



Kaplan Academic Policy Framework Procedures

Scope

These Procedures apply to the development, review, management and implementation of all Kaplan academic policies, procedures, guidelines and forms. To avoid repetition, the term “Policy” is used hereafter to refer to academic policy and academic policy related documents unless otherwise stated.

These Procedures supplement the Academic Policy Framework. The Procedures clearly outline, step by step processes to be taken in the development, review, management and implementation of Kaplan’s academic policies and academic policy related documentation such as academic procedures, guidelines and forms. Intended users of these Procedures are staff members involved in or supporting Kaplan’s academic policies lifecycle.

Purpose

The purpose of these procedures is to:

- increase staff awareness of process requirements in the development, review, management and implementation of Kaplan academic policies and academic policy related documentation
- assist staff involved in the policy lifecycle to better understand their roles and responsibilities and
- provide procedural consistency and integrity in the Kaplan policy lifecycle.

Policy Statement

Whilst procedures, guidelines and forms are typically approved and managed at Business Unit level with support from the Quality, Regulations and Standards Team, these procedures remain a useful reference for understanding how to appropriately develop, review, manage and implement academic policies and policy related documents

Policy Principles

- Procedures address processes and actions aligned with the policy principles. They outline the operational steps required to implement the policy.
- Procedures will:
 - provide clear instructions on the way the policy will be implemented
 - step through the actions required to implement policy principles
 - assign responsibilities
 - enable monitoring of policy implementation.
- Procedures are to be reviewed every three years.
- Procedures may be further supported by guidelines and internal local documents. Guidelines provide advice which assist in the establishment and implementation of effective practices to achieve quality outcomes. Guidelines provide a more specific level of operational details where clarity of processes in procedures is required. Local documents apply within a business unit, such as a school/college or administrative area.



Guiding Procedures

A policy lifecycle is a conceptual approach that identifies the different stages involved in the “life” of a policy – which generally refers to the period ranging from the inception of a policy to its review and its eventual rescission. Kaplan’s Academic Policy Lifecycle incorporates several distinct steps, which include:

1. Identification of gaps or policy requirements and designation of appropriate staff to oversee the policy review or development.
2. Research and analysis of best practice in the policy area.
3. Consultation of stakeholders.
4. Drafting and/or revision of the policy.
5. Approval by the appropriate authority.
6. Publication of approved policy.
7. Communication to stakeholders.
8. Implementation and maintenance of the policy which includes, appropriate record management and review.
9. Review and/or rescission of policy as appropriate.

Responsibilities

Kaplan policies span a range of control areas related to academic and non-academic matters. Each policy identifies the nominated roles who have approval, management and implementation responsibilities to ensure effective application of the policy.

For consistency, the following provides guidelines for the indicative approval and responsibility roles for each category.

Category	HE Indicative Approver	Non-HE Indicative Approver	Indicative Responsible Officer
Academic	Academic Board	Policy Committee	Vice President Academic
Legal	Corporate Board	Policy Committee	General Counsel
Operations	Policy Committee	Policy Committee	CEO/Executive Director
People and Culture	Corporate Board	Policy Committee	Executive Director – People & Culture
Finance	Corporate Board	Policy Committee	Finance and Commercial Director
Information Technology	Corporate Board	Policy Committee	Chief Information Officer
Governance and Compliance	Corporate Board	Policy Committee	Director, Quality Assurance and Governance

