

St Cuthbert's Privacy Statement

Last updated: April 2021

Our motto – **By Love, Serve** – drives the way we manage privacy and the personal information entrusted to us by our community – our students, Old Girls, parents, staff, guardians, contractors, suppliers, customers and visitors.

We keep it safe and use it only for good.

We see privacy as an integral part of our values-led approach to education. We need to collect and use personal information to do our jobs. Without this information, we cannot educate and grow our students, keep people safe or innovate. But we also know that maintaining the trust and confidence of our community is paramount.

WHAT IS THIS PRIVACY STATEMENT?

This privacy statement explains what personal information St Cuthbert's collects, why we need it, how we use it, and who we share it with. It also explains how our community members can request or correct their information. In summary:

- We collect only the personal information we really need to meet our purposes, and as required by the Education Act.
- We take reasonable steps to protect the personal information we hold from harm.
- We use personal information in the ways set out in this statement, and only ever to meet our lawful school purposes.
- We only share information with others when we really need to, and we may have to share without consent if we think a community member is at risk.
- Community members have the right to request a copy of the personal information we hold about them, or to correct their information.
- Parents and guardians can generally request personal information about their children, but we must always put our students' best interests first.

We may update this privacy statement from time to time, for example to reflect changes to the Privacy Act, so take another look occasionally to see what might have changed. This statement was last updated in April 2021.

A NOTE ON CONSENT

Information and consent are sought directly from the individual concerned where possible.

Where we are relying on consent, or authorisation, to collect, use or share personal information about students, we will generally seek this consent from a student's parent or guardian (as the student's representative).

However, there may be times where this is not appropriate, including where a student is over the age of 16 and the personal information in question is sensitive, or relates to matters over which the student may have a reasonable expectation of privacy.



WHAT PERSONAL INFORMATION DOES ST CUTHBERT'S COLLECT?

We collect and generate personal information about our community members in several ways:

- We collect personal information **directly from the person** when they engage with us, for example completing a job application form, enrolment form or medical form.
- We collect personal information **from third parties**, for example from a student's family, from medical practitioners, or from other schools.
- We **generate** personal information as people use our services, for example when students engage in the classroom, meet with our health, careers or pastoral staff, or move around the school campuses.

We collect a very broad range of personal information, and the information we collect about someone will depend on their role in our community – whether they're a student, Old Girl, staff member, parent or guardian, or a visitor to our school campuses. The information we may collect includes:

- Personal details, including name, contact information, date of birth, gender, and ethnicity
- Academic history
- Health information
- Human resource and staff salary information
- Student financial (fees) information
- Information about academic performance
- Correspondence between individuals while using school systems
- Information about student behaviour and welfare, including family circumstances
- Attendance records
- Information about family/whānau and emergency contacts
- Photographs, audio, video or other media (for example during events, school trips or activities)
- CCTV footage (St Cuthbert's uses CCTV cameras on school premises for safety and security purposes, but not in private areas such as toilets or changing rooms)
- Event attendances and e-newsletter readership
- Information about use of St Cuthbert's digital resources and web portals, collected using log files or cookies
- Information about volunteering or donating to the school



HOW DOES ST CUTHBERT'S USE PERSONAL INFORMATION?

Our primary purpose for collecting personal information is to deliver educational services. To do this, we need to use 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 or with consent.

WE USE PERSONAL INFORMATION TO:

- Provide educational services to our students;
- Look after student educational, social and medical wellbeing and safety;
- Communicate with a students' parents, guardians, designated caregivers or whānau about their education and wellbeing;
- Ensure the safety of our staff, volunteers, and visitors to our school campuses;
- Manage and administer our school;
- Conduct marketing and communications activities (for St Cuthbert's, not third parties), manage events, and seek volunteering contributions and donations;
- Maintain a school archive for the purposes of historical research;
- Meet the requirements of the Education Act and other legislation, including reporting requirements; and
- For any other purposes that would be reasonably expected and are permitted by law.

We will only use sensitive information, like health information or information about suspected risks to a student's safety, for the purpose of ensuring student wellbeing. We will only use this information in other ways with consent or where permitted or required by law.

WHEN DOES ST CUTHBERT'S SHARE PERSONAL INFORMATION?

We need to share personal information to meet the purposes set out above. In all cases, we share with care and only ever disclose the minimum amount of personal information required to meet our purposes.

SHARING AS PART OF THE EDUCATION SYSTEM

We need to share general information about our students and community members to deliver educational services. This might include information about academic performance, reports, information about student behaviour, information required for planning school trips or events, or statistical information for reporting purposes.

We may share this information with:

- Parents, guardians, designated caregivers or whānau;
- Authorised volunteers;
- Other schools (including overseas schools for student exchanges);



- The Parents & Friends' Association and Old Girls' Association;
- New Zealand Qualifications Authority (NZQA) ;
- International Baccalaureate (IBO) ;
- Ministry of Education; or
- Other external providers.

