



VILLANOVA COLLEGE



PRIVACY POLICY

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INTRODUCTION

This Privacy Policy sets out how Villanova College manages personal information provided to or collected by it. The College is bound by the Australian Privacy Principles contained in the *Privacy Act 1988 (Cth)*.

From time to time, Villanova College may review and update this Privacy Policy to take account of new laws and technology, changes to the College's operations and practices, and ensure the policy remains responsive to the changing school environment.

PURPOSE

Villanova College is bound by the Australian Privacy Principles in the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles. This statement outlines the College's privacy policy and describes how it uses, applies, and manages the personal information provided to it or collected by the College. This includes interaction with traditional and generative Artificial Intelligence (AI) technologies. This includes the evolving use of Artificial Intelligence (AI) within the College's information ecosystem.

APPLICATION

The policy applies to Board members, employers, employees, volunteers, parents/guardians, students, contractors, and people visiting the College site. It describes the type of information the College collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.

SCOPE

Under the *Privacy Act 1988 (Cth)*, the Australian Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to Villanova's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Villanova College and the employee.

DEFINITIONS

The *Privacy Act 1988 (Cth)* applies to personal information captured in a written record.

Personal Information includes names, addresses, and other contact details; dates of birth, next of kin details, photographic images, attendance records, and financial information.

Sensitive Information includes government identifiers, religious beliefs, nationality, country of birth, professional memberships, family court orders, and criminal records refers to personal information that is sensitive, including information about health, genetics, biometrics, or disability; racial or ethnic origin; religious, political or philosophical beliefs, professional association or trade union memberships, sexuality, or criminal record.

Health Information includes medical records, disabilities, immunisation details, and psychological reports.

Primary purpose refers to the primary purpose for which information is collected.

Secondary purpose is any purpose other than the primary purpose for which the APP entity collected the personal information.

Parents means those persons who are the parents, carers, legal guardian/s, adoptive parent/s, or de facto parent/s of the student.



1. PERSONAL INFORMATION COLLECTED AND HOW IT IS COLLECTED

The type of information Villanova College collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- Students and Parents before, during, and after the course of a student's enrolment at the College:
 - name, contact details (including next of kin), date of birth, gender, language background, previous school, and religion
 - parents' education, occupation, and language background
 - medical information (e.g., details of disability and/or allergies, absence notes, medical reports, and names of doctors)
 - conduct and complaint records, or other behaviour notes, and College/school reports, information about referrals to government welfare agencies
 - counselling reports
 - health fund details and Medicare number
 - court orders
 - volunteering information
 - photos and videos at college events
 - any personal information collected by, or generated through the use of traditional and generative Artificial Intelligence (AI) technologies
- Job applicants, staff members, volunteers, and contractors:
 - name, contact details (including next of kin), date of birth, and religion
 - information on a job application
 - professional development history
 - salary and payment information, including superannuation details
 - medical information (e.g., details of disability and/or allergies, and medical certificates)
 - complaint records and investigation reports
 - leave details
 - photos and videos at college events
 - workplace surveillance information
 - work emails and private emails (when using a work email address), and Internet browsing history
 - any personal information collected by, or generated through the use of traditional and generative Artificial Intelligence (AI) technologies
- Other people who come into contact with the College, including name and contact details, and any other information necessary for the particular contact with the College.

1.1. Personal Information you provide:

Villanova College will collect personal information about an individual through forms filled out by parents or students, face-to-face meetings, interviews, over the internet, via email, and telephone conversations. On occasions, people other than parents and students



provide personal information.

Personal information relates to information or an opinion about an identified individual or an individual who is identifiable, whether the information is accurate or not. It includes all personal information regardless of its source.

1.2. Personal Information provided by other people:

In some circumstances, Villanova College may be provided with personal information about an individual from a third party, for example, a report provided by a medical professional or a reference from another school.

1.3. Personal Information collected and/or generated by traditional and generative Artificial Intelligence (AI) technologies:

We might also collect personal information by using AI systems to generate it. The kinds of personal information that an AI system may generate include those set out above under the heading 'Personal Information Collected and How it is Collected.'

