Dilworth Privacy Statement

A. Dilworth Privacy Statement

This Privacy Statement explains how the School, Trust Offices, Trust (Dilworth) collects, stores, uses and shares personal information about our current, prospective and former staff, students and wider community. This includes staff employed on casual agreements.

Dilworth takes care to ensure that your personal information is managed in accordance with the Privacy Act 2020 and, where applicable, the Health Information Privacy Code 2020. This statement operates in conjunction with any specific privacy notice or declaration made in connection with the collection by, or supply to, Dilworth of individual items of information.

This Privacy Statement may be updated from time to time to reflect internal and external changes.

B. Collection of personal information

We will only collect personal information that we consider is necessary to meet our lawful purpose. We need to collect this information to meet our obligations as an employer, charitable trust and school, including to meet our legal obligations in respect of health and safety.

We collect information:

- from you directly (e.g. when you enrol at Dilworth, apply for a job vacancy, or when you enter data into the software used by the school, Human Resources (HR), Health and Safety (H&S), Advancement (ADV) or alumni relations)
- from third parties (e.g. your nominated referees, Police, MoE, Teaching Council)
- generated during your employment or enrolment with us (e.g. interviews, during performance reviews, achievement meetings, accident/incidents, health or drug screening)

Personal information we may **collect from you directly** or from a parent/guardian will include:

- contact information, including your title, name, address, email and phone number
- education, experience and work history information, names of referees and any other information you provide to us in your record of learning, CV or enrolment package, or other supporting documentation
- your date of birth and country of birth
- your tax number and tax code, bank account number, and superannuation scheme membership
- identity information, where required for enrolment, recruitment processes and delegations (e.g. financial)
- information about your nationality, immigration status and your right to work, and if applicable, information required by our licensed immigration adviser in connection with support being provided for a visa application
- whether you worked for or attended Dilworth in the past
- your gender and racial or ethnic origin (including your iwi affiliations, if applicable) for statistical purposes and promotion of equity and diversity
- health information, including information about any disabilities or other conditions that might impact on your employment or on our workplace health and safety obligations
- personal and health information required for the management of ACC claims
- psychometric testing information, where this is relevant to your employment
- personal and health information when using Dilworth recreation services such as the Gym
- information about any criminal convictions or pending criminal charges relating to you
- photographs, audio, video or other media (for example, during school or alumni events, school trips or activities)

- CCTV footage (Dilworth's Junior, Mangatāwhiri and Senior Campuses each use CCTV recording cameras on the premises in public areas for our students and staff members safety and security)
- your driver licence number, where this is relevant to your employment
- your disclosure of any conflicts of interest
- your emergency contact information
- your passport details, where necessary to facilitate travel or confirm identity
- personal information, including about your family members, needed in connection with a parental/guardian permission for sports, education outside the classroom or emergencies, living on site.
- information we collect and hold for the purposes of Advancement (alumni relations and philanthropy)
- other information we request (for example, in our NZQA or HR forms) or you have decided to share with us
- school reports (for students)
- your family's financial position – income and assets
- For any other purpose that would be reasonably expected to operate the school and as otherwise permitted or required by law

Personal information we may **collect from third parties** with your consent will include:

- any information provided by your nominated referees
- confirmation of your academic qualifications and registrations, where this is relevant to your employment or your enrolment
- information related to anti-money laundering, including a credit check, where this is relevant to your enrolment, employment
- health information from your medical practitioner, including any changes to your health or medical conditions that might impact your enrolment, attendance, employment or leave entitlements or on our workplace health and safety obligations, and
- criminal conviction information, or Police vetting information, where this is relevant to your employment
- We may also collect personal information that is publicly available online and information you have made public on any social media platforms you use, where this may be relevant to our decision to employ you, or as part of alumni relations

Where we collect personal information about you **from a third party**, we will take reasonable steps to ensure you are aware of:

- the fact that the information has been collected;
- the purpose for which it has been collected;
- how it will be used and shared; and
- your rights of access and correction.

This will occur before collection where practicable, or otherwise as soon as reasonably practicable after the information is received.

In some circumstances, we may not notify you where this is permitted under the Privacy Act 2020, including where:

- you are already aware of the collection;
- notification would prejudice the purpose of the collection (for example, safeguarding, misconduct, or incident investigations); or
- it is not reasonably practicable to do so.

