Privacy Policy – Ākonga/Learner information

Version	Published Date	Changes made	Policy Owner	Review date
1.0	10/3/25	*Initial draft*	Doug Pouwhare – Executive Officer	Jan 2026

Policy Statement

GRIP is committed to protecting the privacy of ākonga/learner, especially high school students. This Privacy Policy outlines how we collect, use, store, and disclose personal information in compliance with the New Zealand Privacy Act 2020 and the Vulnerable Children's Act.

This policy aims to inform ākonga/learners, parents/guardians, and employers about our practices regarding personal information. We are dedicated to ensuring that all personal information is handled responsibly and in accordance with relevant legislation.

Objective

The objective of this privacy policy is to ensure that GRIP complies with relevant legal requirements and protects the personal information of all individuals and entities involved in its services. This policy is designed to:

- Ensure that personal information is collected, used, and disclosed in a lawful, fair, and transparent manner.
- Safeguard the rights of vulnerable individuals, especially minors.
- Maintain a high standard of data security to prevent unauthorised access or misuse.
- Provide clear guidelines for kaimahi on how to handle personal information responsibly and in accordance with applicable laws.

Scope

This policy applies to:

- All personal information collected from ākonga/learners, their parents/guardians, schools, and employers in relation to the services provided by GRIP.
- Any personal data processed, stored, or transmitted by GRIP, whether electronically or in paper form.
- All employees, contractors, volunteers, and third-party partners who may handle personal information on behalf of GRIP.

The policy covers personal data used for educational purposes, employment-related activities, school partnerships, and communications with parents/guardians.

Policy Guidelines

Information We Collect

We may collect the following types of personal information:

- *Personal Information:* Name, contact details, date of birth, and other identifying information.
- *Academic Information:* The name of school, national student number (NSN) and unit standards achieved
- *Communication Records:* Records of communication between GRIP and ākonga/learner, /guardians.
- *Device Information:* Data stored on devices used by staff to facilitate programs.

Purpose of Collection

We collect personal information for the following purposes:

- To enable us to process ākonga/learner enrolment in our programmes and to facilitate credit registration.
- To communicate with ākonga/learner and guardians regarding program details.
- To monitor and assess academic progress.

Use of Information

- The personal information collected will be used solely for the purposes stated above. We will not use your information for any unrelated purposes without obtaining your consent.

Disclosure of Information

We will not disclose personal information to third parties without consent, except in the following circumstances:

- To comply with legal obligations.
- To protect the safety of ākonga/learners or others.
- When required by a relevant authority, such as educational institutions or law enforcement.

Storage and Security of Information

We take reasonable steps to ensure that personal information is stored securely. This includes:

- Using password protection and encryption for digital data.
- Regularly reviewing our data storage and security measures.
- Limiting access to personal information to authorized staff only.

Staff Vetting and Training

To ensure the safety of our ākonga/learners:

- All team members are required to undergo police vetting on an annual basis.
- Staff must also complete privacy training regularly to stay informed about best practices and legal requirements related to the handling of personal information.

Access and Correction

- Ākonga/Learner and their guardians have the right to access and request corrections to personal information held by GRIP. Requests can be made by contacting us using the details provided below.

Data Retention

We will retain personal information only for as long as necessary to fulfil the purposes outlined in this policy or as required by law. Once it is no longer needed, we will securely delete or anonymize the data.

Roles and responsibilities

GRIP Management: Responsible for ensuring the overall implementation of this policy, including the allocation of resources to maintain privacy standards and compliance with relevant legislation.

Data Protection Officer (DPO): A designated DPO will be responsible for monitoring compliance with the Privacy Act 2020, overseeing data security measures, and addressing any data privacy concerns raised by individuals.

Kaimahi and Contractors: All GRIP staff and contractors are required to understand and follow the guidelines set out in this privacy policy. They must ensure that personal data is collected, used, and stored responsibly and securely.

Third-Party Partners: Any third-party providers, including schools and employers, who may handle personal data on behalf of GRIP, are expected to adhere to this privacy policy and comply with all relevant privacy regulations.

Complaints

If you believe that your privacy has been breached or that we have not complied with this policy, please contact us on complaints@industrypathways.co.nz and we will investigate the complaint and respond in a timely manner.