



PRIVACY POLICY

POLICY:

The Privacy Act 2020 replaced the Privacy Act 1993. This Privacy Policy ensures that our procedures are compliant with current legislation and importantly, that the privacy of our students, staff, tutors, contractors, donors and volunteers is protected.

RESPONSIBILITY APPOINTED PRIVACY OFFICER: Operations Manager

PROCEDURE:

The Privacy Act 2020 has thirteen information privacy principles.

Principle 1 - Purpose for collection:

At Circability, we will only collect information from students that is necessary to comply with our funding agreements.

Principle 2 - Source of information

We recognise personal information should be collected directly from the person it is about. The best source of information about a person is usually the person themselves. We will collect information directly from students or their whanau/family/ legal guardians or school.

Principle 3 - What to tell an individual

When we collect personal information, we must take reasonable steps to make sure that the person knows:

- why it's being collected
- who will receive it
- whether giving it is compulsory or voluntary
- what will happen if the information isn't provided.

Student enrolment processes are being updated to include this information.

Principle 4 - Manner of collection

Personal information will not be collected by unlawful, unfair or unreasonably intrusive means. When Circability collects information about a person the process is transparent, fair and legal.

Principle 5 - Storage and security

Circability ensures there are safeguards in place that are reasonable in the circumstances to prevent loss, misuse or disclosure of personal information.

Circability uses Google Drive to store all our information. This is password protected and users are limited to folders they can access. All our accounting software is on Xero which is also password protected and using Xero Verify. Only the Operations Manager, Accountant, Aktive and Creative Director have access to Xero. This Google Drive is to be backed up onto a harddrive in the Circability Central office.

Invoice and class bookings come into the Operations Manager via office@circability.org.nz. There are personal details sent to this email regarding student bookings and payments. Access to this email is password protected.

We are moving to a paperless system. However, we do have some folders of information available in the office at Circability Central. These are locked when not in use. Access to this cupboard is available to: The Creative Director, the Accounts Manager and the Operations Manager.

Principle 6 - Access

Circability recognises that people have a right to ask for access to their own personal information. We only hold information relating to Circus Class bookings on file. However, individuals can request this information at any time. Requests can be sent to the Operations Manager at office@circability.org.

Principle 7 - Correction

Circability acknowledges that a person has a right to ask us to correct information about them if they think it is wrong. Any requests to correct information about them can be sent to the Operations Manager at office@circability.org.

Principle 8 - Accuracy

At Circability we check before using or disclosing personal information that it is accurate, up to date, complete, relevant and not misleading. Most Circability classes require term bookings. This gives us the opportunity to update information each school term to ensure it is accurate.

Principle 9 - Retention

Circability will not keep personal information for longer than it is required. Most Circability classes require term bookings. This gives us the opportunity to update information each school term to ensure the information we have on file is accurate and necessary.

If a student does not re-enrol for the following term, we will ask them if they would like their information to be removed from our database and respond accordingly.

Principle 10 - Use

Circability will only use personal information about our students for the purpose it was collected. We will not gift or sell personal information to other parties.

Principle 11 - Disclosure

Circability will only disclose personal information in limited circumstances.

- the person concerned authorises the disclosure
- the information is to be used in a way that does not identify the person concerned
- disclosure is necessary to avoid endangering someone's health or safety
- disclosure is necessary to uphold or enforce the law

Also, see the Child Protection Policy and Protection of Adults with Disabilities Policy. There may be times when students disclose information to Circability tutors or staff which may need to be disclosed to other organisations (*Police, Oranga Tamariki*) if the student is at risk.

Principle 12 - Disclosure outside New Zealand

Circability will only disclose personal information to another organisation outside New Zealand on request of the student or tutor.

Principle 13 - Unique identifiers

Circability will take reasonable steps to protect unique identifiers from misuse. Unique identifiers are individual numbers, references, or other forms of identification allocated to people by organisations, such as driver's licence numbers, passport numbers, or IRD numbers.

Training

Training around privacy, the Privacy Act 2020 and this Privacy Policy is included in the annual Circability team training and in the staff induction for new team members.