

## Governance Policy

Poipoi – Kauawhi – Tāuteute – Pūnaha Auaha – Ārahi  
Nurture - Include - Engage - Innovate - Lead

What guides us:

Living Te Tiriti o Waitangi  
Ensuring ākonga are at the centre of everything we do  
Delivering high-quality, future-focused teaching and learning

## INFORMATION MANAGEMENT & SECURITY

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Date of approval	: 25/3/2025
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Sponsor	: Deputy Chief Executive Systems and Support
Owner	: Chief Information Officer
Who are these procedures for	: All kaimahi

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### Outcome statement

1. Board of Trustees (Board) recognises that Te Aho o Te Kura Pounamu (Te Kura) information is a valuable strategic asset, central to its purpose and the achievement of its educational objectives.
2. This policy sets out the principles for managing, securing, and protecting information, with a focus on compliance with the Privacy Act 2020, data sovereignty, and ethical information use, and ensures Te Kura upholds its obligations to ākonga, Kaimahi, and the Te Kura Community.

### Te Tiriti o Waitangi

3. As a leading education provider, Te Kura is committed to living Te Tiriti o Waitangi in both leadership and organisational practice. This policy recognises the constitutional status of Māori as tangata whenua, affirming the principles of equal treatment, mutual benefit, and tino rangatiratanga.
4. Te Kura is committed to actively protecting mātauranga Māori, values, interests, and other taonga. We recognise and respect the role of Māori as kaitiaki of their taonga and the mātauranga that underpins it.
5. This policy aligns with Te Tiriti o Waitangi Governance Policy, which acknowledges and upholds the obligations and commitment of Te Tiriti o Waitangi.

### Cultural Inclusivity

6. Te Kura is committed to cultural safety and responsiveness for kaimahi, ākonga, and whānau. This policy recognises and respects the rights of all cultures to their own knowledge, values, interests, and taonga. It also ensures that cultural perspectives are considered in decisions affecting their information and intellectual property.

### Scope

7. This policy applies to all Te Kura Kaimahi involved in the creation, use, maintenance, and disposal of school-related information.

8. Everyone covered by this policy, regardless of their role, must consistently adhere to all Te Kura policies and comply with New Zealand laws.

### Delegated authorities

9. Any decisions must be made in accordance with the [Financial and Human Resources Delegations Governance Policy](#).

### Accountabilities and responsibilities

10. The Board is accountable for the responsible management, security, and ethical use of information in its care. This includes maintaining the confidentiality, integrity, and availability of information, aligning with best practices, and recognising the unique cultural needs and aspirations of Iwi Māori.
11. The Chief Executive manages the daily operations of Te Kura<sup>1</sup>, which includes the development and implementation of an information management and security framework.

### Definitions

12. In this Policy, unless the context requires otherwise:

Term	Definition
Data Sovereignty	Refers to the understanding that data is subject to the laws of the nation within which it is stored.
Indigenous Data Sovereignty	Perceives data as subject to the laws of the nation from which it is collected.
Kaimahi	Staff, including permanent, fixed-term, temporary, and seconded employees, as well as volunteers and contractors engaged by Te Kura, regardless of whether they work full-time, part-time, or casually.
Māori Data Sovereignty	Recognises that Māori data should be subject to Māori governance. Māori data sovereignty supports tribal sovereignty and the realisation of Māori and Iwi aspirations.
Māori Taonga Work	A creation of the pre-existing and distinctive body of knowledge, values, and insights called mātauranga Māori and is a result of the effort and creativity of people and atua whether in modern times or the distant past. <sup>2</sup> Has a whakapapa (genealogy) and often naturally has a kaitiaki because of this whakapapa.  For the purpose of this policy, taonga includes Māori words, symbols, designs, images, and human and non-human identities.
Te Kura Community	Kaimahi, parents and caregivers, whānau, iwi, hapū, and communities.
Frequently used terms, including Te Reo Māori, can be found <a href="#">here</a> .	

### Policy statements

<sup>1</sup> Section 130 Education and Training Act 2020

<sup>2</sup> As interpreted from the Ko Aotearoa Tēnei: A report into claims concerning New Zealand law and policy affecting Māori culture and identity, Te Taumata Tuatahi (Waitangi Tribunal Report 2011), pg. 30. Referred to as the "[Ko Aotearoa Tēnei Report](#)".

## Information as a strategic asset

13. Information will be treated as a strategic asset that contributes to better educational outcomes for ākongā, operational effectiveness, and regulatory compliance.
14. Te Kura will establish information stewardship roles to manage, protect, and optimise the use of its information assets throughout their lifecycle.
15. Appropriate measures will ensure that information is accessed and used in a way that maximises its value as a strategic asset while protecting against risks.

