



# Privacy Policy and Procedure

## 1. Overview

### POLICY

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This privacy policy explains how The Cause Collective collects, stores, uses and shares personal information it collects.

This policy applies to all personal information collected, stored, used and shared by The Cause Collective

### SCOPE

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We recognise the value of peoples' lived experiences as a legitimate source of information and a key contributor to our work. We collect, store, use and share personal information to carry out our functions and activities. All data and information that we collect is a taonga and treated with the utmost respect. We will protect it and ensure that it is managed appropriately.

We are committed to observing all the obligations and responsibilities of the Privacy Act 2020.

#### **Our privacy commitment is that:**

1. We only collect personal information where it is necessary to carry out our functions.
2. We will only use and share personal information where necessary to carry out the functions for which we collected it, or if required by law or in accordance with legislation.
3. Information may be collected either directly, or from other people or agencies, and we may generate personal information about you when we carry out our functions.
4. We store our data (including your personal information) on secure information technology platforms.
5. Information may be used for research and statistical purposes, within the obligations and requirements of the Privacy Act.
6. Individuals can ask for a copy of their personal information and correct it at any time.

<b>Policy:</b>	Privacy Policy	<b>Date first issued:</b>	August 2021
<b>Approved By:</b>	The Cause Collective Board of Trustees	<b>Date Reviewed:</b>	Jan 2022 / August 2024
<b>Policy Number:</b>	INFPL12	<b>Date Reviewed:</b>	Nov 2022
<b>Version:</b>	2022/03	<b>Next Review Date:</b>	Nov 2023



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## Collection of personal information

Personal information is collected directly from individuals as we carry out safety checking of our workforce, human resource management and undertaking research.

Personal information collected can include:

- full name, date of birth, gender, ethnicity
- contact details including address(es), email address and phone number(s)
- qualifications and employment details
- police vetting details and outcomes
- your experiences in relation to our service provision
- any questions or comments you submit on our social platforms
- your responses to surveys, research, interviews or focus group discussions

We may also collect information directly and from third parties for the purpose of investigating issues and complaints.

## Cookies

We use cookies to help us understand how people engage with our website. Cookies may also be used to help users navigate efficiently, to perform certain functions on our site, and/or to provide information about how our site is used.

We also use cookies where they are required for particular features to work – for example if you are logged in, to allow you to remain logged in while moving around the site and to allow you to complete certain tasks.

## Website analytics

We use Google Analytics to collect data about your interaction with our website. The collection of information in this way is to improve your experience when using our site. We analyse non-identifiable web traffic data to improve our services. The data is aggregated and cannot personally identify you. You are able to opt out of the tracking by changing your browser settings or visit the [Google Analytics page](#).

Other websites and social media services have their own privacy policies and may track your use of our website on those pages where their links are displayed. If you are logged in to associated services (such as any other Google service) while using our site, tracking of you will be associated with your profile with them.

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## Surveys, newsletters and community contributions

If you submit a comment or participate in a discussion in our social media forums your name will be displayed. We do not display any other personal information in our social media forums. We recommend that you do not post your email address, home address, phone number or any other personal information as part of community contributions.

## Third-parties

We use third-party providers to manage some of our engagement with communities, such as for newsletters, event registrations and surveys. Where we do this, the information you provide may also be collected and stored by those providers. We use the following third-party providers:

- Google Analytics (<https://policies.google.com/?gl=NZ&hl=en-GB>) for website interaction data
- Monday.com (<https://monday.com/>) for project and case management
- Mailchimp (<https://mailchimp.com/>) to manage our mailing lists
- Pasifika Proud (<https://www.pasefikaproud.com>) to manage some workshop registrations
- Facebook (<https://www.facebook.com>) to manage community forums
- Instagram (<https://www.instagram.com>) to manage community forums
- Survey Monkey (<https://www.surveymonkey.com/>) for subscriptions and conducting surveys

Social media sites and third-party websites may store information overseas.

## How we use personal information

Personal information is only used for the purposes required to carry out our functions. This may include disclosure to persons or organisations that require the information to complete related activities (such as NZ Police for police vetting, and safety checking). Access to, use of and sharing of personal information is done in line with our legal requirements including the Privacy Act 2020, and the Children's Act 2014.

Personal information is used for:

- Research purposes to investigate the behaviour, needs, attitudes, opinions, motivations or other characteristics of a whole population or a particular part of a population. We do this to provide accurate and timely information to government and service providers about issues relevant to their services to support their decision-making processes.
- Conduct statutory and administrative functions of The Cause Collective.

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Some personal information can be disclosed to:

- New Zealand Police to obtain a Police Vet.
- External agencies to avoid endangering individual health or safety, or to uphold the law.

*PP10 – limits on the use of personal information*

*PP11 – Disclosure of personal information*

### **Access to your personal information**

We make every effort to ensure personal information we collect, use or disclose is accurate, complete, and as up to date as possible. Accuracy of information is partially dependent on the information provided to us. In our communication with people we provide opportunities to advise us of any corrections needed to personal information.