Version Control

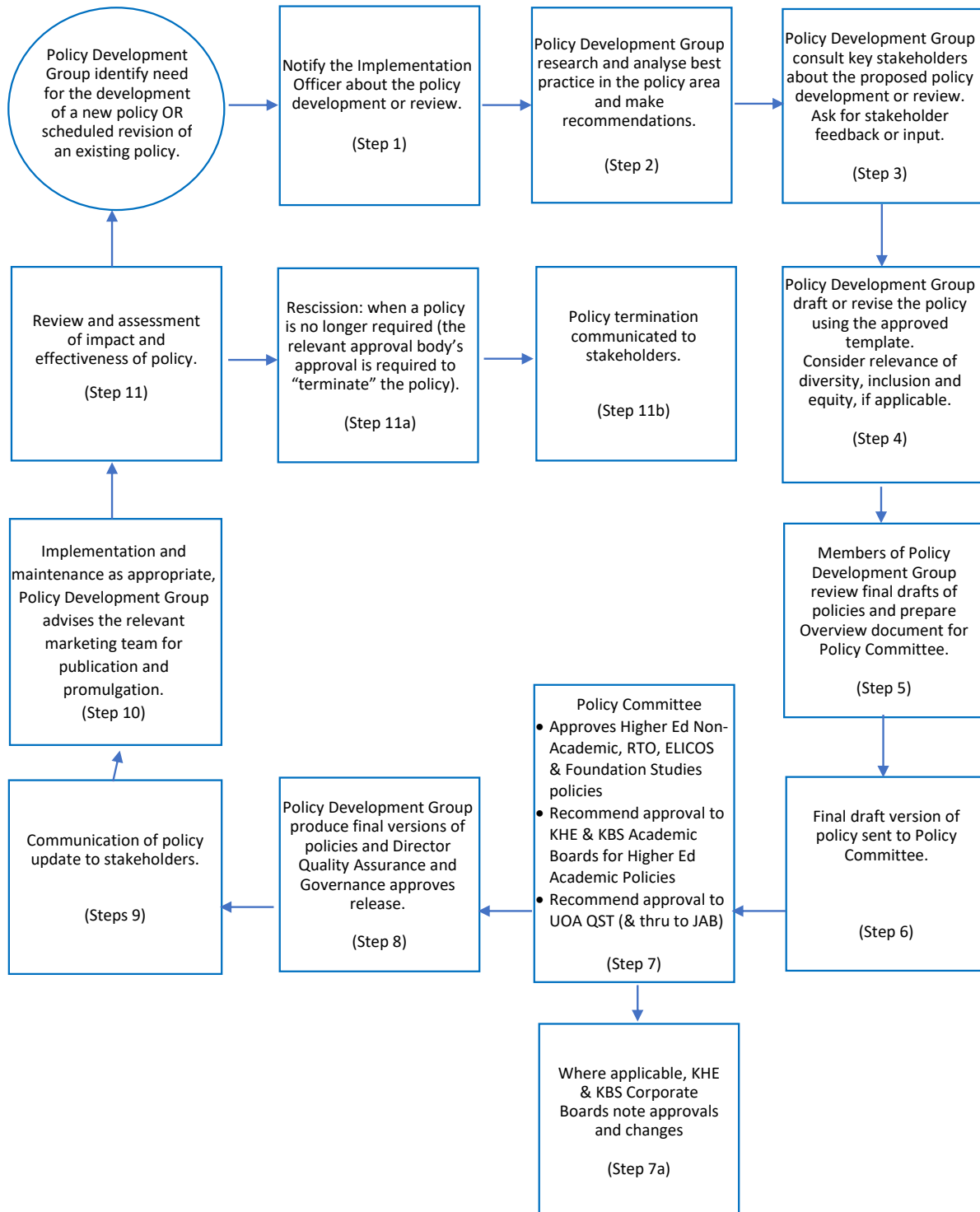
Document version control is the process of tracking and managing different versions of the policy to identify the current iteration of the policy.

For consistency of application, policy reviews that result in material change, that is the alteration affects an important part of the policy and impacts stakeholders, will trigger a new whole number version (e.g. Version 1.0). Policy reviews that result in non-material change to the policy will trigger a decimal number version (e.g. Version 1.1).

To ensure succinct policy documentation, version control logs will be contained to displaying a rolling maximum five historical change entries.

Policy Process Map

The Process Map below outlines each step in the policy development and review process. It also specifies who does what and when. Staff members involved in the policy lifecycle are encouraged to use this process map as a point of reference.



Policy Development and Review Process

The following table provides information about the policy process, including explanations of the processes outlined in the preceding process map.

