



National Contact Centre Privacy Guidelines November 2011

1. Purpose

The purpose of this document is to establish guidelines for staff in response to requests received in the National Contact Centre for access to personal information.

The Massey University National Contact Centre provides a range of services, from a prospective student's initial inquiry through to their graduation. For this reason the National Contact Centre staff have access to a large amount of personal information.

The Privacy Act 1993 and its amendments provide the legislative context for the protection and use of personal information. The following guidelines are intended to interpret the legislation in the particular context of the role and responsibilities of National Contact Centre staff, to assist them to provide adequate security for this information.

2. Policy

Refer to the Massey University Privacy Policy in Appendix 1 and associated document in Appendix 2, Procedure for Collection, Use and Disclosure of Personal Information (Privacy Act) or see <http://policyguide.massey.ac.nz>.

3. Audience

All staff within the Massey University National Contact Centre

4. National Contact Centre Access to Personal Information

The National Contact Centre staff have access to a large amount of personal information in order to provide a complete and accurate service to Massey University students. Personal information is usually stored and retrieved with the use of a Student ID number or any of the contact methods used, for example personal information can be stored in various media either electronically including voice and screen recordings, text messages, email message, chat transcripts, facsimile, notes entered in the Student Management System (SMS) and the like, or via more traditional methods such as written correspondence.

According to the privacy principles mentioned in Appendix 2, any information that is classified as personal is only able to be accessed or maintained either by the individual themselves, or by an authorised agent. In this case the individual is a Massey student and the authorised agent is a person employed or otherwise bound to Massey University and who is specifically authorised to access that information.

Requests for private information can be either verbal or written. A request for information does not have to be in writing. National Contact Centre staff are agents of the University and can release personal information instantaneously (including live playback of voice recordings to callers) once the identity and procedures in Section 5 have been confirmed. If further assistance is required, staff are to seek the assistance of Contact Centre Team Leaders or direct the enquiry to the University's Privacy Officer in Section 14 of this guideline (you may be able to withhold information in certain situations). A request for access to personal information made under Principle 6 of the Privacy Act must be responded to as soon as possible and within 20 working days and if the information should be provided then this must be provided without undue delay.

5. Guideline for Releasing Information to Individuals

Information is collected for the purposes of studying at Massey University and staff must ensure that information is only released to the student to whom it belongs, (with some exceptions as contained within the Privacy Act) and that only the student makes changes to existing information. This responsibility is carried out by performing a suitable **check on the identity of a caller before releasing or altering any personal information.**

A suitable check is defined as obtaining a correct response from the student him/herself directly to at least the student identification number (if known), and **all** of the following:

- Current Address
- Date of Birth
- Full Name (as shown on the birth certificate or passport).

(Note: It is advisable to obtain an ID Number from the student, rather than searching for it via SMS because the number of identifiers available is reduced.)

If the National Contact Centre staff are in any doubt as to the identity of the caller, other questions can be used, possibly drawn from their academic details: for example, the numbers/titles of the last three papers that the student was registered in.

If doubt still exists, do not release the information.

National Contact Centre staff can assume, having performed this check on the identity of the caller, that the caller is being truthful about their identity. In other words, National Contact Centre staff will not be considered negligent in discharging their responsibility for protecting the information if they are dealing with a person who has answered all questions correctly.

6. Guideline for Disclosure to Third Party - Parents/Partners/Family Members/Employer

Staff should not release information about a student to parents, partners, or other family members, unless the caller is an **authorised agent** (see Agent Authorisation, section 8 below).

National Contact Centre staff may accept credit card payment of fees from a third party if the caller provides core information such as the student ID number and amount paid. Under no circumstances are staff to confirm or release any personal information held about individuals.

Payment of tuition fees by a third party does not entitle him or her to be given any personal information about the student. It is important to note that the student owns this information and has not authorised us to release to parents. This also applies when the third party is an employer.