2. HOW THE COLLEGE WILL USE THE PERSONAL INFORMATION YOU PROVIDE

Villanova will use personal information it collects from you for the primary purpose of collection and for other secondary purposes that are related to the primary purpose of collection and reasonably expected by you or to which you have consented.

2.1. Students and Parents

In relation to the personal information of students and parents, Villanova College's primary purpose of collection is to enable Villanova to provide schooling to students enrolled at the College, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the College. This includes satisfying the needs of parents, the needs of the students, and the needs of Villanova College throughout the period in which the student is enrolled at the College.

The purposes for which Villanova College uses personal information of students and parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters, and magazines
- day-to-day administration of Villanova College
- looking after students' educational, social, and medical wellbeing
- seeking donations and marketing for Villanova
- to satisfy Villanova College's legal obligations and allow the College to discharge its duty of care

In some cases, when Villanova College requests personal information about a student or parent, if the information requested is not provided, Villanova may not be able to enrol, continue the enrolment of the student, or permit the student to take part in a particular activity.

On occasion, information such as academic and sporting achievements, student activities, and similar news is published in College newsletters and magazines, on our intranet, and on our website. This may include photographs and videos of student activities such as sporting events, College camps, and College excursions, including international and national travel. The College will obtain permission from the student's parent (and from the student if appropriate) if we would like to include such photographs or videos, or other identifying



material, in our promotional material or otherwise make this material available to the public, such as on the internet and social media.

Villanova may use de-identified academic data to train AI systems. This will be through nominated AI systems, such as Copilot, that are contained within the College environment and follow the policies of the College. Villanova College may use Copilot for miscellaneous communication activities that could include collecting data to automatically generate internet content, newsletter content, social media posts, and presentations.

Turnitin is used for plagiarism detection and AI writing detection. The system supports academic purposes and is used solely for educational purposes.

2.2. Job Applicants, Staff Members, and Contractors

In relation to the personal information of job applicants, staff members, and contractors, Villanova College's primary purpose in collecting information is to assess and (if successful) to engage the applicant, staff member, or contractor.

The purposes for which Villanova uses the personal information of job applicants, staff members, and contractors include:

- administering the individual's employment or contract, for insurance purposes.
- seeking donations and marketing for the College.
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

2.3. Volunteers

The College also obtains personal information about volunteers who assist Villanova College in its functions or conduct associated activities, such as alumni associations and the Parents and Friends Association of Villanova, to enable the College and the volunteers to work together.

2.4. Marketing, Promotion, and Fundraising

Villanova College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that Villanova continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the Villanova College Foundation or alumnae organisation, or, on occasions, external fundraising organisations.

Parents, staff, contractors, and other members of the wider College community may, from time to time, receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

If you would like to opt out of direct marketing, contact us by email at villa@vnc.qld.edu.au.

3. WHO THE COLLEGE MIGHT DISCLOSE AND STORE YOUR PERSONAL INFORMATION WITH

Villanova may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing, and support purposes. This may include to:

- another College or staff at another school
- government departments (including for policy and funding purposes)
- medical practitioners



- people providing educational support and health services to the College, including specialist visiting teachers, sports and co-curricular coaches, volunteers, counsellors, and providers of learning and assessment tools
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN), Queensland Curriculum and Assessment Authority (QCAA)
- people providing administrative and financial services to Villanova College
- recipients of College publications, such as newsletters and magazines
- students, parents, or guardians
- anyone you authorise Villanova to disclose information to and anyone to whom we are required or authorised to disclose the information, by law, including child protection laws
- the provider of information management and storage systems and other technology services, which may include third-party providers of AI systems we use. None of these providers hold data outside of Australia.

3.1. Sending and Storing Information Overseas

Villanova College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a College exchange. However, Villanova will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases, this consent will be implied).
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Villanova may use online or cloud service providers to store personal information and to provide services to Villanova College that involve the use of personal information, such as services relating to email, instant messaging, and education and assessment applications.

