



PRIVACY POLICY

Purpose

Ōtūmoetai College (“we, “us”, our”) will respect the privacy of all individuals. This Privacy Policy defines our responsibility to comply with the provisions of the Privacy Act 2020. It sets the rules for us when managing personal information and is supported by our **Privacy Statement** which explains how we deal with personal information.

Scope

This policy applies to all staff, students, parents/guardians, volunteers, alumni, student teachers, donors, contractors, visitors and other people associated with Ōtūmoetai College who may be required to collect, access, use or disclose personal information, who may manage projects or systems that impact on personal information management, or who are responsible for making policy decisions about the way Ōtūmoetai College manages personal information. It also includes any websites or online platforms that are operated by Ōtūmoetai College.

Definitions

Personal information is “information about an identifiable individual”. The information does not have to identify the individual to be personal information. It can be electronic, hard copy, or in someone’s mind. It includes but is not limited to contact, demographic, health and academic information, CCTV footage, staff performance information, business and operational data, emails and other correspondence, photos, videos and other media, and opinions about the individual.

A **Privacy Breach** means any unauthorised or accidental access to, or disclosure, alteration, loss, or destruction of personal information, or an action that prevents us from accessing personal information.

To judge whether something constitutes a **serious threat**, consideration should be given to the likelihood that the threat will be realised, the severity of the consequences if the threat is realised, and the time at which the threat may be realised.

Related Legislation

2020 Education and Training Act 2020

Public Records Act 2005

Official Information Act 1982

Oranga Tamariki Act 1989

Family Violence Act 2019

Related Policies / Procedures

Personnel Policy

Child Protection Policy

Surrender and Retention Procedure



POLICY

Collection and Processing

- We will only collect necessary information for a lawful purpose connected with the function or an activity related to the school.
- We will collect personal information from individuals directly, unless an exception can be relied upon to collect it from a third party in accordance with the Privacy Act 2020. The usual basis on which we collect information from a third party is with the authorisation of the individual.
- We will take reasonable steps to ensure that any personal information collected is accurate, complete, relevant, up to date, and not misleading.
- We will collect all personal information in a fair manner that does not intrude to an unreasonable extent upon the personal affairs of the individual concerned.
- We will refer people to our **Privacy Statement** when collecting information to explain what information we are collecting, why we need that information, how we intend to use or share it, and their right to see the information collected and to request it is corrected if necessary.

Storage and Security

- We will take reasonable steps to protect personal information from loss, misuse, or unauthorised access or disclosure, including ensuring that only authorised staff or volunteers can access electronic platforms or physical storage, and that they access only the personal information they need to perform their functions.

Retention

- We will not retain personal information for longer than we have a lawful purpose to use it.
- We will abide by the requirements of the Public Records Act 2005 and will follow the Ministry of Education records retention and disposal guidelines.
- We will securely destroy or de-identify the information we no longer need.

Access and Correction

- We will assist any individual making a request; this may include re-directing the individual to the appropriate agency, helping them formulate a request, or advising them what information we hold.
- We will process Privacy Act requests as quickly as possible, and respond no later than 20 working days after we receive them.
- Whenever we provide a decision in response to a privacy request, we will inform the individual of their right to have the decision reviewed by the Privacy Commissioner and their right to request correction of any information they believe is incorrect.
- When an individual makes a request to correct information, we will inform the individual that we will either make the change or attach a statement with the individual's view of the change.



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- We will not charge individuals for access to personal information that we hold.

Use

- We will only use personal information for the same purpose for which we obtained that information.

Disclosure

- We will release information on request to the individual, in the form that it was requested, unless we have a lawful basis to withhold that information.
- We will not disclose personal information to a third party unless the individual concerned has authorised the disclosure, or we are required to by a legal or regulatory obligation, or we believe that an exception applies under the Privacy Act 2020, or we believe that disclosure is necessary to prevent or lessen a serious threat to public health or safety, or the life or health of the individual concerned.

Privacy Officer

- The Ōtūmoetai College Board has appointed the Principal as Privacy Officer.

