



Third Party Arrangements for Higher Education Delivery Policy

Scope

This Policy outlines Kaplan's position and requirements regarding its higher education institutions, including Kaplan Business School and Kaplan Higher Education. It applies to all arrangements with Third Party Providers related to higher education delivery, including but not limited to:

- Collaborative delivery of programs
- Provision of educational services
- Support services (e.g., accommodation, student support, administrative services)

Purpose

The purpose of this Policy is to establish the principles for selecting, screening, and monitoring Third Party Providers engaged by Kaplan in accordance with the HES Framework, the ESOS Act and the National Code.

Policy Statement

All Third-Party Arrangements for higher education delivery must maintain the highest standards of quality and comply with Regulatory Requirements. Third Party Providers must meet or exceed Kaplan's standards and are expected to assist Kaplan to meet its Regulatory Requirements, given Kaplan retains ultimate responsibility for the outsourced services.

Definitions

ESOS Act: Education Services for Overseas Students Act 2000.

Kaplan: Kaplan Business School (KBS) and Kaplan Higher Education (KHE) trading as Kaplan Professional, Murdoch College, The University of Adelaide College and the University of Newcastle College of International Education.

Third Party Arrangement: An arrangement between Kaplan and a Third-Party Provider.

Third Party Provider means a party that provides outsourced services to Kaplan and the arrangement is subject to Regulatory Requirements.

HES Framework: Higher Education Standards Framework (Threshold Standards) 2021, which describes the responsibilities of higher education providers in Australia, including aspects related to outsourcing.

Homestay: A living arrangement where students live with a host family in a private residence as part of their educational experience.

National Code: National Code of Practice for Providers of Education and Training to Overseas Students 2018.

Purpose-built student accommodation providers (PBSA): Providers who specialise in providing housing specifically designed for students.

Regulatory Requirements: the requirements set out in the HES Framework, the ESOS Act and the National Code, each as amended from time to time.

Welfare support providers: Providers who offer a range of support services to international students aimed at promoting well-being and ensuring that individuals have access to necessary resources.



Working With Children Check (WWCC): A background screening process designed to assess the suitability of individuals to work or volunteer with children and includes a check by any other name in the various States and Territories.

Policy Principles

The following principles apply to all Third-Party Providers:

- Before entering into any Third-Party Arrangement, Kaplan will conduct a thorough assessment of the third party's capacity, capability, and reputation, including, but not limited to, evaluating the proposed Third-Party Provider's financial stability, expertise, and experience in delivering similar services or programs.
- All Third-Party Arrangements must be formalised with a written agreement, signed by all parties, that outlines the roles, responsibilities, and obligations of each party.
- Agreements must specify compliance with the HES Framework, the National Code and relevant Kaplan policies that cover quality assurance, governance reporting and review requirements.
- Kaplan will implement a robust system for monitoring Third Party Provider performance, including regular reporting and evaluation against agreed-upon standards.
- Third-Party Arrangements will be reviewed at least annually to audit compliance and performance.
- Any review process will assess the quality of services or programs and the effectiveness of the Third-Party Provider's adherence to agreed-upon standards.
- Potential risks associated with Third-Party Arrangements will be assessed, and appropriate mitigation strategies will be developed and implemented.
- Kaplan will maintain contingency plans to address any potential issues arising from Third-Party Arrangements, including provisions for terminating the arrangement if necessary.
- Clear and accurate information about all third-party arrangements will be provided to students regarding the nature of the arrangements and the roles of Kaplan and the third party.

Educational Delivery

Kaplan may engage Third Party Providers to deliver all or part of a Kaplan course. Kaplan is responsible for the quality of its courses and compliance with the HES Framework, National Code and ESOS Act.

While the operational execution may be outsourced to a Third-Party Provider, Kaplan, through its Academic Boards, remains responsible for the quality and outcome of the delivery. This ongoing oversight is crucial to maintaining the integrity of the educational outcome.

Other Services

Kaplan may engage Third Party Providers to assist in providing accommodation, student support, or welfare support services to students, including students under the age of 18. Kaplan cannot delegate responsibility for international students to Third Party Providers as it has ultimate responsibility under the Regulatory Requirements for the care and supervision of all students.

Kaplan is also responsible for verifying that international student accommodation and welfare is suitable for the student's age and needs.

Responsibilities

Kaplan may engage a range of Third-Party Providers to deliver specific services to Under 18 students, the most common types of service providers and their key responsibilities are outlined below:

Homestay service providers are responsible for engaging appropriately screened homestay hosts who have appropriate training, insurance, and experience, WWCC and providing evidence of such at the request of Kaplan.

Homestay hosts are responsible for providing a safe, compliant home that is suitable for the international student given their age and needs.

Purpose-built student accommodation providers are responsible for providing a safe, compliant living space that is suitable for the international student given their age and needs, and employing staff who have appropriate training, experience, WWCC and providing evidence of such at the request of Kaplan.

Welfare support providers are responsible for referring welfare support personnel who have the training, qualifications, experience, WWCC and providing evidence of such at the request of Kaplan.

Selection and Screening

All proposed Third-Party Providers must undergo a screening process prior to engagement. Kaplan must ensure that the staff are appropriately trained, qualified, and experienced and that suitable measures and controls are put in place to assist Kaplan by providing accommodation or welfare support services to international students.

Monitoring and Review

Kaplan must conduct regular reviews and seeks feedback to monitor service quality and ensure adherence to Regulatory Requirements and relevant Kaplan policies. Any issues are promptly addressed and remediation is carried out as required. All WWCC expiry dates are verified and monitored to ensure timely renewals.

Record Keeping

All records relating to the selection, screening, monitoring and review of Third-Party Providers must be maintained in accordance with the Student Records Management Policy.

Relevant Legislation

As a registered education provider, Kaplan operates under particular industry specific laws and regulations. Policies and procedures are in place to ensure compliance with such laws. Set out below is the most relevant legislation that applies in connection with this Policy:

- Child Protection (Working with Children) Act 2012 (NSW)
- Child Protection (Working with Children) Regulations 2013
- Child Safety (Prohibited Persons) Act 2016 (SA)
- Child Safety (Prohibited Persons) Regulations 2019
- Children and Young People (Safety) Act 2017 (SA)
- Children and Young People (Safety) Regulations 2017
- Children and Community Services Act 2004 (WA)
- Children's Guardian Act 2019 (NSW)
- Children and Young People (Safety) Act 2017 (SA)
- Children and Young Persons (Care and Protection) Act 1998 (NSW)
- Education Services for Overseas Students Act 2000 (ESOS Act)
- Education Services for Overseas Students Regulations 2019
- Higher Education Standards Framework 2021 (Threshold Standards)
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code)
- Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)
- Working with Children (Criminal Record Checking) Act 2004 (WA)
- Working with Children (Criminal Record Checking) Regulations 2005



Related Policies

This Policy should be read in conjunction with the following Kaplan policies:

- Grievances, Complaints and Appeals Policy
- Supplier Code of Conduct
- Modern Slavery Policy
- Onboarding & Relationship Management with Third Parties
- Privacy Policy
- Student Records Management Policy
- Under 18 Policy

Version Control and Accountable Officers

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

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Responsible Officer		VP Academic		
Implementation Officers		Business Executive		
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KBS and KHE Academic Boards				
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