

Privacy policy

Purpose

Greenhouse Education is committed to providing all stakeholders with the highest standard of service, integrity, and professionalism. The purpose of this Privacy Policy is to explain how we collect, manage, store, protect, and provide access to personal information in compliance with the Privacy Act 1988 (Cth) (the *Privacy Act*) and the Australian Privacy Principles (APPs).

We recognise the importance of maintaining the privacy and confidentiality of personal information and the trust that students, staff, and partners place in us. Protecting personal information is central to our role as a Registered Training Organisation (RTO).

As a provider of nationally recognised training and a registered training organisation regulated by the Australian Skills Quality Authority (ASQA), Greenhouse Education is required to collect, hold, use, and disclose a range of personal and sensitive information relating to students enrolled in training and assessment programs.

This obligation arises from the National Vocational Education and Training Regulator Act 2011 and its associated legislative instruments, including:

- Standards for RTOs 2025; and
- Data Provision Requirements 2012.

In addition, Greenhouse Education is bound by various Commonwealth and State legislative requirements that govern the collection, use, and disclosure of information. These include (but are not limited to):

- Education Acts;
- Vocational Education and Training Acts;
- Traineeship and Apprenticeship Acts relevant to state jurisdictions; and
- The National Code of Practice for Providers of Education and Training to Overseas Students 2018 (the National Code), where applicable.

Under the Data Provision Requirements 2012 and the National VET Data Policy (which includes the *National VET Provider Collection Data Requirements Policy*), Greenhouse Education is required to collect and submit AVETMISS-compliant data to the National VET Provider Collection for all nationally recognised training.

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This data is stored by the National Centre for Vocational Education Research Ltd (NCVER) and may be used for purposes such as:

- Issuing VET Statements of Attainment or Qualifications, and populating Authenticated VET Transcripts;
- Supporting research and statistics in the education and training sector, including surveys and data linkage;
- Pre-populating RTO student enrolment forms to improve efficiency and accuracy;
- Providing insights into the operation of the VET market for policy, workforce planning, and consumer information; and
- Administering VET, including program regulation, compliance monitoring, and evaluation activities.

It is further noted that, in alignment with these legislative obligations, Greenhouse Education delivers training and assessment services under a range of Commonwealth and State Government funding contracts and agreement arrangements. These agreements also require the collection, use, and disclosure of specific personal information to ensure compliance with contractual, regulatory, and reporting requirements.

Scope

This policy applies to all personal information collected by Greenhouse Education through any medium, including online platforms, enrolment forms, learning management systems, assessments, employment records, and third-party service providers.

The policy covers:

- Students (domestic and international)
- Staff and trainers/assessors
- Contractors, agents, and service providers
- Prospective students and stakeholders

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What Information We Collect

Greenhouse Education is required to collect a range of personal and sensitive information from students in order to deliver nationally recognised training programs, meet compliance obligations, and ensure student welfare and support.

The types of information that may be collected include:

- **Personal details** – such as the student’s full name, gender, date and country of birth, nationality, and, once established in Australia, their residential address. Students are also required to provide their Unique Student Identifier (USI) in accordance with national VET regulations.
- **Course information** – including the course or qualification code, the agreed commencement date, the expected completion date, and any variations such as deferrals, withdrawals, or extensions. For international students, this may also include details relating to Confirmation of Enrolment (CoE) and changes to enrolment status.
- **Financial information** – such as the amount of tuition fees received, a record of payments made, and where applicable, an estimate of the total course fees payable by the student.
- **Health and insurance information** – including whether the student has obtained Overseas Student Health Cover (OSHC) or other relevant insurance policies prior to commencing their studies.
- **Sensitive information** – where required, Greenhouse Education may collect information relating to a student’s racial or ethnic background, political opinions, religious or philosophical beliefs, membership of professional or trade associations, sexual orientation, criminal history, or health information. This is only collected where it is directly relevant to training, support, or compliance obligations, and always managed in line with the Privacy Act.
- **English language proficiency** – details of any English language tests undertaken, including the name of the test and the score achieved, to determine the student’s ability to successfully participate in the course.
- **Visa information** – for international students, this may include details of the Department of Home Affairs (DoHA) office where the student visa application was made, the student visa number, and the student’s local DoHA office while studying in Australia.
- **Passport details** – including passport number, particularly if the student was already in Australia at the time they accepted their place in a course.

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- **Compliance information** – records of any breaches of visa conditions, including those relating to course attendance or satisfactory academic performance.

How We Collect and Hold this information

Individuals are advised that, in accordance with legislative and regulatory requirements, Greenhouse Education may disclose personal information to a range of authorised entities for valid purposes. These may include, but are not limited to:

- Government agencies at Commonwealth, State, or Local levels;
- Australian Apprenticeship Support Network providers;
- Employers and their representatives, as well as Job Network Providers, schools, and parents/guardians (where relevant to a student’s enrolment and training);
- Authorised service providers, such as credit agencies and background check providers engaged to support compliance, administration, or student services.

Sensitive Information

Sensitive personal information will only be used or disclosed for the primary purpose for which it was collected, or for a directly related secondary purpose, unless the individual provides consent for another use, or where disclosure is otherwise required or authorised by law.