7. Incapacitation or Death of Individuals

Callers with information on incapacitation or death of a student must be advised that they need to write to NSATS Enrolment Office, providing evidence of incapacitation or death of a student so that the appropriate action can be taken by NSATS. Staff should not release information about a student to third party unless the caller is an authorised agent (see Agent Authorisation, section 8 below). National Contact Centre staff must follow the Deceased Student Procedure detailed in the internal KnowledgeBase FAQ system including internal notifications required to invoke NOUT and DIED status procedures.

8. Agent Authorisation

A student can nominate an agent to make inquiries about their enrolment on their behalf, so must advise the University in writing using the Agent Authorisation form. Faxed or emailed documents will not be accepted. A sample copy is attached in Appendix 3.

If a caller states that they are an approved agent for a student, National Contact Centre staff must:

- Find the scanned copy of the Agent Authorisation form in Silent One
- Confirm the key identifiers for the agent and the student with the agent
- Proceed with the student look up when identification has been confirmed. Make the appropriate call history notes.

Do not release any information if there are unsatisfactory responses to the identifiers.

Only in exceptional or urgent cases with authorisation from Enrolment staff we may accept the Agent Authorisation Form to be submitted via fax on 06 350 5619 or email enrolments@massey.ac.nz. This will be presented on a case by case basis for approval. The student must also then send the original application form by post to the address on the form if permission to fax or email application form is granted by Enrolment staff.

9. Power of Attorney

When a student gives someone (or a company) power of attorney, they give them the legal right to act on their behalf with one of two types of power of attorney, either an Ordinary Power of Attorney or an Enduring Power of Attorney. Students can provide a verified copy of a Power of Attorney in lieu of an Agent Authorisation as this is a Legal Document and the same procedures above applied for Agent Authorisation are to be followed.

10. Guideline for Disclosure to Police

There is no legal requirement for staff to release student information if requested by the Police.

The correct guideline when dealing with such a query is to:

- inform the requester to submit a document, such as search warrant, with exact details of information requested and why, and;
- conference the caller through to the on-site Police Constable or Security and Traffic Office

11. Guideline for Disclosure to Massey University Staff

In situations where a Massey University staff member is requesting student details, or changes to this information, **the Privacy Act still applies.**

- Academic staff requesting information or changes are to be advised that they will need to contact their School/Departmental Secretary or School/Department Head.
- General staff, particularly library staff and Student Liaison Advisors who are initiating a change to student details will need to either access this information themselves, contact their administrator, advise the student to call personally or to send the relevant paperwork to NSATS.

12. Guideline for Refusing a Request for Information

In the event that the caller is a third party and information will be withheld, the staff should inform the caller that they are withholding the information and the reason they are withholding the information.

Explain that:

- Release of information to an unauthorised third party is in breach of the Privacy Act 1993
- The student her/himself may call to obtain or change their information, or else may authorise the third party to receive or change information provided that this is done in writing.

13. Guideline for Handling Difficult Callers

Sometimes, where a refusal to release or change information has been made, a caller can become difficult. After the best possible effort has been made, the staff should refer the caller to the Contact Centre Team Leader. Remind the caller that release of information to a third party is a breach of the Privacy Act 1993.

14. Privacy Officer

The Massey University Privacy Officer is:
Mr Stuart Morriss
Assistant Vice-Chancellor and University Registrar
Massey University
Private Bag 11222
Manawatu Box Lobby
Palmerston North 4442
New Zealand

15. Request for Information under Official Information Act 1982

All requests for information under the Official Information Act 1982 should be addressed to:

Mr Stuart Morriss
Assistant Vice-Chancellor and University Registrar
Massey University
Private Bag 11222
Manawatu Box Lobby
Palmerston North 4442
New Zealand

16. Complaints

For further information, please also refer to the Complaints Procedure in Appendix 2.

