



# Privacy Procedure

DNI School promotes and protects the privacy of all individuals associated with the school, i.e. students, staff, parents, whānau, guardians, and any others. We follow the key principles of the Privacy Act 2020, which describe how we may collect, use, store, and dispose of personal information. The Office of the Privacy Commissioner administers the Act and encourages best practice.

We've used the word "parent" throughout this section to refer to parents and guardians. Our privacy officer deals with requests for personal information and, if required, liaises with the Privacy Commissioner in any investigations. Our privacy officer is the principal.

Our Privacy Guidelines (below) inform:

- how we collect, store, and dispose of information
- what information we collect
- how we use and disclose information about individuals, including official information requests.
- how individuals may access information relating to them that is held by the school
- how to manage the rights of parents regarding information about their child.

It is important that staff understand the school's privacy guidelines, especially in relation to personal information and reporting breaches. See information from the Privacy Commissioner about [reporting privacy breaches](#)

## Privacy Guidelines:

The Privacy Act 2020 is primarily concerned with good information handling practices, and is made up of 13 information privacy principles. The following guidelines apply these principles (see numbers in brackets).

### **Purpose, source and manner of collecting personal information**

- When we collect personal information about an individual, we make known the purpose of collecting it, who will have access to it, and whether it is compulsory or optional information. We advise that individuals have the right to request access to, and correction of, their personal information.
- We only collect personal information:
  - for purposes connected with the function of the school, and only when it is necessary to have this information [1]
  - directly from the person concerned, or, if a student, their parent or guardian, unless it is publicly available from elsewhere, or the person's interests are not prejudiced when we collect the information from elsewhere [2]
  - in a transparent manner [1,3]
  - in a lawful and fair manner, and avoid intruding on people's privacy as much as possible, especially vulnerable children or young people [4].

- We have reasonable safeguards in place to protect personal information from loss, unauthorised access, use, or disclosure.
- If an individual wants access to information we hold about them, we provide it. Individuals may request correction of this information or, when not corrected, that a record of the request is attached to the information [6,7].
- We take reasonable steps to make sure personal information is correct, up to date, relevant and not misleading [8].

### **Holding, disclosing, and disposing of personal information**

- We only keep information for as long as it is needed, and for the purposes for which it was obtained. When a student moves to a new school and their records are requested, we forward the relevant information that we hold. We securely dispose of personal information that is no longer needed. [9]
- Information is only used for the purposes for which it was obtained except in certain circumstances (for example, for statistical purposes where the person's identity is not disclosed) [10]. ● We safeguard students' information and we do not release that information to third parties unless we are allowed, or required, to release information by law. This covers disclosure to persons other than those able to legitimately access material about their own children.

As a general rule, information about any person is not given to a third party without the person's knowledge, unless:

- the information is already publicly available
- it is being passed on in connection with a purpose for which it was obtained, for example, to the student's new school.
- the right to privacy is over-ridden by other legislation or law, including a court order ● it is necessary for the protection of individual or public health and safety [11].

### **Disclosing personal information outside New Zealand**

DNI School only discloses personal information outside New Zealand if:

- a parent authorises the disclosure, and understands that we cannot guarantee the security of the information once it is sent outside New Zealand (for example, sending a report to an international student's parents), or
- we reasonably believe the country where the information is sent has comparable privacy safeguards [12].

### **Unique identifiers**

Where necessary, and when it's useful for administrative purposes, we use the National Student Number (NSN) or other personal ID numbers. Except for the NSN, the school doesn't use the same ID number for a student that another agency also uses for them [13].

For most purposes, the best guide is to use good sense and to treat personal information with great respect. When in doubt, seek advice from the school's privacy officer or the Office of the Privacy Commissioner.

### **Official Information Act Requests**

The Board uses the official guidelines provided by the Office of the Ombudsman to deal with OIA requests <https://www.ombudsman.parliament.nz/resources/oia-and-school-boards>

## Personal Information Definition:

The school collects personal information (information about an identifiable individual) to:

- provide a high standard of teaching and learning
- celebrate achievement and recognise diversity
- record and maintain:
  - student records of academic progress, through, for example, portfolios, digital learning stories, etc
  - accounts
- provide:
  - library and information technology services
  - learning behaviour programmes
  - counselling services
  - accurate information to other schools/education providers to ensure proper and safe transfer of students
  - information for school liaison and fundraising purposes
- produce school communications and maintain the school's website and management systems. ● report/disclose information to:
  - government bodies or other agencies for the purposes of funding/support or to meet contractual/legislative obligations, e.g. Ministry of Education, Work and Income, Oranga Tamariki – Ministry for Children, Health NZ - Te Whatu Ora, their agents or contractors. This may include Otago Youth Wellness Trust, External contractors for Board of Trustee election etc, the North Dunedin Community of Learning, Otepoti ki te Raki

To do this, the school collects and holds the following information:

- **Personal** – full name, date of birth, gender, names and ages of siblings, ethnicity (statistical), citizenship/residency status/eligibility criteria, iwi, first language, and religion (optional).
- **Health** – doctor's name, proof of immunisation, medical conditions/health matters/disabilities about which the school should be aware.
- **Education** – information relevant to the student's learning, such as the student's interests, any aspect of behaviour, performance in class, test results, electronic images including photographs, videos and audio recordings (for teaching and learning and reporting purposes).
- **Caregivers** – caregiver contact details (address, phone, email), relationship to the student, occupation (optional), and day-to-day care arrangements.

The school may require certain documentation to verify the information above (e.g. passport, birth certificate, etc.)

## Legislation:

- Privacy Act 2020
- Official Information Act 1982
- Education and Training Act 2020
- Oranga Tamariki Act 1989

## Resources:

- Privacy Commissioner: [Sharing information about vulnerable children](#)
- Simply Privacy: [Collecting personal information from children](#)
- [Office of the Privacy Commissioner](#)