Developing and Reviewing an Academic Policy		
Role	Action	Detail/Explanation
Implementation Officer and/or Quality, Regulations and Standards Team	Step 1. <u>Check</u> if there is an existing policy. <i>Note: There will be an existing policy if a policy review is required.</i>	<p>Conduct an environmental scan to see if the policy already exists. The Kaplan Australia Policy Register is the source of truth for all Kaplan policies, the Register maintained by the Quality, Regulations and Standards Team</p> <ul style="list-style-type: none"> ○ If there is no existing policy, proceed to Step 2. ○ If the existing policy is outdated and/or inadequately covers the policy area, proceed to Step 2. ○ If the policy exists and sufficiently covers the identified policy gap, no further action is required. <p>For policies under review due to the expiration of time, if the Implementation Officer considers that a revision is unnecessary, a recommendation should be made to the approval body that the existing policy be maintained and that the review date be extended for a further 3 years, being the maximum length of time in a Kaplan policy review cycle, as per Kaplan’s Academic Policy Framework.</p> <p>If unsure about the status of a policy, contact the Quality, Regulations and Standards Team for assistance.</p>
	Step 2. <u>Conduct</u> preliminary research on the policy area.	<p>When researching, consider the following:</p> <ul style="list-style-type: none"> ○ Research and review best practice in the policy area. ○ Existing related policies and the implications the “prospective” policy may have on these and vice versa. ○ Policy implementation needs such as, who needs to be consulted as part of the policy’s development, the approval process and/or how the policy will be effectively communicated to stakeholders. ○ Resources required to implement the policy, such as how the policy will be communicated to the stakeholders and/or how it will be maintained. <p>Early consideration of such factors promotes the development of effective policies, minimises duplication of effort and ensures implementation matters are considered and addressed before work commences.</p>

	<p>Step 3.</p> <p>Consult stakeholders for feedback, input or comments.</p>	<p>Identify stakeholders affected by the policy. The business function affected by the policy should be consulted on the development/review/update of the policy.</p> <p>Note: <i>The length and extent of the consultation process will largely be determined by the complexity of the policy area. In some instances, it will be prudent to consult Kaplan’s General Counsel for advice.</i></p> <p>In consulting stakeholders, strategies such as policy workshops, email consultations and meetings may be used to obtain stakeholder input.</p>
	<p>Step 4.</p> <p>Draft the policy.</p>	<p>When drafting a new policy, use the applicable “Policy Template”.</p> <p>If an existing policy is being revised, use track changes to identify the changes being made and ensure that the last approved version of the policy is being used. The Quality, Regulations and Standards Team maintains authoritative Word versions of Kaplan policies.</p> <p>Draft the policy in plain, clear and concise language, ensuring that the draft addresses stakeholders’ input and comments where relevant.</p> <p>Ensure that relevant policies are supportive of the “Diversity, Inclusion and Equity Policy”.</p>
	<p>Step 5.</p> <p>Send the draft policy to stakeholders.</p>	<p>Policy Development Group members liaise with relevant stakeholders for input and prepare final drafts for the Kaplan Policy Committee.</p>
<p>Policy Development Group member in consultation with the Implementation Officer</p>	<p>Step 6.</p> <p>Kaplan Policy Committee</p> <p>Endorsement and/or Approval</p>	<p>Once a final draft has been finalised, higher education policies must have Kaplan Policy Committee endorsement before approval from the Academic Board is sought.</p> <p>Non-higher education policies are approved by the Kaplan Policy Committee and require no further approval.</p> <p>The Kaplan Policy Committee membership consists of:</p> <ul style="list-style-type: none"> ○ Business Unit Head ○ Vice President, Academic ○ Academic Dean or equivalent ○ General Counsel ○ Director, Quality Assurance and Governance
	<p>Step 7.</p> <p>Facilitate policy approval.</p>	<p>Once Kaplan Policy Committee endorsement has been received for higher education policies, the Director, Quality Assurance and Governance will facilitate the approval of the final policy with the appropriate approval authority.</p>