Privacy complaints **from students** should be sent to the Risk Manager and copied to the Privacy Officer:

Ms Anne Walker
Risk Manager
Office of the University Registrar
Massey University
Private Bag 11222
Manawatu Box Lobby
Palmerston North 4442
New Zealand

Copy to:
Mr Stuart Morriss
Assistant Vice-Chancellor and University Registrar
Massey University
Private Bag 11222
Manawatu Box Lobby
Palmerston North 4442
New Zealand

Privacy complaints **from staff** should be sent to the Employment Relations Manager, Human Resources Section and copied to the Privacy Officer:

Ms Fiona McMorran
Employment Relations Manager
Human Resources Section
Massey University
Private Bag 11222
Manawatu Box Lobby
Palmerston North 4442
New Zealand

Copy to:
Mr Stuart Morriss
Assistant Vice-Chancellor and University Registrar
Massey University
Private Bag 11222
Manawatu Box Lobby
Palmerston North 4442
New Zealand

17. Version Control

File Name: **National Contact Centre Privacy Guidelines**

Date	Status	Version	Updated by	Reason for Update
12/09/2006	Draft	1.0	Tina Hilliam	New guidelines document established. Sent to Anne Walker, Risk Manager and June Dallinger Director Human Resources for comment
15/09/2006	Final	1.1	Tina Hilliam	Document approved by Risk Manager and Director Human Resources. Issued to National Contact Centre staff.
02/10/2007	Review	1.2	Tina Hilliam	Annual review of guidelines. Document sent to Anne Walker, Risk Manager and June Dallinger Director Human Resources for comment
12/11/2007	Final	1.3	Tina Hilliam	Replaced Risk Manager with Registrar in Section 14 at request of Anne Walker. Document issued to staff.
5/09/2008	Review	1.4	Tina Hilliam	Updated section 4 to include clarification that personal information is stored in all media types and can be released instantaneously by staff once identifiers are checked. Updated Section 15, replaced June Dallinger with Michelle Ryan, Employment Relations Manager. Updated Appendix 1 & 2, MU Privacy Policy, Next Review: May 2010. Sent to Anne Walker, Risk Mgr and Michelle Ryan ER Mgr for review
18/09/08	Final	1.5	Tina Hilliam	Feedback received, document updated and issued to staff
20/11/09	Review	1.6	Tina Hilliam	Updated section 8 to include procedure for Agent Authorisation forms in exceptional or urgent circumstances. Updated Section 15 contact from Michelle Ryan to Angela van Welie. Full document sent for review to Anne Walker, Risk Mgr and Jenni Ward HR Adviser ER for review
30/11/09	Final	1.7	Tina Hilliam	Add new postal code format. Document approved. Issued to National Contact Centre staff.
16/11/11	Updated	1.8	Tina Rowland	Inserted Power of Attorney section, Updated Employment Relations Manager and AVC-UR Title, Updated Appendix 1-3 with latest versions. Distributed to Anne Walker, Risk Mgr, Fiona McMorran ER Mgr, Office of AVC-UR and all National Contact Centre staff.



PRIVACY POLICY

Section	Risk Management
Contact	Risk Manager
Last Review	May 2010
Next Review	May 2012
Approval	VC/VCEC 06/05/67

Purpose:

The purpose of this policy is to establish procedures and guidelines for:

- (a) The collection, use and disclosure of personal information by Massey University.
- (b) Access by individuals to personal information about themselves held by Massey University

Policy:

Massey University has determined that it will comply with its obligations in respect of personal information under the Privacy Act 1993, the Official Information Act 1982 and the Education Act 1989.

This policy is not intended to be a stand-alone document. It must be read and applied in conjunction with:

- The Information Privacy Principles in the Privacy Act 1993.
- The agreements between Massey University and its staff.
- The agreements between Massey University and its students.
- Procedure for collection, use and disclosure of personal information
- All relevant law, including the Privacy Act 1993.

The Privacy Officer for Massey University is the AVC & University Registrar. Responses to requests for information made in respect of the Privacy Act 1993 may be sub-delegated.

Definitions:

Personal information means information about an identifiable individual.

Audience:

All staff and students

Relevant legislation:

Privacy Act 1993
 Official Information Act 1982
 Health Information Privacy Code 1994

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Legal compliance:

Procedures for collection, use and disclosure of personal information about identifiable individuals, and access to and correction of personal information and the use of unique identifiers, must comply with the twelve Privacy Principles of Privacy Act 1993. Massey University must appoint a 'Privacy Officer' with responsibilities for compliance with these principles, and to deal with requests for access.

