R&O Consulting

Policies and Procedures · Version 1.0 · Effective 4 November 2026

Document control

Item	Detail
Organisation	R&O Consulting Limited
Registered address	60a Kimpton Road, Papatoetoe, Auckland
Document owner	Ronal Reddy, Director
Approved by	Ronal Reddy, Director
Version	1.0 (final)
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Contact	021 265 6767 · ronal.reddy@roconsulting.co.nz · roconsulting.co.nz
Applies to	The Director and all employees, contractors, tutors and volunteers working for or on behalf of R&O Consulting Limited
Designated roles	The Director is the Privacy Officer and the Child Protection Lead until other people are appointed
Review cycle	Child Protection and Safeguarding: at least every three years, as required by the Children's Act 2014. All other policies: annually. Any policy is reviewed sooner after a serious incident, a change in law or a new contract requirement

Purpose

This document sets out how R&O Consulting Limited keeps children safe, protects personal information, manages health and safety, secures information and handles food when delivering education services, including the Ministry of Education Pacific Homework and Tutoring Initiative.

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1. Child Protection and Safeguarding Policy

Policy no.	Version	Effective date	Next review	Policy owner
RO-01	1.0	4 November 2026	4 November 2029	Director (Child Protection Lead)

Legislation and standards: Children's Act 2014; Children's (Requirements for Safety Checks of Children's Workers) Regulations 2015; Oranga Tamariki Act 1989; Privacy Act 2020.

R&O Consulting puts the safety and wellbeing of every child and young person first. This policy meets the requirements of the Children's Act 2014 and the Children's (Requirements for Safety Checks of Children's Workers) Regulations 2015. It is published on our website at roconsulting.co.nz and given to every school, family and funder we work with on request.

1.1 Our commitment

- Every child and young person has the right to be safe, respected and heard.
- We will not tolerate abuse or neglect of any kind.
- We work in partnership with families, schools, Oranga Tamariki and Police to keep children safe.
- Our practice is grounded in Pacific values: **va** (respectful relationships), **tautua** (service), **alofa/aroha** (care) and the central place of family and community in a young person's life.

1.2 Scope and definitions

- **Child / young person:** anyone under 14/18.
- **Children's worker:** anyone working for R&O Consulting, paid or unpaid, whose work involves regular or overnight contact with children. This includes tutors, coordinators, contractors and volunteers.
- **Core worker:** a children's worker who may be the only adult present with a child, or who has primary responsibility for or authority over a child. All R&O tutors are treated as core workers.
- **Abuse:** physical, sexual or emotional harm, ill-treatment, or exploitation of a child. **Neglect:** failing to provide for a child's basic needs or safety.

1.3 Roles and responsibilities

Role	Responsibility
Director (Child Protection Lead)	Owns this policy; receives and acts on all concerns; makes reports to Oranga Tamariki and Police; notifies the Ministry and school; keeps confidential records
Lead tutors / supervisors	Model safe practice; supervise tutors; pass concerns to the Child Protection Lead the same day
All children's workers	Follow the code of conduct; complete training; report any concern immediately

1.4 Safe recruitment and safety checking

No one works with children for R&O Consulting until every check below is complete and recorded. The Ministry must also approve and name each tutor on the contract before they deliver sessions.

Check	Detail	When
Identity	Verify name and identity using approved documents (e.g. passport, driver licence) and confirm any previous names	Before start
Police vet	NZ Police Vetting Service check; overseas police check if lived overseas 12+ months in the last 10 years	Before start, then every 3 years
Work history	Employment history for at least the last 5 years, with gaps explained	Before start
References	At least one referee, not a family member, spoken to directly	Before start
Interview	Face-to-face or video interview, including questions on child safety	Before start
Professional registration	Teaching Council registration checked where held	Before start
Risk assessment	Director assesses all information and decides whether the person poses a risk to children; recorded and signed	Before start, then every 3 years

A person convicted of a specified offence under Schedule 2 of the Children's Act 2014 will not be employed as a core worker unless they hold a valid exemption. Workers must tell the Director straight away if they are charged with or convicted of any offence.

1.5 Code of conduct for safe practice

- Sessions take place in open, visible spaces. Doors stay open or have viewing panels.
- No worker is alone with a child out of sight of other adults. Where 1:2 or 1:3 tutoring is needed, it happens in a shared or visible space.
- Online sessions are live, use R&O-controlled accounts, are scheduled in advance with the school and family, and are never recorded without written consent.
- No private contact with students through personal phones, social media or messaging apps. All contact goes through school or R&O channels and includes the parent or caregiver.
- No photos or videos of students without written consent from the parent or caregiver and the school.
- Physical contact only when needed for safety, and always appropriate and public.
- No transport of students in a worker's private vehicle unless agreed in writing in advance by the family, the school and the Director.