Under the Privacy Act, people are able to request access to their personal information held by us. You are able to ask us to correct any errors in the information that we hold.

If you wish to make a request under the Privacy Act 2020 please email:

[privacy@thecausecollective.org.nz](mailto:privacy@thecausecollective.org.nz)

### **Storage and retention of your personal information**

We use third-party providers to store and process our data, including your personal information. The information and technology policies used by The Cause Collective are based on the security requirements set out in the New Zealand Information Security Manual and the New Zealand Protective Security Requirements.

Data, including your personal information will be kept for as long as needed to carry out our functions. We will dispose of it when authorised and legally appropriate to do so, using a managed process.

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# Privacy Policy and Procedure

## 2. Procedure

### Privacy assessment

Some types of initiatives/projects are commonly known to create privacy risks. In this case a Privacy Assessment may be required, and staff should apply the checklist to determine if the Privacy Assessment should be completed.

Templates for a Privacy Assessment and Brief can be downloaded [here](#)

### How to make a privacy complaint

If you wish to make a complaint about how we have breached a privacy principle or caused significant harm in relation to your personal information, please contact us in writing with details of your complaint [privacy@thecausecollective.org.nz](mailto:privacy@thecausecollective.org.nz)

Complaints will be acknowledged within two working days. Our Privacy Officer will look into the details of your complaint and respond in writing as soon as possible, generally within 20 working days.

If you are not happy with our response to a complaint, please write to the Chief Executive within 30 days, providing the reasons why you feel that the response is not satisfactory. The Chief Executive will review the complaint response and respond as soon as possible, generally within 20 working days.

You may also complain to the Privacy Commissioner (<https://www.privacy.org.nz/your-rights/making-a-complaint/#contact>)

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## Appendix A

### Primary Health Care Specific requirements aligned to the Privacy Act 2020 and the Health Information Privacy Code 2020

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The requirements of the **Privacy Act 2020** and the **Health Information Privacy Code 2020** are applicable to staff both during and after employment. All Health Providers must have a designated Privacy Officer, Appendix A to **Responsibility of the Privacy Officer**.

#### All staff working with primary care providers must ensure:

##### Confidentiality

- All staff, volunteers, and any contractors who may have access to information (e.g. data systems service persons, auditors) sign a confidentiality agreement.
- Staff Employment Agreements must contain a specific clause relating to confidentiality.
- All Primary Care staff must complete training in Health Information Privacy

##### Use

- Primary care providers will be provided with a health information privacy poster for display in the practice advising patients of the collection and use of health information and the transfer of information between agencies such as Primary Health Organisation (PHO), Practices, Te Whatu Ora etc.
- Health information collected by primary care providers released to PHO must be used for the purposes collected and within the boundaries of the information provided to patients at the time of collection.

##### Storage and release of information

- Transfer of non-identifiable health information does not require patient consent, nor does it fall within privacy legislation.
- Any files data/files containing confidential information or clear reference to NHI/Patient names, etc., must be all encrypted or password protected by the person who saves the file.
- Confidential waste must be placed in the locked document shredder bin or shredded on-site using a commercial shredder.

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Below are The 12 Privacy & Health Information Privacy rules applicable to the Health Information

Principle	Summary
Principle 1 – Purpose for collection	Only collect information when you need it for a lawful purpose connected with your agency.
Principle 2 – Source of information	Obtain the information directly from the person concerned if possible.
Principle 3 – What to tell an individual	Tell the person what you are doing.
Principle 4 – Manner of collection	Do not use unfair or unreasonably intrusive means of collecting the information.
Principle 5 – Storage and security	Take due care of the information once you have obtained it.
Principle 6 – Access	The person can ask to see the information.
Principle 7 – Correction	The person can ask you to correct the information
Principle 8 – Accuracy	Make sure that the information is accurate before you use (process) it.
Principle 9 – Retention	Dispose of the information once you have finished with it.
Principle 10 – Use	Only use the information for the purpose for which it was obtained.
Principle 11 – Disclosure	Only disclose the information if this was the reason for which you obtained it.
Principle 12 – Unique identifiers	Only use unique identifiers in place of personal names when necessary.

Reference link - <https://www.privacy.org.nz/>

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## Appendix B:

### Role of the privacy officer/s

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1. Ensuring that the organisation has the required privacy policies and procedures up to date and stored in a readily accessible format.
2. Ensuring the Privacy Policy and requirements are covered as part of new employee orientation.
3. Ensuring that the organisation complies with the Privacy Act in relation to employees, and the Health Information Privacy Code in relation to health information.
4. Dealing with requests made to the organisation about personal, employment or practice-level information.
5. Briefing the staff on changes to legislation and processes
6. Alerting the staff to privacy complaints received and what will be done to prevent the same thing from happening again.
7. Ensuring that the privacy complaints received are dealt with in the correct manner, working with the privacy officers and Privacy Commissioner or investigating officer should the need arise.
8. Ensuring that there are clear guidelines on who can access information and that handling information is done according to health Information privacy and IT security and back up policies and procedures.
9. Ensuring associated IT security documents are in place for health information.

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