All requests made under the Official Information Act 1982 are deemed to be a request made pursuant to with ss 1(b) Principle 6 of the Privacy Act 1994.

The Health Information Privacy Code 1994 requires that Massey University appoint a 'Privacy Officer' with responsibilities for compliance with these principles, and to deal with requests for access. Access to all Health Information for identified individuals must be secured.

Related procedures / documents:

- [Procedure for collection, use and disclosure of personal information](#)
- [Information Privacy Principles in the Privacy Act 1993](#)
- [Law Guide \(Available on the Intranet\)](#)

Document Management Control:

Prepared by: Risk Manager
 Owned by: AVC & University Registrar
 Authorised by: VC/VCEC 06/05/67
 Date issued: 24 May 2006
 Last review: May 2010
 Next review: May 2012

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PROCEDURE FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION (PRIVACY ACT)

Section	Risk Management
Contact	Risk Manager
Last Review	May 2010
Next Review	May 2012
Approval	VC/VCEC 08/05/67

Definitions:

- “Personal Information” is any information about an identifiable living individual
- “Agent” means an agent authorised in writing
- “Prospective Student” means a person who provides personal information to Massey University with a view to enrolling as a student at Massey University and has never been and does not enrol at Massey University.

Collection of Personal Information:

Massey University must not collect personal information unless:

- The information is collected for lawful purposes connected with a function or activity of Massey University; and
- The collection of the information is necessary for that purpose.

When Massey University collects personal information it must collect it directly from the individual concerned unless one of the exceptions set out in Information Privacy Principle 2(2) applies (see appendix 1).

When Massey University collects personal information directly from the individual concerned it must comply with Information Privacy Principles 3 and 4.

Staff:

Massey University will keep all personal information that it holds or obtains about a staff member in a personal file for that staff member.

Massey University will keep a staff members personal file for 7 years after the end of the employment relationship between it and the staff member. At the end of that period the staff member’s personal file will be destroyed unless there is a good reason why it should not be.

Students:

Massey University will keep a personal file for each student that includes the following personal information:

- The students:
 - Full name and address
 - Date of birth
 - Identification number, if any, assigned by Massey University

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APPENDIX 2: Massey University Privacy Policy – Procedure for Collection, Use and Disclosure of Personal Information (Privacy Act)



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- Course of study and the fees for that course of study
 - Changes to their course of study, if any
 - Citizenship or residency status in New Zealand
- The progress of the student at Massey University (including the principal results achieved by the student) in his or her course of study.
 - Particulars of any allowances, grants or other payments received by the student in respect of his or her course of study at the institution out of public money appropriated by Parliament.
 - Such other information as must be kept so that Massey University can fulfill its obligations to provide the Secretary of Education with statistical information relating to students generally or to a particular class of student.
 - Such other personal information relating to the student as may be reasonably required by the Chief Executive (as that term defined in Section 226A of the Education Act 1989) for the administration of the student loan scheme.

Prospective Students:

All personal information obtained by Massey University about a prospective student will be kept in a personal file for that prospective student.

If a prospective student does not become a student their personal file must be destroyed no later than five years after the last piece of information on the file was obtained.

Access to and correction of personal information:

Any staff member, student, prospective student or their agent may request access to all personal information about themselves held by Massey University other than evaluative material and other material that is subject to exception under the Information Privacy Principles in the Privacy Act 1993. If such a request is made then Massey University must provide the person making the request with access to that information, either by providing a copy or allowing viewing of the personal information, within a reasonable time.

Anyone is entitled to request correction of their own personal information other than evaluative material and other material that is subject to exception under the Information Privacy Principles in the Privacy Act 1993. Where such a request is made Massey University must decide whether or not to correct the personal information. Once it has decided Massey University must inform the staff member, student, prospective student or their agent of its decision. If Massey University decides not to correct the person's personal information then it must inform the person of their right to have their request and Massey University's refusal noted on their personal file. If a person decides to exercise this right then Massey University must note then the person's request and Massey University's refusal on the person's personal file.

