

Accuracy of information

It is important that you take the time to ensure any learner information that you want to use or share with others is accurate, up to date, complete, relevant and not misleading.



Maintaining accurate, up to date and complete learner information is important – it helps give you and your governance function assurance that you can rely on the information to make good decisions and gives learners (and their parents) confidence that your decisions are robust, fair and proportionate.

Relevant information privacy principles

The Privacy Act 2020 sets out rules about ensuring personal information about learners is accurate before you use or share it. The relevant information privacy principles (IPPs) are:

Principle 8: Accuracy of personal information to be checked before use or disclosure

An education provider that holds personal information must not use or disclose that information without taking steps that are reasonable, in the circumstances, to ensure that the information is accurate, up to date, complete, relevant and not misleading.

Principle 6: Access to personal information (IPP6(2))

If a learner is given access to their personal information, they must be advised that they may request correction of that information.

Principle 7: Correction of personal information (IPP7(2))

An education provider that holds personal information must, on request or on its own initiative, take such steps (if any) that are reasonable in the circumstances 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.

What does taking reasonable steps mean?

The Privacy Act requires you to take reasonable steps that are reasonable the circumstances, to ensure personal information about a learner is accurate, up to date, complete, relevant and not misleading before you use or share it.

What steps you may need to take will depend on the circumstances. For example, when you are making a decision that could negatively impact a learner you should take extra care to ensure the information used or shared to inform that decision is accurate, up to date, complete, relevant and not misleading.

Some reasonable steps to take before using or sharing a learners information include (but are not limited to) checking:

The source of the information

From whom and how did you receive the information? Is the information more rumour and speculation than factual in nature? You may need to verify both the source and the veracity of the content of the information received before you use or share it.

The age and status of the information

How long ago did you receive the information? You may need to check with the learner (or their parents where appropriate) that the information is still correct and up to date.

If the information is contained in a report, do you have the latest version of the report? You may need to check that you have the most up to date information, or whether the information contained in the report is still valid.



Is the information relevant to the purpose you want to use or share the information?

Is the information necessary for the purpose for which you want to use or share the information? If information about a learner is contained in a report, do you need to share the full report, or is only some of the information in the report relevant?

Is there other information about the learner that you don't hold?

Is the information you hold only part of picture? You may need to seek further information to ensure you have a complete understanding of the learner's circumstance before you use or share it others. You may also need to ensure the recipient is aware you only hold part of the information and that additional information about the learner may be required from other parties to form a complete picture of the learner and their circumstances.

Could you or others misinterpret the information without additional context?

Could the information when considered on its own be misleading? Is additional contextual information required before using or sharing the information?

Does the information contain terms that have specific meanings? You may need to ensure when sharing a learner's information any terms used are fully understood by the recipient e.g. when sharing absence information ensure the recipient is aware of the difference between justified and unjustified absence.

Is the learner (or their parents where appropriate) aware of their access and correction rights (IPP6 and IPP7)?

Does the learner know you are using or sharing their personal information, and are they aware that they can request correction of that information if they believe it is wrong? This gives the learner (or their parents where appropriate) the opportunity to request correction to their information before it is used to make a decision that may impact them or shared with others.



Why it is important to use or share accurate, up to date, complete, relevant and not misleading personal information

When you use or share out of date, inaccurate, irrelevant or incomplete information to make decisions that impact a learner, the consequences for the learner and their family can be significant.

For example:

- Information about a learner's disrupted home life was not considered when making a disciplinary decision leading to an unfair or disproportionate disciplinary outcome.
- Information about a learner's disruptive behaviour several years ago was relied on to decide about unsuitability or eligibility for a scholarship or award.
- Out of date parental contact information was used to send absence notifications resulting in the notifications being sent to the wrong address.
- The mental health of a learner who has transitioned from a male to female gender can be impacted by knowing the school or ECE services student management system records their gender as male. The learner can also be impacted when the inaccurate gender information is used or shared in reports or other documents.
- Relying on out of date or inaccurate health or medical information may impact a learner's ability to access appropriate learning support interventions or funding.
- Using anecdotal information about a learner's residential address without verifying it could impact enrolment decisions.
- incomplete, out of date or irrelevant information could negatively impact a decision on a directed enrolment.
- Sharing incorrect achievement information about a learner could result in them repeating unnecessary work.



Establishing good information management practices

Good information management practices can also help you maintain the accuracy of the learner information you hold. Some of these include:

Know where your learner information is stored

Knowing what business systems hold the authoritative learner data helps ensure you are using or sharing accurate and up to date learner information. For schools this will likely be ENROL and your student management system, for ECE services this will likely be ELI and your student management system.

Establish good collection practices

Establish collection practices that ensure only accurate and up to date information is collected from learners (or their parents where appropriate) and other people. Robust collection practices help avoid duplication, inconsistency and help maintain the accuracy of the learner information you hold.

Attach dates to learner information

When adding information to a learner's file or record, ensure you note the date the information was added to the file. This helps you to determine whether the information may be out of date or irrelevant when you are considering using or sharing it later.

Undertake data and information quality checks

Implement information quality checks (manual or automated) to identify and correct inaccurate, out of date, incomplete, irrelevant or misleading information. Data quality checks provide assurance to your governance function, and your learners and parents, that information you hold is reliable and trustworthy.

Check-in with learners (or their parents where appropriate)



Annually, or at other appropriate intervals, check in with learners (and their parents) and ask them to update any relevant learner information (for example, contact information, medical or health information, family circumstance information).

Retention and disposal practices

Regularly review information held in your learner and education management systems and assess against your data retention and disposal schedule.

Oranga Tamariki Act 1989 and Family Violence Act 2018

When using or sharing learner information under section 66C of the Oranga Tamariki Act or section 20 of the Family Violence Act, you are still required to comply with the Privacy Act IPP8 requirement to take reasonable steps to ensure you are sharing accurate, up to date, complete, relevant and not misleading information.

When a learner's wellbeing or safety is at risk there is often urgency to information requests. Where an urgent request for information about a learner is received, ensuring accuracy of the information provided is always more important than speed of response. Inaccurate, out of date, incomplete, irrelevant or misleading information can lead to decisions that may create further risk or harm to the learner.

In these situations, use or share what you know to be accurate and up to date as soon as you can, and let the requester know you will come back to them with further information once you have checked it is accurate and up to date. Also consider whether contextual information is necessary to ensure the information is complete and not misleading – don't assume that the requestor will know or understand the context of the information.

For more information about using and sharing learner information using the Oranga Tamariki Act or the Family Violence Act see [Chapter 6: Using Information](#) and [Chapter 7: Sharing Information](#).