Some limited personal information may also be provided to these service providers to enable them to authenticate users who access their services. This personal information may be stored in the 'cloud', which means that it may reside on a cloud service provider's server, which may be situated outside Australia.

Villanova College uses the cloud service provider Microsoft 365 (M365). M365 has been developed to provide enterprise-grade security, privacy, and compliance capabilities. Our M365 Environment (Exchange, SharePoint/OneDrive) data is located in Australia and Asia Pacific. College personnel and service providers may have the ability to access, monitor, use, or disclose emails, communications (e.g., instant messaging), documents, and associated administrative data for the purposes of administering the College systems and ensuring their proper use.

The College uses AI systems provided by third parties. These third parties may store or have access to personal information input into, and/or generated by, these AI systems. None of these providers hold data outside of Australia.

3.2. Managing Information, including Sensitive Information

In referring to sensitive information, Villanova College means information relating to a person's:

- racial or ethnic origin



- political opinions
- religion
- trade union or other professional or trade association membership
- philosophical beliefs
- sexual orientation or practices
- criminal record
- health information
- biometric information.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose unless you agree otherwise, or the use or disclosure of the sensitive information is required by law.

3.3. College Websites and Portals

When using College websites and portals hosted in the www.Villanova.qld.edu.au domain, servers automatically record information that your browser sends whenever you visit. These server logs may include information such as your IP address, your top-level domain name, the date and time of the visit to the site, the pages accessed and the documents viewed, previous sites visited, the browser type, the browser language, and one or more 'cookies' that may uniquely identify your browser.

No attempt is made to identify you through your browser except in exceptional circumstances, such as an investigation into improper use of the service.

3.4. Management and Security of Personal Information

Villanova College staff are required to respect the confidentiality of student and parent personal information and the privacy of individuals. Villanova has put steps in place to protect the personal information Villanova holds from misuse, interference, and loss, unauthorised access, modification, or disclosure by use of various methods, including locked storage of paper records and password access rights to computerised records.

4. DATA BREACHES

It will be deemed that an 'eligible data breach' has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of, personal information about one or more individuals (the affected individuals)
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result
- the information is lost in circumstances where:
 - unauthorised access to, or unauthorised disclosure of, the information is likely to occur
 - assuming unauthorised access to, or unauthorised disclosure of, the information was to occur, a reasonable person would conclude that it would be likely to result in serious harm to the affected individuals. Serious harm may include serious physical, psychological, emotional, economic, and financial harm, as well as serious harm to reputation.

4.1. What must the College do in the event of an eligible data breach?

If Villanova College suspects that an eligible data breach has occurred, it will conduct a



reasonable and expedient assessment/investigation within 30 days.

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then Villanova will be required to lodge a statement to the Privacy Commissioner. Where practical to do so, the College entity will also notify the affected individuals. If it is not practicable to notify the affected individuals, Villanova will publish a copy of the statement on its website or publicise it in another manner.

Staff who become aware of a Privacy Breach must immediately notify a member of the College Leadership Team. The notification should include:

- time and date of suspected breach
- personnel involved
- the cause and extent of the breach
- who may be affected
- how to contain the breach and evaluate the risks

Within a reasonable timeframe, the Principal will delegate responsibility for the investigation to an appropriate senior role holder or a suitably qualified external consultant, depending on the type of breach. The role holder/s chosen to investigate must carry out the following tasks.

- Establish who is affected by the breach; are multiple individuals affected by the breach?
- What personal information is involved in the breach?
- Identify the date, time, duration, and location of the breach.
- Is there (now or in the future) a real risk of serious harm to the affected individuals?
- Does the breach or suspected breach indicate a systemic problem with practices and procedures?
- Does there need to be a public notification in relation to the breach?
- What is the risk of harm to the College and the individuals affected?
- What is the likely recurrence?
- What is the likely cause of the breach?
- Has the Principal been notified?
- Other issues relevant to circumstances.

