

Hagley Community Preschool

Privacy Policy (GMA 6.)



Rationale

At Hagley Community Preschool we respect the right to privacy of children, their families, and employees and will work to protect confidentiality of their information.

This policy provides guidelines to promote and protect individual privacy in regards to the collection, use and disclosure of personal information, and access to the information relating to the person.

Goal: To ensure that the Privacy Act 2020 is complied with.

Procedures

1. Privacy officer

The appointed privacy officer for Hagley Preschool is the preschool Director. The privacy officer is responsible for overseeing the implementation of procedures as stated in this policy.

The privacy officer is responsible for making sure all teachers understand and follow procedures. This is done through induction procedures, staff handbook, staff meeting discussions, inclusion of staff in policy reviews, and distributing relevant notices from Agencies//Ministry.

All employees are encouraged to access information and resources including the privacy ABC for schools online course on the privacy commissioner website - elearning.privacy.org.nz

2. Collection of information

Any information about children is gathered from parents/whānau for preschool operational procedures or to meet legislative requirements of Government agencies.

The preschool enrolment form requires permission from parent/guardians for the collection of children's imagery to use in preschool displays and portfolios.

Permission is sought from parents/guardians when imagery is collected for other purposes, such as website or student assignments. Parents will have the opportunity to view imagery before it is used for these purposes.

Parents/whānau are asked to only photograph their own child during sessions, celebrations and events.

Visitors to the preschool are not allowed to photograph children.

Information about employees is only gathered for preschool operational purposes or to meet legislative requirements of Government agencies.

All reasonable steps will be taken to ensure the person the information is about, or the parent/legal guardian, knows:

- Why the information is being collected,
- Who will get the information,
- Whether providing the information is voluntary or not, and

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- What happens if the information is not given

Information about a child may be shared with an external agency when it is deemed to be in the best interest of the child. Eg. The Children's team. In most cases the parent will be aware of the relationship between the preschool and external agency.

Parents/whānau are responsible for ensuring child information is up to date in relation to personal information, or guardianship/custody of children.

People can ask to correct information about themselves or their child (ie. employee or parent/guardian of an enrolled child) if they think it is inaccurate. The preschool can choose to add the views of the person to the relevant documented information.

3. Storing information

Physical records:

Personal information and or records of children, whānau, and staff is stored in a locked filing cabinet in the preschool office. The preschool administrator and Director are responsible for securing the cabinet daily and for the location of the key.

Documented records of children and employees that are required to be kept for 7 years are stored in a secure location.

Children's portfolios: access and privacy procedures are followed as per the Purpose and Procedures for Children's Portfolios document.

Documentation of 'In-committee' Trust meeting discussions are deemed confidential and will be stored separately to regular Trust meeting minutes. In committee minutes will be stored in the Hagley College secure files under the supervision of the senior administrator, Hagley College

Digital records:

Storypark portfolios: Preschool teachers post information about children's learning (Learning stories) in individual children's online portfolios (Storypark).

One parent/guardian is given access to the portfolio. This involves setting up their own password and sign in process. The parent/guardian can invite others to access the portfolio, preschool staff cannot do this.

The Preschool computer is password protected. The preschool administrator and Director store information about children and employees using the office computer. They have their own sign in and password.

Teachers have an individual sign in and password for the staffroom computer. This ensures their own information remains private and secure.

4. Using information

All personal information (digital and physical) will only be used for the purpose it was collected.

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5. Sharing information

The early learning information system (ELI) used by the preschool provides privacy guidelines. The persons responsible for entering data are familiar with these, and use their own login details, which are not shared with others.

Prior to disclosing information to Government agencies, information will be checked to ensure accuracy and relevance. For example, the Ministry of Education requires information about children's enrolments and attendance for funding purposes. This is submitted quarterly.

Parents and employees have the right to ask for their personal information. The return of information can be refused if the privacy officer (Director) and/or Preschool Trust Board consider it may breach another person's privacy or endanger the safety of a person.

Teachers, the Administrator and the Director will respect parent/guardians rights to access information about their children, except if it is not in the child's best interests. In such situations, teachers will discuss with the Director the implications of sharing the information. The Director as privacy officer will make the final decision.

Permission from the parent/legal guardian is required prior to the preschool referring a child/family to an external agency, eg. MoE Learning Support team.

6. Disposing of information

Physical records:

Paper records containing personal information are firstly offered to the person concerned or legal guardian. Unless claimed paper records are destroyed using Hagley College's 'disposal of confidential documents' bin after the required timeframe that these records must be stored. This includes children's profile books that have not been claimed when a child leaves preschool.

Photographs and laminated records (ie. those not accepted in the disposal bin) will be torn and disposed of.

Staff employment and appraisal information will be securely stored for the required timeframe before being destroyed in the 'disposal of confidential documents' bin.

Digital records:

Storypark portfolios: when a child is no longer enrolled in the preschool, the child's portfolio is deleted from the preschool Storypark site. Parents retain ownership and access to the child's portfolio from that time.

Digital records of children, families and employees are regularly updated and cleared by the preschool administrator.

7. Privacy Complaints

Complaints about privacy breaches will be dealt with as a serious harm incident. As such it is mandatory to report:

- Breaches of privacy that are believed to have or be likely to cause serious harm will be reported on the Privacy Commissioner website
- Unauthorised disclosure of personal information held on behalf of agencies/organisation/individuals. Eg. Ministry of Education, will be reported to the office concerned.

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- Ministry of Education – email: health.safety.security.privacy@education.govt.nz or ph 0800 477 278

The privacy officer is responsible for ensuring privacy breaches are reported.

8. Review of Privacy Policy & Procedures

The privacy officer is responsible for the ongoing monitoring of privacy practices, including checking on parental permissions for use of information, and monitoring teacher practice in relation to the guidelines of this policy.

The privacy policy will be reviewed on a regular cycle of review in line with the preschool three-year review plan and review procedures.

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