Presiding Member

Principal