Direct Marketing

Greenhouse Education may use or disclose personal information to provide individuals with direct marketing communications about our services. We may also, where appropriate, distribute information from carefully selected third parties, including business partners, consultants, professional advisers, or social networking platforms, who work with us to promote or improve our services.

All direct marketing will comply with the **Spam Act 2003** and relevant privacy obligations. Individuals may opt out of receiving marketing communications at any time by contacting us.

Publishing of Information

Greenhouse Education will only publish personal information (such as student or staff details) on its website where it has been specifically collected for that purpose and with the individual’s knowledge and consent.

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Individuals should be aware that once information is published online, it may be indexed by search engines, copied, or shared globally, beyond Greenhouse Education’s control. For this reason, consent to publish personal details online should be given carefully and with full understanding of the potential implications.

The names and email addresses of Greenhouse Education staff will only appear on the website with their explicit knowledge and consent.

Under no circumstances will Greenhouse Education sell, trade, or receive payment for licensing or disclosing personal information.

Overseas Disclosure

Greenhouse Education does not routinely disclose personal information overseas. However, where disclosure is necessary (for example, to an authorised educational agent, migration agent, or nominated family member), such disclosure will only occur with the individual’s consent or where required by law.

If disclosure to overseas recipients is required, Greenhouse Education will take all reasonable steps to ensure that the recipient complies with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs), unless:

The recipient is subject to laws that provide substantially similar protections to those under Australian privacy law, and enforceable mechanisms exist for individuals to exercise their rights; or

The individual has provided express consent for their personal information to be disclosed overseas.

Storage and Protection of Personal Information

Greenhouse Education stores personal information in a combination of secure electronic systems, paper-based records, and other appropriate formats. We take all reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure.

Access to personal records is restricted to authorised personnel only, and appropriate security safeguards are applied to both digital and physical records. Our systems are regularly reviewed to maintain compliance with industry standards and regulatory obligations.

Where personal information is no longer required for the purposes for which it was collected, or as required by legislation and funding agreements, Greenhouse Education will take reasonable steps to securely destroy or permanently de-identify that information.

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Accessing and Correcting your Personal Information

Greenhouse Education respects the rights of individuals to access the personal information we hold about them. You may request access to, or correction of, your personal information at any time, subject to certain legal exceptions.

We may refuse access where:

- Providing access would pose a serious threat to the life, health, or safety of an individual, or to public health or safety;
- Access would unreasonably impact the privacy of another individual;
- The request is frivolous or vexatious.
- The information relates to current or anticipated legal proceedings between you and Greenhouse Education, and would not ordinarily be accessible through the discovery process;
- Providing access would prejudice negotiations with you;
- Access is unlawful or prohibited by an Australian law or court/tribunal order;
- There are reasonable grounds to suspect that unlawful activity or serious misconduct has occurred, and providing access would prejudice appropriate action;
- Access would likely prejudice enforcement activities conducted by, or on behalf of, an enforcement body; or
- Access would reveal internal evaluative information connected to a commercially sensitive decision-making process.

Correction of Information

Greenhouse Education takes reasonable steps to ensure that personal information held is accurate, complete, relevant, up to date, and not misleading. Corrections may be made where:

- We are satisfied the information we hold is inaccurate, incomplete, irrelevant, or misleading; or
- You formally request correction of your information.

Process for Access and Correction

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If you wish to access or correct your personal information, you may submit a written request to Greenhouse Education. We will:

- Respond to your request within a reasonable timeframe; and
- Where possible and appropriate, provide access or correction in the manner requested.

If access or correction is refused, Greenhouse Education will provide written notice outlining:

- The reasons for the refusal (to the extent permitted by law); and
- The mechanisms available to lodge a complaint about the refusal.

If we refuse a correction, we will:

- Provide written notice explaining the reasons and complaint pathways; and
- Where appropriate, associate a written statement with the record noting the requested correction.

Contacting Us and Making a Privacy Complaint

If you have any questions about this Privacy Policy, wish to update or correct personal information held by Greenhouse Education, or would like to make a complaint about how your personal information has been collected, used, or disclosed, please contact us at:

Email: admin@greenhouse.edu.au

Phone: 1300 052 805

Postal Address: 8 Sudbury Road, Mirrabooka WA 6061

All privacy-related complaints will be directed to the appropriate staff member for review. We will acknowledge receipt of your complaint and provide a response, generally within 30 days.

Our response will confirm:

- Whether or not a breach of privacy has occurred;
- If a breach has occurred, the action being taken to rectify the issue;
- The measures being implemented to prevent similar breaches in the future; and
- Any steps you may need to take to minimise potential impacts.

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If you are dissatisfied with the outcome, or if we fail to respond within the 30-day timeframe, you may request that the matter be reviewed internally.

If you remain unsatisfied after this process, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC). Complaints to the OAIC may be submitted online, by mail, fax, or email. Further information can be found at: www.oaic.gov.au.

Policy Review and Amendments

Greenhouse Education reserves the right to amend, update, replace, or terminate this Privacy Policy at any time, with or without prior notice. Any updates will be published on our official website, and individuals are encouraged to check the website regularly to remain informed of any changes.

Nothing in this Privacy Policy overrides or replaces any formal legal rights or procedures available to individuals for accessing or correcting their personal information.

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