Kaplan Academic Policy Framework Procedures

Scope

These procedures apply to the development, review, management and implementation of all Kaplan academic policies and academic policy-related documents (including procedures, guidelines and forms) across Kaplan's registered providers, including Kaplan Higher Education, Kaplan Business School and Kaplan Professional (Higher education and Vocational Education).

These Procedures supplement the Academic Policy Framework, setting out the step-by-step processes for developing, reviewing, managing and implementing Kaplan's academic policies and related documentation. Intended users are staff members involved in or supporting Kaplan's academic policy 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:
  - provide clear instructions on the way the policy will be implemented
  - step through the actions required to implement policy principles
  - assign responsibilities
  - support 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 assists 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.

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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 the following steps, which must be applied in conjunction with the Kaplan Academic Policy Framework Policy and the Kaplan Academic Policy Framework Procedures.

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Planning and scheduling

1. The Policy Manager maintains the Kaplan Policy Register as the master set of Kaplan policies.
2. The Policy Working Group (PWG) meets (typically quarterly) to agree the list of policies to be reviewed in each cycle, considering review dates, regulatory changes and strategic priorities.
3. For each policy scheduled for review, PWG confirms the Implementation Officer and/or assigns an Initial Reviewer (IR).

Accessing the policy and confirming review scope

The Policy Manager provides controlled, time-limited access to the authoritative document recorded in the Policy Register to relevant stakeholders. All changes must be made online using tracked changes and comments, without creating duplicate copies. Following approval, the Policy Manager updates the Policy Register, restricts access and archives superseded versions.

Research and analysis:

Using a controlled, auditable online review method that preserves visibility of all proposed changes, the Initial Reviewer reviews the current policy against:

- relevant legislation and external standards
- the Academic Policy Framework and related Kaplan policies
- current practice, systems and organisational structure.

The Initial Reviewer documents suggested changes as tracked edits and records issues and recommendations using the ***Comments*** function, ensuring each comment includes a brief description and the review date.

Stakeholder consultation

- The Implementation Officer and/or Initial Reviewer identifies and consults stakeholders affected by the policy.
- Stakeholders provide feedback via comments in Word Online, email or meetings, with agreed points captured in the online document.
- Where appropriate, advice on legal, regulatory, operational impact and quality implications is sought.

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Drafting and revision

- The Implementation Officer and/or Initial Reviewer revises the policy using the approved Kaplan policy template, incorporating stakeholder feedback and ensuring alignment with the Academic Policy Framework and other relevant policies.
- Drafts should be maintained using a method that keeps all amendments visible and auditable throughout the review.
- The Implementation Officer and/or Initial reviewer works Policy Manager to ensure that roles, approval authorities, digital governance requirements and cross-references are correct.

Policy Working Group review and status confirmation

- At the PWG meeting, members review the status of each policy scheduled in the quarterly cycle.

PWG confirms whether the revised policy is:

- ready to progress to the Kaplan Policy Committee (and, where applicable, Academic Board); or
- requires further development, in which case the next review date is amended in the Policy Register.

Approval, publication and review

- Policies follow the approval pathways and authorities defined in the Kaplan Academic Policy Framework Policy and in these Procedures, including endorsement and/or approval by the Kaplan Policy Committee and Academic Board or Corporate Board where required.
- Once approved, the Policy Manager finalises the approved version, prepares it for publication, arranges publication to relevant internal and external sites, and updates the Policy Register.
- Policies are implemented, monitored and reviewed in line with their approved timelines.

These guiding procedures must be read together with the Policy Development Process Map, Policy Review Process Map and Policy Development and Review Process in this document.

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	Higer Education - Indicative Approver	Vocational Education Indicative Approver	Indicative Responsible Officer
Academic	Academic Board / Policy Committee	Policy Committee	Vice President Academic
People and Culture	Policy Committee	Policy Committee	Executive Director – People & Culture

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Governance and Compliance	Policy Committee	Policy Committee	Director, Quality Assurance and Governance

