



Policy Name:	Portfolio	Operational (OP)
Confidentiality and Privacy Policy	Doc Code	OP.2
	Approval Delegation	ARC & Board
	Version	3.0
	Date Created	October 2021
	Date Approved	
	Review Date	December 2025

1.0 STATEMENT OF INTENT

Tamatea Pōkai Whenua (TPW) is committed to:

1. protecting the privacy and confidentiality of its Trustees, Independent Committee Members, Employees and Heretaunga Tamatea members to ensure ongoing stakeholder confidence, and
2. safeguarding the personal data it possesses and processes, taking all reasonable steps to ensure its security, accuracy and integrity.

2.0 PURPOSE

TPW recognises the importance of protecting confidential information collected or obtained and is committed to protecting any persons where information is held by TPW regarding individuals and or their families. This policy will ensure the privacy of that information is upheld.

3.0 SCOPE

Applies to all Employees, Trustees, Independent Committee Members, Contractors and any third-party entity involved in receiving, collecting, storing, or disclosing personal information as part of their employment and or engagement responsibilities within TPW.

4.0 POLICY

TPW often has information circulating, gathered and stored throughout the various workstreams within the office - verbal and written information or documents. This information will not be released without approval by the CE.

This Policy outlines:

- how TPW will collect, store, use and disclose personal information,
- how individuals can access and manage their own personal information,
- how TPW will protect the privacy and confidentiality of all data collected in accordance with the Privacy Act 2020 and all other applicable laws, regulations and any other policies and procedures in place, and
- how TPW will ensure all data is collected transparently, securely and in accordance with the principles of data protection.

Trustees, Independent Committee Members and Employees may at any time seek to review their personal file or details held by TPW.



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5.0 PROCEDURE

All Employees, Trustees, Independent Committee Members, Contractors and any third-party entity will understand, comply with and implement the TPW Confidentiality and Privacy Policy.

- The appointed Privacy Officer is the Business Manager. This person is responsible for monitoring privacy issues and acting on feedback from Trustees, Independent Committee Members and Employees.
- Guidance in managing privacy issues is available directly from the Office of the Privacy Commissioner – telephone 0800 803 909.
- Micro data sets may be exchanged with other agencies in order to fulfil the aims and aspirations of TPW. All micro data will remain anonymous.

Individual Information

Any information collected from an individual will be for:

- Administrative purposes; OR
- Employment purposes.

Information will be collected from the individual concerned in the first instance except where:

- The individual has authorised collection from someone else, or
- Where the collection of information from the individual is not reasonably practical, or
- Where the collection of information from an individual would potentially harm their interests, compromise the intended purpose of collection, or jeopardise the safety of any person.

Information Collection

TPW holds information about Trustee, Independent Committee Members, Employees and Contractors. This information shall only be accessed by Management and or such persons who need this information to complete their role e.g. payroll.

Those who work with payroll, shall not discuss or release any information about the Trustees, Independent Committee Members or Employee salaries to anyone – internally or externally. Payroll shall only have access to their information associated to payroll and nothing more.

Employees, Trustees, Independent Committee Members, Contractors and any third-party entity will ensure:

- Sensitivity will be exercised in determining who collects the information and how it is collected,
- When collecting information verbally (in person, or over the telephone), that the conversation cannot be overheard by unauthorised people, and
- Only relevant information pertaining to TPW to successfully fulfil its obligations will be collected.



- That information regarding those who work for TPW

Types Of Confidential Information

- Examples of confidential information and other data that TPW holds includes personal details of Trustees, Independent Committee Members, Employees, Contractors, Third-Party entities and the general personal information of people who interact with TPW from time to time.

Collection And Use Of Personal Information

- TPW will only collect the minimum amount of information necessary to conduct its business. This information may include name, address, contact number, bank account details, IRD information or email addresses.
- TPW will only use this information for the purposes of providing services to ngā hapū o Heretaunga Tamatea and for other business activities that are related to organisational tasks.
- TPW will not disclose any of this confidential information to any third parties outside of TPW unless required by law or by the specific instructions of the individual concerned.

Storage And Security Of Personal Information

- TPW will store confidential information on secure data storage systems with appropriate access controls and encryption.
- Hard copy documents containing confidential information will be kept in a secure location, accessible only by authorised personnel. All confidential information will be destroyed in a secure manner when it is no longer required.

Access To Confidential Information

- Access to confidential information within TPW will be restricted to those authorised personnel who have a legitimate need to access such information in order to carry out their duties.
- All authorised personnel are expected to treat this information with the highest level of confidentiality.

Enquiries And Complaints

- All enquiries or complaints regarding TPW's adherence to this Policy must be submitted in written form to TPW.
- TPW is committed to thoroughly investigating all enquiries and complaints received. Upon receipt, TPW will diligently review each matter and provide a written response to the individual who raised the enquiry or complaint.



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6.0 REVIEW AND AMENDMENTS

This policy will be reviewed bi-annually, or as required. Any changes will be endorsed by ARC, approved by the Board and implemented by the CE.

7.0 DOCUMENTS RELEVANT TO THIS POLICY

This policy should be read alongside:

Internal Documents	Legislation and External Standards
• OP.1 Code of Conduct Policy • OP.GUIDE Code of Conduct Guide • QI.3 Complaints Policy • HR.DESCRIP Privacy Officer Role Description • Incident Reporting Form • HR.FORM Confidentiality and Privacy Declaration Form • QI.4 Cyber Security Policy	• The Privacy Act 2020 • The Employment Relations Act 2000