



Privacy Policy

Policy area:	Governance/Operations
Status & date:	Approved 24/11/2022
Approved by:	Board
Review date:	November 2025

1. Purpose & Scope

- 1.1 Te Pū Harakeke—Community Collective Manawatū is committed to protecting the privacy of personal information which the organisation collects, holds, and administers.
- 1.2 Te Pū Harakeke holds a range of personal information, including, but not limited to, information about our staff and board members, information we receive in the course of assisting clients in Hancock Community House, grant and funding records, training records and records relating to our legal and professional advice programme.
- 1.3 Te Pū Harakeke recognises an individual’s right to have their information administered in ways they would reasonably expect. The purpose of this policy is to provide a framework for Te Pū Harakeke in dealing with privacy of information.

2. Policy

Privacy officer

- 2.1 The Manager will be Te Pū Harakeke’s Privacy Officer or, in the Manager’s absence, the Manager’s delegate.

Privacy statement

- 2.2 A privacy statement outlining how we will collect, use and disclose personal information will be available on request and published on our website.

Training

- 2.3 The Privacy Officer will ensure all staff complete training on our responsibilities under the Privacy Act as part of their induction, and will renew this every two years.

Collection of information

- 2.4 Personal information will only be collected when doing so is both lawful and necessary to carry out the functions of Te Pū Harakeke.
- 2.5 Personal information will be collected directly from the individual, or, where that is not possible, from an alternative source if the person concerned provides consent.
- 2.6 For clarity, information which is publicly available is not considered personal information.

- 2.7 Individuals will be informed of the purpose of collecting and retaining information, as well as how it will be stored and accessed, and their right to access it.
- 2.8 Te Pū Harakeke will take reasonable steps to ensure that the information collected is accurate, complete, up to date, and relevant.

Individuals' right to access and correct information

- 2.9 Individuals will be provided access to their information if they request it, except if doing so:
- a. endangers someone's safety
 - b. creates a significant likelihood of serious harassment
 - c. prevents the detection or investigation of a crime
 - d. breaches someone else's privacy
- 2.10 Information will be provided within 20 working days of the request being made.
- 2.11 Individuals have the right to request the correction of the information if they believe it to be incorrect, inaccurate, incomplete, misleading, or not up to date.
- 2.12 Information will not be destroyed or deleted after an access request has been made by the individual.

Security, retention and sharing of information

- 2.13 Te Pū Harakeke will ensure that the information is stored securely so it cannot be misused, lost, modified, or subject to unauthorised access.
- 2.14 Te Pū Harakeke will only store personal information for as long as it is necessary to do so.
- 2.15 In some instances, it may be necessary to pass information on to other agencies, for example training providers. Individuals will be made aware of this when they provide the information.
- 2.16 Except as provided for in section 2.9, the information will only be released with written permission from the individual.
- 2.17 Training attendance records will be destroyed after the completion of the relevant years' audit.

Privacy breaches

- 2.18 If a privacy breach occurs, the Privacy Officer will, in line with guidance provided by the Privacy Commissioner, seek to:
- a. contain the breach,
 - b. assess the impact of the breach,
 - c. notify, where required by law and/or the Privacy Commissioner, and
 - d. review the incident in order to prevent any recurrence.
- 2.19 The Privacy Officer will inform the Board of any privacy breach as the soonest opportunity.

3. Definitions

- 3.1 **Personal information** is any information which tells us something about a specific individual. The information does not need to name the individual, as long as they are identifiable in other ways, like through their home address. Personal information may be held by the organisation in the form of notes, emails, recordings, photos and scans, whether they are in hard copy or electronic form, or in other forms.

4. Relevant Legislation & Related Policies

Legislation

- 4.1 [Privacy Act 2020](#)

Related Policies

- 4.2 Record Keeping, Archiving and File Destruction Policy.