



Carey Privacy and Records Policy and Procedure

INTRODUCTION

Carey Baptist College ("Carey") is committed to protecting the privacy of personal information it collects, uses, stores, and discloses in relation to its students, staff, contractors, and partners. Carey complies with the Privacy Act 2020, the PTE Enrolment and Academic Records Rules 2022, the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021, and the Tertiary Education Commission (TEC) Base Funding Conditions.

Personal information is collected and managed lawfully and transparently. Carey does not rely on implied or blanket consent. Instead, learners are informed at the point of collection about what information is collected, why it is collected, how it is used, who it may be disclosed to, and their rights of access and correction.

PURPOSE

This Policy:

- Ensures Carey meets its statutory, regulatory, and funding obligations in relation to privacy and records management
- Sets out how personal information is collected, used, disclosed, stored, retained, and disposed of
- Supports learner trust, wellbeing, and safety
- Provides assurance for NZQA quality assurance and TEC funding audits

SCOPE

This Policy applies to:

- All enrolled students (domestic and international)
- All Carey staff and contractors
- All third-party service providers handling personal information on Carey's behalf

LEGISLATIVE AND REGULATORY FRAMEWORK

This Policy aligns with:

- Privacy Act 2020 (including IPP 3A from 1 May 2026)
- PTE Enrolment and Academic Records Rules 2022
- Education and Training Act 2020

- Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021
- TEC Base Funding Conditions (including Privacy Statement requirements effective 1 January 2025)

POLICY

1. Governance and Responsibilities

1.1. Privacy Officer Carey will appoint a Privacy Officer who is responsible for:

- Overseeing compliance with the Privacy Act 2020
- Managing privacy breach responses
- Ensuring privacy training for staff
- Acting as the primary contact for privacy enquiries and regulators

1.2. Academic Registrar is responsible for student records accuracy, access, correction requests, and records retention.

1.3. All Staff Must handle personal information in accordance with this Policy and approved procedures.

2. Collection of Personal Information

2.1. Carey collects personal information only where necessary for lawful education, regulatory, funding, pastoral care, or institutional purposes. Collection occurs directly from learners wherever practicable.

2.2. Where personal information is collected from third parties (e.g. agents, employers, partner organisations), Carey will notify the learner in accordance with IPP 3A unless a statutory exception applies.

3. TEC Learner Privacy Statement (Required)

3.1. Carey provides all learners with a TEC-compliant Privacy Statement during enrolment. This statement explains:

- What personal information is collected
- Why it is collected
- Which government agencies may receive it (including TEC, NZQA, Ministry of Education, Statistics New Zealand)
- The learner's rights of access and correction

(Full TEC Privacy Statement provided in Section 12 below)

4. Use and Disclosure of Personal Information

4.1. Personal information is used only for the purpose for which it was collected, or where authorised by law.

Disclosure may occur to:

- NZQA (record of achievement, quality assurance)
- TEC (funding, accountability)
- Ministry of Education (statistical returns)

- Statistics New Zealand (integrated data for official statistics)
- Other agencies where required by law (e.g. IRD, Immigration NZ)

Learners are informed of these disclosures through the TEC Privacy Statement.

5. Storage, Security, and Digital Systems

5.1. Personal information is stored securely in approved electronic systems with controlled access.

Carey ensures:

- Role-based access controls
- Secure cloud storage arrangements
- Data backups and disaster recovery plans
- Protection against unauthorised access, loss, or misuse

5.2 Offshore storage or processing occurs only where Privacy Act 2020 requirements are met.

6. Records Retention and Disposal

6.1. Records are maintained in accordance with PTE Enrolment and Academic Records Rules 2022:

- Enrolment records: minimum 2 years post-completion
- Academic results, awards, RPL/credit decisions: permanent
- Assessment materials: minimum 12 months post-completion

6.2. Records are securely destroyed when no longer required.

7. Privacy Breach Management

A privacy breach is any unauthorised access, disclosure, loss, or misuse of personal information.

7.1. When a privacy breach is discovered, Carey will:

- Immediately contain and assess the breach
- Determine risk of serious harm
- Notify the Privacy Commissioner and affected individuals where required
- Document and review the incident

7.2. All staff must report suspected breaches to the Privacy Officer immediately.

8. TEC Privacy Statement (Standalone)

Privacy Statement for Learners

Carey Baptist College collects personal information from you for education delivery, administration, quality assurance, and funding purposes.

We may share your information with:

- Tertiary Education Commission

- New Zealand Qualifications Authority
- Ministry of Education
- Statistics New Zealand

This information supports funding, learner records, and official statistics.

You have the right to access and correct your personal information. If you do not provide requested information, your enrolment or access to services may be affected.

For privacy enquiries contact Carey's Privacy Officer.

9. Monitoring of Systems and Communications

Carey may monitor use of its IT systems for lawful operational and security purposes. Monitoring is proportionate, necessary, and consistent with privacy obligations.

10. Review and Continuous Improvement

This Policy is reviewed at least every two years, or earlier if legislative or regulatory changes occur.

APPENDIX A – PRIVACY BREACH RESPONSE FLOW (Text Description)

1. Breach identified or suspected
2. Immediate containment
3. Notify Privacy Officer
4. Assess seriousness and risk of harm
5. Decide notification obligations
6. Notify OPC and affected individuals if required
7. Record incident and review controls

DOCUMENT MANAGEMENT AND CONTROL

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Approved by: Management Team