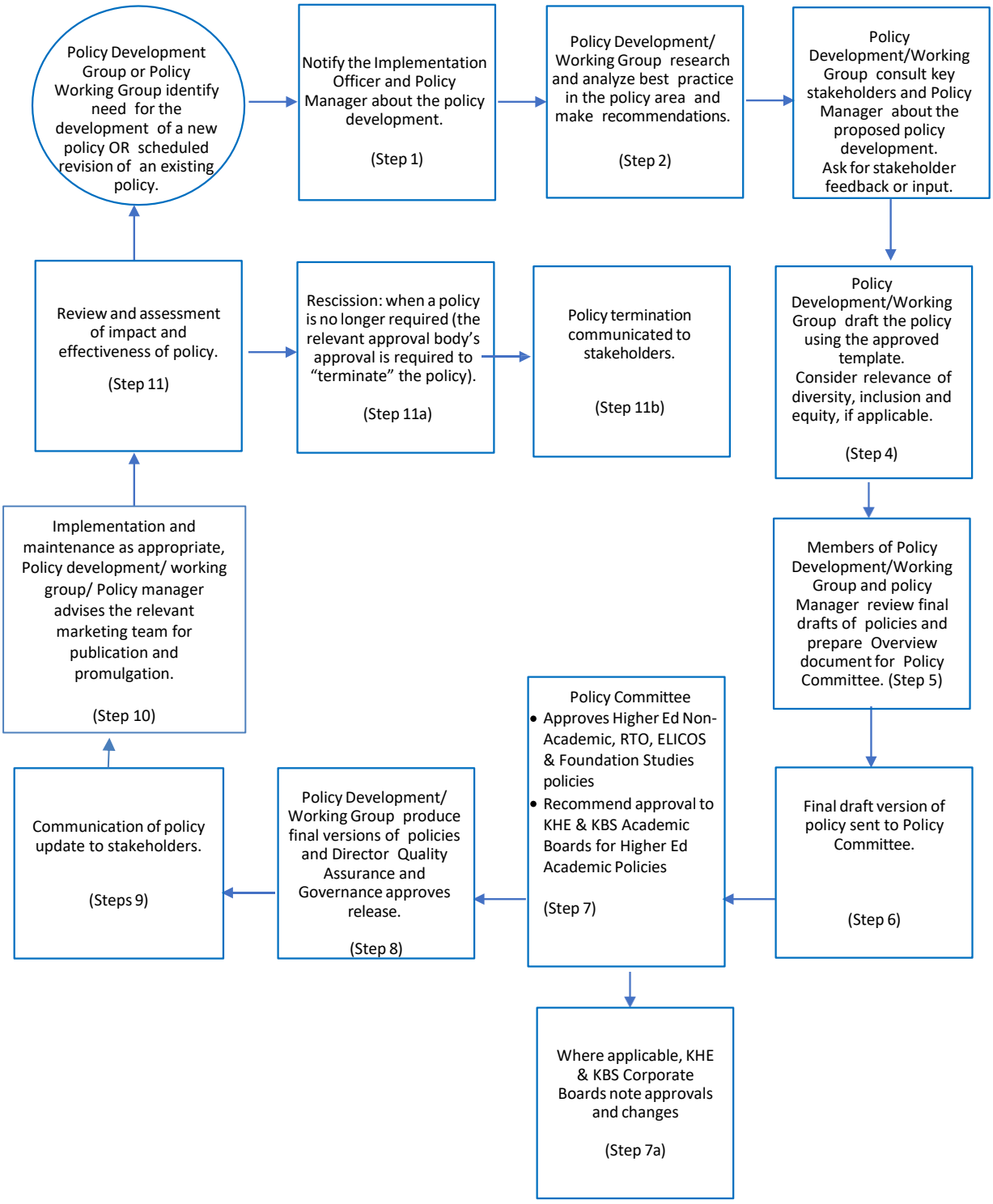
Note: The approval authority for an individual policy will be determined in accordance with the applicable governance framework and delegations. The responsible officer is accountable for the policy and its implementation but is not necessarily the policy approver.

