# Privacy policy template

## Explanatory note

The Code of Integrity for Sport and Recreation (the **Integrity Code**) requires that personal information collected, used or held by any organisation in connection with Integrity Code obligations or activities:

* 1. must be managed in accordance with the Privacy Act 2020
  2. will be used only for the purpose of the Integrity Code, which is to prevent and address threats to integrity in sport and recreation.

Organisations must also provide certain advice to those who provide information to the organisation about how that information will be treated.

This privacy policy template covers the minimum requirements and measures that should be in place to ensure that personal information is appropriately collected, used, held and shared in accordance with the requirements of the Privacy Act 2020. It should be tailored to the needs and circumstances of your organisation and reflect the specific functions and activities that might require you to collect and use personal information. It should also be prepared in conjunction with any advice or guidance provided by the Office of the Privacy Commissioner.

## It complies with the Integrity Code

Organisations who use and implement this policy template without changing the mandatory sections, or add the mandatory sections of this policy to their existing policies, will comply with this requirement in clause 9 of the Integrity Code.

Even if you haven’t adopted the Integrity Code, we encourage you to use and implement this policy template or develop and adapt your own privacy policy using this policy template as a guide*.*

## How to use this safeguarding policy template

1. Download and save to your computer*.*
2. Either*:*
   1. use this policy by inserting your organisation’s logo, name and sport or recreation activity where indicated, or
   2. adapt your existing privacy policy by adding the mandatory sections of this policy indicated in blue. Check that the wording your existing policy will be consistent with the mandatory sections, and if it is not you will need to change it.

# Privacy policy

Add your logo here

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| --- |
| Our commitment to you  We are committed to protecting your rights when you provide your personal information to [name of organisation].  We do this by:   * ensuring your personal information is secure and used appropriately * telling you how we will use your personal information * giving you access to your personal information when you ask for it * allowing you to update your personal information * complying with our obligations under the Privacy Act 2020.   We are committed to ensuring that all members, staff, volunteers, contractors and participants are aware of, and understand this policy. Who you can speak to If you are concerned about how your personal information is used or stored by [name of organisation], you can raise it under this policy either to:   * [Insert name of organisation’s contact for privacy/information security issues] or * the Sport Integrity Commission – [sportintegrity.nz/make-a-complaint](https://sportintegrity.nz/making-a-complaint/make-a-complaint) |

## Introduction

1. [name of organisation] collects and uses personal information from those it deals with to carry out its activities and functions. [Name of organisation] acknowledges that individuals care about how their personal information is treated and are entitled to have their privacy rights respected.
2. [name of organisation] is committed to complying with its obligations under the Privacy Act 2020 when dealing with personal information, including ensuring privacy rights are protected and that personal information is only used appropriately.
3. Any personal information provided to [name of organisation] will be collected, used, stored and shared in accordance with this policy. This policy should also be read in conjunction with any applicable terms and conditions relating to the use of and access to our website and other activities or services.

## Purpose

1. This policy explains how [name of organisation] will deal with any personal information that it may collect in connection with performing its activities or functions.

## Who this policy applies to

1. This policy applies to the members, staff, volunteers and contractors of [name of organisation] as well as all participants involved in [the sport and recreation] activities, events and competitions that we are responsible for, in all circumstances where people provide personal information to [name of organisation]. Personal information is information about an identifiable individual.

## Te Tiriti o Waitangi

1. [name of organisation] is committed to upholding the mana of Te Tiriti o Waitangi and the principles of partnership, protection and participation. This policy has been prepared in line with this commitment and its text and implementation is guided by the following values and principles.
   1. Whanaungatanga: fostering positive relationships, connections and a sense of community between participants, particularly for people who are disadvantaged or at risk.
   2. Manaakitanga: participants are treated, and treat each other, with dignity and respect.
   3. Hauora: physical, psychological, spiritual, family and social wellbeing of participants and recognising sport and recreation should make a positive contribution to participants’ wellbeing.
   4. Haumarutanga: the importance of protecting the safety and wellbeing of participants, particularly when they are at risk.
   5. Mokopunatanga: an emphasis on the wellbeing of children and young people, and ensuring future generations thrive.
   6. Pono: acting in a way that is trustworthy, honest and fair.
   7. Utu and ea: reciprocity and opportunities for repairing harm done and restoring a state of balance.

