



# Privacy Policy

Original policy approved by:

<b>i-Manage reference</b>	3082772	<b>Approved by</b>	Chief Executive
<b>Date originally approved</b>			27/01/2016

Amended policy approved by:

<b>i-Manage version</b>	3082772 v.4	<b>Contact</b>	DPMC Privacy Officer
<b>Amended version approved by</b>	Executive Director, Strategy, Governance and Engagement Group (SGE)	<b>Name</b>  <b>Signature</b>	Clare Ward  
<b>Date amended version approved</b>	30/10/2023	<b>Date for review</b>	1/09/2026

## Objective

This Privacy Policy describes how the Department of the Prime Minister and Cabinet (DPMC) and National Emergency Management Agency (NEMA) will ensure that our staff, members of the public and the government retains the highest level of confidence in our ability to safeguard the personal information we hold.

## Applies to

This policy applies to everyone in DPMC and NEMA, including permanent, fixed-term, secondee, casual and agency temporary staff, self-employed and independent contractors (together referred to in this policy as 'staff'), regardless of position or seniority.

The Chief Executive of DPMC is responsible for DPMC's compliance with the Privacy Act. The Chief Executive of NEMA is responsible for NEMA's compliance. Each agency has appointed its own Privacy Officer. Any reference to Privacy Officer in this document means reference to the relevant agencies Privacy Officer.

## Principles

DPMC and NEMA's management and protection of personal information will be guided by the following principles:

- All personal information we hold will be managed and used in accordance with the Privacy Act 2020.

- DPMC and NEMA will embody a culture in which personal information is protected and respected.
- We respect and uphold the mana and dignity of the people, whānau, communities or groups who share their data and information with DPMC and NEMA.
- Individuals will be confident that DPMC and NEMA are trusted guardians of their personal information.

## **Definition - What is personal information?**

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Personal information is any information about an identifiable individual.

DPMC and NEMA hold personal information about staff, contractors and individuals who interact with us in relation to the services we provide.

The Privacy Act is concerned with the content of personal information, rather than the specific form that content is in. This means that all sorts of things can contain personal information, including notes, emails, recordings, photos and scans, whether they are in hard copy or electronic form.<sup>1</sup> For example, the information does not need to name the individual, as long as they are identifiable in other ways, like through their home address.

## **Commitment to privacy:**

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Our commitment to ensuring privacy will be shown by:

- Only collecting personal information which is necessary to undertake our functions.
- Being transparent and open about what personal information is being collected.
- Giving individuals the opportunity to make an informed choice about the personal information they provide, or how much personal information they provide.
- Ensuring all individuals have the right to access personal information we hold about them and the right to seek correction if that information is wrong.
- Establishing a clear and lawful purpose for collecting personal information, and only using and disclosing personal information in accordance with that purpose.
- Taking reasonable steps to make sure that personal information is accurate before we use it.
- Protecting personal information from loss, misuse, and unauthorised access.
- Using reasonable endeavours to ensure that personal information being sent offshore will be subject to comparable privacy safeguards as those that apply in New Zealand.
- Disposing of personal information held when it is no longer required.
- Responding quickly and appropriately if a privacy breach occurs or is suspected.

To achieve this, DPMC and NEMA will:

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<sup>1</sup> Definition of personal information from the Office of the Privacy Commissioner 'Ask Us' tool.

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- Implement best practice end-to-end privacy management processes. We will do this by:
  - Embedding privacy by design principles into service design so that privacy protection is at the forefront of any systems and business processes that contain personal information.
  - Using privacy impact assessments in all new business process development where personal information is involved.
  - Testing and reviewing our current systems and processes to actively identify risks to privacy and apply treatments when risks are identified.
  - Notifying the Office of the Privacy Commissioner and affected individuals as soon as possible if DPMC or NEMA believes a privacy breach has caused (or is likely to cause) serious harm.
- Ensure our staff are confident and knowledgeable in their approach to managing personal information. We will do this by:
  - Providing resources and training on privacy practices.
  - Developing and publishing guidance on how privacy is managed at DPMC and NEMA.
  - Using our privacy communication strategy to focus and raise awareness of privacy with our staff.
- Regularly assess the state of our privacy health. We will do this by:
  - Reviewing and refreshing our privacy programme to continually lift our performance as measured against the Government Chief Privacy Officer annual privacy self-assessment report.
  - Monitoring how we manage privacy requests, complaints and breach responses and implementing changes to our processes if deficiencies are identified.
- Provide effective leadership on privacy across DPMC and NEMA. We will do this by:
  - Empowering our Privacy Officers to undertake effective monitoring and oversight of our compliance with the requirements of the Privacy Act 2020.
  - Equipping our people leaders and staff with privacy skills and knowledge so they can 'walk the talk' on privacy.
- Ensure that members of the public understand how privacy is managed at DPMC and NEMA. We will do this by:
  - Publishing our privacy policy on the DPMC website to ensure the public understand DPMC's commitment to privacy.
  - Ensuring that all our websites contain accurate privacy notices and information about how individuals can access information held by DPMC and NEMA.

## Responsibilities

Role	Responsibilities
Staff	<p>Are responsible for:</p> <ul style="list-style-type: none"> <li>protecting personal information entrusted to DPMC and/or NEMA</li> <li>identifying privacy issues and events and report these to their manager and the Privacy Officer for their agency.</li> </ul>
ELT	<p>is responsible for:</p> <ul style="list-style-type: none"> <li>Ensuring all staff within their business unit or teams are aware of this policy</li> <li>ensuring their agency has appropriate policies and processes to safeguard the personal information entrusted to DPMC and/or NEMA</li> <li>creating and nurturing a respectful privacy culture assuring the Chief Executive for DPMC or NEMA that each business unit/team complies with relevant policies and processes to safeguard the personal information entrusted to DPMC and/or NEMA</li> </ul>
Privacy Officers (DPMC and NEMA)	<p>are responsible for</p> <ul style="list-style-type: none"> <li>encouraging and monitoring compliance with the Privacy Act for their agency</li> <li>advising on information privacy requests received by their agency</li> <li>advising the respective ELT about any risks to DPMC and/or NEMA's ability to protect and manage the personal information it holds</li> <li>ensuring appropriate incident management in the event of a significant privacy breach for their agency</li> </ul> <p>The DPMC Privacy Officer is responsible for ensuring the Privacy Policy and related guidance is up to date and fit for purpose.</p>
Ministerial Services	<p>is responsible for providing administrative support for coordinating requests for personal information under the Privacy Act 2020.</p>

## Related policies, guidance and information

- Privacy Act 2020
- DPMC's Guide to Managing Privacy Breaches
- Official Information Act 1982
- Public Records Act 2005
- Privacy Threshold Assessment template
- Privacy Impact Assessment template
- Privacy breach guidance