



**Hōhepa**

every life fully lived

# Privacy Policy

**Vision:** Every Life Fully Lived

**Mission:** Supportive communities inspired by anthroposophy, which celebrate the diverse ways of being human

**Values:** Whakamana, Sustainability. Consistent with these values we will:

- Manage risk
- Promote Hōhepa and the difference we make
- Reflect openness and integrity
- Uphold the dignity of the people within our community.

## Approach:

The purpose of this Policy is to ensure that appropriate processes, procedures and systems are in place to manage personal information in line with public, and individual expectations, and to protect the privacy of individuals.

Hōhepa will:

- demonstrate the appropriate standards of care and respect required to ensure that individuals can have trust in us with their personal information;
- be open and transparent about how we collect, use, access, share, store and dispose of the personal information in our care;
- ensure that our data collection use and sharing is lawful;
- use explicit informed consent wherever possible;
- foster a culture of continuous improvement by having a consistent approach for managing privacy-related business activities, compliance monitoring, performance measures and event management, and by sharing experiences, failures, successes and best practices;
- ensure people are comfortable coming forward to report privacy events that result from an honest mistake, through correct channels and as soon as practicable.

This policy applies to the Board, casual, permanent, contract staff and volunteers.

## Definitions:

• **Privacy event:** Where Hōhepa (including our contractors and third-party service providers) fails to manage personal information in accordance with the Privacy Act or Hōhepa's policy or procedures. It includes all privacy breaches (where personal

## Roles:

• **Our People – (those that we support and those who support us) - will:**

- Manage personal information in accordance with Hōhepa policies, processes and systems, and practices;

information is wrongly collected, used, accessed, disclosed, kept or withheld as set out by the Privacy Act 2020) and potential privacy breaches ('near misses') (where an action could have resulted in a breach but a breach did not occur.

- **Personal information:** Any information about an identifiable individual

- **Hōhepa people:** All staff, volunteers, contractors, directors employed or engaged on any basis by Hōhepa, whether they are casual, temporary or permanent, whether full time or part time.

- Maintain the integrity, accuracy and confidentiality of personal information they deal with;
- Identify privacy issues and events and escalate appropriately.

- **Hōhepa leaders will:**

- Embed this policy and provide associated procedures in their area of responsibility.
- Ensure privacy risks are appropriately assessed and captured in the operations risk registers.
- Ensure their area of responsibility is compliant with this policy.
- Support a culture of encouraging people to come forward to report privacy, events and 'near misses'.

- **Manuhiri will:**

- Respect our standards and expectations and support Hōhepa's approach.

## Measures of the success of the policy:

- Compliance with the requirements of the Privacy Act 2020 and any other legislation;
- Risk registers in the respective regions appropriately record and action privacy risk;
- Event reporting, including root cause analysis of privacy events report to assess the effectiveness of the Policy and provide feedback and recommendations to the regional leadership to strengthen internal processes and to comply with this Policy.