Requests for Personal Information:

Massey University must not disclose personal information that it holds about any individual to any person, body or agency unless one of the exceptions in Principle 11 of the Information Privacy Principles applies.

Complaints:

Any Massey University staff member, student or prospective student may complain to Massey University that there has been a breach of the Privacy Information Principles in relation to themselves. Where a complaint is received under this Clause it will be dealt with through the privacy complaints procedure set out in Appendix 2.

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APPENDIX 1:

INFORMATION PRIVACY PRINCIPLES AS OUTLINED IN THE PRIVACY ACT 1993

PRINCIPLE 1

Purpose of collection of personal information

Personal Information shall not be collected by any agency unless –

- (a) The information is collected for a lawful purpose connected with a function or activity of the agency; and
- (b) The collection of the information is necessary for that purpose.

PRINCIPLE 2

Source of personal information

1. Where an agency collects personal information, the agency shall collect the information directly from the individual concerned.
2. It is not necessary for an agency to comply with subclause (1) of this principle if the agency believes, on reasonable grounds, –
 - (a) That the information is publicly available information; or
 - (b) That the individual concerned authorises collection of the information from someone else; or
 - (c) That non-compliance would not prejudice the interests of the individual concerned; or
 - (d) That non-compliance is necessary –
 - i. To avoid prejudice to the maintenance of the law by any public sector agency, including the prevention, detection, investigation, prosecution and punishment of offences; or
 - ii. For the enforcement of a law imposing a pecuniary penalty; or
 - iii. For the protection of the public revenue or
 - iv. For the conduct of proceedings before any court or [tribunal] (being proceedings that have been commenced or are reasonably in contemplation); or
 - (e) That compliance would prejudice the purpose of the collection; or
 - (f) That compliance is not reasonably practicable in the circumstances of the particular case; or
 - (g) That the information –
 - i. Will not be used in a form in which the individual concerned is identified; or
 - ii. Will be used for statistical or research purposes and will not be published in a form that could reasonably be expected to identify the individual concerned; or
 - (h) That the collection of the information is in accordance with an authority granted under section 54 of this Act.

PRINCIPLE 3

Collection of information from subject

1. Where an agency collects personal information directly from the individual concerned, the agency shall take such steps (if any) as are, in the circumstances, reasonable to ensure that the individual concerned is aware of –
 - (a) The fact that the information is being collected; and
 - (b) The purpose for which the information is being collected; and
 - (c) The intended recipients of the information; and
 - (d) The name and address of –

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- i. The agency that is collecting the information; and
 - ii. The agency that will hold the information; and
 - (e) If the collection of the information is authorised or required by or under law, -
 - i. The particular law by or under which the collection of the information is so authorised or required; and
 - ii. Whether or not the supply of the information by that individual is voluntary or mandatory; and
 - (f) The consequences (if any) for that individual if all or any part of the requested information is not provided; and
 - (g) The rights of access to, and correction of, personal information provided by these principles.
 2. The steps referred to in subclause (1) of this principle shall be taken before the information is collected, or, if that is not practicable, as soon as practicable after the information is collected.
 3. An agency is not required to take the steps referred to in subclause (1) of this principle in relation to the collection of information from an individual if that agency has taken those steps in relation to the collection, from that individual, of the same information or information of the same kind, on a recent previous occasion.
 4. It is not necessary for an agency to comply with subclause (1) of this principle if the agency believes, on reasonable grounds,
 - (a) That non-compliance is authorised by the individual concerned; or
 - (b) That non-compliance would not prejudice the interests of the individual concerned; or
 - (c) That non-compliance is necessary -
 - i. To avoid prejudice to the maintenance of the law by any public sector agency, including the prevention, detection, investigation, prosecution and punishment of offences, or
 - ii. For the enforcement of a law imposing a pecuniary penalty; or
 - iii. For the protection of the public revenue; or
 - iv. For the conduct of proceedings before any court or [tribunal] (being proceedings that have been commenced or are reasonably in contemplation); or
 - (d) That compliance would prejudice the purposes of the collection; or
 - (e) That compliance is not reasonably practicable in the circumstances of the particular case; or
 - (f) That the information -
 - i. Will not be used in a form in which the individual concerned is identified; or
 - ii. Will not be used for statistical or research purposes and will not be published in a form that could reasonably be expected to identify the individual concerned.

