



Mountains to Sea Conservation Trust

Privacy Guidelines 2022

1. Introduction

This document provides practical guidance for staff (including trustees, employees and contractors) of the Mountains To Sea Conservation Trust (MTSCT) in relation to collection, retention and destruction of documents.

2. MTSCT policies

Staff should familiarise themselves with the MTSCT Record Keeping Policy and the MTSCT Privacy Statement.

3. Basic principles

- Documents should be kept no longer than necessary (check Appendix to Record-Keeping Policy if unsure)
- Documents / images that may contain “personal information” should be given particular consideration, and not kept any longer than necessary
- Contractors are responsible for setting up their own systems to manage retention and destruction of documents in accordance with the MTSCT Record Keeping Policy, the MTSCT Privacy Statement and these Guidelines.
- When a contractor leaves the organisation or does not wish to store this information, these must be passed on to the regional coordinator

4. Examples

Photos

- Photos of individuals are considered to be “personal information” (and subject to the Privacy Act), even if they do not include the name of the individual photographed.
- Before photos are taken: ensure permission has been obtained (School Agreement, Registration form)
- After photos are taken:
 - Identify photos for use for promotional/reporting purposes (move these to separate folder)
 - Other photos should be deleted, no longer than 24 months after the event when not in use (on website, or facebook for example)
- Only use images of children in suitable dress/kit.

- Where possible use a digital camera owned by the organisation and not a personal smart phone, photos of children should remain within the organisation and not accessible to others (personal camera phones).
- Images should positively reflect young people's involvement in the activity (e.g. showing smiling participants rather than anxious or unhappy ones) and promote the best aspects of the activity.
- Where possible do not include the name of a child whose image is being used. For digital media only use their first names - this reduces the risk of inappropriate, unsolicited attention from people within and outside the organisation.
- Avoid the inclusion of other detailed information about individual children that might help identification.

Emails

- Take reasonable care to delete emails containing personal information that is not of use to the organization

Registration forms (school agreements and community events)

- Registration forms to be retained for 5 years after the event (to enable use in WorkSafe audits).
- The following information should be captured from the registration forms before deletion:
 - Contact information for database (where permission given). To be recorded in the regional reports
 - [Number of attendees / coordinators / volunteers]
 - [Notes on areas for improvement – provided to Regional Coordinator and included in regional reports]
- Where forms contain personal information (for example, medical information), take active steps to ensure information is not visible to other participants.

Pre-site assessment forms and other H & S forms

- Retain for a minimum of five years (for use in WorkSafe audits)
- It's Important to have H & S paperwork samples from every region
- Provide H & S paperwork from the day with any incident report supporting documentation
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Events where a health & safety incident occurs

- Retain all paperwork, including registration forms, pre-site assessment forms, photos for five years (for use in WorkSafe audit / investigation).

Responsibilities

Regional coordinators are responsible for collating H & S forms and including examples to the regional reports (digital or paper copies) from all programme coordinators and hold for 5 years

This is intended to be a practical, helpful document. If you have any questions or would like to see the document to be updated to include other examples, please get in touch with one of the Poutokomanawa/Co-directors.