Privacy Breach

- We will work to contain a breach of privacy as soon as it is discovered and plan for the future prevention of such a breach.
- We will notify the Privacy Commissioner and the affected individuals as soon as practicable when there has been a privacy breach that has caused, or is likely to cause, serious harm to the individuals the information is about.

Reviewed: June 2025

Next Review: June 2028



Privacy Statement

This **Privacy Statement** explains how Ōtūmoetai College (“we”, “us”, our) manages personal information - why we need it, how we use it, and who we share it with. It also explains how an individual can request or correct their information. Our **Privacy Policy** sets the rules for us when managing personal information and defines our responsibility to comply with the provisions of the Privacy Act 2020.

Collection and Purpose

- We collect a wide range of personal information about students, parents/guardians, families, employees or prospective employees, contractors and prospective contractors, volunteers, visitors and other people within our community.
- We only use and share personal information for the purposes for which the information was collected or for other lawful and permitted purposes.
- We collect personal information to enable us to fulfil the primary purpose of providing schooling and educational services for our students and prospective students.
- We do not collect any personal information to sell, trade or rent to third parties.
- We may use personal information collected about students (including alumni) and parents/guardians for the following purposes:
 - Providing schooling for its students
 - To communicate with parents/guardians in relation to their child/children’s schooling
 - Day-to-day administration
 - Looking after the students’ educational, social and medical well-being and safety
 - Communicating to the wider school community and wider public (including celebration and marketing)
 - To satisfy legal obligations
 - For any other lawful purposes
- We may use personal information collected about prospective employees, employees, volunteers, and contractors for the following purposes:
 - To assess whether an individual is suitable for employment or work, including child-connected work
 - Administering the individual's function, employment, or contract
 - Internal accounting and administration
 - For reporting to educational and Government authorities
 - For any other lawful purposes

Storage and Protection

- All personal information we collect is stored electronically (on secure systems or platforms), or in hard copy physical files (in secure lock protected locations on our campus).



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- We take all reasonable steps to protect personal information from loss, misuse, or unauthorised access or disclosure, including staff training and advice on privacy matters, ensuring that only authorised staff or volunteers can access electronic platforms or physical storage, and that they access only the personal information they need to perform their functions.
- We back-up our data using a New Zealand located, third-party cloud platform service.
- We use the Google Suite for Education. The Google Education Privacy Notice can be found at https://workspace.google.com/terms/education_privacy.html. Google will not share personal information with others except to our system administrators, with your consent, for external processing based on their instructions and in compliance with their Privacy Policy (<https://policies.google.com/privacy>), the Google Cloud Privacy Notice (<https://cloud.google.com/terms/cloud-privacy-notice>), and any other appropriate confidentiality and security measures, and for legal reasons.

Disposal

- We will only retain personal information for as long as it is required.
- Information that is no longer required is destroyed securely and completely.
- We follow Ministry of Education records retention and disposal guidelines, and generally retain personal information about a student for no more than 7 years after their enrolment with us has ended, though we may retain some information (like name and contact information) for longer if we have a lawful purpose to use it (e.g. alumni networks) or in the public domain (e.g. school publications and awards).

Campus Surveillance

- We have CCTV cameras in place at multiple locations throughout the campus for safety and security purposes.
- We provide signage advising that surveillance monitoring is in place.
- We retain surveillance footage as appropriate to help us with any of the purposes outlined above.

Our Website

- We do collect some non-personal information when you visit our website (e.g. IP address, date and time, pages accessed, search terms used, etc.) for the purposes of system administration, auditing use of the site and improving it for different customer profiles, and for our internal reporting.
- We use cookies to collect and analyse information on our website's performance and to enable the site to function.



Governance Policies

Your rights

- You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong (and you are unable to update it yourself through a relevant online service). Parents or guardians can generally request a copy of personal information about their child, on the basis that they are acting as their child's representative.
- Requests for access to or correction of personal information should be addressed to our Privacy Officer
 - ✉ PO Box 8033, Tauranga, 3145
 - 💻 principalspa@otc.school.nz
 - ☎ 07 5762316
- You also have the right to make a complaint to the Office of the Privacy Commissioner if you think we have breached, or may have breached, your privacy.
- You can contact the Office of the Privacy Commissioner at www.privacy.org.nz.