- No gifts, money or favours to or from individual students, other than shared group rewards approved by the Director.
- Respect students' culture, language, faith and identity. Discriminatory, humiliating or harsh language or discipline is never acceptable.

1.6 Recognising abuse and neglect

Workers are trained to notice possible signs of harm, such as unexplained injuries, sudden changes in behaviour or attendance, fearfulness, hunger or poor hygiene, or a student saying something worrying. A sign alone does not prove abuse; it means the worker must pass the concern on.

1.7 If a young person tells you something

1. Stay calm, listen and let them speak in their own words.
2. Reassure them they did the right thing in telling you and that it is not their fault.
3. Do not promise to keep it secret. Explain that you must tell someone whose job is to help keep them safe.
4. Do not ask leading questions, investigate or contact the alleged abuser.
5. Write down what was said, in their words, with the date, time and who was present, as soon as possible.
6. Tell the Child Protection Lead the same day.

1.8 Reporting a concern

1. **Immediate danger:** call Police on 111, then tell the Child Protection Lead.
2. **Any other concern:** tell the Child Protection Lead the same day, in person or by phone, and give them your written notes.
3. The Child Protection Lead decides on action, usually within 24 hours, and consults the school's designated safeguarding person.
4. Where there is reasonable concern that a child is being or is likely to be harmed, the Child Protection Lead reports to Oranga Tamariki on 0508 326 459 (or contact@ot.govt.nz) and, where a crime may have occurred, to Police.
5. The Child Protection Lead notifies the Ministry of Education contract manager immediately, as a critical incident, while protecting the child's identity as far as possible.
6. If the Child Protection Lead is unavailable or is the subject of the concern, the worker reports directly to Oranga Tamariki or Police and to the school principal.

Anyone who reports a concern in good faith is protected from civil, criminal and disciplinary action under section 16 of the Oranga Tamariki Act 1989.

1.9 Allegations about a worker

- Any allegation or concern about a worker's conduct goes straight to the Director (or, if it concerns the Director, to the school principal and the Ministry contract manager).
- The worker is stood down from contact with children while the matter is assessed. Standing down is not a finding of fault.
- The Director informs the Ministry and the school immediately, and reports to Police or Oranga Tamariki where required.

- R&O follows a fair employment process and keeps a confidential record of the allegation, actions and outcome.

1.10 Complaints and concerns from students and families

Students, families and schools can raise a concern with any tutor or directly with the Director on 021 265 6767 or at ronal.reddy@roconsulting.co.nz. We acknowledge it within one business day and aim to resolve it within five business days. Anyone not satisfied can contact the school or the Ministry of Education.

1.11 Training and supervision

- All workers complete child protection and safeguarding training during induction, before working with students, and a refresher every year.
- Training covers this policy, signs of abuse and neglect, responding to disclosures, safe online practice and culturally responsive care for Pacific young people and families.
- Each worker signs a declaration that they have read and will follow this policy. R&O completes the Ministry's annual compliance declaration on safety checking.
- Tutors are supervised by the Director or a lead tutor, with regular observation of sessions.

1.12 Records and information sharing

Child protection records are kept secure and confidential, separate from learning records, and shared only with people who need them to keep a child safe, as allowed by the Oranga Tamariki Act 1989 and the Privacy Act 2020.

2. Privacy Policy

Policy no.	Version	Effective date	Next review	Policy owner
RO-02	1.0	4 November 2026	4 November 2027	Director (Privacy Officer)

Legislation and standards: Privacy Act 2020 and the Information Privacy Principles.

R&O Consulting collects, stores, uses and shares personal information only as the Privacy Act 2020 and its 13 Information Privacy Principles allow, and only for the purpose it was collected for. This policy is addressed to every employee, contractor and tutor, and is available to students, families and schools.

2.1 Privacy Officer

Ronal Reddy, Director, is R&O Consulting's Privacy Officer, contactable at ronal.reddy@roconsulting.co.nz and 021 265 6767. The Privacy Officer:

- makes sure R&O complies with the Privacy Act 2020 and contract privacy requirements
- handles requests to access or correct personal information
- leads the response to any privacy breach (section 3)
- trains staff on privacy at induction and every year
- reviews privacy risks and controls every six months and reports on them in the annual compliance review.

