

Environment Network Manawatū

Privacy Policy and Procedures

1. Background

This document outlines the privacy policies and procedures for Environment Network Manawatū (ENM) concerning the personal information it processes and manages. As the area of privacy develops and the resulting impact on ENM and members assessed, this document will be reviewed and updated.

The Privacy Officer will be responsible for updating this document informed by a twice-yearly review to ensure ongoing accuracy and appropriateness. Related documents, Terms and Conditions and Privacy Statement will be reviewed at the same time.

Note. Personal information is defined as information about identifiable, living people.

At the heart of the Privacy Act are the privacy principles, these can be found here.

<https://www.privacy.org.nz/the-privacy-act-and-codes/privacy-act-and-codes-introduction/>.
These principles have informed ENM policy and procedures.

2. Personal Information Collection

Images, video and audio will be treated the same as text and numerical data where the individual can be identified. Any information which can identify an individual or lead to identification is regarded as personal data, and ENM will be guided by and comply with the Privacy Act 1993. Online, individuals providing personal information will be required to accept website terms and conditions and ENM's privacy statement. Offline, a consent form collecting personal information via images, video and audio will be completed and kept on file. Attention will be drawn to ENM's privacy statement online.

The following documents relate to how ENM gathers personal information and gains consent:

- 2.1. Terms and Conditions
- 2.2. Privacy Statement
- 2.3. Offline consent form for images, video and audio



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3. Checking for Accuracy and Managing Personal Information

There is provision within privacy legislation that personal information held should be accurate, up to date, complete, relevant, and not misleading. With this in mind, the following will determine the accuracy and management of personal information.

- 3.1. All personal information held will undergo an annual review
- 3.2. ENM will proactively contact each individual through telephone, email or online survey
- 3.3. ENM shall not keep personal information for longer than is required for the purposes for which the information may lawfully be used

4. Handling Questions and Complaints

All questions and complaints will be directed through the Privacy Officer. In the Privacy Officers absence, a member of the management committee will act in the officer's absence. Questions and complaints will be handled promptly with step 4.2 below completed within five working days.

- 4.1. Understand and document the question or complaint. (The "making a complaint" form at <https://www.privacy.org.nz/> will be used as the basis to ensure all information is captured.)
- 4.2. Create a written record where required
- 4.3. Have the written record confirmed and agreed in writing by both parties
- 4.4. Go through the complaint process

5. Complaint Process

As complaints may vary in nature, the process will vary. Below is a broad outline of the complaint process.

- 5.1. Receive and review the complaint
- 5.2. Investigate the complaint
- 5.3. Settle the complaint or refer the complaint to an independent body
- 5.4. Take any action required to remedy the cause of the complaint and any similar future complaints

6. Receiving Alerts of a Privacy Breach

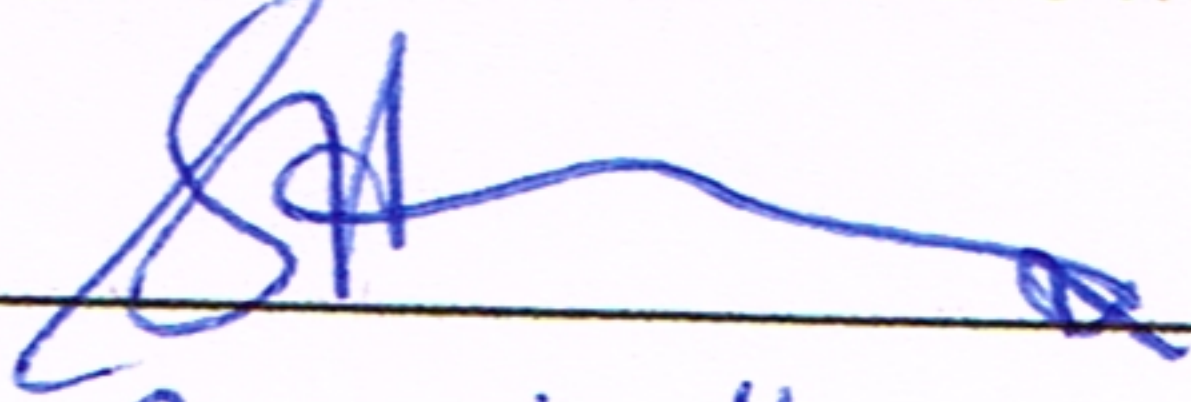
All privacy related alerts from any organisation providing services to ENM or holding data on behalf of ENM will be directed through the Privacy Officer. The officer will:

- 6.1. Understand and document the nature of the alert and proposed action to be taken (or already taken by the organisation)
- 6.2. Assess the seriousness of the alert. (Note, at this point the office of the Privacy Commissioner may be contacted for advice if necessary)
- 6.3. Advise the management committee of the alert, seriousness and recommended next steps
- 6.4. Advise affected individuals

Signature

The ENM Management Committee ratified this policy on 19 March 2020:

Signed on behalf of the Management Committee:


_____ (Signature) 24/11/2020 (Date)

Stewart Huxley
_____ (Print Name)

Co-Chair
_____ (Position in Organisation)