		<p>The approval pathway will vary according to the type of policy document.</p> <p>Recommended revisions to existing policies will be provided to the approval body, with tracked changes highlighting the changes to be approved. All major revisions and any rescissions of academic policies must be approved by the Academic Board.</p> <p>Note: <i>Only substantive amendments to academic policies are approved by the Academic Board. For more information, refer to Section 5 of the Academic Policy Framework or the “Policy Management Post Publication” section in these Procedures.</i></p> <p>Potential Outcomes</p> <p>The approval body may recommend that:</p> <ul style="list-style-type: none"> ○ The policy be further revised before approval is granted. If this occurs, the Implementation Officer may consider the recommendation, revise and resubmit the policy for approval. The Implementation Officer may also consider to postpone the development and approval of the policy. If this decision is made, it is prudent that a policy register be maintained for future actions on the policy. The policy be approved (with or without amendment). The responsible Policy Development Group member will embed the relevant amendments as outlined by the approval authority and prepare the policy for publication.
Policy Development Group member Marketing Team	Step 8. <u>Prepare</u> policy for publication.	Once the policy has been approved, the responsible Policy Development Group member prepares the policy for publication on the relevant business unit’s website.
	Step 9. <u>Submit</u> the policy to relevant business unit’s website administrator for publication.	The responsible Policy Development Group member provides the relevant Marketing Team(s) with the final PDF version of the approved policy for publication. The responsible Policy Development Group member also records the policy details in Kaplan’s Policy Register and maintains records of the latest approved and published version (the “ Master ” version).
Relevant Business Unit Marketing Team	Step 10. <u>Upload and publish</u> the policy on the relevant website.	<p>The Marketing Team uploads the approved policy on the relevant website(s) and notifies the responsible Policy Development Group member.</p> <p>Note: <i>As websites can be audited by the Registering Body at any given time, and from a compliance perspective, it is recommended to have the website updated as soon as practicable from the receipt of publication supplied by the responsible Policy Development Group member.</i></p>
Quality, Regulations	Step 11.	Once the marketing team notifies the responsible Policy Development Group member of successful publication,



and Standards Team	Communicate the policy publication to the Implementation Officer.	the Implementation Officer will be advised about the publication.
Implementation Officer	Step 12. Communicate to all staff the policy.	The Implementation Officer is responsible for communicating policy developments to stakeholders. Effective communication of policy developments is essential in ensuring stakeholders are familiar with their obligations and responsibilities.
	Step 13. Implement and maintain the policy.	The Implementation Officer is also responsible for ensuring that staff employed within the business unit follow the policy. This can be done by providing policy information sessions to key stakeholders.
Implementation Officer in consultation with Quality, Regulations and Standards Team	Step 14. Review and/or rescission of academic policy.	<p>Kaplan’s academic policies and academic policy related documents are reviewed every three years. However, an academic policy may require amendments as and when changes occur that affect the relevance and application of the policy. For information about reviewing an academic policy refer to the steps outlined in this policy.</p> <p>A policy may be rescinded where the policy is deemed obsolete. For this to happen, the initial approval authority is required to rescind the document. Once a policy is rescinded, it ceases to be in effect as of the date of rescission.</p> <p>An academic policy can only be rescinded by the relevant Academic Board. Non-academic policies will be rescinded by the Kaplan Policy Committee</p>

Policy Management Post Publication

The Implementation Officer acts as the primary contact for a policy related document and is responsible for communicating the policy to stakeholders (staff and students), ensuring business-level compliance and the ongoing, proactive review of the current policy.

From time to time, the Quality, Regulations and Standards Team may make administrative and/or inconsequential changes to academic policies without the Academic Board approval. Kaplan’s Academic Policy Framework delegates authority for such changes to the Vice President, Academic who has authority to approve such changes to academic policies and similar documents.

Where administrative and/or inconsequential changes occur, the approval of the Vice President, Academic should be sought in writing and appropriate records of the change and its approval are to be maintained by the Quality, Standards and Regulation Team for future reference.

Related Policies

This Policy should be read in conjunction with the following Kaplan policies available on the Company’s Intranet:

- Kaplan Academic Policy Framework
- Kaplan Diversity, Inclusion and Equity Policy



Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and Responsible Officers to ensure compliance with this Policy.

Policy Category	<i>Academic</i>			
Responsible Officer	Director, Quality Assurance and Governance			
Implementation Officers	Policy Development Group			
Review Date	August 2023			
Approved by	Corporate Board			
Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
1.0	Quality, Regulation and Standards Team	New Policy Significant process changes to reflect establishment of Kaplan Policy Development Group and Kaplan Policy Committee	02/12/2020	02/12/2020