## Acceptance of this policy

1. By accessing and/or using any of our services, engaging in our activities, events and competitions, or otherwise providing us with your personal information, you acknowledge that you have read and understood this policy, and authorise the collection, use, disclosure and storage and retention of your personal information as described in this policy.

## Changes to this policy

1. We may change this policy by posting a revised version on our website. The change will apply from the date we post the revised policy on our website. If we make any significant changes, we will endeavour to provide you with reasonable notice on website or by other means such as email.

## Collecting personal information

1. When you become a member of [name of organisation], or participate in any of the activities, events and competitions that we are responsible for, we will collect personal information about you.
2. Personal information we collect will vary, but may include:
   1. your name, phone number, postal address, email address
   2. your performance results and health/medical information
   3. details of your membership with [name of organisation] (including the nature of your membership or association and any applicable membership terms and conditions)
   4. if relevant to a complaint or dispute resolution process, certain sensitive personal information about you such as your age, gender identity, race, ethnicity, religious or cultural beliefs, sexual orientation, disability, and health information.
3. [Name of organisation] may also collect other information needed to perform its functions, or where required by law.
4. [name of organisation] may collect this information directly from you with your permission, or from the regional organisation and/or national organisation to which [name of organisation] belongs, as well as other organisations which are affiliated to it, for example the New Zealand Olympic Committee, Paralympics New Zealand, or the Sport Integrity Commission, or relevant international sporting organisations.
5. When you use our website we may collect information that is sent to us by your computer, mobile device or other access device. The information that is sent to us may include your computer IP address, referral URL, geo-location and data about the web pages you access. Generally, this information is not personally identifiable data, but to the extent that it is considered personal information for the purposes of the Privacy Act 2020, we will comply with our obligations under law when processing that information.

## Using personal information

1. We will only use and disclose your personal information:
   1. [List name of organisation’s primary activities/operations/purposes];
   2. to verify your identity or to consider an employment or volunteer application
   3. to review and improve the delivery of the activities, events and competitions that we are responsible for
   4. to communicate with you about a complaint, investigation or disciplinary process or proceeding
   5. to conduct research and statistical analysis (on an anonymised basis) and meet our reporting requirements
   6. to bill you and to collect money that you owe us, including authorising and processing credit card transactions
   7. for other everyday business purposes that involve the use of personal information
   8. to protect our rights, property, or safety, or that of our members, participants or others
   9. to comply with any legal obligations, including as permitted by the Privacy Act 2020
   10. for any other purpose authorised by you or the Privacy Act 2020.

## Disclosing personal information

1. We may, for example, disclose your personal information to:
   1. community, regional and/or national/international organisations [name of organisation] belongs to, other organisations which are affiliated to us that you belong to or have applied for membership of, for example, the Sport Integrity Commission, Sport New Zealand, High Performance Sport New Zealand, the New Zealand Olympic Committee and Paralympics New Zealand
   2. any service providers we have engaged to provide a service to us. For example, we may engage third parties to provide us with IT, or customer support services
   3. other parties to a complaint received by [name of organisation] to investigate or resolve the complaint (noting that we will generally obtain your prior consent to such disclosure, except in situations where we are required by law to make the disclosure or there is a risk of serious harm to either party)
   4. any person we believe could provide information that is relevant to whether to investigate a complaint, or to an investigation, including witnesses to complaint matters (please note that we will usually seek agreement to directly contact witnesses)
   5. our professional advisors, including our accountants, insurers and lawyers
   6. a person who can require us to supply your personal information (eg, a regulatory authority)
   7. any other person or organisation authorised by you
   8. any other person or organisation authorised by the Privacy Act 2020 and/or another law (eg, the New Zealand Police or Oranga Tamariki).