Personal information **generated during your enrolment or employment** may include:

- interview notes (if you are shortlisted and interviewed)
- your photograph (e.g. for staff/student ID cards, taken for marketing, communications and H&S reasons)
- salary, benefit and deduction information (e.g. tax, child support, superannuation)
- information about your employment status and terms of employment
- information about your enrolment status and scholarship/attendance terms

- performance information, including information generated during your academic progress, performance reviews, assessments and on an ad hoc basis
- information about your professional development and training
- information about performance issues, disciplinary action, complaints or personal grievances
- leave information, including leave taken and ongoing leave entitlements
- audio and/or visual recording of lessons, training opportunities, zoom/teams meetings – where attendees have consented to such recording
- information about your use of email, internet and IT services – Dilworth may inspect and monitor all information and communications technology hardware and software, data and associated infrastructure and devices, including tracking the usage, or examining the content of any Dilworth provided computer or which has been connected to its networks
- information connected with the use of your Dilworth mobile device
- your location information - we may collect and use location information for the purposes of ensuring your health and safety or investigating incidents, particularly while you are travelling
- information about the use of your Staff ID access keys - for safety and security purposes and to enable access to restricted areas
- CCTV images/footage - for safety and security purposes we may collect still or video footage of your activities from CCTV cameras on Dilworth campuses or other Dilworth owned and operated locations

C. Voluntary

You are not required to provide us with all of this personal information. However, if you choose not to provide the information requested, it may prevent Dilworth from processing your enrolment/employment application or employment related request.

It is mandatory for employers and schools to collect certain information from its students and employees, for example, medical information for students, applicable tax codes and information relating to an employee's eligibility to work in New Zealand.

D. How is your personal information used?

We will use your personal information in the ways set out below. Where we need to use information in a way we have not anticipated here, we will only do so if required or permitted by law.

We may use your personal information to:

- decide on your employment or enrolment application, including verifying your academic record of learning, qualifications and registrations, and experience with referees and third parties
- maintain our records - if you accept an offer of employment or enrolment with Dilworth, your candidate/student profile, CV, academic record, and any other information obtained about you during the interview process will become part of our employee/enrolment records
- consider your suitability for current and future employment at Dilworth unless you have opted not to receive this information
- determine and process your pay and other entitlements
- correspond with you
- inform you about the range of facilities, services and benefits available to staff
- inform you about opportunities to engage with and support Dilworth
- administer your employment, including administration of ACC requirements
- determine your development and training requirements, and provide any training needed
- manage your performance, including conducting academic / performance reviews
- inform staff of relevant information to assist with pastoral support and care of students
- provide assistance to students/staff with disabilities on request
- provide associated services such as security, parking, information technology, sport and other services
- where applicable, provide support in relation to your visa/residency application
- investigate any performance / disciplinary issues or complaints about you or another student/staff member
- ensure the health and safety of any student/staff member, and assist in the event of an emergency
- comply with legislative reporting and recordkeeping requirements and our obligations under the Official Information Act

- conduct benchmarking, analysis, quality assurance and planning activities, including statistical, management and governance reporting
- set budgets, for the purposes of funding applications and/or our Advancement work; and
- contact you after your enrolment/employment with Dilworth ceases, to seek your feedback in relation to benchmarking, analyses, quality assurance and planning activities or in relation to a retrospective enrolment/employment related matter and or alumni relations

E. How is your personal information shared?

Information provided by job/scholarship applicants is used solely for the recruitment function. It is disclosed only to staff and relevant panel members involved in the selection and appointment process and is treated confidentially.

Information relating to current students/staff members (including successful job/scholarship applicants) needs to be shared internally with systems and people who have a legitimate role in the management, administration and safety of Dilworth or the compiling of management information. Dilworth will only use or disclose your personal information under the following circumstances:

- for the purpose for which it was collected
- for a related purpose which you might reasonably expect
- where you have consented to the disclosure
- if we are required or permitted to do so by law
- where we have engaged a contracted service provider or partner to perform legitimate functions on our behalf

If we do need to share information with others:

- where possible, we will only share anonymous information that does not identify you
- if we need to identify you, we will always try to tell you first and explain why we need to share the information
- we will share the minimum amount of information necessary to meet our objectives
- we will only ever share information with the people or agencies who really need to see it

In addition, Dilworth will share the personal information of its Community Members on its website, social media sites, or in its promotional materials (such as advertisements, brochures and prospectuses) and community publications, including its newsletter (which may be in an electronic or paper format) and the Dilworthian. This may include sharing information such as:

- Student work and profiles
- Old Boy and alumni profiles and life journey stories
- Photographs or video content from Dilworth organised trips and activities

People who may have access to your personal information include but is not limited to:

- Enrolment / Human Resources staff, for the purposes of managing the enrolment, recruitment and employment process
- professional staff, for the purposes of compiling and generating internal and external management information or for maintaining systems
- your teachers, managers and their manager
- contracted medical staff
- Advancement staff, for purpose of alumni relations and philanthropy
- contracted service providers which Dilworth uses to perform services on its behalf - e.g. Bamboo HR, Insurance, EAP, database and Customer Relationship Management (CRM) providers
- Creative and Media agencies, external Designers, printers/publishers
- Dilworth's legal advisers or other professional advisers and consultants engaged by Dilworth
- your nominated financial institution for payment of your salary
- Kiwisaver or other superannuation scheme
- government agencies, such as the Inland Revenue Department, the Ministry of Education, the Ministry of Education, Teaching Council, the Ministry of Social Development, the Ministry of Foreign Affairs and