## Data Sovereignty

16. Wherever possible, information should be stored within New Zealand and be subject to New Zealand laws. If information must be stored overseas, efforts should be made to ensure it is also governed by New Zealand laws wherever feasible.
17. Te Kura recognises the importance of ensuring that information related to Māori is collected, stored, and used in ways that supports the rights of Māori to access, use and reuse, information and records that are taonga.
18. Te Kura is committed to aligning its information governance practices with government directions and guidance on Māori Data Sovereignty.

## Māori Taonga Works and intellectual property<sup>3</sup>

19. Māori Taonga Works are expressions of Māori artistic and cultural traditions, rooted in mātauranga Māori. Kaitiaki have a unique role in protecting these works, regardless of whether they were the original creators.

## Respect and appropriate use

20. Kaimahi should ensure that Māori Taonga Works and taonga-derived works (which incorporate mātauranga Māori or draw inspiration from Māori Taonga Works but do not have mauri or living kaitiaki under tikanga) are used in a manner that reflects their cultural significance, and aligns with tikanga and the values of Te Kura.

## Commercial use and consultation

21. Te Kura should prevent the commercial use of Māori Taonga Works unless there has been appropriate consultation.
22. This includes seeking expert advice and, where required, the consent of kaitiaki – refer to [Intellectual Property, Copyright, & Other Related Rights Hātepe Kaimahi].

## Purposeful information collection and management

23. A maintained inventory of information assets will detail the purpose, use, and storage of information, ensuring transparency and alignment with educational goals.
24. Information collection will be limited to defined and legitimate purposes aligned with the school's objectives.
25. Robust measures will be in place to control access to sensitive information, protecting the privacy and rights of ākongā, Kaimahi, and the Te Kura Community.

## Privacy obligations

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<sup>3</sup> Respect, appropriate use, and commercial use of Māori Taonga Work by Te Kura should be consistent with Ko Aotearoa Tēnei Report [Chapter 1: Taonga Works and Intellectual Property](#) recommendations.

26. Te Kura will adhere to the [Privacy Act 2020](#) and the Privacy Principles, ensuring the privacy of individuals, particularly ākonga – refer to [Privacy Governance Policy](#).
27. Specific protections will be in place for ākonga, including those outlined in the [United Nations Convention on the Rights of the Child](#).
28. Privacy Impact Assessments (PIAs) will be conducted for new information systems or changes in information processing activities to evaluate potential risks.

## Responding to the digital information landscape

29. Te Kura will regularly review and adapt its information policies to stay ahead of the rapidly changing digital environment and associated risks.
30. Ethical considerations will guide the use and protection of information, including safeguards against misuse and unauthorised access.
31. Ongoing training for Kaimahi, ākonga, and parents/caregivers will promote information protection, privacy rights, and digital citizenship.

## Compliance

32. Breaches of this policy may be treated as a performance issue, misconduct, or serious misconduct and will be managed in accordance with the Te Kura [Code of Conduct - Kaimahi](#) and the relevant employment agreement.

## Monitoring and reporting

33. The Chief Executive will oversee the implementation of this policy and will report annually to the Board on its compliance.

## Related documents and information

34. The following information supports the interpretation of this Policy:

### Policy documents

- a. [Code of Conduct - Kaimahi](#)
- b. [Financial and Human Resources Delegations Governance Policy](#)
- c. [Information and Records Management Hātepe Kaimahi](#)
- d. [Intellectual Property, Copyright, and Other Related Rights Governance Policy](#)
- e. [Policy Framework Governance Policy](#)
- f. [Privacy Governance Policy](#)
- g. [Privacy Hātepe Kaimahi]
- h. [Protected Disclosure Hātepe Kaimahi](#)
- i. [Responsible Use of ICT Hātepe Kaimahi](#)
- j. [Te Tiriti o Waitangi Governance Policy](#)

### Guidance

- k. [United Nations Convention on the Rights of the Child](#)
- l. [Ko Aotearoa tēnei : a report into claims concerning New Zealand law and policy affecting Māori culture and identity. Te taumata tuatahi.](#) (Waitangi Tribunal report 2011)

### Legislation

- m. [Crown Entities Act 2004](#)

- n. [Education and Training Act 2020](#)
- o. [Education \(School Boards\) Regulations 2020](#)
- p. [Human Rights Act 1993](#)
- q. [Official Information Act 1982](#)
- r. [Privacy Act 2020](#)
- s. [Protected Disclosures \(Protection of Whistleblowers\) Act 2022](#)
- t. [Public Records Act 2005](#).

**Approved by Nicola Ngarewa, Chairperson, Te Aho o Te Kura Pounamu Board of Trustees**