2.2 What we collect

For the Pacific Homework and Tutoring Initiative we collect only what we need to deliver and report on the service:

- student name, school, year level and the learning needs identified by the school
- parent or caregiver contact details
- attendance, diagnostic and progress results, learning plans and end-of-tutoring reports
- dietary needs and allergies (for safe catering) and emergency contacts
- student and family feedback
- staff and tutor records, including safety-check results.

We collect information directly from the person or their parent or caregiver where we can, or from the school and the Ministry as the contract allows. We tell people why we are collecting it, who will see it and how they can access it.

2.3 How we use and share it

- Personal information is used **only** to deliver, monitor and report on the contracted service.
- It is shared only with the student's school, their family, the Ministry of Education as required by the contract, and anyone else the law requires (for example Oranga Tamariki or Police when a child's safety is at risk).
- Reports to the Ministry use aggregated or de-identified data wherever possible.
- **R&O does not use or share any personal information collected under the contract for its own purposes**, including marketing, analytics, research or product development, and never sells it.

2.4 Storage and security

- Electronic records are kept in Microsoft 365, with data stored in Australia or New Zealand where available, encrypted at rest and in transit.
- Every account uses a unique login and multi-factor authentication. Access is role-based: tutors see only their own students.
- Laptops and phones used for R&O work have screen locks, encryption and up-to-date security software, and can be wiped remotely if lost.
- Personal information is never stored on USB drives or personal email, or sent in unencrypted attachments.
- Paper records (e.g. attendance sheets, consent forms) are kept to a minimum, carried in a closed folder, stored in a locked cabinet, and scanned and securely shredded within one week.
- Data is backed up automatically by the cloud provider.
- Tutors' access is removed on their last working day.

2.5 Keeping and disposing of information

- We keep personal information only for the life of the contract, unless a law requires us to keep it longer (e.g. tax and employment records).
- At the end of the contract, or when the Ministry asks, we return the information to the Ministry or school and then permanently delete it from all systems and backups, and cross-cut shred any paper copies, within 30 days.

- The Director confirms the deletion in writing to the Ministry.

2.6 Access and correction

Anyone may ask to see or correct the personal information we hold about them, or about their child. We respond within 20 working days, as the Privacy Act requires.

2.7 Staff responsibilities

All workers sign a confidentiality agreement, complete privacy training at induction (including the Privacy Commissioner's free online Privacy ABC module) and report any actual or suspected privacy breach to the Privacy Officer immediately.

2.8 Questions and complaints

Privacy questions or complaints go to the Privacy Officer. Anyone not satisfied with our response can complain to the Office of the Privacy Commissioner at privacy.org.nz.

3. Privacy and Security Breach Procedure

Policy no.	Version	Effective date	Next review	Policy owner
RO-03	1.0	4 November 2026	4 November 2027	Director (Privacy Officer)

Legislation and standards: Privacy Act 2020 (Part 6, notifiable privacy breaches).

Any actual or suspected privacy or security breach is reported to the Privacy Officer immediately, contained within hours, and notified to the Ministry of Education straight away. It is also notified to the Privacy Commissioner and affected people whenever it is likely to cause serious harm.

3.1 What counts as a breach

Any unauthorised or accidental access to, disclosure, change, loss or destruction of personal information, or anything that stops people accessing their information. Examples: an email or report sent to the wrong person, a lost laptop, phone or attendance sheet, a hacked account, a tutor viewing records they don't need, or information shared without consent.

3.2 Roles

Role	Responsibility
Any worker	Report a breach or suspected breach to the Privacy Officer immediately, and help contain it
Privacy Officer (Director)	Leads the response: containment, assessment, notifications, records and lessons learned
IT/cloud provider	Supports technical containment (password resets, remote wipe, access logs) when asked

3.3 Steps and timeframes

Step	What happens	Timeframe
1. Report	Worker tells the Privacy Officer by phone, then confirms in writing: what happened, when, what information, who is affected	Immediately on discovery
2. Contain	Recall or ask recipients to delete misdirected information; reset passwords; remove access; remote-wipe lost devices; recover paper records	Within hours
3. Notify the Ministry	Privacy Officer notifies the Ministry of Education contract manager, treated as a critical incident, and keeps them updated	Immediately, no later than 24 hours
4. Assess	Privacy Officer assesses the risk of serious harm, considering: how sensitive the information is (children's information is treated as high risk), who has it, whether it is protected, and what harm could follow	Within 48 hours
5. Notify the Privacy Commissioner and affected people	If serious harm is likely, notify the Office of the Privacy Commissioner through NotifyUs (privacy.org.nz), and tell affected students' families what happened and what they can do	As soon as practicable (OPC expects within 72 hours of becoming aware)
6. Fix and learn	Find the cause, fix the gap (training, settings, process), update policies, and report outcomes to the Ministry	Within 10 working days

3.4 Records

Every breach or near miss is recorded in the R&O breach register, whether or not it is notifiable: date, description, information and people affected, actions taken, notification decisions and reasons, and lessons learned. The register is reviewed every six months.

