

PRIVACY POLICY

Introduction

The Dilworth Trust Board and Dilworth School (together, **Dilworth**) has a responsibility to ensure that its policies and procedures comply with the Privacy Act 2020 (**Privacy Act**) and other applicable legislation relating to privacy for schools, including the Official Information Act 1982 and the Education and Training Act 2020 (together, **Privacy Legislation**).

The Privacy Act controls Dilworth's handling of "personal information" and gives rights and protections to individuals. In this regard, "personal information" means information about an identifiable individual, but it does not capture statistical data from which an individual cannot be identified.

The Privacy Act does not seek to hinder school boards of trustees from enabling schools to achieve their education objectives in the way that they choose, provided this can be achieved in a way which is consistent with the Privacy Act.

Scope

This policy applies to and relates to personal information it collects in respect of its staff members, students (current and former) and their parents, guardians, and caregivers (together, **Community Members**).

Purpose

The purpose of this policy is to explain what personal information Dilworth collects, why we need to collect it, and who we share it with. This policy also explains how our Community Members can request and/or correct the personal information which Dilworth holds about them.

Personal information Dilworth collects

We collect and generate personal information about our Community Members in a variety of ways:

- We collect personal information **directly from the person** when they engage with us, for example by completing an enrolment application or medical form.
- We collect personal information **from third parties**, for example from a student's family/whanau, from medical practitioners, or from other schools.
- We **generate** personal information as people use our services, for example when a student engages in the classroom, meets with Dilworth health, careers, or

pastoral staff members, or when a student moves from the Junior Campus to the Rural or Senior Campus.

We collect a broad range of personal information from our Community Members, and the information we collect will vary on each person's particular role in the Dilworth community. The information we collect may include (but is not limited to):

- Personal details, such as name, contact details (phone number, address etc.), date of birth, ethnicity;
- Student family financial information and personal circumstances;
- Academic history;
- Medical and health information and records;
- Information about family/whanau and emergency contacts;
- Photographs, audio, video or other media (for example, during School events, School trips or activities);

CCTV footage (Dilworth's Junior, Rural and Senior Campuses each use CCTV recording cameras on the premises in public areas for our students and staff members safety and security).

How Dilworth uses its Community Member's personal information

We use the personal information we collect to:

- Provide for the education, advancement, and welfare of our students;
- Manage and administer our School in a safe way;
- Ensure our student and staff member's educational, social and medical wellbeing and safety;
- Communicate with our students' parents, guardians, caregivers or whanau in relation to the student's education and general wellbeing;
- Promote and market Dilworth and generate content for its various community publications
- Meet certain requirements of the Education and Training Act 2020 and other legislation containing various reporting requirements;
- Maintain a School archive of our students and staff members records; and
- For any other purpose that would be reasonably expected to operate the school and as otherwise permitted or required by law.

In respect of highly sensitive information we collect, such as health or medical information about our students, we will only use such information if there is a suspected risk to a student's safety or wellbeing. If we need to use sensitive information in other ways, we will only use that information with consent, or where permitted or required by law.

Storage and protection of personal information

All personal information we collect is stored electronically (on secure systems or platforms, which may include cloud platforms), or in hardcopy physical files (in secure lock protected locations on Dilworth campuses). In some circumstances we may use third-party service providers to store and process personal information on Dilworth's behalf, some of which may store or process this information overseas, however any of Dilworth's agents/service providers do not use that information for any of their own purposes.

Dilworth takes all reasonable steps to protect personal information from misuse or unauthorised access or disclosure, including minimising access to personal information stored on our electronic platforms and physical storage locations to staff members or other persons authorised by Dilworth who require access to that information to carry out and perform their particular functions at the school.

Dilworth will retain its Community Members personal information for as long as it is required. Once information is no longer required by Dilworth, it will be retained by it in its archives and Dilworth reserves the right to destroy the information at its discretion.

Sharing of personal information

Dilworth is required to share personal information to meet the purposes of collection set out above, as well as to deliver educational services to our students.

To enable this, we may share our Community Members personal information with (for example):

- Parents, caregivers, and legal guardians;
- Ministry of Education;
- Other schools;
- The Dilworth Old Boys Association (DOBA);
- Police;
- Health agencies;
- Oranga Tamariki;
- New Zealand Teaching Council; and
- Other external agencies (governmental or otherwise) as permitted and required by law to ensure the safety and wellbeing of our Community Members.

In addition, Dilworth will share the personal information of its Community Members on its website, social media sites, or in its promotional materials (such as advertisements, brochures and prospectuses), and community publications, including its newsletter (which may be in an electronic or paper format) and the Dilworthian. This may include sharing information such as:

- Student work and profiles;
- Old Boy profiles and career stories; and
- Photographs or video content from School organised trips and activities.

Dilworth takes reasonable care to ensure that it does not disclose the personal information of its Community Members about whom there are safety or wellbeing concerns. At any stage our Community Members may opt-out of this kind of information sharing by advising Dilworth's privacy officer that they no longer wish to have their information shared by the School.

Appointment of Privacy Officer

Dilworth will appoint a privacy officer. The privacy officer is the person responsible for handling Dilworth privacy issues. In particular, the privacy officer will be responsible for:

- encouraging compliance by Dilworth with the information privacy principles, including providing advice and assistance to the Board and staff in this regard;
- providing training and guidance to Dilworth staff (and in particular its administration staff) about the requirements under Privacy Legislation;
- monitoring existing policies and procedures to ensure that they comply with Privacy Legislation;
- dealing with requests made by individuals to Dilworth for personal information, or for the correction of their personal information; and
- providing assistance to Dilworth in dealing with complaints about breaches of privacy, including working with the Privacy Commissioner in the event that any complaints are investigated.

Accessing and Correcting Personal Information

All Community Members have the right to request a copy of the personal information Dilworth holds about them.

Equally, if any information held by the School is thought to be incorrect, a Community Member may ask us to correct it.

Any requests for access to information or correction of information held by the School can be directed to the Headmaster.

Dilworth will endeavor to process requests within 20 working days after receiving it. If any information is unable to be disclosed as it would amount to a breach of the Privacy Act, we will advise the requester of the reasoning for withholding such information. For example, we may withhold certain information if we believe that releasing it might amount to an unwarranted disclosure of the affairs of another person.

Complaints Process

All Community Members have the right to make a formal complaint to Dilworth if they:

- are dissatisfied with Dilworth’s treatment of their personal information;
- are dissatisfied with Dilworth’s response to a request or enquiry relating to a Community Members personal information generally, or access to their personal information; or
- feel that an action taken by Dilworth is or appears to be an interference with the privacy of an individual.

To lodge a complaint, please complete the Complaints Form available here [Complaints Form](#)

Once a privacy complaint is brought to Dilworth’s attention, Dilworth will use all reasonable efforts to resolve the issue in a timely manner itself in the first instance.

If the privacy complaint is unable to be resolved with the assistance of Dilworth, all Community Members have the right pursuant to section 70 of the Privacy Act to take a privacy complaint to the Office of the Privacy Commissioner (on behalf of themselves or on the behalf of another person), who may conduct an independent investigation into the complaint.

As soon as practicable after receiving a complaint the Privacy Commissioner must consider the complaint and follow the procedure required by section 73 of the Privacy Act.

For further information on privacy protection, the complaints process, or to lodge a complaint with the Privacy Commissioner, see the Privacy Commissioner’s website at www.privacy.org.nz, or call 0800 803 909.

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