Version Control

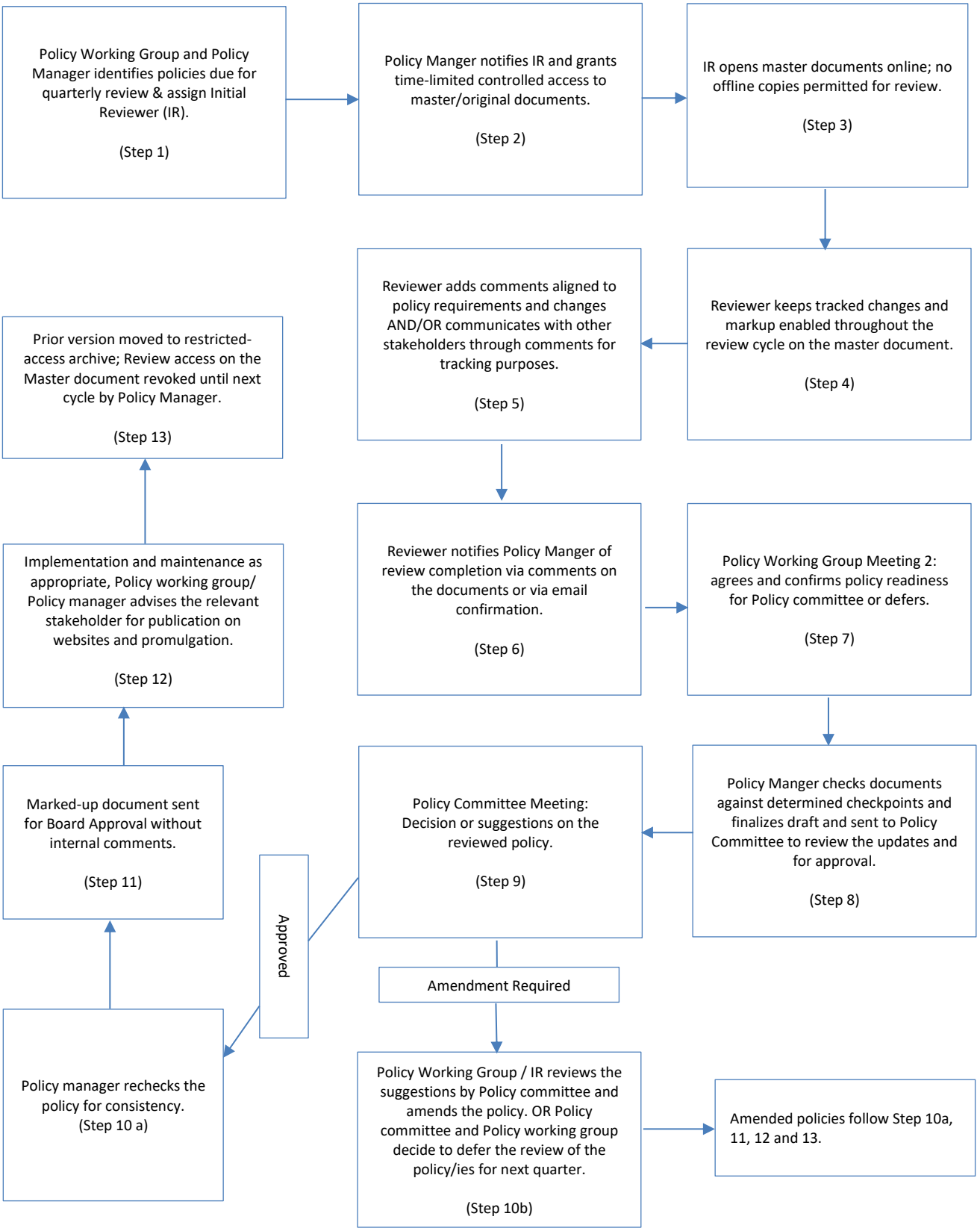
Document version control is the process of tracking and managing different versions of the policy to identify the current iteration of the policy.
For consistency of application, policy reviews that result in material change, that is the alteration affects an important part of the policy and impacts 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 display a rolling maximum five historical change entries.

Policy Development 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 Review Process Map