SHARING TO KEEP STUDENTS SAFE AND WELL

Detailed information about student health and wellbeing is generally only accessed by our health and counselling staff, who are subject to additional medical ethics requirements.

Other staff who may have access to relevant health information include deans, teachers, boarding staff and those staff and authorised volunteers accompanying students on school trips.

Student enrolment and contact information may be shared with local District Health Boards (DHBs) for the purposes of providing medical care such as dental checks and vaccinations.

Dietary information of relevant students is made available to our caterers, suppliers and volunteers involved in planning menus and preparing food.

At times, we may need to share sensitive information about our students or community members to keep people safe. This might include health information, information about student wellbeing, information about inappropriate behaviour, or any concerns we have about a students' family circumstances (including perceived risks of family violence). This is always a difficult decision for us to make, as we may need to share personal information at these times against the wishes of a student. We always approach these decisions with care, and in the best interests of the student concerned.

We may share this information with:

- Parents, guardians, designated caregivers or whānau;
- Health agencies;
- Police;
- Oranga Tamariki;
- Other government agencies; or
- Other third parties that support student and staff wellbeing.

SHARING TO PROMOTE OUR SCHOOL

We're proud of our school and our school community. This means that we want to share our achievements and the achievements of our students to promote St Cuthbert's, grow our enrolment and raise the funds we need to deliver an exceptional educational experience.

For these purposes, we might share student work, student profiles, Old Girl profiles and career stories, or photographs and video footage of student trips or activities. At the time of enrolment,



we provide students and their parents with the ability to opt out of this type of information sharing if they are concerned about it. We also take care to ensure that we do not share information about any students about whom there are safety concerns.

We may share this information:

- On our website;
- On the social media sites we use;
- In promotional materials, such as advertisements, brochures and prospectuses; and
- In our community publications, including our e-newsletter and Evergreen Ties Magazine.

HOW DOES ST CUTHBERT'S STORE AND PROTECT PERSONAL INFORMATION?

We store personal information electronically (on secure systems or platforms, including cloud platforms) or in hardcopy (in a secure physical location, including lockable cabinets). We may use third-party service providers to store and process personal information for us, some of which may store or process information overseas.

We retain personal information only for as long as we have a lawful purpose to use it, and we securely destroy or de-identify the information we no longer need. We follow Ministry of Education records retention and disposal guidelines, and generally retain personal information about a student for no more than 7 years after their enrolment with St Cuthbert's has ended, though we may retain some information (like name and contact information) for longer if we have a lawful purpose to use it (e.g. Old Girl networks) or in the public domain (e.g. school publications and awards).

We take all reasonable steps to protect personal information from loss, misuse, or unauthorised access or disclosure, including ensuring that only authorised staff or volunteers can access electronic platforms or physical storage, and that they access only the personal information they need to perform their functions. We won't ask you to use any third-party software or applications to interact with us unless we've assessed them first.

HOW DO COMMUNITY MEMBERS ACCESS OR CORRECT THEIR INFORMATION?

All community members – students, staff, Old Girls, parents or guardians, designated caregivers or visitors – have the right to request a copy of the personal information we hold about them, or to ask us to correct it if they think it's wrong. Please direct requests to St Cuthbert's Privacy Officer by:

- Emailing – privacy@stcuthberts.school.nz;
- Calling – + 64 9 520 4159; or
- Writing to – Privacy Officer, St Cuthbert's College, PO Box 26020, Epsom, Auckland 1344

We will process a request as soon as possible, and respond no later than 20 working days after we receive it. We will be as open as we can with the requestor, and will only withhold information if we have a lawful basis. For example, we might withhold information if we believe that releasing it might involve the unwarranted disclosure of the affairs of another person, or



might increase the risk of harassment or harm to another person.

Parents or guardians can generally request a copy of personal information about their child, on the basis that they are acting as their child's representative. However, we will always act in the best interests of our students, and if we believe releasing student information to a parent or guardian may not be in the student's best interests, we may refuse.

If we refuse to correct information because we believe it is accurate, the requestor has the right to attach a statement to the information that explains the correction.

HOW DO COMMUNITY MEMBERS RAISE PRIVACY CONCERNS?

If you have any concerns about the way St Cuthbert's has managed your personal information, or information about your child, including the way we have responded to a privacy request, or if you wish to opt out of our promotional information sharing, please let us know. We will investigate your enquiry or complaint and will notify our decision as soon as practicable after it has been made.

PLEASE DIRECT PRIVACY ENQUIRIES OR COMPLAINTS TO ST CUTHBERT'S PRIVACY OFFICER BY:

- Emailing – privacy@stcuthberts.school.nz;
- Calling – + 64 9 520 4159; or
- Writing to – Privacy Officer, St Cuthbert's College, PO Box 26020, Epsom, Auckland 1344

If we cannot resolve your concerns, then you have the right to complain to the Office of the Privacy Commissioner. Details for making a complaint to the Privacy Commissioner can be found at privacy.org.nz/your-rights/making-a-complaint