3.5 Communication

All workers know this procedure from induction. Notifications to families are clear, in plain language, and offered in a Pacific language where helpful. Media or public statements are made only by the Director, after consulting the Ministry.

4. Health and Safety Policy

Policy no.	Version	Effective date	Next review	Policy owner

R&O CONSULTING

Policy no.	Version	Effective date	Next review	Policy owner
RO-04	1.0	4 November 2026	4 November 2027	Director

Legislation and standards: Health and Safety at Work Act 2015; Health and Safety at Work (General Risk and Workplace Management) Regulations 2016.

R&O Consulting is committed to keeping its workers, students and everyone at its sessions safe and well, and to meeting its duties as a PCBU (person conducting a business or undertaking) under the Health and Safety at Work Act 2015.

4.1 Responsibilities

Who	Duties
R&O Consulting (PCBU)	Eliminate risks, or minimise them where they can't be eliminated; provide safe venues, equipment and work practices; provide information, training and supervision; monitor workers' health and session conditions
Director (officer)	Exercises due diligence: knows the work and its risks, makes sure resources and processes are in place, checks they are working, and reviews this policy every year
Workers (employees, tutors, contractors)	Take reasonable care of their own and others' health and safety; follow instructions and this policy; report hazards, incidents and near misses straight away
Schools and venue owners	Overlapping duties: R&O consults, cooperates and coordinates with each school or venue on site rules, emergency procedures and hazards before delivery starts

4.2 Key risks and controls

Risks are recorded in the R&O hazard and risk register, reviewed before each delivery block and after any incident.

Risk	Main controls
Sessions before or after school hours	Venue induction; at least two adults on site; sign-in and sign-out of students; students released only to agreed arrangements
Lone working and travel	Tutors check in and out with the lead tutor; no lone working in empty buildings; travel at night planned

Risk	Main controls
	in advance
Student medical needs (asthma, allergies, epilepsy)	Medical and allergy information collected at enrolment; first-aid-trained person at every session; first aid kit on site; emergency contacts to hand
Food handling and allergies	Food Safety, Nutrition and Allergy Procedure (section 6)
Challenging behaviour or conflict	De-escalation training; follow school behaviour policies; incidents reported the same day
Slips, trips, furniture and equipment	Visual check of the room before each session; damaged items reported to the school
Emergencies (fire, earthquake, lockdown)	Follow each school's emergency procedures; tutors know exits and assembly points; drills attended where possible
Online sessions	Safe online practice in the Child Protection Policy (section 1.5); screen breaks
Worker wellbeing and fatigue	Reasonable session loads; supervision check-ins; access to support

4.3 Incidents and near misses

1. Give first aid and make the area safe; call 111 if needed.
2. Tell the Director and the school as soon as possible, and the student's family the same day.
3. Record the incident or near miss on the R&O incident form within 24 hours.
4. The Director investigates every incident that caused, or could have caused, harm, and records the cause and corrective actions.
5. Serious incidents involving students are reported to the Ministry of Education immediately as critical incidents.

4.4 Notifiable events

A death, notifiable injury or illness, or notifiable incident is reported to WorkSafe New Zealand (0800 030 040 or worksafe.govt.nz) as soon as possible, and the scene is preserved until WorkSafe says otherwise. Records of notifiable events are kept for at least five years.

4.5 Worker engagement and training

- All workers receive a health and safety induction covering this policy, venue procedures, incident reporting and emergency procedures.
- At least one person with a current first aid certificate is present at every session.

- Workers are asked for their views on health and safety at team meetings and can raise concerns at any time without fear of disadvantage.

4.6 Monitoring and review

The Director reviews the incident register and risk register before each delivery block and reviews this policy at least every year.

5. Protective Security Policy

Policy no.	Version	Effective date	Next review	Policy owner
RO-05	1.0	4 November 2026	4 November 2027	Director

Legislation and standards: New Zealand Government Protective Security Requirements (PSR); Privacy Act 2020.

R&O Consulting protects the people, information and assets involved in government contracts in line with the four areas of the New Zealand Government Protective Security Requirements (PSR), scaled to the size of our business and the low-risk nature of our services.