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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 Policy Working Group	Step 1. Check if there is an existing policy.	Conduct an environmental scan against the Kaplan Policy Register, the source of truth for all Kaplan policies. If no policy exists, or the existing policy is outdated or inadequate, proceed to Step 2. If the policy sufficiently covers the identified area, no further action is required. For policies under review due to expiry, if revision is unnecessary, recommend to the approval authority that the policy be maintained and the review date extended by up to three years, consistent with the Academic Policy Framework. If unsure of a policy's status, contact the Quality, Regulations and Standards Team.
Implementation Officer and/or Initial Reviewer	Step 2. Conduct research and analysis.	Research best practice in the policy area; consider existing related policies and their interdependencies; identify implementation needs, including who must be consulted, the approval pathway, and how the policy will be communicated; identify resourcing needs. Early consideration of these factors reduces duplication and ensures implementation matters are addressed before drafting begins.
Implementation Officer and/or Initial Reviewer	Step 3. Consult stakeholders.	Identify and consult stakeholders affected by the policy, including the business function(s) it governs. The extent of consultation is proportionate to the complexity of the policy area; where appropriate, seek advice from General Counsel and/or the Quality, Regulations and Standards / Governance teams on legal, regulatory or quality implications. Consultation may occur through workshops, targeted written consultation, or meetings. Consultation outcomes must be documented and retained as part of the policy record.
Implementation Officer and/or Initial Reviewer	Step 4. Draft or revise the policy.	Draft new policies using the approved Kaplan policy template. Where an existing policy is being revised, use a controlled, auditable review method that preserves visibility of all proposed changes, ensuring the current approved version is the basis for revision. Draft in plain, clear and concise language, addressing stakeholder input. Ensure alignment with the Diversity, Inclusion and Equity Policy and other related policies.
Implementation Officer and/or Initial Reviewer	Step 5. Confirm readiness and prepare final draft.	The Policy Working Group reviews the status of each policy scheduled in the cycle and confirms whether it is ready to progress to the Policy Committee, or requires further development, in which case the review date is amended in the Policy Register. Once confirmed ready, members prepare the final draft and supporting overview documentation for Policy Committee submission.

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Role	Action	Detail / Explanation
Policy Working Group member, in consultation with the Implementation Officer	Step 6. Policy Committee endorsement and/or approval.	The final draft is submitted to the Policy Committee. Higher education academic policies require Policy Committee endorsement before Academic Board approval; non-higher education policies are approved directly by the Policy Committee. The approval pathway follows the authorities defined in the Academic Policy Framework Policy.
Policy Working Group member	Step 7. Facilitate policy approval.	Following Policy Committee endorsement, the Director, Quality Assurance and Governance facilitates approval with the relevant approval authority. Recommended revisions are provided to the approval body with tracked changes highlighting proposed amendments. All substantive amendments and rescissions of academic policies will be approved by the Academic Board. Potential outcomes: the approval authority may require further revision and resubmission, defer the decision to the next cycle, or approve the policy with or without amendment. Where amendment is required, the Policy Working Group and Initial Reviewer re-review the flagged policy and resubmit.
Policy Working Group member and Policy Manager	Step 8. Finalise and prepare for publication.	Once approved, the Policy Manager rechecks the policy for consistency, finalises the authoritative version, and prepares it for publication. The marked-up document is submitted for Board Approval without internal working comments, where required.
Policy Working Group member / Policy Manager	Step 9. Publish, communicate and archive.	The Policy Manager provides the finalised policy documents to relevant stakeholders for publication on internal and external websites and to coordinate communication of policy updates across the relevant business units. The Policy Manager The prior version is moved to a restricted-access archive, and review access to the authoritative document is revoked until the next review cycle.

Policy Management Post Publication

Following approval, the Policy Manager provides the finalised policy documents to relevant stakeholders for publication on internal and external websites and to coordinate communication of policy updates across the relevant business units. The Policy Manager also updates the Policy Register, archives superseded versions in a restricted-access location and revokes review access to the authoritative document until the next review cycle.

The Implementation Officer acts as the primary contact for the policy and related documents and is responsible for communicating policy requirements to staff and students, ensuring business-level compliance and proactively monitoring the policy's ongoing relevance and effectiveness.

The Quality, Regulations and Standards Team may propose administrative amendments to academic policies that do not alter their substance. Such amendments require written approval from the Vice President, Academic, in accordance with the Kaplan Academic Policy Framework Policy. The Policy Manager, in consultation with the Quality, Regulations and Standards Team, ensures that approved amendments and supporting approval records are documented, the Policy Register is updated, and the revised documents are published and communicated as appropriate.

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 Equity and Inclusion 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	*Academic*
Responsible Officer	Director, Quality Assurance and Governance
Implementation Officers	Policy Working Group
Next Review Date	June 2028
Approved by	Corporate Board

Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
1.0	Quality, Regulation and Standards Team	Major review to reflect the establishment of Policy Working Group, Policy Manager role and responsibility and current changes in review and development processes aligning with Kaplan Academic Policy Framework Policy.	17.09.2026	16.10.2026