Trade, the Ministry of Business, Innovation and Employment, Immigration New Zealand, NZ Police, and the Accident Compensation Corporation
- agencies involved in quality assurance and planning for education, such as NZQA
- agencies involved with child protection
- agencies involved in funding research or other projects (though we will endeavour to aggregate personal information shared for this purpose where possible)
- agencies that provide staff/student benefits, including automated payments for services (e.g. health providers, health insurance providers, union fees, professional body membership fees), and
- in the event of an emergency, police, medical or hospital personnel, civil emergency services, your legal representative or nominated emergency contact person, or any other person assessed as necessary to respond to the emergency.

If we need to share your information with a third party that is overseas, such as another education provider, we will ensure that this complies with principle 12 of the Privacy Act. If the third party is not located in a country that has comparable privacy laws to ours, we will require them to agree to protect your information to New Zealand standards (unless you have provided consent to such disclosure and acknowledge that the country to which your information is being sent may not provide the same privacy safeguards as exists under New Zealand law).

F. Where is your personal information stored?

Personal information is held by (or on behalf of) Dilworth. We store information electronically on Dilworth systems and, less often, in hard copy on Dilworth files or archives.

We may use third-party service providers (e.g. cloud-based processors) to store your personal information and provide us with services in New Zealand and overseas. Where this occurs, Dilworth will do everything reasonably within its power to ensure that the service provider also has reasonable security measures in place to protect the information.

Health information collected by Dilworth's Health Centre is saved to a patient medical management system, MedTech – a secure cloud-based data storage platform that is separate from the other information Dilworth collects. All steps will be taken to ensure unauthorised access to this health information is not possible – for example restricted access and individual passwords, auto lock and privacy screens on computers.

We recognise that we are accountable for your personal information wherever it is in the world. Where we can, we will send personal information only to countries that have adequate privacy laws in place (such as New Zealand, Australia or the European Union). However, where we cannot do this, we take reasonable steps to ensure that any third-party service providers we use can meet our privacy and security expectations.

G. Security of your personal information

We will take all reasonable steps to keep personal information safe and secure and to ensure that it is protected against loss or unauthorised access, modification, use or disclosure. For example:

- Dilworth systems are protected by firewalls and modern encryption standards
- Dilworth systems are password protected, and access is monitored and audited
- All members of the Dilworth community are required to adhere to the security measures set out in the Cyber Safety processes and related IT suite of policies
- Access to the personal information we store is limited to those staff members who have a legitimate business / operational requirement to use it
- We make privacy and information security training available to employees
- We have a data breach management procedure in place, and
- Information is backed up regularly, and backups are encrypted and held in secure storage facilities

H. How long is your personal information kept?

We retain your personal information only for as long as we need it to perform our contractual obligations or meet our legitimate interests, or to comply with our legal obligations, including under the Dilworth Record Keeping Policy, Public Records Act 2005, Education & Training Act 2020, Health and Safety at Work Act 2015,

Tax Administration Act 1994 and Employment Relations Act 2000. Once there is no longer a need or obligation for Dilworth to retain this information, it will be deleted or securely destroyed.

Computerised records of events and incidents are archived and not destroyed. These electronic records remain retrievable within the system, should they be required.

We generally retain information about former students and their families for our Advancement work (alumni relations and philanthropy) and unsuccessful job applicants to enable us to keep in touch with them in case other suitable roles become available. We also retain personal information about temporary staff and contractors for this purpose. If you are not comfortable with us retaining your information, you can email the Director of Advancement or Director of HR to opt out.

I. Access to your information and correction

You have the right to request a copy of the personal information that we hold about you. We will be as open as we can with you but sometimes, we might need to withhold personal information, for example where the information is legally privileged, relates to references provided to us in confidence or includes personal information about other people. If we need to withhold information, we will tell you why.

You may also ask us to correct or remove any information if you think it is wrong. If we cannot correct your information (for example, where we don't agree that it's wrong), we will tell you why. You can ask us to attach your correction request to the information as a statement of correction.

If you would like to ask for a copy of your personal information or to have it corrected, please email the Privacy Officer.

If you are a former student and wish to request access to your personal information , this request should be directed to the Headmaster.

J. Contact details

Please contact us if you have any concerns about the collection, use or disclosure of your personal information.

Dilworth
2 Erin Street
Epsom
Auckland

Dilworth's Privacy Officer – Stephen Ralph, Director of Health and Safety
Email: s.ralph@dilworth.school.nz

It is important that the information we hold about you is accurate and current. Please keep us informed of any changes that may be necessary.