4.2. Exception to Requirement to Notify

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information
- there is no serious harm to affected individuals
- a reasonable person would conclude the breach is not likely to result in serious harm.

4.3. Notification

The main consideration before choosing what action to take is to ask: "Is there a real risk of serious harm to affected individuals or the College?" If communication is deemed



necessary, a communication strategy should be developed that outlines:

- who is responsible for implementing the communication strategy
- determining how affected individuals will be contacted
- the criteria for determining which external stakeholders should be contacted (e.g., law enforcement, cyber security agencies, regulators, including the Office of the Australian Information Commission, and the media).
- who is responsible for determining which external stakeholders are to be contacted
- who is responsible for liaising with those stakeholders.

4.4. Prevent Further Breaches

The Privacy Breach must be fully investigated by the College, and the breach and its cause must be recorded on the Privacy Breach Log. The Privacy Breach Log will be reviewed annually by the College Leadership Team.

5. ACCESS AND CORRECTION OF PERSONAL INFORMATION

Under the *Privacy Act 1988* (Cth), an individual has the right to seek and obtain access to any personal information that Villanova holds about them and to advise Villanova of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will be able to access and update their personal information through their parents, but older students may seek access and correction themselves.

To make a request to access or to update any personal information Villanova holds about your currently enrolled or pre-enrolled child, please access the *My Villanova* Parent Portal or contact enrolments@Villanova.qld.edu.au. About an employee, please email villa@vnc.qld.edu.au.

Villanova may require the person making the request to verify their identity and specify what information they require. Villanova may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing, and copying any material requested. If the information sought is extensive, Villanova will advise on the likely cost in advance. If we cannot provide the person making the request with access to that information, we will provide them with written notice explaining the reasons for refusal.

The College will take reasonable steps to ensure that any personal information is accurate, up-to-date, complete, relevant, and not misleading. In general, to make a request to access any information Villanova College holds about a person, please contact the Principal in writing to:

*The Principal, Villanova College
24 Sixth Ave, Coorparoo Qld 4151
Ph. 07 3394 5690*

Access will generally be allowed except where:

- it would unreasonably impact the privacy of other individuals
- the request is frivolous or vexatious
- the information relates to existing or anticipated legal proceedings between the parties, and the information would not be accessible through discovery
- it would reveal a negotiation position
- it would be unlawful
- denying access is required or authorised by or under law
- providing access is likely to prejudice the presentation, detection, investigation, prosecution,



or punishment of an unlawful activity, the activity of a law enforcement agency, or a legal proceeding

- providing access is likely to reveal evaluative information generated within the organisation in connection with commercially sensitive decision-making processes.

6. STUDENT MEDIA MANAGEMENT

As part of our duty of care, Villanova College is working with a contracted service provider, Pixevety, a secure Australian-owned school media management system that operates primarily as an administrative compliance tool within the College's private systems environment. The system is used to centrally manage and systemically apply and enforce student/staff media consent settings in real time and at scale for school recordings and media created for legitimate educational, safeguarding, and operational purposes, acting as a prevention mechanism to ensure continuous, reliable protection.

The system is not a monitoring or surveillance tool: it is a privacy enhancing tool. It does not observe behaviour or generate new recordings. Instead, it supports the consistent and lawful application of media consent (namely, photo and video) across the entire College. The use of the platform is to improve and technologically enhance an existing explicit administration function (media consent management) to support College compliance in an overwhelmed media environment. All data is stored securely in Australia with the highest level of protection.

All media captured through Pixevety is encrypted immediately upon upload and transmitted securely to the platform for storage and consent verification. Data is protected using commercial-grade encryption both in transit and at rest, ensuring images cannot be accessed or intercepted by unauthorised parties. Pixevety also uses strict access controls, role-based permissions and continuous security monitoring to safeguard student images at every stage of collection, storage and sharing. The College always retain full ownership and control of their content. Pixevety acts as a contracted data processor, not a data owner. Media is only accessible to verified, school-authorised users and sharing is governed by explicit parental consent settings that are applied automatically and in real time. This ensures the College remains compliant with the Australian Privacy Principles and child-safe obligations while maintaining full control over how student images are accessed and used.

