

Playcentre Aotearoa's Privacy and Information Management Policy



Purpose

Playcentre Aotearoa holds an enormous wealth of information regarding our children, whānau, employees and Playcentre education ākonga (adult students). We collect the information in many forms (spoken, written, digital and visual). No matter what the form of information or how it is collected, we will respect and protect that information.

The purpose of this policy is to:

- Express our intent to respect the privacy and confidentiality of the information we gather while also ensure ease of access to information held as authorised and appropriate
- Comply with required education and early childhood service regulations, privacy legislation and other applicable legislation

Our privacy undertakings:

- We will protect the privacy of our Playcentre people.
- We will only collect information necessary for the purposes of Playcentre
- When we request personal information, we will be clear what the information requested will be used for, how it will be stored, and who will have access to it.
- We will limit access to personal information to only those who are required to have access and we keep this information securely
- We will not share another person's personal information beyond those required to have access without their express permission
- We will make clear that any personal information shared in our Playcentre communities, for example contact lists, is in circulation for strictly Playcentre purposes only.
- We will give our people the right to access personal information and to request correction of it.

We support these privacy undertakings with

- Designated office holder roles at Centres with privacy-related responsibilities for overseeing our commitments to respecting privacy and confidentiality
- Information retention and destruction guidelines

- Procedures to ensure all personal information at Playcentre will be collected, stored, used, disclosed and disposed of in accordance with privacy related legislation and its core principles.
- Notifiable breaches must be sent to the office of the Privacy commission – this is a breach that has caused, or is likely to cause serious harm, and notify those affected.

Access to information and our undertakings

It is important that our people can access the relevant and appropriate levels of information, including how to access information about their child, information about Playcentre and our operational documents.

- Upon starting at Playcentre, whānau will know how to access their children's information at their Centre
- Ongoing, we will maintain and make readily accessible to whānau information about Playcentre, our operational documents and recent reviews on our website, at Centres, and in onboarding material.
- We will ensure our people know how to access the relevant and appropriate levels of information as it relates to
 - o Playcentre operations and reviews of our services



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- o Being involved as learners, parents of learners, parents as educators, volunteers and employees
- o Funding
- We will retain required records for the regulatory required periods of time, for example enrolment and attendance records will be held for at least seven years.

Playcentre Education as a Private Training Establishment (PTE)

In addition to the obligations under the Privacy Act 2020, Playcentre Education has additional responsibilities to its ākonga as detailed in the Education and Training Act 2020. Information collected about ākonga for their participation in the Playcentre Education programme(s) will be used solely for the purpose of Playcentre Education and not shared with the wider Playcentre Aotearoa organisation without prior ākonga consent.

The 13 legislated Privacy principles that we seek to uphold:

Principle 1 You can only collect personal information if it is for a lawful purpose and the information is necessary for that purpose. You should not require identifying information if it is not necessary for your purpose.

Principle 2 You should generally collect personal information directly from the person it is about. Because that won't always be possible, you can collect it from other people in certain situations. For instance, if:

- the person concerned gives you permission
- collecting it in another way would not prejudice the person's interests
- collecting the information from the person directly would undermine the purpose of collection
- you are getting it from a publicly available source

Principle 3 When you collect personal information, you 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 they don't give you the information.

Sometimes there may be good reasons for not letting a person know you are collecting their information – for example, if it would undermine the purpose of the collection, or if it's just not possible to tell them.

Principle 4 You may only collect personal information in ways that are lawful, fair and not unreasonably intrusive. Take particular care when collecting personal information from children and young people.

Principle 5 You must make sure that there are reasonable security safeguards in place to prevent loss, misuse or disclosure of personal information. This includes limits on employee browsing of other people's information.

Principle 6 People have a right to ask you for access to their personal information. In most cases you have to promptly give them their information. Sometimes you may have good reasons to refuse access. For example, if releasing the information could:



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- endanger someone's safety
- create a significant likelihood of serious harassment
- prevent the detection or investigation of a crime
- breach someone else's privacy

Principle 7 A person has a right to ask an organisation or business to correct their information if they think it is wrong. Even if you don't agree that it needs correcting, you must take reasonable steps to attach a statement of correction to the information to show the person's view.

Principle 8 Before using or disclosing personal information, you must take reasonable steps to check it is accurate, complete, relevant, up to date and not misleading.

Principle 9 You must not keep personal information for longer than is necessary.

Principle 10 You can generally only use personal information for the purpose you collected it. You may use it in ways that are directly related to the original purpose, or you may use it another way if the person gives you permission, or in other limited circumstances.

Principle 11 You may only disclose personal information in limited circumstances. For example, if:

- disclosure is one of the purposes for which you got the information
- the person concerned authorised the disclosure
- the information will be used in an anonymous way
- disclosure is necessary to avoid endangering someone's health or safety
- disclosure is necessary to avoid a prejudice to the maintenance of the law

Principle 12 You can only send personal information to someone overseas if the information will be adequately protected. For example:

- the receiving person is subject to the New Zealand Privacy Act because they do business in New Zealand
- the information is going to a place with comparable privacy safeguards to New Zealand
- the receiving person has agreed to adequately protect the information – through model contract clauses, etc.

If there aren't adequate protections in place, you can only send personal information overseas if the individual concerned gives you express permission, unless the purpose is to uphold or enforce the law or to avoid endangering someone's health or safety.

Principle 13 A unique identifier is a number or code that identifies a person in your dealings with them, such as an IRD or driver's licence number. You can only assign your own unique identifier to individuals where it is necessary for operational functions. Generally, you may not assign the same identifier as used by another organisation. If you assign a unique identifier to people, you must make sure that the risk of misuse (such as identity theft) is minimised.



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Policy controls	Regulatory references	Other related references
<ul style="list-style-type: none">• Name: Playcentre Aotearoa's Privacy and Information Management Policy• Version: P6/R1/7.19• Issued: July 2021• Owner: National Support Manager/Privacy Officer• Approver: Chief Executive• Last Reviewed: 2021• Scheduled Review Date: 2022, thereafter every three years	<ul style="list-style-type: none">• Education (Early Childhood Services) Regulations 2008, No 47• Licensing Criterion GMA2, GMA 3, GMA6, GMA 10, GMA 11, GMA 12• Privacy Act 2020• https://www.privacy.org.nz/assets/Privacy-Act-2020-content/2020-A-quick-tour-of-the-privacy-principles-Oct-2020.pdf	<ul style="list-style-type: none">• Communications & Media Policy