PRINCIPLE 4

Manner of collection of personal information

Personal Information shall not be collected by an agency -

- (a) By unlawful means; or
- (b) By means that, in the circumstances of the case, -
 - i. Are unfair; or
 - ii. Intrude to an unreasonable extent upon the personal affairs of the individual concerned.

PRINCIPLE 5

Storage and security of personal information

An agency that holds personal information shall ensure -

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- (a) That the information is protected, by such security safeguards as it is reasonable in the circumstances to take, against –
 - i. Loss; and
 - ii. Access, use, modification, or disclosure, except with the authority of the agency that holds the information; and
 - iii. Other misuse; and
 - (b) That if it is necessary for the information to be given to a person in connection with the provision of a service to the agency, everything reasonably within the power of the agency is done to prevent unauthorised use or unauthorised disclosure of the information.

PRINCIPLE 6

Access to personal information

1. Where an agency holds personal information in such a way that it can readily be retrieved, the individual concerned shall be entitled –
 - (a) To obtain from the agency confirmation of whether or not the agency holds such personal information; and
 - (b) To have access to that information
2. Where, in accordance with subclause (1) (b) of this principle, an individual is given access to personal information, the individual shall be advised that, under principle 7, the individual may request the correction of that information.
3. The application of this principle is subject to the provisions of Parts IV and V of this Act.

PRINCIPLE 7

Correction of Personal Information

1. Where an agency holds personal information, the individual concerned shall be entitled -
 - (a) To request correction of the information; and
 - (b) To request that there be attached to the information a statement of the correction sought but not made.
2. An agency that holds personal information shall, if so requested by the individual concerned or on its own initiative take such steps (if any) to correct that information as are, in the circumstances, reasonable to ensure that, having regard to the purposes for which the information may lawfully be used, the information is accurate, up to date, complete and not misleading.
3. Where an agency that holds personal information is not willing to correct that information in accordance with a request by the individual concerned, the agency shall, if so requested by the individual concerned, take such steps (if any) as are reasonable in the circumstances to attach to the information, in such a manner that it will always be read with the information, any statement provided by that individual of the correction sought.
4. Where the agency has taken steps under sub clause (2) or sub clause (3) of this principle, the agency shall, if reasonably practicable, inform each person or body or agency to whom the personal information has been disclosed of those steps.

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5. Where an agency receives a request made pursuant to sub clause (1) of this principle, the agency shall inform the individual concerned of the action taken as a result of the request.

PRINCIPLE 8

Accuracy, etc. of personal information to be checked before use

An agency that holds personal information shall not use that information without taking such steps (if any) as are, in the circumstances, reasonable to ensure that, having regard to the purpose for which the information is proposed to be used, the information is accurate, up to date, complete, relevant and not misleading.

PRINCIPLE 9

Agency not to keep personal information for longer than necessary

An agency that holds personal information shall not keep that information for longer than is required for the purposes of which the information may lawfully be used.

PRINCIPLE 10

Limits on use of personal information

An agency that holds personal information that was obtained in connection with one purpose shall not use the information for any other purpose unless the agency believes, on reasonable grounds, -

- (a) That the source of the information is a publicly available publication; or
- (b) That the use of the information for that other purpose is authorised by the individual concerned; or
- (c) That non-compliance is necessary –
 - i. To avoid prejudice to the maintenance of the law by any public sector agency, including the prevention, detection, investigation, prosecution and punishment of offences; or
 - ii. For the enforcement of a law imposing pecuniary penalty; or
 - iii. For the protection of the public revenue; or
 - iv. For the conduct of proceedings before any court or [tribunal] (being proceedings that have been commenced or are reasonably in contemplation); or
- (d) That the use of the information for that other purpose is necessary to prevent or lessen a serious and imminent threat to –
 - i. Public health or public safety; or
 - ii. The life or health of the individual concerned or another individual; or
- (e) That the purpose for which the information is used is directly related to the purpose in connection with which the information was obtained; or
- (f) That the information –
 - i. Is used in a form in which the individual concerned is not identified; or
 - ii. Is used for statistical or research purposes and will not be published in a form that could reasonably be expected to identify the individual concerned; or
- (g) That the use of the information is in accordance with an authority granted under section 54 of this Act.

