

# 3.2 PRIVACY POLICY (NAG 3)

### **Outcome Statement**

New Plymouth Girls' High School collects a range of personal and sensitive information from its students and school community. Information collected by the school shall be used only for the purposes for which it is collected. Information will only be used in a way that protects the anonymity and confidentiality of the person who provided the information.

#### **Definitions**

Privacy means those principles that are defined by the Privacy Act 2020 and include the collection, access and accuracy of personal data and the holding, sharing and use of personal information with the overarching principle that information collected should be only used for the purposes for which it is collected, and by those persons authorised to use the information and must within the boundaries of the law protect the confidentiality and anonymity of the provider of the information.

Personal information is information about an identifiable individual. Personal information includes information that the school collects, processes, stores or receives. This may be in person or via our website, email, social media, apps, over the phone, or through other channels.

# **Overarching Principles**

To ensure that personal information given to New Plymouth Girls' High School remains confidential to us, is used for the purposes for which it was collected and is used only by those persons authorised to use it.

### **Expectations and limitations**

### Collection of personal information

- 1. Personal information collected, stored, used and disclosed by New Plymouth Girls' High School must be necessary for the purpose of the school activity.
- 2. Where personal information is collected from or about a student aged under 16, consent of the parent or guardian will be sought.
- 3. Personal information collected, may include demographic and personal contacts data, performance, achievement and assessment information, attendance information, information that supports the school to provide education and other pastoral support, health and medical information, images of students engaging in school activities, and information relating to the use of the schools IT systems.
- 4. Some of the personal information collected is mandatory, in accordance with our legislative obligations and responsibilities.
- 5. Individuals have a right to know what information is collected about the student for the purposes above.

## Advising of purpose of collection of information

- 6. New Plymouth Girls' High School uses the information collected for the purposes of school activity and educational services. This includes, but is not limited to providing education, school and extra curricula services; understanding the student demographic, to inform decisions about funding and resources; to support teaching and learning; to set policy and procedure; to assess performance and set targets; to safeguard students welfare and provide services and supports accordingly; to meet legislative responsibilities and statutory reporting; and to promote and market the school.
- 7. Only information that is necessary will be collected.

### Storage and security of personal information

- 8. All personal information will be kept secure and stored in a manner that will minimise loss and access, use, modification or disclosure by unauthorised persons.
- 9. Access to student files is limited to the student and to staff. Parents and legal guardians of students under the age of 16 may have access, preferably with the consent of the student. All parents and legal guardians will have access to some of their student's information via the KAMAR portal, through username and password access.
- 10. Access to staff information is limited to the Principal and their delegates.

#### Disclosure

- 11. Personal information must not be disclosed to a third party unless there is a legal obligation to do so, the information is publicly available, disclosure is necessary to prevent a serious and or imminent threat to health or safety, there is reasonable belief that disclosure is one, disclosure is authorised by the individual concerned.
- 12. Personal information shall not be disclosed to persons or organisations not bound by New Zealand's privacy laws.

### Access to and correction of personal information

- 13. The individual whom the information is held about shall be entitled to access and request correction of their personal information held by us, and to request that there be attached to the information a statement of any correction sought but not made.
- 14. Requests to access or correct personal information shall be answered/completed within 20 working days of the request being made.
- 15. Where an individual notifies us that their request to access or correct their personal information is urgent, and provides the reason surrounding the urgency, we will ensure this is considered when determining the priority to be given to responding to the request.
- 16. Where an individual requests to access or correct their personal information and we do not hold such information we will notify the individual who requested the information.
- 17. We may refuse to grant access to personal information, or partially withhold information, only in accordance with the provisions of the Privacy Act 2020.
- 18. Before providing access to any personal information, we must be satisfied of the identity of the requestor, have reasonable grounds to believe the request is not being made under the threat of physical or mental harm, and, if the request is made by an agent of the individual, ensure that agent has the written authority of the individual.

## **Holding of information**

19. Personal information will not be held for longer than is required for the purposes for which the information may lawfully be used and in line with the requirements of the Public Records Act 2005 and the School Records Retention/Disposal Schedule guidance from the Ministry of Education and Archives New Zealand.

## Delegation

The responsibility to uphold the legislative requirements regarding privacy for the school is delegated to the Principal.

The Privacy Officer is responsible for dealing with requests made under the Privacy Act 2020, working with the Privacy Commissioner in the event of any complaints being received and otherwise encouraging compliance with the Privacy Act 2020 by the school. The Principal fulfils the role of the Privacy Officer for the school.

# **Legislative Compliance**

Protected Disclosures Act 2000 Privacy Act 2020 Public Records Act 2005

# **Supporting Resources**

<u>Privacy Commissioner Guidance</u> <u>School Records Retention and Disposal Schedule Guidance</u> School and Hostel Security Policy

Reviewed: Sept 2022	Next review: 2025