



Introduction

Middleton Grange School complies with the requirements of the Privacy Act 2020. We look after the privacy of everyone associated with our school. In particular, we acknowledge that children and young people are vulnerable and are given particular emphasis in the Act (Principle 4).

We ensure that staff understand our school privacy processes, especially in relation to how we manage personal information and our process for reporting breaches. Staff are made aware of these processes as needed (e.g. through staff induction and professional development, during staff meetings, and after incidents).

Privacy principles

Middleton Grange School follows the information privacy principles of the Privacy Act 2020. See [Privacy Act 2020 and the Privacy Principles](#) (Privacy Commissioner).

- We collect, protect, access, and correct personal information according to the information privacy principles of the Privacy Act.
- We only use information for the purposes for which it was collected, except in circumstances where the individual's identity is not disclosed (e.g. for statistical purposes).
- We only keep information for as long as it is needed and destroy any documents that contain personal information in accordance with the [Public Records Act 2005](#).

Privacy officer

Under the Privacy Act, we are required to have a privacy officer. Our privacy officer is the Principal. Their responsibilities include:

- Responding to general questions about privacy at our school.
- Managing requests for personal information.
- Managing complaints about privacy.
- Liaising with the Privacy Commissioner in investigations, if required.
- Informing our school community of serious privacy breaches or risks to the security of personal information the school holds.

Privacy breaches

We follow the Privacy Commissioner's steps for responding to privacy breaches:

1. Contain

The school acts to contain the breach. We inform our privacy officer as soon as possible if our school (or an individual at our school) intentionally or accidentally provides unauthorised access to personal information, or discloses, alters, loses, or destroys someone's personal information.

2. Assess

We consider each incident on a case-by-case basis to assess the impact and seriousness of the breach.

3. Notify

- We decide whether to notify any affected people, and if the breach needs to be reported to the board. If there is no risk of harm, it may not be necessary to notify affected people of a breach.
- If the privacy breach has caused or is likely to cause serious harm (e.g. physical, psychological, emotional, or financial), our privacy officer notifies the Office of the Privacy Commissioner within 72 hours of being made aware of the breach. We also notify the person or people involved and the board.
- We notify CERT NZ if the breach is due to a cyberattack, or a flaw in a product or online service that our school uses.
- We may notify other third parties (e.g. police, insurers) if necessary.

4. Prevent

We investigate the incident and take steps to prevent it from happening again.

MIDDLETON GRANGE SCHOOL BOARD Board copy of the Policy to be signed by the Board Presiding Member	
Name	
Position	Board Presiding Member
Signed on behalf and with the authority of the Board	
Date	November 2024
Next Review	November 2027