Given that the College environment includes children and other potentially vulnerable individuals, the system is designed to embed privacy, consent management, and safeguarding by design and by default. The platform prevents unauthorised access or exposure that could compromise a student/staff member's safety or wellbeing and prevents the mishandling of school media by staff. Other methods of enforcement have become unreliable at scale, increasing the risk of accidental publication, failure to apply withdrawn consent preferences, unauthorised image sharing, or staff handling errors.

As part of this system, purpose-limited image-matching technology is used to assist the College in applying and enforcing student media consent preferences within the College's secure internal media library in real-time. This matching process which collects face biometric data (a mathematical algorithm encrypted at rest and in transit and irreversible) is used solely for our school media management purposes and is not shared with any third parties. By restricting data collection to this primary purpose, the platform only captures what is necessary and proportionate. Pixevety is a multi-award-winning service in data protection and is ISO27001 security management certified, audited annually. It is an OAIC registered company.

Parents/carers may contact the College at any time with questions by emailing villa@vnc.qld.edu.au or calling 07 3394 5690.



7. CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF STUDENTS

Villanova College respects every parent's right to make decisions concerning their child's education. Villanova will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. Villanova will treat consent given by parents as consent given on behalf of the student, and notice to parents will act as notice given to the student.

As noted above, parents may seek access to personal information held by Villanova College about them or their child by contacting the College Principal. However, there will be occasions when access is denied.

Such occasions would include where the release of the information would have an unreasonable impact on the privacy of others or where the release may result in a breach of Villanova College's duty of care to a student.

The College may, at its discretion, on the request of a student, grant that student access to information held by Villanova College about them or allow a student to give or withhold consent to the use of their personal information, independently of their parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

8. ENQUIRIES AND COMPLAINTS

If you would like further information about the way Villanova College manages the personal information it holds, or wish to make a complaint about Villanova's breach of the Australian Privacy Principles, please contact the College Principal at villa@vnc.qld.edu.au or call 07 3394 5690.

Villanova will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made. If you are not satisfied with our response, you may refer the complaint to the Catholic Education Queensland Limited (CEQL). A referral to CEQL should be a last resort once all other avenues of resolution have been exhausted.

9. ARCHIVAL REQUESTS

Outside of formal legal requests and subpoenas, past students and staff may request copies of historic documentation formally and in writing by completing the Villanova College Archival Request Form, available from the College, or through an email request to villa@vnc.qld.edu.au.

These requests remain at the discretion of the Principal and require identification and verification of enrolment and identity.



ACCOUNTABILITY

Role	Responsible For
College Principal and College Board	Oversight and review of this policy
College Leadership Team	Implementation, compliance, and reporting
All workplace participants and students	Compliance with this policy

ASSOCIATED DOCUMENTS

Description	Document Type
Grievances and Complaints Policy	Policy
Enrolment Policy	Policy
Parent Code of Conduct	Code
Staff Code of Conduct	Code
Student Code of Conduct	Code
Parent Code of Conduct	Code
<i>Privacy Act 1988 (Cth)</i>	<i>Legislation</i>
Australian Privacy Principles	Resource

RELEVANT LEGISLATION

The following legislation, standards, and regulations apply, and this policy aligns with these mandated requirements:

- *Privacy Act 1988 (Cth)*
- *Health-based privacy legislation in various state jurisdictions*
- *NCEC Commission School Privacy Compliance Manual*

REVIEW AND APPROVAL

This Policy will be reviewed annually or as required by legislation.

Version	Review	Author/s	Authorisation	Approval Date	Next Review
1.0	Periodic review. Update publishing platforms.	Principal	College Board	2019	2024
2.0	Substantial review	Principal	College Board	August 2024	August 2026
3.0	Periodic review	Director of HR	College Board	April 2026	April 2028