An organisation we disclose to may be outside New Zealand. This may mean your personal information is held and processed outside New Zealand.

## Integrity Code

1. [name of organisation] has worked with the Sport Integrity Commission (the Commission) and adopted the Code of Integrity for Sport and Recreation (the Integrity Code). We have done so to protect the safety and wellbeing of our participants. This includes, but is not limited to athletes, coaches, instructors, volunteers, officials, administrators and others who take part in activities associated with [name of organisation].
2. The purpose of the Integrity Code is to prevent and address threats to integrity in sport and recreation by:
   1. setting minimum standards to apply across the sport and recreation sector
   2. requiring organisations bound by the Integrity Code to put policies and procedures in place to implement the minimum standards set out in the Integrity Code
   3. prescribing the Commission’s role in overseeing the Integrity Code, including through dispute resolution processes, investigations and a disciplinary panel.
3. Threats to integrity include bullying, violence, abuse, discrimination, harassment, corruption, fraud, deception, breaches of trust, competition manipulation, as well as situations where organisations fail to take reasonable steps to prevent these threats, or to safeguard children and young people in sport and recreation.
4. As part of [name of organisation] working with the Commission to respond to threats to integrity, from time to time we will be required to collect personal information from our participants.
5. [name of organisation] confirms that personal information collected, used or held by it in connection with Integrity Code obligations or activities will be:
   1. managed in accordance with the Privacy Act 2020
   2. used only for the purpose of the Integrity Code as set out above.
6. [name of organisation] also confirms that anyone who provides personal information to it in connection with any Integrity Code obligations or activities will be advised about:
   1. the purpose of collecting the personal information
   2. what it will be used for
   3. how it will be stored
   4. how long it will be kept for
   5. whether the information will be shared or disclosed.

## Accessing and correcting your personal information

1. You agree that any information you give to us will be accurate, correct and up to date.
2. Subject to certain grounds for refusal set out in the Privacy Act 2020, you have the right to request a copy of the personal information we hold about you (whether we have collected from you directly or from a third party), and to request we amend it if it is incorrect. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.
3. In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we are not willing to correct errors that you have identified in your personal information, you may request that we take reasonable steps to attach a statement to the personal information that you requested the correction.
4. We will process your request as soon as possible, and no later than 20 working days after we receive it. We may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.
5. We will only retain personal information for as long as it is required for the purposes for which the information may lawfully be used.

## Security of information

1. We take all reasonable steps to ensure the personal information we collect is protected against loss, unauthorised access and disclosure or any other misuse. We ensure that any third-party data processors we might use to store and process our data can meet our privacy and security requirements.

## Links to other websites

1. Our website may have links or references to third-party websites. This policy does not apply to those websites. If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site’s privacy policy before you provide personal information. We accept no responsibility or liability for the content or privacy practices of any third-party websites.

## How to contact us

1. If you have any queries or concerns about this policy, our handling of your personal information or if you would like to request access to, or correction of, your personal information, please contact us at:
   1. [Insert name of organisation contact for privacy/information security issues].

## Reporting a breach

1. Breaches of this policy includes breaches of any of the [Privacy Principles](https://www.privacy.org.nz/privacy-act-2020/privacy-principles/) under the Privacy Act 2020.
2. Any person may report an alleged breach of this policy in accordance with the complaints procedure outlined in [name of organisation]’s complaints and dispute resolution policy or to the Sport Integrity Commission by [insert contact details].

## Related policies

* 1. Complaints and Dispute Resolution Policy
  2. Mandatory Notification Policy
  3. Disciplinary Policy

## Policy approval

1. This policy was approved on [insert date] by [insert name of organisation] representative].

## Review of policy

1. This policy must be reviewed by [insert date no later than 1 year after approval date – should be on an annual review].