PRINCIPLE 11

Limits on disclosure of personal information

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An agency that holds personal information shall not disclose the information to a person or body or agency unless the agency believes, on reasonable grounds, -

- (a) That the disclosure of the information is one of the purposes in connection with which the information was obtained or is directly related to the purposes in connection with which the information was obtained; or
- (b) That the source of the information is a publicly available publication; or
- (c) That the disclosure of the individual concerned; or
- (d) That the disclosure is authorised by the individual concerned; or
- (e) That non-compliance is necessary –
 - i. To avoid prejudice to the maintenance of the law by any public sector agency; including the prevention, detection, investigation, prosecution and punishment of offences; or
 - ii. For the enforcement of a law imposing a pecuniary penalty; or
 - iii. For the protection of the public revenue; or
 - iv. For the conduct of proceedings before any court or (tribunal) (being proceedings that have been commenced or are reasonably in contemplation); or
- (f) That the disclosure of the information is necessary to prevent or lessen a serious and imminent threat to –
 - i. Public health or public safety; or
 - ii. The life or health of the individual concerned or another individual; or
- (g) That the disclosure of the information is necessary to facilitate the sale or other disposition of a business as a going concern; or
- (h) That the information –
 - i. Is to be used in a form in which the individual concerned is not identified; or
 - ii. Is to be used for statistical or research purposes and will not be published in a form that could reasonably be expected to identify the individual concerned; or
- (i) That the disclosure of the information is in accordance with an authority granted under section 54 of this Act.

PRINCIPLE 12

Unique identifiers

1. An agency shall not assign a unique identifier to an individual unless the assignment of that identifier is necessary to enable the agency to carry out any one or more of its functions efficiently.
2. An agency shall not assign to an individual a unique identifier that, to that agency's knowledge, has been assigned to that individual by another agency, unless those 2 agencies are associated persons within the meaning of (section OD 7 of the Income Tax Act 1994).
3. An agency that assigns unique identifiers to individuals shall take all reasonable steps to ensure that unique identifiers are assigned only to individuals whose identity is clearly established.
4. An agency shall not require an individual to disclose any unique identifier assigned to that individual unless the disclosure is for one of the purposes in connection with which that unique identifier was assigned or for a purpose that is directly related to one of those purposes.

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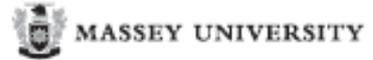
APPENDIX 2:

COMPLAINTS PROCEDURE

1. If a complaint is made whether orally or in writing to a staff member by any individual regarding their own personal information then the staff member shall endeavor to resolve the complaint directly with the person concerned.
2. If the complaint is not resolved then the staff member shall refer the complainant to the University's Privacy Officer.
3. On receipt of a complaint, the Privacy Officer shall ascertain the nature of the complaint and endeavor to bring about a resolution to the complaint.
4. This procedure does not affect any rights the complainant might have under the Privacy Act 1993 or the University in relation to the Student Contract (see Massey University Calendar) or Grievance procedures.

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AGENT AUTHORISATION FORM



Student details

ID number

Surname or family name

First or given names

Date of birth

Day

Month

Year

Street address

Suburb

Town/City

Postcode

E-mail

Phone ()

Agent details

Surname or family name

First or given names

Date of birth

Day

Month

Year

Street address

Suburb

Town/City

Postcode

E-mail

Phone ()

Declaration

I authorise my Agent to have access to my Massey University file, to change any details, request any information and speak on my behalf. I authorise my Agent to receive access to such information either in person, through the phone, or through electronic or other means:

From

To

or have access from

until I notify otherwise.

Signed (by student)

Verified copy of signature

Date

Day

Month

Year

Please send completed form to:

Enrolment Office PN 610

Massey University

Private Bag 11 222

Palmerston North 4442

New Zealand