PSR area	What R&O does
Security governance	The Director is accountable for security. Security risks are recorded in the risk register and reviewed before each delivery block. Security incidents are reported to the Ministry immediately and handled under the Breach Procedure (section 3). Subcontractors must meet the same requirements.
Information security	Ministry and student information is handled at the classification it is given (e.g. IN-CONFIDENCE) and kept in R&O's secure cloud system with multi-factor authentication, encryption and role-based access (section 2.4). Devices are encrypted, screen-locked, kept up to date and wiped remotely if lost. No personal email, USB drives or unapproved apps for contract information. Strong unique passwords and a password manager are required.
Personnel security	Every worker passes the safety checks in section 1.4 (identity, Police vet, work history, references, interview, risk assessment) before starting. Workers sign confidentiality and acceptable-use agreements, complete security and privacy training at induction, and lose all access on their last day.
Physical security	Paper records are kept in a locked cabinet and shredded once scanned. Devices are never left unattended in vehicles or public places. Workers follow each school's sign-in, visitor and site security rules. Sessions are held only in venues assessed as safe and approved by the school or Director.

The Director checks compliance with this policy every year, and after any security incident.

6. Food Safety, Nutrition and Allergy Procedure

Policy no.	Version	Effective date	Next review	Policy owner
RO-06	1.0	4 November 2026	4 November 2027	Director

Legislation and standards: Food Act 2014; MPI food safety guidance; Ministry of Health *Healthy Food and Drink Guidance – Schools* (2021).

Every student gets a nutritious, culturally appropriate snack at each tutoring session. Snacks follow the Ministry of Health *Healthy Food and Drink Guidance – Schools* (2021), are prepared under MPI food safety basics, and are checked against each student's dietary and allergy needs.

6.1 Nutrition

- Mostly whole and less-processed foods: fruit, vegetables, wholegrain breads and crackers, plain yoghurt, eggs, cheese, tuna, chicken, legumes.
- Drinks are water or plain milk only; no sugary drinks, energy drinks or confectionery.
- Low in added sugar, salt and saturated fat; no deep-fried food.
- Pacific favourites in healthy forms, where practical and safe: fresh pawpaw, pineapple, banana and other seasonal fruit, cooked taro, kumara or cassava, and wholegrain sandwiches with Pacific-style fillings. Menus are planned with input from students and families.
- Portions suit a snack for a Year 9–10 student; the menu is reviewed each block.

6.2 Allergies, intolerances and dietary needs

1. At enrolment, families tell us about any allergy, intolerance, medical diet, religious or cultural dietary need (e.g. halal, vegetarian, Seventh-day Adventist practice).
2. The lead tutor keeps a confidential dietary list for each group, shared only with the people preparing and serving food.
3. Snacks avoid common severe allergens (e.g. nuts) where any student in the group has that allergy, and an alternative is always available.
4. Ingredients are checked on labels before serving; food is labelled when it contains common allergens.
5. Students with a known severe allergy have their action plan and medication (e.g. adrenaline auto-injector) brought to sessions, and tutors are trained to respond. In an emergency, call 111.

6.3 Food safety

- Everyone who prepares or serves food completes MPI's free "Food safety basics" online modules before handling food.
- Pre-packaged or commercially prepared food is bought from registered food businesses; any food prepared by R&O follows MPI safe food practices.
- Hands are washed before handling food; food is served with clean utensils and gloves where appropriate.

- Cold food is kept at 5°C or below with chilly bins and ice packs, and hot food at 60°C or above; food is not left out for more than two hours.
- Use-by dates are checked; leftovers that have been served are thrown away, not stored.
- Any suspected food-related illness is recorded as an incident and reported to the Director, the school and the family the same day.

7. Adoption and review

These policies were adopted by R&O Consulting on the date below and apply from that date.

Policy	Adopted	Next review due
1. Child Protection and Safeguarding	4 November 2026	4 November 2029
2. Privacy	4 November 2026	4 November 2027
3. Privacy and Security Breach Procedure	4 November 2026	4 November 2027
4. Health and Safety	4 November 2026	4 November 2027
5. Protective Security	4 November 2026	4 November 2027
6. Food Safety, Nutrition and Allergy	4 November 2026	4 November 2027

Authorisation

Approved by	Signature	Date
Ronal Reddy, Director, R&O Consulting Limited	Ronal Reddy	4 November 2026

Worker declaration

Each worker signs at induction: *I have read and understood these policies and agree to follow them.*

Name	Role	Signature	Date